



## **Environmental, Social and Governance Policy**

Zayo is focused on creating a more sustainable business through our efforts in environmental impacts, social responsibility and corporate governance (ESG). We have many 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/Sustainability Report which will include efforts to date against established ESG goals and KPIs. Our annual ESG/Sustainability 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 continue to address these material topics to our business in our annual ESG/Sustainability report. These material KPIs include, but are not limited to: carbon footprint, 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 ESG website.

### **Environmental**

Zayo's environmental strategy underscores our commitment to aligning our values with business practices. On the environmental front, we are dedicated to achieving net-zero emissions by 2030 through ambitious science-based emissions reduction targets validated by the Science Based Target Initiative (SBTi). Our initiatives include abating 100% of our energy consumption through the purchase of Renewable Energy Credits, and reduction of greenhouse gas emissions through facility site consolidation, equipment efficiency, technology improvements in building management, migration to more fuel efficient fleet vehicles, use of reflective paint on technical site roofs, optimization of technical site thermostat and night time cooling (to name a few), as well as our continued collaboration with supply chain partners to reduce environmental impact, reflecting our substantial investment in sustainable practices.

### **Social**

Socially, corporate social responsibility holds significant importance for us. We have introduced a community North Star, which fosters a shared goal for our workforce. It emphasizes the positive impacts on technology leaders from historically marginalized

communities. Through our time and our treasure Zayo invests in STEM based programs to further our impact. Zayo offers paid time off to our employees to volunteer and support charities of their choice and Zayo has historically provided donations to organizations with this vision as a goal. Our Diversity, Equity, Inclusion, and Belonging (DEIB) statement reinforces our culture that values diverse perspectives. We continue to see notable improvements in gender and ethnic diversity across organizational levels, and within our supply chain, which underscores our commitment to these principles. We actively support initiatives for universal broadband access, especially for low-income students. These initiatives showcase our comprehensive approach to social responsibility and inclusivity.

## **Governance**

Governance principles are integral to our strategy, with notable improvements in gender and ethnic diversity across all levels. We actively monitor our progress, demonstrating transparency and accountability through detailed insights shared in annual ESG/Sustainability Reports. 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, and follows, and reports 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.

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 annually.

This commitment extends to robust initiatives such as implementing a Supplier Code of Conduct to include diversity and environmental expectations, enhancing cybersecurity, and establishing a Crisis/Emergency Management Program, all of which collectively reinforce our dedication to governance principles, transparency, and resilience.