

## **Supplier Code of Conduct**

### Introduction

Zayo is committed to a strong and continuously improving Environmental, Social and Governance (ESG) posture. One important part of that commitment is this Supplier Code of Conduct (Code). All Zayo suppliers are expected to comply with the Code, and to have their own policies, positions and practices that strongly support such compliance.

Zayo considers suppliers to include contractors, consultants, vendors and service providers, and their employees, agents or subcontractors that supply goods and services to Zayo. Suppliers are expected to inform employees, agents and subcontracts of these requirements to ensure full compliance.

If there are questions about the Code, or if there are concerns about any non-compliance by suppliers or Zayo employees, please notify the “compliance hotline”.

### Strong Safety Culture

Suppliers are expected to make a strong safety culture a priority in doing business. Any safety program should support open and transparent communication of safety related incidents, and focus on event learning for future improvement and avoidance of incident recurrence. Suppliers must comply with all safety related laws and regulations. Suppliers shall report to Zayo any safety related incidents or inquiries from a regulatory agency occurring in the performance of work for Zayo as soon as possible.

### Supplier Diversity

Advancing a diverse supply base is key to success for Zayo. Supplier selection processes are based on fair and competitive evaluations and awards are made based on decisions that drive the greatest overall value for Zayo. We actively encourage and promote diversity and inclusion in our supplier selections and expect our suppliers to do the same. Zayo recognizes diverse suppliers in many ways to include small business and those majority-owned by minorities, women, veterans, LBGTQ and disabled for example. Certification of diverse status is validated in supplier onboarding processes.

Additionally, all suppliers are expected to promote a culture of diversity, equity and inclusion in hiring and retaining employees.

### Environmental Sustainability

Suppliers are expected to protect the environment (air, water, land, natural resources, etc.), reduce energy consumption, reduce emissions, and comply with all laws, permits required in performing work for Zayo, conditions and other applicable requirements.

Zayo is focused on reducing GHG emissions through actively managing energy consumption and seeking clean energy solutions in all operations. Zayo has established a target to reach net zero emissions by 2030. We expect our suppliers to set similar goals. It is expected that at some point in the future Zayo will implement shared goal setting with key suppliers as part of its supplier collaboration programs and processes.

#### Responsible and Ethical Sourcing

Suppliers are expected to protect human rights and comply with all domestic and international employment law and principles set forth in International Labour Organization Conventions, including those associated with equal opportunity, immigration, child labor, forced and trafficked or compulsory labor. Employees must be fairly compensated and wages must comply with local laws.

Suppliers must not use conflict minerals whose obtainment is linked to human rights violations and must meet the conflict reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

#### Conflicts of Interest

Suppliers are expected to act in the best interest of Zayo and avoid any actual or perceived conflicts of interest. Such conflicts occur when the supplier's personal interests interfere with its obligations and responsibilities to Zayo. If suppliers become aware of a conflict or appearance thereof supplier must immediately notify us.

Suppliers must never offer personal incentives, gifts, meals or business entertainment to Zayo employees in an effort to influence a business decision. Nominal gifts intended to foster goodwill or strengthen business relationships in normal course are acceptable as long as the value is compliant with local and international regulations, and such gifts are not recurring or frequent. In no event is a gift of cash or cash equivalent ever acceptable.

#### Security, Safeguarding of Property and Information Handling

Suppliers are responsible for protecting Zayo's assets, intellectual property and confidential information. Confidential and confidential restricted information shared by Zayo shall not be collected or processed in any way other than how authorized in writing in order to enable the performance of Suppliers' work. All information shared is the property of Zayo and must not be used by the Supplier for its own benefit.

#### Follow Laws

Suppliers are expected to compete fairly and adhere to all applicable laws and regulations at all times as stated in all Zayo contract and Purchase Order documents. Suppliers must abide by

anti-bribery and anti-corruption laws, including the Foreign Corrupt Practices Act. Suppliers must not pay or receive bribes, kickbacks or unlawful payments to or from any public official, or government or other individual, whether foreign or domestic, to secure any contract, concession or favorable treatment. Suppliers must comply with all applicable export control and economic sanctions laws of the United States.