

Uniti Group Inc.

Charitable and Political Contributions Policy

(December 31, 2020)

Purpose. Uniti Group Inc. (together with its subsidiaries, the “Company”) may only make financial or in-kind contributions to various charitable organizations, causes and groups (a “Company Contribution”) under circumstances that strictly conform to the requirements of this Charitable and Political Contributions Policy (the “Policy”). Pursuant to state and federal campaign finance laws, the Company may not directly or indirectly make contributions to national party committees or individual candidates for local, state or federal public office. As outlined further below, Company employees may make political campaign contributions using their own funds so long as such contributions are allowable under applicable state and federal laws. Under no circumstances will the Company reimburse any employee for any political contribution made.

Scope and Applicability. This Policy outlines requirements for Company Contributions and provides procedures that must be followed prior to the payment of any Company Contribution. This Policy applies to the Company and its employees, officers and directors who act for, or on behalf of, the Company (each a “Covered Party” and collectively, the “Covered Parties”). For the avoidance of doubt, employees, officers and directors of the Company’s subsidiaries are included in the definition of Covered Parties. Because contributions to charities and other non-governmental organizations, could be construed improperly as bribes or conflicts of interest, Company Contributions are only made under circumstances that strictly conform to the requirements of this Policy.

Company Contributions Generally. Company Contributions must align with the Company’s need and best interest and should only be for the purpose of supporting a legitimate cause administered by a charitable organization whose views and work are consistent with the interests and ethics of the Company, the telecommunications and real estate industries and the communities in which the Company operates.

Company Policy. The Company requires that all Company Contributions be formally reviewed and pre-approved pursuant to the guidelines set forth below. Additionally, the Company supports public transparency relating to Company Contributions and complies with all applicable laws and legal reporting requirements relating to Company Contributions. While the Company recognizes the need to make certain Company Contributions, the Company expressly forbids the act of making, or offering to make, a Company Contribution:

- with the intent to directly or indirectly influence current or potential business or revenue;
- to obtain favorable treatment or to close deals; and
- in anticipation of, in recognition of, or in return for an official act.

Uniti in the Community Committee. All Covered Parties are entitled to request a Company Contribution to charitable organizations, causes and groups of their choice. Such requests for Company Contributions shall be submitted to the Uniti in the Community Committee (the “Committee”). The Committee’s primary purpose shall be to conduct due diligence of proposed Company Contributions, as well as determine and oversee the provision of Company assets budgeted for Company Contributions. The Committee shall be comprised of employees across the Company, including without limitation, at

least one (1) representative per business unit and one (1) representative from each of the following corporate departments:

- Accounting;
- Human Resources;
- Legal; and
- Corporate Development.

Members of the Committee shall exercise reasonable business judgment to act in what they believe to be the best interests of the Company and its stockholders. The Committee shall meet regularly to review all requests for Company Contributions. The affirmative vote by a majority of those Committee members present at a meeting shall be required to recommend a Company Contribution for approval. Following such an affirmative vote, a Committee representative shall submit to the General Counsel's Office a Charitable and Political Contributions Request Form (each a "Request Form", attached as **Appendix A**) that includes the following information:

- The value of the proposed Company Contribution;
- Recipient of the Company Contribution:
 - Name;
 - Contact;
 - Description of the nature of the organization;
 - Affiliation (if any) to the Company;
 - Known government relationships;
 - Identity of the requester;
- Reason(s) for the Company Contribution; and
- Other Company Contributions made to the same recipient in the past 12-months, if any, including a brief description of such prior Company Contribution.

Following receipt of a completed Request Form, the General Counsel's Office shall review the recommended Company Contribution for red flags indicating possible violations of this Policy, other Company policies and any applicable laws or regulations. Following a determination that no such violations exist, or are likely to exist, the General Counsel's Office shall route the applicable Request Form to representatives of the Company's financial and operational teams, neither of which shall concurrently serve on the Committee, for approval. Following approval, the General Counsel's Office will notify the Committee that such Company Contribution has been approved for payment.

Political Contributions. The Company may not use corporate funds to contribute, either directly or indirectly, to individual candidates for public office, national party committees or to political action committees.

Special Considerations for Governmental Officials. This Policy does not prohibit the Company from making legitimate charitable contributions to any particular entity or organization. However, in order to avoid potential liability under the Foreign Corrupt Practices Act, special consideration is required if a government official is connected to an entity or organization or if any government official requests a contribution from the Company. Elements for a proper due diligence process may include, but are not limited to:

- Understanding the proposed recipient's corporate status (e.g., not-for-profit) and the respective legal requirements in that location;

- Identifying owners, directors and officers, etc. and their relationship with any government official; and
- Researching the organizations' reputation, corporate governance and anti-corruption commitments.

For more information, please refer to the Company's Anti-Bribery and Anti-Corruption Policy.

Personal Charitable and Political Spending. Personal charitable and political spending by Covered Parties using personal funds is not affected by this Policy; provided that the Company will not, under any circumstances, reimburse Covered Parties (either directly or indirectly) for such personal charitable or political spending. The Company will neither pressure nor coerce Covered Parties to make any personal charitable or political expenditures. Under no circumstances may Covered Parties utilize a Company-issued credit card to make any charitable or political contribution, even with the intent of paying the credit card invoice directly or reimbursing the Company.

Responsibilities of Covered Parties. All Covered Parties acting for, or on behalf of, the Company must read and comply with this Policy and are required to avoid any activities that could create, lead to, or imply, a breach of this Policy. In the event an individual has reason to believe or suspect that an improper contribution has taken, or is likely to take, place such individual must notify the Company as provided herein. A failure to report known or suspected wrongdoing in connection with the Company's business, of which a Covered Party has knowledge may, by itself, subject that individual to disciplinary action up to and including termination of employment. All Covered Parties have a duty, if directed by the Company, to complete training and certify their compliance with this Policy and cooperate in Company investigations, including those involving alleged violations of this Policy.

Violations. The conduct and representations made on behalf of the Company may affect its operations and relationship with other stakeholders. As such, Company Contributions must be made in strict compliance with this Policy as well as all applicable laws and corresponding legal reporting requirements. Violations of this Policy could result serious harm to the Company's reputation and individuals who engage behaviors prohibited in this Policy, will be subject to disciplinary action, up to and including dismissal, and for certain violations, may face serious criminal and civil penalties, including imprisonment.

Questions and Reporting. All questions regarding this Policy should be referred to the General Counsel.

Uniti Group Inc.
Attn: General Counsel
10802 Executive Center Drive
Benton Building, Suite 300
Little Rock, AR 72211
Daniel.Heard@uniti.com
(501) 850-0844

All known or suspected violations of this Policy should be reported to the General Counsel. Any reports that involve the Chief Executive Officer, Chief Financial Officer or General Counsel will be immediately communicated to the Chairman of the Board of Directors and the Chairman of the Audit Committee. Anonymous inquiries, notifications and reports may be made via email to the Company at UNIT@openboard.info or by contacting the Company's ethics hotline at 866-822-6502. Please include

“Company Contributions” in the subject line.

Protections against Retaliation. The Company will not tolerate retaliation against any person who has reported a compliance concern in good faith and will ensure that such individual is not harassed, threatened or penalized in any way for reporting good faith concerns.

Uniti Group Inc.

Charitable Contribution Request Form

(Effective December 31, 2020)

Purpose: To conduct proper due diligence of the recipient and allow the General Counsel’s Office to evaluate the business reasons behind the contributions. Upon completion, the form must be submitted to the General Counsel’s Office to review and route for final approval.

SECTION I. Requester Information		
1	Origination of Proposed Contribution Request:	<input type="checkbox"/> Company Employee <input type="checkbox"/> Company Executive or Director <input type="checkbox"/> Uniti in the Community Member <input type="checkbox"/> Representative of Proposed Recipient <input type="checkbox"/> Other: _____
2	Requestor Name:	
3	Requestor Title:	
4	Requestor Business Unit (if applicable):	<input type="checkbox"/> Uniti Group (Corporate) <input type="checkbox"/> Uniti Fiber <input type="checkbox"/> Uniti Leasing <input type="checkbox"/> Other: _____
5	Affiliation (if any) with the Recipient:	
SECTION II. Contribution Information		
1	Type:	<input type="checkbox"/> Charitable Contribution <input type="checkbox"/> Other: _____
2	Company Entity:	<input type="checkbox"/> Uniti Group (Corporate) <input type="checkbox"/> Uniti Fiber <input type="checkbox"/> Uniti Leasing <input type="checkbox"/> Other: _____
3	Approximate Value:	
4	Date of Proposed Contribution:	_____ / _____ / 20____ <small>mm dd yy</small>
5	Nature and purpose of the contribution:	

6	Contribution Approved by Majority of Committee members:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other: _____
7	Date Approved by Committee:	_____ / _____ / 20____ mm dd yy
SECTION III. Proposed Recipient Information		
1	Name of Proposed Recipient:	
2	Proposed Recipient Contact Information:	<i>Address:</i> _____ _____ <i>Phone:</i> _____ <i>Name of Contact Person:</i> _____
3	Description of the Proposed Recipient (e.g., nature and purpose of the charitable organization):	
4	Does the Proposed Recipient have any prior affiliation with Uniti?	<input type="checkbox"/> Yes, please elaborate: _____ _____ <input type="checkbox"/> No
5	Does the Proposed Recipient have any relationship with any government entities or officials?	<input type="checkbox"/> Yes, please elaborate: _____ _____ <input type="checkbox"/> No
6	Are you aware of whether the purpose of the contribution is or will be associated with any government entities or officials, including candidates for political office?	<input type="checkbox"/> Yes, please elaborate: _____ _____ <input type="checkbox"/> No
7	Has the Proposed Recipient received any other contributions from Uniti in the past 12 months?	<input type="checkbox"/> Yes, please provide the following information: <i>Value:</i> _____ <i>Date:</i> _____ <i>Description of prior contribution:</i> _____ _____ <input type="checkbox"/> No
8	<i>Please attach a copy of all correspondence from the Proposed Recipient (if any) relating to the contribution, if any.</i>	

Recipient: _____

By signing below, you acknowledge you have reviewed this Request Form and you further confirm you are not aware of any information that may (1) prevent or prohibit payment of the Proposed Company Contribution by the Company; or (2) violate the Company's Charitable and Political Contributions Policy.

	<u>Signature</u>	<u>Title</u>	<u>Date</u>
Committee Representative:			
SVP Operations:			
Finance Representative:			
General Counsel's Office:			

Additional Approvals (Designated by General Counsel's Office):

_____ **Date:** _____

_____ **Date:** _____

_____ **Date:** _____