

# Uniti Group Inc.

## Environmental Policy

(Effective October 1, 2019)

**Purpose.** Uniti Group Inc. (the “Company”) is committed to environmental stewardship and to mitigating our potential impact on the environment, including environmental risk analyses and disclosing material environmental impacts that our operations may have. The Company operates in compliance with all relevant environmental legislation, and this Environmental Policy (the “Policy”) outlines measures taken by the Company’s management and employees to integrate the consideration of environmental concerns and impacts into our decision making and activities.

**Commitments.** The Company is committed to mitigating our potential impact on the environment and operating in compliance with all relevant environmental legislation. The Company supports the United Nation’s Principles for Responsible Investment (the “Principles”). Specifically, where consistent with our fiduciary responsibilities, the Company will continue to:

- Incorporate environmental, social, and corporate governance (“ESG”) issues into investment analysis and decision-making processes;
- Strive to incorporate ESG issues into our policies and practices where consistent with the manner in which we undertake triple net leases with our business partners;
- Request appropriate information and disclosure on ESG issues by the entities with which we partner;
- Promote acceptance and implementation of the Principles within the investment community in which we operate;
- Work collaboratively to enhance our effectiveness in implementing the Principles; and
- Report on our activities and progress towards implementing the Principles.

**Practices.** The Company has implemented certain practices that are regularly reviewed to ensure our actions are compatible with the objectives stated in this Policy. These practices currently include:

- *Investment Decisions:* As part of our transactional diligence process, the Company asks potential partners for detail on their environmental practices and policies and incorporates that information into our risk assessment and investment strategies. This includes areas of non-compliance with environmental laws and regulations, as well as a holistic review of the partner’s environmental policies generally.
- *Underground Network Construction:* With respect to network construction and facility deployment operations, the Company takes significant care to ensure that our activities minimally impact air and water resources, and do not result in the release of hazardous materials to the environment. Our underground fiber boring uses water, not hazardous materials. Such work is undertaken only after the appropriate permits have been obtained from the relevant local, state, and federal authorities, and our crews are trained to ensure that we remain in compliance with all applicable environmental regulations throughout the completion of permitted projects. Our underground crew managers also work with local utility authorities to ensure groundwater contamination does not occur on or around our job sites.
- *Wireless Operations:* The Company does not operate any 4G, 5G, or other wireless services for general

consumer use. The Company does, however, operate a number of fixed wireless facilities that provide point-to-point data backhaul services for some of our customers. These facilities are primarily operated in locations where the cost or possibility of installing fiber is prohibitive due to topography or other factors. The Company operates all such equipment in compliance with all applicable Federal Communications Commission's safety requirements applicable to radiofrequency energy.

- *Water Usage:* The Company acknowledges the United Nation's [resolution](#) regarding the human right to water and sanitation, and specifically, that everyone is entitled to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic uses. To the extent that the Company's operations in the future result in a material violation of local, state, federal or international environmental laws, regulations or policies, the Company commits to disclosing those findings to the public.
- *Energy Usage:* The Company has implemented telematics in its vehicle fleets to ensure that vehicle travel is undertaken in the most efficient manner possible. Where possible, field crews are also required to carpool to job sites to further reduce energy consumption and emissions. The Company is committed to better understanding our energy usage and carbon footprint so as to identify further opportunities to reduce such impacts.
- *Hazardous Materials and Waste Generation:* The Company and its subsidiaries are not hazardous waste generators. The Company does utilize batteries in some of its facilities to support network, transportation, and other operations. All such batteries are managed and disposed of properly under applicable Universal Waste Regulations. The Company generates used motor and similar oils, which are appropriately recycled through verified and trusted vendors pursuant to state and federal requirements specific to those materials. In addition, the Company's vehicle wash bays are contained and maintained in compliance with federal and state environmental standards so that grease and oil runoffs are collected, filtered, and sent off for recycling as used oil, eliminating any potential harmful side-effects on the local ecosystem. With respect to general waste reduction, the Company has implemented a recycling program at our corporate offices as well as our subsidiaries' warehouse facilities. The Company's offices and warehouses are equipped with general waste receptacles as well as a variety of recycle receptacles for paper, plastics, glass, and aluminum and our employees are encouraged to make smart choices when it comes to waste.

**Summary.** At every stage, the Company will seek to advise and co-operate with customers, vendors, targets and other interested parties to achieve environmentally friendly outcomes that uphold the Principles. The Company also encourages its customers, sub-contractors and suppliers to adopt similar policies and objectives.