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FROM STEVE SMITH, CEO

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ESG @ Zayo

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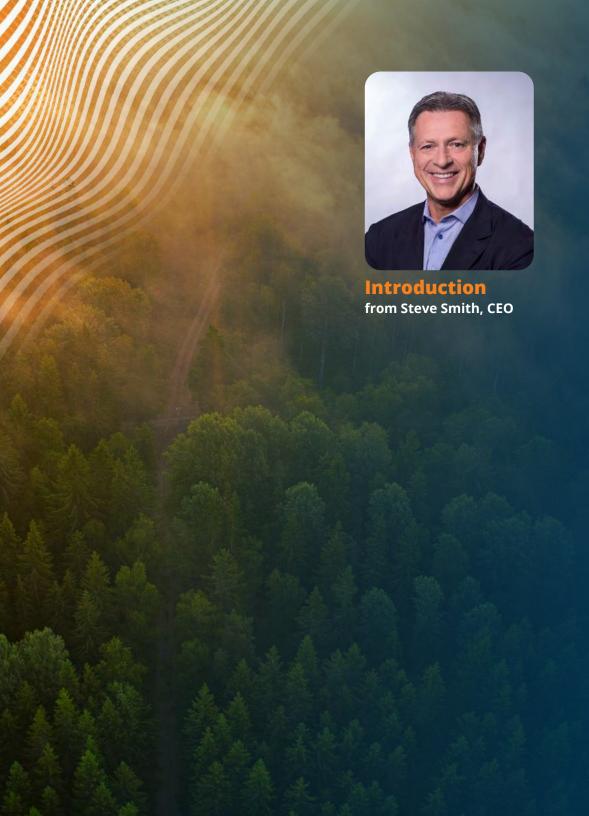
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I am pleased to share our Environmental, Social and Governance (ESG) report for 2022, highlighting the tremendous progress we have made and our goals for the future. This past year, we worked diligently to nurture and evolve our culture and values, to create an ideal blend of beliefs and behaviors that make Zayo both unique and special, and pave the way for us to rally around a shared vision.

In 2022, our vision was fueled by collaboration, as we came together and reacquainted with one another in our new hybrid work space, prioritizing a sense of belonging and connection. Through our expanded Diversity, Equity, Inclusion, Belonging (DEIB) initiatives, Zayo is able to connect what's next for our employees, customers, partners, and communities.

Zayo strives to be a force for positive change within our workplace and in our communities. We value and promote diversity and inclusion both within Zayo and with our community partners. We seek to enrich the communities around us as represented in our newly developed North Star statement and our commitment to make a positive impact through investing in the next generation of technology leaders. We are excited at the possibilities of advancing our community mission in 2023.

For more than 15 years, Zayo has been committed to driving sustainable change through employee programs, initiatives and volunteer efforts, which focus on enriching our environment and community. Zayo continues to reduce our overall carbon emissions through operational efficiencies, appropriate renewable energy credits and offsets against energy consumption, and expanded use of our green fiber.

I am proud of our efforts to make environmental sustainability, social responsibility and effective corporate governance a priority in everything we do.

Thank you,

Steve Smith, Chief Executive Officer



We are committed to meeting various environmental, social and governance key objectives that are important to our customers, vendors, partners, lenders and employees.

One area of emphasis over the past year has been mitigating our impact on climate change. Climate change is a growing threat to people, ecosystems, and economies, and Zayo is committed to being the industry leader in proactively addressing this threat.

We have a commitment to reach **net zero emissions by 2030**, for Scopes 1 and 2 (see page 27), where we have the greatest ability to exert control. This is a big, bold endeavor that requires bold action. We have developed an emissions reduction roadmap to reach net zero emissions through courageous commitments, planning and actions across the business. Beyond a business priority, it is the right thing to do for the future of our planet.

We continued to improve gender and ethnic diversity across all levels of the organization, including the Board of Directors. We are also focused on diversity within our supply chain and have recently established targets to improve our overall gender and ethnic supplier diversity.

Another important area of emphasis is supporting initiatives to bring broadband to all, especially for low-income students. Through our acquisition of ENA, funded by Zayo's recent <u>sustainability-linked first lien term loan</u> ("ESG term loan"), Zayo now connects over 19,000 K-12 schools across the United States.

Andrés Irlando, president of Zayo, said, "ENA's mission, particularly serving K-12 and healthcare customers, will enable us to have a positive impact on communities while furthering our commitment to leading in Environmental, Social and Governance initiatives. Together, we look forward to driving digital transformation across the public sector while delivering an exceptional customer experience."

Zayo has made commitments to our **investors, lenders** and **customers** to be a catalyst for change.





Lisa is a recognized leader with experience across multiple industries in the public and private sector. She will be an invaluable asset to our board as we continue to lead Zayo into its next phase of growth and service to our customers."



STEVE SMITH,
 Chief Executive Officer





Zayo Identity:

Purpose, Culture & Brand



Supporting the next generation with our future-ready network

Making a positive impact on the next generation is embedded in the Zayo brand, through developing strong relationships with our people, customers, and partners. Through a partnership with Peak Internet, we delivered connectivity solutions to the Willamette Valley in West Oregon, a geographically difficult region to service. Residents of this rural community had grown accustomed to poor internet speeds in their homes while standard speeds in the rest of the world rose dramatically. And unfortunately, local K-12 students were particularly affected. The lack of bandwidth created

a substantial barrier to implementing remote learning environments and students were falling behind.

Our recently built IP point-of-presence and dark fiber ring was in perfect proximity to Peak Internet's service area in the Willamette Valley. Our partnership allowed Peak to provide redundant, affordable, and reliable service to this under-served rural community. The result: an entire region of connected students, and a step closer to eliminating the digital divide.





Purpose:

We Connect What's Next

Developing innovative solutions for a more sustainable future

At Zayo, our purpose is to connect what's next for our customers. When a group of datacenter industry veterans had a vision for a futuristic datacenter that could achieve unprecedented innovation, we worked with them to bring this vision to life. We partnered with Novva to design and build the solution: a diverse four fiber dark fiber ring connecting the datacenter to two major aggregation hubs in Utah, plus 100G dedicated Internet service.

Our highly resilient solution meant less downtime, faster speeds, and endless possibilities for customer innovation. The innovations included robotic dogs and drones patrolling the facility, monitoring security and temperature and a self-cooling, waterless HVAC system that runs entirely on renewable energy. The outcome: a state-of-the-art datacenter focused on meeting their sustainability goals and minimizing its use of resources.





Corporate social responsibility (CSR) is central to who we are. Zayo is a force for positive change within our workplace and in our communities. We value and promote diversity and inclusion both within Zayo and in our community. Zayo ensures transparency within the organization and with our suppliers of goods and services. We are committed to prohibiting and driving out acts of modern slavery, child labor and human trafficking within the business and our supply chains, including subcontractors and partners. Zayo also condemns all forms of racism, xenophobia, and intolerance. As such, we are committed to ensuring our culture is both equitable and fully inclusive.

Culture

Zayo's identity consists of our purpose, culture, and brand, and 2022 was a pivotal year for them all, as we celebrated Zayo's 15th Anniversary. With a solid foundation to build on, we not only identified the Values that truly represent the drive and the nexus of our Zayo community, we launched our core Operating Norms, which capture how Zayoites approach their day-to-day responsibilities and interactions with each other.

Culture is not invented or created just once—it's continuously developing as we adapt to what's next in our ever-changing world. Our culture is driven by each of our employees, through their actions and contributions to Zayo and their commitment to our customers and to one another.

Values

- Be Authentic
- Drive Excellence
- WOW Customers
- Think Big
- Win Together

Our Operating Norms

- Our Lead with Trust
 - Communicate with Transparency
 - Act with Accountability

Our culture is ambitious and collaborative. We are centered on excellence and exceeding customer expectations through high performance, big ideas and a growth mindset.





Brand

Ambition:

Be the preferred, global communications infrastructure platform, by being customercentric and providing innovative products on a future-ready network, whose inspired employees exceed customer expectations, efficiently delivering mission-critical connectivity for the demands of the evolving digital world.

Differentiators



Future-Ready Network



Trusted Experts



Tailored Connectivity Solutions





Working at Zayo

Zayo is a diverse and thriving community of talented individuals. As Zayoites,we pride ourselves on our growing and inclusive work environment, which is fundamental to creating and sustaining a sense of community, one that inspires us to collaborate in support of the business. In 2022, our Zayo community grew by more than 13 percent, compared to 10 percent in 2021. And we're pleased to offer new employees a variety of value-driven benefits.

Our competitive compensation includes a 401(k) match and incentive pay, generous paid time off including paid parental leave, and health and wellness plan options. We also offer specialized programs such as Employee Assistance Plans; emergency travel assistance; backup childcare; commuter benefits; tuition reimbursement; and collaborative workspaces.

Zayo is committed to nurturing talent from within, offering a variety of professional development and growth opportunities. In 2022 we introduced our Leadership Journey development framework that establishes targeted learning for the

different levels of leadership at Zayo. We started our journey by focusing on our managers and emerging leaders. This program builds on the capabilities of Zayo people leaders as they evolve throughout their career, elevates their ability to deliver on expected results, and fosters our high performing growth culture. The program educates our leaders and provides them with opportunities for experience, exposure and evaluation.

At the helm of this commitment to building a strong culture and community, Zayo CEO Steve Smith was also recognized as one of the Denver area's most admired CEOs by the Denver Business Journal.

When asked about his five-year plan for Zayo, Smith envisions Zayo being "the leading independent communications infrastructure partner that has helped enable the digital transformation agenda across the world."

Our diverse community of Zayoites is here to support Steve's and the organization's goals, as we continue Zayo's journey, and Win Together.

How you + we can shine





Employee Satisfaction

At Zayo, our employees' engagement is integral to our culture and guiding our evolving environment. We encourage Zayoites to communicate with transparency through expressing their authentic opinions about the workplace, leadership, engagement, inclusion and belonging. Our goal is to improve beyond an 80 percent positive satisfaction rating as we continue to measure employee engagement through regular surveys. We greatly appreciate the diverse contributions and perspectives of our colleagues and the ~70% of employees who actively engage and provide their perspectives each year.

In addition to our regular engagement survey, we have a history of asking for frequent feedback in multiple forums either transparently or confidentially: company meetings for the entire organization to join, where we solicit questions and comments before, during and after; pulse and benefits surveys; and open forums on Salesforce chatter, to name a few.

We not only strive to do an excellent job of asking for feedback, we listen and use the data to find solutions and process improvements, identify gaps or risks, improve training and experiences, and learn from each other. For the second consecutive year, Zayo was named one of the best large companies to work for by Built In Colorado. The annual Built In Best Places to Work awards program recognizes top employers across the country and includes companies of all sizes, from startups to Fortune 100. Built In is a well-respected organization that provides a platform for global tech professionals to stay ahead of industry trends and news, develop their careers and find opportunities with companies that share their values.

For Zayo's Chief People and Culture Officer, Iulie Tschida Brown, the work that comes with this level of recognition doesn't end with the award. One of the ways we incorporate this feedback is through our benefits and well being offerings. Tschida Brown notes, "Each year, Zayo continues to strengthen its foundation and offer a suite of benefits that will provide the most value to employees, and we know this because they tell us. In 2022, using employee feedback as our guide, we introduced two new health and wellness benefits: zWell+, a holistic wellness platform allowing employees to optimize our benefits offerings, and Modern Health, a mental health solution offering a broad range of coaching and therapy offerings through digital, group or individual sessions."

While we are very proud of and excited for the award, we never rest on our accomplishments. We have much momentum carrying us into 2023, and we will continue to engage employees, create an inclusive environment where they can do their best work and offer the resources, tools, and benefits that are most valuable to them."



JULIE TSCHIDA BROWN,Chief People and Culture Officer

88%

of Zayoites believe successful collaborations get the job done

77%

of Zayoites over the year stated they are proud to work at Zayo



Diversity, Equity, Inclusion and Belonging (DEIB)

In 2022, Zayo proudly unveiled our Diversity, Equity, Inclusion, and Belonging statement.

At Zayo, we believe that diverse perspectives drive innovative ideas and fuel our growth. We foster a culture where every Zayoite feels seen, valued, respected and empowered to be their most authentic self. We strive to work with partners that also demonstrate core values around diversity and sustainability.

Through our Diversity, Equity, Inclusion, Belonging (DEIB) initiatives, Zayo is able to connect what's next for our employees, customers, partners, and communities.

18% Women on Board of Directors

75% of Zayoites over the year stated they are comfortable voicing their ideas and opinions, even if different from others.

30% Current gender diversity with a goal to continue to advance

30% Current ethnic diversity with goal to continue to advance

Diverse perspectives help drive the innovative ideas that fuel our company's growth and DEIB is foundational to our success. We encourage potential employees from all backgrounds to apply at Zayo. Once we bring these diverse perspectives into the discussion, we aim to do everything we can to ensure our behaviors, programs, policies and environment are equitable and conducive to employees feeling involved, respected, and heard.

DEIB is foundational to our success; it's not something we do once we're successful.

DEI statements are common, but the important distinction with a DEIB statement is the inclusion of "belonging." While we think the D, E, and I portions of the statement are equally important, belonging means that Zayo strives to create an environment where employees feel psychologically safe, where they can be their authentic selves, and bring their ideas to the table. We want Zayo to continue to be a place our employees want to come to work, and we all have a role to play.

In 2022, we focused on diverse employee attraction by being intentional about our employment brand through sharing our diverse culture on our company website and social media platforms. We increased our gender diverse hiring from 30.5% to 33.2% and sustained our ethnically diverse hiring at 28.2%. We continued to grow, invest in and promote our ERG's and allyship to improve employee experience and will continue to expand opportunities for diverse and underrepresented groups to thrive at Zayo. We have built the foundation to nurture the professional and personal growth of our employees and will continue to provide ongoing training and opportunities for discussion around DEIB and bias. In 2023 and beyond, we will focus on building diverse talent pipelines both internally and externally through a focus on diverse talent attraction and the growth and development of diverse talent within Zayo.



Community Impact

In 2022, Zayoites across the globe continued enriching the communities around us. In alignment with our newly defined Zayo purpose *We Connect What's Next*, we created a Community North Star, which aligns Zayo's purpose and intention for partnering and working with community organizations. Our North Star provides a common goal that we can all rally around, one that prioritizes our community investments of time and money. And, supports and aligns to our DEIB commitment, through shared priorities and a cohesive approach. Leveraging our North Star will help us support a variety of focus areas: engagement, culture, and brand; CSR, DEIB, and Employee Resource Groups (ERGs).

Zayo's North Star

At Zayo, we connect what's next. We are committed to making a positive impact through investing in the next generation of technology leaders by creating development and professional advancement opportunities for historically marginalized and underrepresented communities.

Our North Star statement, released mid-December of 2022, outlines our continued commitment to the advancement of the communities where we live and work. Our hope is that we are able to build engagement and momentum within and outside the organization, attract and retain a diverse talent pipeline of technology leaders, and cultivate employee and team growth and development.

The end of 2022 marked one year of providing Volunteer Time Off (VTO) to allow for company sponsored time for employees to get involved in areas of personal interest, while giving back and making a meaningful impact to nonprofit organizations. Zayo employees receive four hours of VTO per quarter and are encouraged to volunteer up to 16 hours (2 days) per calendar year toward any 501(c)(3) charitable organization of their choice.

To reinforce our diversity efforts, we continue to engage with our communities where we live and work. Throughout the year we supported numerous charitable organizations, including the Food Bank of the Rockies and the Food Bank of Eastern Oklahoma. We supported our next generation by partnering with A Precious Child to collect school supplies and packed more than 225 backpacks so kids feel supported and confident on their first day of school. We volunteered at

A Precious Child's Holiday Gift event, where we bundled holiday gifts for more than 337 children, and donated over 58 hours of time. Several Zayoites volunteered for various United Way Day of Caring events and sponsored B-strong bike races to raise awareness for cancer prevention.

Our executive and senior leadership team participated in various speaking events that enhance the development of women in technology including partnering with the Colorado Technology Association and Women in Technology (WIT). One of the highlights from the year was collaborating with the YWCA Boulder County for a STEM E3 Jam Session, where we invited several school aged children to Zayo to learn coding skills and provide them exposure to careers in the technology field. Several Women Zayoites shared their career journey and discussed their current role at Zayo.

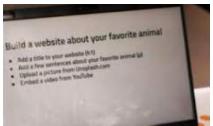
2022 also expanded our community efforts in the UK where the group renewed their offerings of regular workshops, thematic animations and events in the London office. The group was created to remind us all that we are part of a whole, that we belong together, and that we work to attain the same purpose, along with having fun and laughter along the way.















STEM Jam Sessions at Zayo Group with a career panel of Zayo Group Employees

Precious Child Fill a Backpack and Precious Gift Volunteer Events



2022 Holiday Charitable Contributions

As part of the 2022 holiday season, Zayo made a significant contribution to five organizations that aligned with our Community North Star and supported our DEIB initiatives. We were able to highlight these national and global organizations across our employee base, and provided the opportunity for Zayoites to vote on the percentage of overall dollars to be donated to each of these charities on behalf of employees.

Through our contributions we:

- Helped create opportunities for the next generation of LGBTQ+ tech professionals to advance their careers by equipping them with the skills and confidence to force change in the tech industry
- Provided support to veterans, military members, and their spouses to help them **secure meaningful careers** through job search support, tools and resources
- Empowered women to achieve economic independence by providing them a network of support, professional attire and development tools to thrive in work and in life
- Contributed to closing the gender gap in technology by equipping girls with the computing skills and education to be change agents in their communities
- Provided Black people in the tech industry access to resources, mentorship and a **network** to foster diversity and representation in the tech industry.

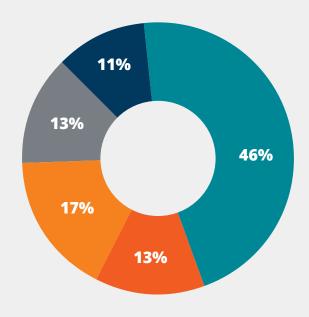








2022 Holiday Charitable Contribution



- Out in Tech (National)
- Hire Heroes USA (National
- Dress for Success (Global)
- Girls Who Code (National)
- Blacks in Technology (BIT) (Global)



Employee Resource Groups (ERGs)

Community and DEIB are intertwined and support one another. They have shared priorities and aligned efforts, and are key levers in attracting, retaining and engaging our employees, and driving the highest level of performance. One example of this cohesive approach of internal and external efforts is our ERG program.

We have six ERGs that provide a safe space where employees who identify with the group and their allies come together to share experiences, ideas, support and educate one another. Our ERGs strive to ensure that members and allies feel included for every aspect of their identity and that they belong. Each ERG supports professional development, provides networking opportunities, contributes to business solutions, and helps welcome, recruit and retain diverse hires and their allies.

Employees are provided the opportunity to drive the purpose and activities of these groups within a formal structure. Our leadership team is committed and fully engaged in each of the groups as Executive Sponsors. Each group has a dedicated budget and leadership team. In 2022 the groups came together to support each other with combined events and discussions to deepen their impact. We hosted an in person and a virtual Meet & Greet where each of the ERGs could share more about their communities, upcoming events and engage with Zayoties who were interested in learning how they could get involved.



Our objective is to provide a platform for diverse voices to connect and collaborate on shared experiences, educate and inform, and develop internal leaders.



Our Employee Resource Groups made a huge impact on employee engagement throughout the year.

Here are a few highlights from each group:

MENTAL HEALTH & DISABILITY ADV*CACY



Provides a safe space and unbiased peer support for Zayoites who have either experienced or cared for/supported/lived with friends, family, or others with mental health issues at any point in their lives, or those who currently qualify or care for/ support others with a disability under the ADA. The group continues to lead the charge to eradicate workplace mental health stigma. They have a Safe to Tell Anonymous Mental Health and Disability Support Initiative that encourages discussions about mental illness and disability challenges. They also introduced the Green Bandana Project to Zayoites in 2022 to raise awareness around seeking help resources to normalize and de-stigmatize mental illness and suicide. This was introduced in conjunction with our return to office so Zayoites could visibly see others who could be a support and resource. "My Bandana means I am your resource." The team offers monthly and bi-monthly zChats to raise awareness and provide support and resources around critical topics such as Suicide, Disibilities, Sexual Assault, Stress, Parenting, Depression, Domestic Violence, Gun Violence, and Mental Health in conjunction with specific identities such as women, men, veterans, and underrepresented ethnicities. The ERG also supported NAMI, which is the National Alliance on Mental Illness dedicated to building better lives for those affected by mental illness.





WOMEN @ Zayo

Provides a safe space for Women and their male or non-binary allies to come together to share experiences, ideas, support one another, grow personally and professionally, and contribute to business solutions. Their purpose is to support and empower all women at Zayo to be their best selves through professional and personal development, community engagement, diversity, equity and inclusion, and by living the Zayo Values.

In 2022, the ERG introduced and led a Leadership Series by the Women@ Zayo that was very successful and well attended. It is a one year program for women and their allies with a goal to create a community of women leaders and get more women into senior leadership roles at Zayo. They offer transferable and applicable personal leadership development skills and a safe and authentic community for leaders to communicate and grow together. The ERG is looking to grow their attendance and continue the program into 2023 and beyond.

The group also has a monthly cadence for their Women@Zayo. Each month to encourage support and empowerment for women, the ERG holds:

- Monthly Toastmasters Club
- Book club discussions
- Leadership and technical events in the community, such as Colorado Technology Association and Women in Tech
- Hosting panels to discuss Equality and Equity, including supporting Women's Equality Day
- Volunteer engagement opportunities in local communities

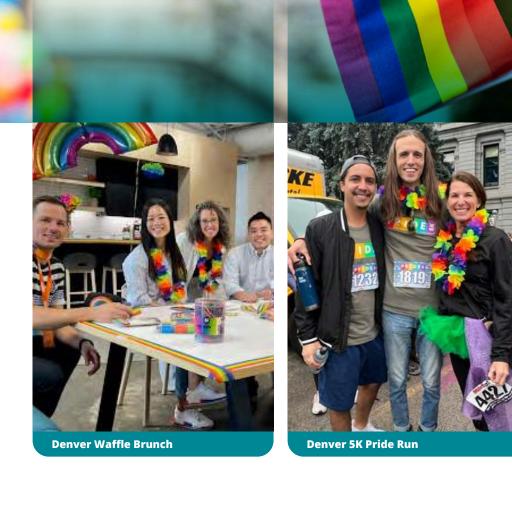




Provides a space for LGBTQIA+ employees and their allies to come together to share experiences, raise awareness of issues, educate and provide resources. The ERG celebrated pride month by raising funds and participating in the Denver Pride 5k, hosted waffle bar brunches in our headquarters, and co hosted a discussion on mental health in the LGBTQI+ community. They also provided many resources specific to the LGBTQIA+ community and hosted zChats throughout the year on important topics, including:

- A discussion led by an external speaker from One Colorado, on encouraging colleagues to display their pronouns, introducing basic terminology and the importance of using correct pronouns in our daily work lives
- A discussion on Women's & LGBTQIA+ Rights & Reactions to the repeal of the Supreme Court's Roe v. Wade ruling.

The ERG supported many volunteer events, worked with and donated to local organizations, brought the community and their families together at a Fall Festival and hosted a virtual company Pumpkin Carving contest.





MULTICULTURAL @ Zayo

Dedicated to promoting an inclusive environment to traditionally marginalized cultures & their allies by providing support, education, identity exploration, leadership development, peer 2 peer support, and diverse & innovative events through partnerships across the entire organization.

Their values are to Serve -

Surpass, Embody, Revere, Venture, Elevate, and Strive.

The group provided resource guides, partnered with the other ERG's on various events, were active volunteers in the community, led an in person and virtual ERG Meet & Greet for the organization, and hosted zChat's called the Remix where they highlighted different diverse individuals at Zayo and discussed various topics such as the pressure of the vote, the impact of what's happening in Iran, Juneteenth, Father's Day, and Pride. On behalf of the ERG, they made a donation to our local partner, Precious Child over the holidays. They acknowledged and celebrated many different cultural holidays and events throughout the year such as Black History Month while raising awareness to the theme for Black Health & Wellness, Native American Heritage Month, Diwali, Asian Pacific American Heritage Month, and held a panel for Zayoites to reflect and celebrate Zayoites who identify as Latinx or Hispanic during National Latinx & Hispanic Heritage Month.





VETERANS @ Zayo

Provides a space to foster a military and veteran friendly environment at Zayo. This allows for veterans and those who support veterans to connect with one another, advocate for veteran support within the company and enhance recruitment of candidates with military experience. The group helps new veterans assimilate into Zayo and has supported the Boulder Crest Foundation, Colorado Veterans Project, Soldiers' Angels Veteran Food Distribution, and Habitat for Humanity. For Veteran's Day the group held a panel of Zayoites, including our CEO Steve Smith who have served our country where they discussed their military service, civilian career including their current roles at Zayo, the skills that they bring to the civilian workforce, and how they have transitioned from military service to careers in telecom. They celebrated National Military Family Appreciation Month and held various bbg's across the organization for veterans and their families.

What skills from the military are useful in your job at Zayo?

Zayo has many veterans, which really helps us to have that immediate co

I believe the military sets you up in multiple ways. The Navy's core values of fonor/Courage/Commitment are the perfect foundation. The extensive leadership training. conflict resolution and teamwork. Learning how to work with, fight side by side with every group and background you can think of and doing that from the simplest of tasks to the most ex-

Were there any ways Zayo helped you transition into your Civilian life?

do not understand what Veterans have gone through and are still going through. So having Veteran profiters and sisters here at Zayo to help, guide each other, talk to each other, and sometimes just knowing you are not alone is essential What do you wish more people knew about the Military or Veterans?

Everyone you meet is fighting a battle that you know nothing about. Many veterans have deep scurs that they will never talk about. Be Kind, if you see one or know one, say thank you.

Branch of Service





zayo

Honoring Our Veterans

What skills from the military are useful in your job at Zayo?

The training provided by the Air Force played a huge role in my success at Zayo, from the molded me into who I am today.

Were there any ways Zayo helped you transition into your Civilian life?

Zayo's commitment to veterans and the ERG established to support veterans is a vital tool in assisting veterans with integrating into the civilian workforce

What do you wish more people knew about the Military or Veterans?

Nearly all of us are here to help when needed, but there are a large portion of veterans that have more issues buried away than anyone should ever have to deal with in their lifetime. Be kind and courteous when talking through their military career, it will almost always bring back.

Branch of Service



Donald Cordray





SUSTAINABILITY

@ **Zavo**

Provides a space for those employees who are committed to driving environmental, social, and economic impact in our offices, communities and beyond. The team comes together to share best practices, ideas, and contribute to business solutions around sustainable practices. They focus on programs aimed at "doing good while doing well" that include: Office Energy, Transportation, Waste Management, and Employee Programs. The team has been successful in joining together for in-person cleanup events, building fences, planting trees in local communities and engaging employees in education and sustainable pledges. In the 2022 Go - Tober challenge, employees were challenged to commute smarter and came in third place within our category, hosting an electronic waste recycling program, and donation drives in Colorado, Tulsa, and London. The group hosted several Lunch N' Learns in conjunction with our community from Blue Star Recyclers, Growing Gardens, International WELL Building Institute, and Ridewell. And in honor of Earth day, they held zChat's on enriching our lives with a more earthfriendly way of living with The Climate Reality Project, valuable water resources and how we can save water in our everyday lives hosted by a member of the UK Groundwater Forum. The group planted 100 trees in partnership with One Tree Planted, and provided various volunteer opportunities across the globe. Through their Eco Tip Series, they provided several resource guides where Zayoites can learn new ideas and find easy ways to integrate sustainable practices into their everyday lives.





Employee Health, Safety, & Wellbeing

Zayo recognizes the importance of diversity and inclusion in employees' wellbeing and engagement, which is why the benefits strategy is considered through a DEIB lens. Zayo's benefits strategy is tied to our purpose of **We Connect What's Next**, and our core values of **Being Authentic**, **Driving Excellence, Wowing Customers (internal** and external), Thinking Big and Winning **Together**. This means we provide benefits programs that are innovative, forward looking and relevant to our current and future Zayoites. We offer inclusive benefits and resources based on Zayo employee needs and listening to their feedback throughout the year. Our comprehensive offerings are simple to use and reduce barriers to care, and are personalized to the experiences of Zayo employees.

Zayo recently launched two exciting new global well-being programs—Modern Health and zWell+. These valuable resources provide a personalized experience, greater access to care, and easier access to benefits information. And, with peer engagement and interaction opportunities, zWell+ is committed to promoting and supporting inclusion and belonging at Zayo.



zWell+

Benefits & Well-being platform, which integrates Zayo's benefits into one digital platform, provides monetary incentives through a global well-being program, and opportunities to challenge colleagues to reach their wellbeing goals. Access to employee benefit information and connecting to peers for health and wellness activities has never been easier.

Modern Health

Expanded mental health services offer free access to eight therapist sessions and eight coaching sessions for Zayo employees and their dependents. Provides overall Employee Assistance Program (EAP) and live and recorded support on relevant topics.



zCollaborate

In 2022, we introduced our zCollaborate initiative. This program is designed to create more peer-to-peer social connection and camaraderie in Zayo's global community. This will enable us to build a company culture that withstands the test of time by identifying new opportunities for employees to collaborate in their day-to-day job responsibilities regardless if they are in an office or remote.

In 2023, we will launch zSquad, a formalized group for employees who help plan and implement office-related events and activities. The importance of getting involved and supporting employee-focused events through zCollaborate and by enabling our zSquad cannot be underscored enough. This will help Zayo to:

- Boost morale and motivation
- Build relationships
- Foster collaboration
- Improve retention
- Demonstrate commitment to DEIB

Through the zCollaborate program, a calendar of events has been created to capture collaboration opportunities. As we evolve the program, we will engage and grow the zSquad, to giveall Zayoites (whether they are located in our core offices, smaller offices or remote) the same experience.

Broadband for All

In 2022 Zayo acquired <u>Education Networks</u> of America (ENA), a leader in providing managed network connectivity, communications and cybersecurity services to K-12 school districts participating in the federally-funded <u>E-Rate</u> program, as well as other public sector customers.

The FCC's E-Rate program provides discounts for telecommunications, Internet access, and internal connections to eligible schools and libraries.

Zayo, known for connecting many of the world's leading technology and financial services firms, has been serving K-12 customers for six years, and is currently powering school districts across several states, including Texas, Washington, Colorado, Oregon, Georgia, California and Arizona. Together, ENA and Zayo will provide education, library, community healthcare and public sector customers with high quality managed services and exceptional customer care.

Zayo has connected over 19,000 schools with 58% considered to be in low-income, under-served communities.

ENA Ally

K-12 school districts can now leverage specialized technical expertise to optimize their network infrastructure and technology systems with ease.

"The education sector plays a critical role in maintaining and growing our overall socioeconomic well-being. Our top priority is to provide our K-12 customers with solutions to help alleviate some of the immense challenges they are facing and ensure students have safe and equitable access to digital learning opportunities, regardless of their infrastructure," said Michael McKerley, president of ENA by Zayo.







Environmental Policy Statement

We are committed to building sustainability into all aspects of our business operations and we are dedicated to making environmentally responsible decisions that align with our Purpose, Culture and Brand. Our goal is to engage all of our stakeholders and vendors in environmentally responsible practices, which helps us build a more efficient business and a more resilient community. We act via the following policies and practices to support a sustainable culture at Zayo:

- Complying with or exceeding standards in existing environmental regulations
- Innovatively improving environmental performance by minimizing resource consumption
- Assessing and mitigating material environmental impacts from operations
- Procuring efficient and environmentallysound equipment that meets business and customer needs
- Minimizing our landfill waste stream through responsible disposal and recycling of electronic and office waste through established programs

- Implementing sustainable procurement practices
- Supporting alternative low- or no-fuel commuting options
- Optimizing energy efficiency at Zayo operated buildings
- Providing paperless billing and quoting options
- Engaging stakeholders (employees, customers, suppliers, investors) to encourage environmentally-sensitive practices through awareness campaigns and training

To maximize our environmental efficiency, our Sustainability Employee Resource Group (ERG) involves our employees in sustainability programs and initiatives such as zero waste recycling, alternative transportation options, and continued education on carbon reduction strategies. Through the support of the Sustainability ERG, a donation was made to the Audubon Society to aid in their efforts to restore the earth's natural ecosystems and biological diversity.

Zayo's Green Fiber

which is better for the environment than other sources of Internet connectivity

Compared to copper, fewer physical resources are required to deploy and maintain a fiber network. Industry data indicates that data transmission using light consumes only a fraction of the energy versus sending an electrical signal over copper wiring. Compared to cable and DSL, fiber far exceeds the expectation of future development around sustainable business practices. Furthermore, fiber uses much less energy than cable, up to ten times less while in use.





Greenhouse Gas Emissions Reporting

In 2022, working with Optera, an expert consulting firm in greenhouse gas emissions, we completed carbon emissions reporting for calendar year 2021. This GHG Emissions report covered Scopes 1, 2 and 3 for 2021.



Through our continued improvement in emissions data collection and analysis we have improved our **CDP score to a B-**.

This reflects stringent standards and, while not yet our full potential grade, reflects a good directional trend for continued improvement.

EMISSIONS SCOPE	
Scope 1 Emissions	Direct emissions from operations
Scope 2 Emissions	Indirect emissions from the generation of purchased energy
Scope 3 Emissions	Up and downstream emissions resulting from activities from assets



CDP runs the global carbon disclosure system for investors, companies, cities, states and regions to manage and report environmental impacts. CDP is considered the gold standard of environmental reporting.





Greenhouse Gas Inventory: Executive Summary

The Greenhouse Gas Inventory ("Inventory") describes Zayo's impact on the environment as measured in greenhouse gas (GHG) emitted in units of equivalent tons of carbon dioxide for the reporting year 2021, comprised of January 1, 2021 to December 31, 2021. The purpose of this Inventory is to benchmark Zayo's organization-wide GHG emissions and to develop a consistent methodology for documenting the emissions inventory on an ongoing basis. Optera compiled the inventory with support from the Corporate Sustainability Director as well as numerous other Zayo staff.

Methodology

Zayo's inventory is developed in accordance with the revised GHG Protocol Corporate Standard. The procedures developed and executed during development of the Zayo Inventory for Reporting Year 2021 satisfy ISO Standard 14064-1.

Inventory development involves the collection and examination of documentation, testimony and data from internal and external sources. Development also includes a determination of completeness and accuracy of the data provided and calculations completed using this data.

Renewable Energy

Through our commitment to environmental stewardship, Zayo supported renewable energy by purchasing 215,815 megawatt hours of Certified Renewable Energy Certificates (RECs), to match 100% of its 2021 electricity use. A REC represents the environmental benefit associated with one megawatt-hour of energy generated from renewable resources. This effort to address the environmental impact of our operations not only allows Zayo to lower our carbon footprint, but it also supports the development of renewable energy technologies.



"We are continually working to reduce energy use in our operations and maximize efficiencies. Supporting renewable energy generation takes our carbon reduction efforts one step further."

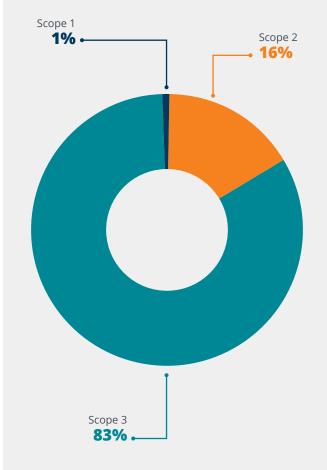
MIKE NOLD, EVP, Corporate Development and Strategy

Key Findings

Zayo's 2021 GHG inventory consists of emissions from scope 1, 2 & 3 categories. The following table summarizes Zayo's GHG inventory by emissions scope. Zayo's 2022 GHG inventory will be confirmed by June 2023, as per our process.

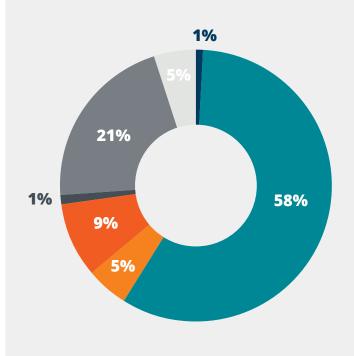
2021 Emissions Totals by Scope

SCOPE	2021 EMISSIONS	DETAILS
Scope 1 Total	5,183.8 mtCO2e	Direct greenhouse (GHG) emissions that occur from sources controlled/ owned by Zayo
Scope 2 (Location Based) Total	59,889 mtCO2e	Indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling
Scope 2 (Market Based) Total	0 mt CO2e	Indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling Zayo purchased 215,815 mWh RECs to offset Scope 2 emissions
Scope 3 Total	315,684 mtCO2e	Result of activities from assets not owned/controlled by Zayo, but indirectly impacting its value chain
Scope 1+2 (location based) Total	65,072 mtCO2e	
Scope 1+2 (market based) Total	5,183 mtCO2e	
Scope 1+2+3 LOCATION-BASED TOTAL	380,755.61 mtCO2e	
Scope 1+2+3 MARKET-BASED TOTAL	320,866.61 mtCO2e	



2021 Emissions Breakdown by Category

SCOPE	SOURCE	2021 EMISSIONS	DETAILS
Scope 1	Space Heating	726.5 mt CO2e	Natural gas is used across Zayo offices and warehouses
	Mobile Fuels	3614.10 mt CO2e	Mobile fuels (gasoline and diesel) are used for fleet vehicles
	Generator	842.89 mt CO2e	Numerous generators of various fuel types are used throughout Zayo operations
Scope 2	Carrier Hotel / Data Centers	34,989 mt CO2e	
	Carrier POP	3,150 mt CO2e	
	ILA	5,527 mt CO2e	
	Small Cell	422 mt CO2e	
	Zayo PoP	12,368 mt CO2e	
	Office	2,653 mt CO2e	
	Warehouse	153 mt CO2e	
	AllStream	627 mt CO2e	
Scope 3	Purchased Goods & Services	103,867 mt CO2e	
	Capital Goods	118,338 mt CO2e	
	Upstream Transportation / Delivery	89 mt CO2e	
	Waste Generated	147 mt CO2e	
	Business Travel	2,450 mt CO2e	
	Employee Commute	1,126 mt CO2e	
	Downstream Transportation / Delivery	38 mt CO2e	
	Downstream Leased Assets	89,630 mt CO2e	
Scope 1 + 2	+ 3 LOCATION BASED TOTAL	380,775.61 mt CO2e	



- Allstream
- Carrier Hotel / Data Centers
- Carrier POP
- ILA
- Small Cell
- Zayo POP
- Office
- Warehouse (0%)



2021 Zayo Greenhouse Gas Emissions Intensity

Greenhouse gas or emissions intensity is a measure of the emission rate of a given pollutant relative to the intensity of a specific activity process. Revenue is one of the most common means of calculating emissions intensity. Intensity is a standard question for many reporting platforms such as the Carbon Disclosure Project (CDP). Based on reported revenue information, Zayo's 2021 greenhouse gas emissions intensity is calculated as follows:







Accounting Principles

The International Organization for Standardization (ISO) is an international standard-setting body composed of representatives from various national standards organizations. ISO Standard 14064-3 defines six principles that should be upheld in the development of a GHG inventory assertion. These principles are intended to ensure a fair representation and a credible and balanced account of GHG emissions. The procedures developed and executed during development of the ZAYO Inventory for Reporting Year 2021 satisfy each of the principles below.

- Relevance
- Completeness
- Consistency

- Accuracy
- Transparency
- Conservativeness

Boundary Conditions

Zayo's 2021 portfolio includes those locations where equipment and utilities are owned and paid by Zayo, and locations that Zayo leases to other vendors/customers.

Zayo's 2021 GHG Inventory includes emissions from scope 1, 2 and scope 3 sources. The following table outlines the emissions activities that are both included and excluded from Zayo's GHG Inventory for Reporting Year 2021.

Inclusion of scope 1, scope 2 and scope 3 emissions data sources will be reevaluated annually to assess the feasibility, accuracy and materiality on Zayo's GHG inventory. Further, Zayo will assess site operation on an annual basis to determine locations for inclusion in subsequent inventories.

EMISSIONS SCOPE	EMISSIONS SOURCE(S)	MATERIALITY
Scope 1	Natural Gas	Material
Scope 1	Mobile Fuel	Material
Scope 1	Generator	Material
Scope 1	Refrigerator	Excluded
Scope 2	Purchased Electricity	Material
Scope 3	Purchased Goods & Services	Material
Scope 3	Capital goods	Material
Scope 3	Fuel- and energy-related activities	Irrelevant
Scope 3	Upstream Transportation & Distribution	Material
Scope 3	Waste Generated	Material
Scope 3	Business Travel	Material
Scope 3	Employee Commute	Material
Scope 3	Upstream leased assets	Irrelevant
Scope 3	Downstream Transportation & Distribution	Material
Scope 3	Processing of sold products	Irrelevant
Scope 3	Use of Sold Products	Irrelevant
Scope 3	End of Life Treatment	Irrelevant
Scope 3	Downstream leased assets	Material
Scope 3	Franchises	Irrelevant
Scope 3	Investments	Irrelevant



Zayo applies emissions factors based on resources consumed. These factors are published by industry relevant sources, including The Climate Registry, GHG Protocol, International Energy Agency, utilities, etc., outlined in The Climate Registry's General Reporting Protocol and consistent with methodologies from the WRI/WBCSD GHG Protocol.

Optera used emissions factors based on recognized published data applicable to the types of emissions associated with the Inventory. See "Limitations" section below for additional information regarding assumptions related to emissions factors, fuel heat values, petroleum fuels and intensity factors.

Limitations

GHG and energy use data are subject to inherent limitations. Information and data were collected via Zayo staff and direct client communication. No on-site sampling was conducted. Rather than empirical measurements, Zayo's inventory is based on appropriate emissions factors from industry relevant sources, including The Climate Registry, GHG Protocol, International Energy Agency, utility, etc., outlined in The Climate Registry's General Reporting Protocol and consistent with methodologies from the WRI/WBCSD GHG Protocol. This methodology has been accepted based on the source of the emission factors used.





SECTION Three

GOVERNANCE

Our Commitment to Governance

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ESG Steering Committee

Our ESG Steering Committee purpose is to support the company's on-going commitment to ESG matters, including but not limited to environment, corporate governance, sustainability, health & safety, diversity and inclusion, and other community and public policy matters. The ESG Committee is a cross-functional committee tasked with setting ESG Strategy, monitoring initiatives and policies based upon this strategy, and monitoring and anticipating developments related to ESG matters.

The ESG Committee works closely with our Sustainability Director to set ESG key performance indicators (KPI), drive implementation of ESG initiatives and ensure compliance with required ESG KPI reporting. The ESG Committee meets regularly with annual reporting to our Board of Directors.

Throughout 2022, we continued to build upon our overarching strategy to lead the industry in our commitment to ESG practices. With this in mind, we formally committed to **SBTi** (Science Based Target Initiative) to set ambitious science-based emissions reduction targets to support environmentally sustainable growth. This is a critical step in meeting our net zero goals.

The SBTi has partnered with CDP, the United Nations Global Compact, the World Resources Institute and the World Wildlife Fund, to support ambitious goals to fight climate change.





Through our commitment to SBTi, we have developed a **Net** Zero 2030 plan to reach near-term and net zero targets. Over the next several years, Zayo will continue to operationalize emissions reduction strategies and incorporate renewable energy opportunities within our footprint.

ESG Steering Committee Members



Jesper Aagaard President, Europe



Bryan Fleming SVP, Service Delivery and Mobile Infrastructure Engineering



Laura Littman VP, Chief of Staff to the CEO



Troy Lupe Chief Network Officer (Interim)



Kevin Mammel SVP. Finance



Mike Mooney Chief Legal Officer







Kimberly Storin Chief Marketing Officer



Sondra Smith Sustainability Director



Julie Tschida Brown Chief People & Culture Officer





Ethics and Compliance

Zayo adheres to the **UN Global Compact Principles** and maintains numerous policies to ensure fair and ethical practices. We expect 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.

We continuously monitor our whistleblower program, available to all stakeholders, and ensure 100 percent of complaints are addressed in a timely manner. Zayo complies with all regulatory reporting requirements, including annual reporting to OSHA.

Zayo is committed to prohibiting and driving out acts of modern-day slavery, child labor, and human trafficking within the organization and with suppliers of goods and services to the organization. As part of the company's due diligence processes into slavery and human trafficking, our supplier approval process incorporates a review of the controls undertaken by our suppliers. The company will not support or deal with any business knowingly involved in slavery or human trafficking

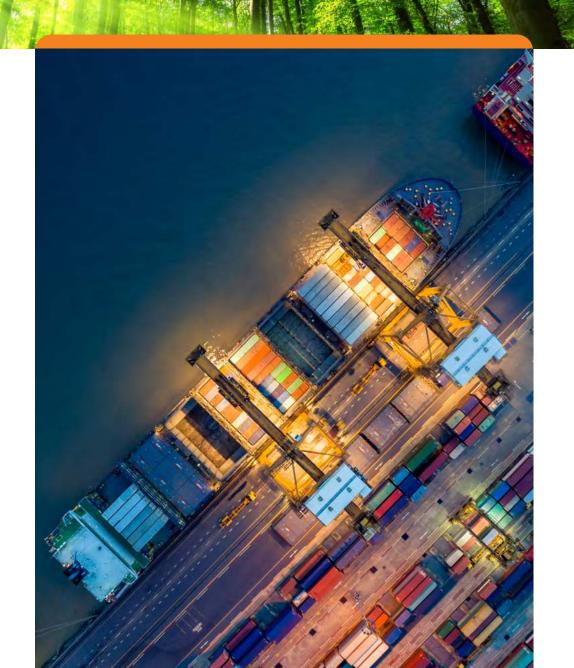
UN Global Compact Principles

- Businesses should support and respect the protection of internationally proclaimed human rights
- Businesses should make sure that they are not complicit in human rights abuses
- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- Businesses should support the elimination of all forms of forced and compulsory labor
- Businesses should support the effective abolition of child labour
- Businesses should support the elimination of discrimination in respect of employment and occupation
- Businesses should support a precautionary approach to environmental challenges
- Businesses should undertake initiatives to promote greater environmental responsibility
- Businesses should encourage the development and diffusion of environmentally friendly technologies
- Businesses should work against corruption in all its forms, including extortion and bribery



Sustainable Procurement

In 2022, we began tracking diversity within our supply chain. We are committed to ensuring diversity among our supply chain with a commitment to year-over-year improvement in the number of women and minority owned suppliers. Also in 2022, we implemented a Supplier Code of Conduct formalizing our position on what we expect from our suppliers in terms of ESG. The Code outlines expected commitments to safety, DEI, environmental sustainability, cyber security and compliance with regulations to name a few. The Code can be found here.





Cybersecurity

The Chief Security Officer (CSO) has overall responsibility for the general development and implementation of Information Security and to support the identification of controls that need to be met on behalf of leadership. The following describes the responsibilities and accountability for the CSO:

- Ensuring the information security policy and the information security objectives are established and are compatible with the strategic direction of the Organization.
- Ensuring the integration of the Information Security Management System (ISMS) requirements into the Organization's processes;
- Ensuring that the resources needed for the Information Security Management System are available.
- Communicating the importance of effective information security management and of conforming to the Information Security Management System requirements.
- Ensuring that the Information Security Management System achieves its intended outcome(s).
- Directing and supporting persons to contribute to the effectiveness of the Information Security Management System.
- Promoting continual improvement.
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

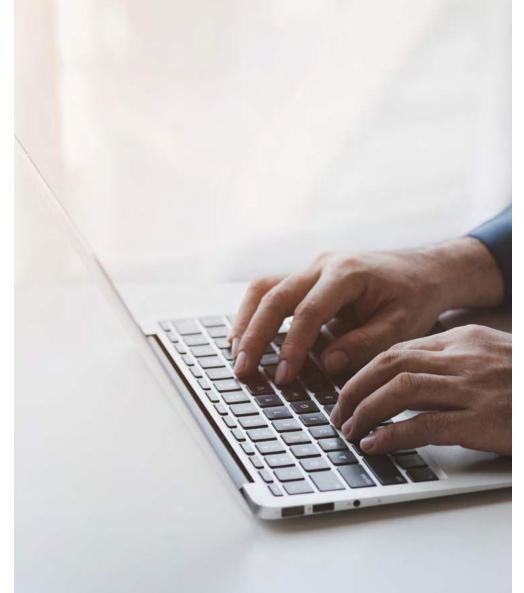




Data Privacy

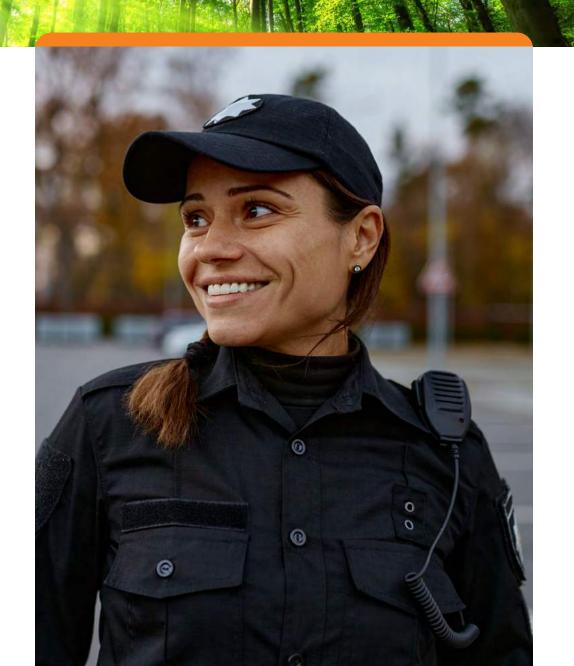
Zayo is committed to protecting the privacy of personal information we collect and process in accordance with the General Data Protection Regulation ("GDPR"), Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"), the California Consumer Privacy Act ("CCPA/CPRA") and other applicable USA State and Global Privacy laws in 2023.

As described under GDPR Article 46. Zayo provides appropriate technical and organizational measures to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction. As described under GDPR Article 46, Zayo has entered into Standard Contractual Clauses ("SCCs") with the European Commission ("EC") for the transfer of personal data outside of the EU/EEA. Depending on location Zayo may use data privacy agreements ("DPAs") outside of EU/EEA. Zayo has taken steps to ensure that the transfer will be compliant with data privacy laws in your location.



Physical Security

Our mission as the Zayo Physical Security Department is to ensure the protection and safety of all assets, facilities, and personnel within our organization. We are committed to maintaining a secure environment through the implementation of effective and innovative security measures, policies and procedures. We strive to provide prompt and professional response to all security incidents and threats, while ensuring the privacy and rights of all individuals are respected. Our ultimate goal is to provide peace of mind to our employees, customers, and stakeholders by proactively mitigating risks and maintaining a secure and stable environment.



Crisis Management

Zayo is committed to safeguarding our most valuable asset, our people, each and every day. A new initiative that launched in 2022 is the establishment of a Crisis/ Emergency Management Program to better prepare for, respond to, and recover from impacting crises/ emergencies to our people and the business.

This program includes the charter of a Zayo Crisis Management Team; a group of key stakeholders and decision makers at the organization who will be able to lead in a streamlined process in times of emergencies. Establishment of the Zayo Crisis Management Team allows for Zayo to further build our resilience in these dynamic times.

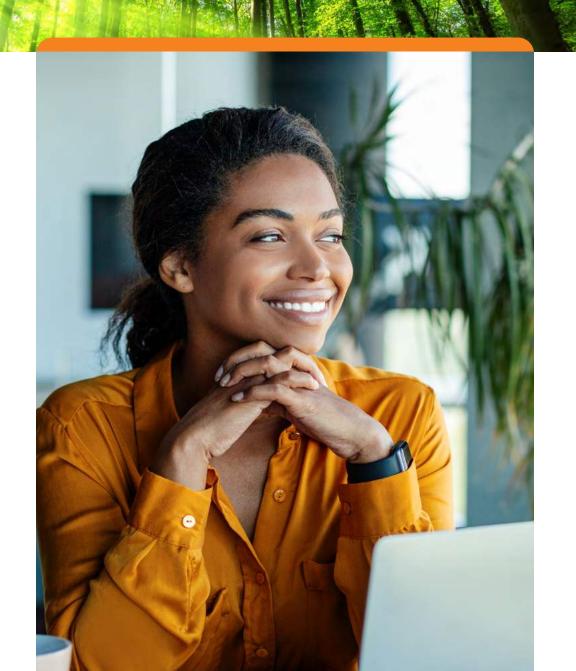
The continuous improvement built into the operating model of the Crisis/Emergency Management plan allows for Zayo to further increase its resilience year over year. Initiatives such as: 24x7 security operations monitoring, business continuity/disaster recovery program maturity, and mutual aid liaison will compound the effectiveness of the program. Ultimately furthering Zayo's resilience and our duty of care to Zayoites.





Zayo believes that the safety of employees is of utmost importance, along with quality, production and cost control. Safety policies describing the safe work practices and procedures to be practiced in workplace actions are an essential element of the overall workplace safety program. Employees are responsible for knowing and following the safety practices described in Zayo's safety manual.

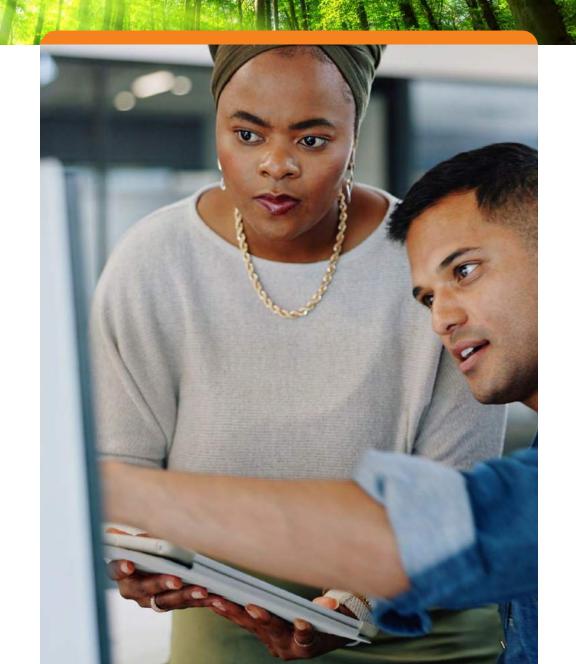
Zayo is committed to eliminating hazards and reducing OH&S risks to safeguard the Health and Safety of all its interested parties and to prevent work-related injury and ill health. They are also committed to a programme of continuous improvement to the Health and Safety management system.



Business Continuity/ Disaster Recovery

As a global telecommunications provider, we understand the importance of resilient and reliable service. Zayo's Business Continuity Program focuses on a company-wide Business Impact Assessment (BIA) that identifies Mission Essential Functions (MEFs) and Mission Essential Processes (MEPs) that are key to operating the business and delivering services to customers. The findings from the BIA are incorporated into dedicated Business Continuity Plans that focus on necessary and sustained strategies that account for loss of facility/locations, loss of key personnel, supported IT applications, supply chain diversity and availability, and essential recovery capabilities.

Zayo maintains a dedicated Business Continuity and Disaster Recovery program that utilizes an Incident Response Team (IRT) capability at its core. The IRT is tasked with identifying and tasking key critical subject matter experts during an incident, ensuring incident communications are timely, and quickly identifying a path to recovery.





The future is bright with Zayo

zayo.com

For more information please contact

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