



Supplier Code of Ethics

It is the policy of Uniti Group Inc. (together with its subsidiaries, “Uniti”) to conduct business in a manner that is ethical and promotes the best interests of its customers, employees, and stockholders. Accordingly, Uniti expects its Suppliers to be ethical and honest, comply with all applicable laws and regulations, and avoid any appearance of impropriety or conflict of interest. Uniti Suppliers are never authorized to commit, or direct others to commit, any illegal or unethical act.

To assist Suppliers in meeting Uniti’s expectations, this Supplier Code of Ethics (“Code”) provides basic guidelines for important areas of business conduct. As used in this Code, “Supplier(s)” refers to any entity, its affiliates or subsidiaries providing products, people or services to Uniti, and where applicable, all supply chain workers, including the personnel of Supplier and its subcontractors and agents. Uniti expects Suppliers to comply with these guidelines and always exercise good judgment in applying them to their conduct as a Uniti Supplier. In addition to the Code, Uniti expects all Suppliers to recognize and adhere to Uniti’s [Ethics Policy](#), or a substantially similar internal supplier ethics and compliance program. Suppliers that do not comply with the Code may be subject to corrective action, up to and including termination of Uniti’s agreement(s) with such offending Suppliers.

This Code is not intended to create new or additional rights, or any additional Uniti obligations, in favor of Suppliers, Supplier personnel, or any third parties. It supplements, but does not supersede, the agreements between Uniti and Suppliers. Where this Code sets higher standards than what is required by law, Uniti expects Suppliers to adhere to such higher standards. Uniti reserves the right to revise the Code and its Ethics Policy at any time.

POLICY AGAINST BRIBERY, CORRUPTION, & FACILITATION PAYMENTS

Suppliers must know and abide by the laws of the United States, including the Foreign Corrupt Practices Act, and the countries in which international operations are being conducted. Suppliers who are acting on Uniti’s behalf may not, with respect to any government official, pay bribes or engage in corrupt practices to advance any interests associated with Uniti. This includes directly or indirectly offering, promising, or authorizing the payment or provision of money or anything of value to government officials, political parties, or candidates for political office for the purpose of influencing their acts or decisions. A Supplier acting on Uniti’s behalf may not engage in any form of bribery, including kickbacks, facilitation payments or commercial bribery. Similarly, Uniti expects its Suppliers to maintain policies, processes and procedures to ensure the foregoing behavior does not occur. For the avoidance of doubt, when Suppliers team with Uniti in providing goods and services to government entities or otherwise deal with government officials in connection with Uniti matters, gifts or entertainment of any value are not permitted.

If a Supplier, in connection with its work for Uniti, is approached by anyone, including a government official or an agent thereof, and asked to provide a payment or anything of value to influence an act or decision of the official or his/her government, or to secure an improper advantage, the Supplier is required to refuse to make the payment or to provide anything of value and immediately report the incident to Uniti using one of the reporting mechanisms listed in this Code.

FALSIFICATION OR ALTERATION OF RECORDS

Falsifying or altering records or reports, preparing records or reports for improper purposes, or knowingly approving such conduct is prohibited. Suppliers must keep accurate and complete books and records regarding all transactions relating to their work for Uniti. All records, including expense reports, time records, or other documentation, made or received in furtherance of a business transaction must fully and accurately represent the transaction. No secret or unrecorded funds or assets should be created or maintained for any reason, and no record should be altered to conceal or misrepresent the underlying transaction. Records should be retained based on the applicable records retention requirements.

GIFTS AND ENTERTAINMENT

Suppliers warrant that no commissions, payments, kickbacks, lavish gifts, entertainment, or other things of any value have been given to any employee or agent of Uniti in connection with Supplier's work for Uniti, and acknowledge that the giving of any such payments, gifts, entertainment, or other things of value is strictly in violation of Uniti's policy on conflicts of interest and may result in the cancellation of Uniti's relationship with a Supplier. Suppliers must notify Uniti of any solicitation by any of Uniti's employees or agents for any payments, gifts, entertainment, or other things of value using one of the reporting mechanisms listed in this Code.

APPEARANCE OF IMPROPRIETY – CONFLICTS OF INTEREST

Uniti awards business on the basis of several factors, including but not limited to, product or service needs, costs, project management resources, experience and performance record. A Supplier must not have a relationship with any employee at Uniti that affects or might appear to affect the objectivity of an employee's judgment or that is or appears to be a conflict of interest. A conflict of interest may occur when a Supplier's outside activities or personal interest conflict, or appear to conflict with, his or her responsibilities to Uniti. In the event an actual or potential conflict of interest does arise, Supplier must immediately [report](#) it to Uniti.

TREATMENT OF PEOPLE WITH RESPECT AND DIGNITY

Suppliers must maintain a workplace culture based on respect where all forms of unlawful harassment and abuse, including sexual harassment, is forbidden. Uniti expects Suppliers to treat all employees with respect and dignity and not to use corporal punishment, threats of violence, physical abuse or other forms of physical coercion, harassment or intimidation. Suppliers' employment, wage and benefits practices should not be based upon grounds of sex, race, age, color, religion, national origin, marital status, veteran status, disability, or other protected status, in accordance with state and federal law.

LABOR RIGHTS

Uniti expects Suppliers to respect the legal rights of their employees to join or not to join worker organizations, including trade unions or similar external representative organizations, and the right to collectively bargain, if they choose to be represented. Suppliers should strive for effective employee communication as a means of promoting positive employee relations.

FREEDOM OF ASSOCIATION

Suppliers must implement hiring practices to accurately verify the age of all workers and workers' legal right to work prior to employment. Suppliers will not employ individuals under the legal minimum working age of the jurisdiction and/or country where the Supplier operates or use child labor. Consistent with the principles set forth in ILO Convention No. 138, the term "child" refers to any person under the age of 15, or under the applicable minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest.

Suppliers must not use forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude. Suppliers must use all reasonable efforts to avoid modern slavery and human trafficking in their supply chains and are required to fully comply with requirements of applicable slavery, forced labor and human trafficking laws. Suppliers must also comply with all applicable wage and hour laws and regulations, including, but not limited to, those relating to minimum living wages, overtime hours and maximum working hours, piece rates and other elements of compensation, and legally mandated benefits. Suppliers' employees should understand their employment conditions including payment terms and benefits, and acceptable living conditions.

SAFETY, HEALTH AND THE ENVIRONMENT

Uniti is committed to providing a work environment that is safe, healthy and free from the effects of alcohol and improper drug use for its employees and for visitors to Uniti's facilities, and Uniti expects Suppliers to do that same. Suppliers should provide appropriate health and safety information and training to their employees. Suppliers are expected to follow all applicable health and safety laws and regulations, as well as any related Uniti policies, and should have a program or mechanism(s) to enforce and monitor compliance with health and safety requirements. Such programs and/or mechanisms should include at least the following: (i) assurances that the Suppliers' workers are provided with a safe place to work and are qualified to perform their work functions safely; (ii) the ability to track occupational injuries and illness; and (iii) an emergency preparedness plan and response procedure.

Additionally, Suppliers are expected to comply with all applicable environmental laws and regulations, including those related to hazardous materials, contaminants in air, soil and water, the protection of natural resources and recycling.

SUPPLY CHAIN RISK MANAGEMENT AND RESPONSIBILITY

Uniti expects that Suppliers manage supply chain risk and establish responsible supply chains in all respects, from the materials in products delivered to Uniti to the treatment of people that deliver Supplier's goods and services. Suppliers should have appropriate policies, management systems, and staffing in place to meet the expectations set forth in this Code. All Suppliers should communicate to their employees and to their suppliers the standards to which the Supplier is committed, as well as relevant laws, regulations, and protections. Suppliers are also required to monitor and enforce compliance of these standards by their sub-suppliers.

Supplier should have a cybersecurity program designed to mitigate threats to their information systems and supply chains. Uniti integrates key practices discussed in the National Institute of Standards and Technology (NIST) cybersecurity supply chain risk management framework and

expects similar efforts from Suppliers to adequately protect the supply chain. Suppliers are required to adopt or establish security practices such as the NIST IR 8276 or equivalent.

Suppliers should have and implement resiliency plans, including plans in the event of disruptions, such as, but not limited to, weather events, geopolitical instability, a pandemic or other public health crisis, wildfires, and earthquakes.

USE AND PROTECTION OF COMPANY ASSETS

Uniti's property and resources are highly valuable. Suppliers are responsible for protecting Uniti's tangible and intangible property and ensuring their legitimate Uniti-related business use. Some examples of Uniti property include our funds, buildings and facilities, company vehicles, resources used to provide communications services, office equipment, intellectual property and confidential information. Suppliers are responsible for safeguarding Uniti property in their possession and control, and for using such resources only for legitimate business purposes to advance the interests of Uniti. Uniti property may not be taken, sold, loaned, given away, licensed, assigned, damaged, used for non-business purposes or otherwise disposed of regardless of its condition or value, unless the Supplier has specific written approval from an authorized Uniti representative.

In addition, if Uniti issues a building key or access device to a Supplier, the key or access device must: (i) be safeguarded; (ii) be used only by the authorized recipient; (iii) not be transferred without the consent of Uniti; (iv) not be duplicated; and (v) be returned to Uniti immediately when the employment of its holder is terminated, when its holder no longer requires such building key or access device, or at the request of Uniti.

ETHICAL USE OF ARTIFICIAL INTELLIGENCE

Uniti is committed to the ethical and responsible use of artificial intelligence (AI) in its operations and customer interactions. Suppliers are responsible for the outcomes generated by AI, and unless otherwise agreed in the agreement between Supplier and Uniti, prohibited from using Uniti Data, as defined in the agreement between Uniti and Supplier, to train AI models. Suppliers must be transparent about their use of AI, ensure their genitive AI use has appropriate oversight, and review any AI output for accuracy, reasonableness, bias, and third-party content.

PROPERTY RIGHTS OF OTHERS

Uniti respects the property rights of others. In the conduct of business, Uniti has occasion to receive and use proprietary information of others, such as customer lists, technical developments or operational data, as well as other material that is not publicly available. Uniti must use this information only in accordance with the agreements under which such information is received. Uniti's policy is to honor and respect the intellectual property rights of others. Such intellectual property rights include patents, trademarks and copyrights. Suppliers should not engage in any improper use of the intellectual property rights of others, including the unlawful or unauthorized copying, revealing or use of anyone's intellectual property.

CONFIDENTIAL INFORMATION AND PRIVACY

Uniti Privacy Policy

Uniti values and protects confidential information, including information about our customers, employees, operations, finances and business plans, and information created by our customers, in accordance with applicable law. Uniti will execute a non-disclosure agreement with a Supplier

before providing access to confidential information. Suppliers are required to protect Uniti's confidential information in accordance with that agreement; any disclosure of Uniti's confidential information is prohibited. This includes inadvertent disclosures, which means that Suppliers must not have discussions involving Uniti's confidential information in public areas where discussions could be easily intercepted or overheard. Suppliers will use Uniti's confidential information solely for the purposes for which it is provided under the agreement, and must not make independent use of Uniti's data.

ADVERTISEMENTS

Uniti exercises, in compliance with the law, broad discretion over our choice of brands and companies that advertise on our platforms. Uniti will reject advertisements it believes are misleading, inaccurate or that make fraudulent or unfair competitive claims. Uniti will also reject advertisements that are patently offensive or that violate the law (e.g. libel, copyright, trademark, right of privacy, etc.).

Additionally, Uniti will reject advertisements that are indecent; are sexually inappropriate; support hate speech; glorify violence or abuse; are defamatory or libelous; glorify drug use and abuse (including alcohol and tobacco); or attack or ridicule an individual or group's age, national origin, race, ethnicity, religion, gender, sexual orientation or disability.

TO REPORT CONCERNS AND POTENTIAL OR ACTUAL VIOLATIONS

Suppliers must promptly report concerns and potential or actual violations of this Code. Suppliers should contact Uniti through the following channels:

Phone: Working with Integrity Helpline, 888-898-3990

Web: <https://secure.ethicspoint.com/domain/media/en/gui/58655/index.html>

Mail:

Uniti Working with Integrity
Attn: General Counsel
2101 Riverfront Dr., Ste. A
Little Rock, AR 72202

The helpline and online reporting system have been established to provide Suppliers with channels to report possible violations confidentially and anonymously. Both the helpline and online reporting system are staffed by an independent third party. Suppliers must provide reasonable assistance with any investigation by Uniti of a violation of this Code.

PROTECTION AGAINST RETALIATION

Uniti will not tolerate retaliation against any person who has reported a compliance concern in good faith. Suppliers must protect anyone who works for them, either as an employee or a contractor, from any form of retaliation for reporting suspected or actual violations.