

Uniti Group Inc.

Vendor Code of Conduct

(December 31, 2020)

Purpose. Uniti Group Inc. (together with its subsidiaries, the “Company”) expects its vendors to conduct business in accordance with the highest moral, legal and ethical standards. This Vendor Code of Conduct (the “Code”) covers a wide range of business practices and procedures that are a high priority to the Company when evaluating or continuing business relationships with vendors. No code can cover all policies or laws, but the Company expects vendors to always act with integrity and to demonstrate commitments to legal, ethical, safe, fair and environmentally responsible business practices.

Scope and Applicability. All vendors are expected to act in accordance with the provisions of this Code, including communicating and enforcing this Code’s provisions throughout their organization and across their supply chain, including if applicable, to their employees, agents and subcontractors. In addition to upholding the principles, guidelines, and expectations set forth in this Code, the Company requires its vendors to fully comply with all the laws and regulations of the states and countries in which they reside and operate. Where the Code may conflict with the terms of a vendor contract, the contract terms will prevail. For the avoidance of doubt, the word “vendors” (individually, a “vendor”), as used in this Code, means any individual or entity, and as applicable its respective affiliates, subsidiaries, employees, agents, suppliers, subcontractors or other representatives, that provides goods or services to, or on behalf of the Company, its subsidiaries and/or affiliates.

Business Ethics Standards. At every stage, the Company is committed to conducting business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations and demands that vendors share these principals. Vendors are expected to continually work to uphold these standards by employing a variety of measures including, without limitation, developing new policies and programs as necessary to ensure that their own employees and subcontractors understand and adhere to these standards.

- *Anti-Bribery.* The Company demands that vendors abide by the requirements of all applicable anti-bribery and anti-corruption laws, including without limitation, the U.S. Foreign Corrupt Practices Act. By engaging in business with the Company, vendors expressly agree not to directly or indirectly give, offer or accept anything of value for the purpose of obtaining or retaining business or preferred treatment. Where appropriate, vendors should implement targeted procedures designed to prevent bribery, corruption, kickbacks and embezzlement. Further information can be found in the Company’s *Anti-Bribery and Anti-Corruption Policy*.
- *Gifts and Entertainment.* No gift or entertainment may be offered to or accepted by any Company officer, director or employee unless it strictly complies with the Company’s *Gifts and Gratuities Policy*.
- *Data Security and Confidentiality.* The Company strives to closely monitor its security and data protection protocol in order to ensure continual and constant evolution of security measures. Vendors must demonstrate the capability to handle and process data only for the purposes for which it was collected or otherwise made available. Vendors should demonstrate compliance with appropriate industry standards and best practices, including without limitation, proper data security controls to ensure that all information is protected and secure

from damage and unauthorized use. Further information can be found in the Company's *Data Protection Policy*.

- *Responsible Sourcing of Minerals.* The Company expects all vendors supplying products that include minerals sourced from conflict-affected and high-risk areas (including, but not limited to, cobalt, tantalum, tin, tungsten or gold) to ensure that the sourcing of such minerals does not knowingly contribute, directly or indirectly, to armed conflict, including terrorist financing or human rights violations. A vendor's sourcing of these minerals must be done in a manner consistent with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*.
- *Anti-Tax Evasion and Anti-Facilitation of Tax Evasion.* The Company does not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Vendors shall not directly or indirectly engage, or facilitate the engagement by others, in the deliberate and fraudulent diversion of funds from a tax authority. The Company encourages vendors to adopt and implement processes and policies designed to prevent such misconduct.
- *Whistleblower Protection and Anonymous Complaints.* The Company maintains grievance mechanisms designed to ensure employees can raise workplace concerns without fear of retaliation. Vendors should develop and maintain whistleblower protections or other systems that provide their own employees with an anonymous means of raising work related concerns or complaints. Further information regarding the Company's own protections can be found in the *Code of Business Conduct and Ethics and Whistleblower Policy*.

Labor and Employment Standards. The Company is committed to maintaining an organizational culture that supports and empowers its employees. The Company encourages its vendors to continually strive to serve their own employees by expanding existing protections and policies benefiting their labor force and by adopting new standards and protections when available.

- *Freedom of Association.* The Company seeks, engages, and proactively builds relationships with vendors that productively engage workers and value them as critical assets to sustainable business success. This includes respecting the rights of workers to make an informed decision as to whether to associate or not with any group, consistent with all applicable laws. Where legally authorized, vendors shall respect their employees' rights to join or form trade unions, bargain collectively and conduct similar activities.
- *Wages, Benefits and Working Hours.* The Company believes fair and just compensation reduces the financial strain on a general workforce population and is committed to paying a competitive wage relative to the industry and local labor markets. Vendors must comply with applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime, maximum hours and legally mandated benefits. Vendors shall not deduct workers' pay for employer provided services such as living quarters, apartment utilities, food, hygiene products or any other basic human services employees may require to live, specifically excluding standard employer provided healthcare and retirement plans. More information on benefits offered by the Company to employees can be found in the Company's *Benefits Summary*.
- *Human Rights.* The Company strives to promote the enjoyment of human rights within the communities in which it operates and to respect the human rights of all people affected by our business footprint. Therefore, vendors shall treat all of their workers fairly and with dignity and are encouraged to adopt an approach to human rights

consistent with the *United Nations' Universal Declaration of Human Rights*, support and respect the protection of internationally proclaimed human rights, and ensure that they are not complicit in human rights abuses. Further information regarding the Company's own human rights commitment can be found in the *Company's Human Rights Policy*.

- *Child Labor*. The Company employs zero tolerance toward child labor, including abuse and exploitation, throughout our business operations and supply chains. Vendors must not employ child labor and should take the necessary preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment. Such measures include age verification systems, training for managers and communicating with subcontractors and suppliers on child labor issues. The Company supports and abides by ILO Conventions *138* and *182*, as well as the *UN Convention on the Rights of the Child*, and its vendors must also fully abide by such standards.
- *Slavery, Forced Labor and Human Trafficking*. The Company prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking and will not engage with vendors that do not safeguard against all forms of forced labor and human trafficking. Vendors are encouraged to put measures in place to ensure no human trafficking exists within their extended supply chains. All vendors are required to fully comply with requirements of applicable slavery, forced labor and human trafficking laws, including without limitation the *Federal Acquisition Regulation Rule on Combating Trafficking in Persons*. Vendors should be familiar with practices identified by the *International Labour Organization (ILO)* and are encouraged to implement due diligence measures for the purpose of monitoring labor conditions to ensure workers are not being exploited by third parties, including without limitation, recruiters.
- *Safe and Healthy Work Environment*. The Company regularly reviews and updates its health and safety and workplace security policies and programs to meet the evolving nature of occupational risk. Vendors must likewise provide their own employees with safe and healthy workplaces in compliance with all applicable laws and regulations. Vendors should take steps as reasonably necessary to prevent accidents and injury to health at work including without limitation, providing workers with appropriate workplace health and safety information and training.
- *Anti-Discrimination and Diversity*. The Company values diversity and promotes practices that advance the inclusion of all people. The Company is committed to equal opportunity and will not engage with vendors that tolerate any discrimination or harassment on the basis of race, color, age, sex, sexual orientation, gender, gender identity, religion, disability, national origin, social or ethnic origin or veteran status, in their hiring or employment practices, including without limitation, compensation and benefits, access to training, promotion, termination and retirement.

Environmental Standards. The Company is committed to environmental stewardship and to mitigating our potential impact on the environment. Vendors must comply with all applicable environmental laws and regulations and are required to operate in an environmentally responsible manner. Vendors should strive to minimize any negative environmental impacts of their business, including without limitation, impacts to greenhouse gas emissions, water, waste, and hazardous materials. Additional information regarding the Company's environmental commitments can be found in the *Company's Environmental Policy*.

- *Environmental Management and Monitoring Systems.* The Company urges vendors to routinely assess their need for an environmental management system detailing the process of accurately measuring and tracking operational and production impacts to air, water and other environmental systems, as appropriate for their business.
- *Energy Management.* Vendors should strive to identify energy sources and monitor their energy consumption in order to set clear goals towards improving energy efficiency.
- *Water Stewardship.* The Company encourages vendors to take all practical steps necessary to conserve, reduce and reuse water in their operations, including without limitation, ensuring that pollutants, if any, are at or below legally required levels.
- *Emissions to Air.* Vendors must comply with all applicable regulatory requirements governing air emissions and are encouraged to monitor and document air emissions to ensure all practical steps are taken to reduce or if possible, eliminate air emission pollutants.
- *Waste Reduction and Disposal.* The Company urges vendors to take all practical steps necessary to minimize or eliminate waste produced in their operations. Vendors must handle, store and dispose of waste, including hazardous waste, legally and cannot engage in the illegal dumping of any type of waste. All employees or agents who handle waste and hazardous waste for or on behalf of vendors should be properly trained to handle such substances, including education on the potential hazards such material presents if mismanaged or released. Vendors must only use permitted transporters and haulers that have a positive record of operating safely and complying with applicable transportation laws.

Vendor Responsibilities. All vendors and their employees must adhere to this Code while conducting business with, or on behalf of, the Company. Vendors must promptly inform their contact within the Company if any situation or circumstance develops causing, or reasonably might expect to cause, the vendor, or a vendor employee or subcontractor, to be in violation of this Code. At present, all Company vendors are expected to self-monitor their compliance with this Code, but the Company maintains the right to audit vendors at any time to confirm compliance with this Code. All vendors have a duty to cooperate in Company investigations, including those involving alleged violations of this Code.

Violations. Violations of this Code could result in both criminal and civil charges in the United States or abroad, with significant penalties and repercussions. The Company could face civil liability and serious harm to its reputation as a result of violations of this Code. Non-compliance with this Code will generally be covered within individual contractual agreements, however, penalties for non-compliance may include, without limitation, termination of a vendor's business dealings with the Company.

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

Uniti Group Inc.
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All known or suspected violations of this Code should be reported to the General Counsel.

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 "Vendor Code of Conduct" 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.
