



## Environmental, Social and Governance Policy: 2022

Zayo is focused on creating a more sustainable business through our efforts in environmental impacts, social responsibility and corporate governance. We have many environmental, social and governance (ESG) initiatives underway, which can be seen on our ESG website, and we recognize that there is more to be done. We are committed to producing an annual ESG Report which will include benchmarking and progress against established ESG goals and KPIs. Our annual ESG Report can be found on our ESG website. Our ESG/Sustainability efforts are managed by our Sustainability Director, along with our ESG Steering Committee, composed of members of the Executive Leadership Team. Our initial efforts began with the completion of an ESG Materiality Assessment with key initiatives and material KPIs identified. We will continue to address these material topics to our business, which includes, but are not limited to: carbon footprint, GHG emissions, renewable power procurement, energy reduction, water usage reduction, waste reduction, diversity, inclusion, employee retention, employee engagement, human rights, data privacy and security, business ethics, and a responsible supply chain. Relevant Zayo policies can be found on our website.

### **ENVIRONMENTAL:**

During 2021, we completed our first GHG inventory for our baseline year 2020. Our first ESG/Sustainability report, which includes this GHG CO2 emissions report can be found on our ESG website. In 2021, we completed our first CDP report and will continue to provide ESG reporting to CDP as well as Ecovadis, Avetta and a number of other reporting platforms. We plan to not only review the UN Sustainable Development Goals to craft our ongoing ESG strategy, but will identify Science Based Targets to ensure we reach our target of **Net Zero 2030**.

### **SOCIAL:**

Zayo believes that a diverse base of talent and an inclusive work environment are key to business success. Zayo continues to track employee engagement scores through quarterly employee surveys. We value and promote diversity and inclusion both within Zayo and in the community. Zayo is committed to prohibiting and driving out acts of modern day slavery, child labor and human trafficking within its business and its supply chains, including sub-contractors and partners. Zayo acknowledges

responsibility to the Modern Slavery Act 2015 and ensures transparency within the organization and with suppliers of goods and services to the organization. Zayo reports all workplace injuries and fatalities annually to OSHA, follow, and report into all required regulatory bodies. Zayo provides critical infrastructure to its customers and as such, any critical incident that disrupts their business becomes a material risk to the company. We have an extensive incident management protocol that includes not just addressing the issue at hand, but also determining and addressing the root cause and the external communications plan surrounding the event.

## **GOVERNANCE:**

Zayo expects that all directors, officers, and employees of Zayo and its subsidiaries and affiliated companies will comply with all applicable laws, including those prohibiting corruption and bribery. Among other laws, Zayo is subject to the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“UKBA”), and the anti-corruption laws of many of the nations in which the Company does business. Although the application of these laws may be complex, their central purpose is simple: to punish corporate entities and individuals who resort to bribery or corruption to obtain or retain business. To comply with these laws and to avoid even the appearance of unethical conduct, all directors, officers, and employees of Zayo and its subsidiaries and affiliated companies must comply with this Anti-Corruption Policy. Code of Conduct and anti-corruption training is provided to all employees.