

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.

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 (ILO) Conventions (C102, C103, C104, C105, C111, C114, C117, C128, C130, C135, C141, C143, C147, C154, C155, C158, C161, C166, C170, C182, C184, C190, C198, C202, C203, C204, C205, C206, C209, C210, C214, C215, C219, C222, C223, C226, C229, C230, C231, C232, C233, C234, C235, C236, C237, C238, C239, C240, C241, C242, C243, C244, C245, C246, C247, C248, C249, C250, C251, C252, C253, C254, C255, C256, C257, C258, C259, C260, C261, C262, C263, C264, C265, C266, C267, C268, C269, C270, C271, C272, C273, C274, C275, C276, C277, C278, C279, C280, C281, C282, C283, C284, C285, C286, C287, C288, C289, C290, C291, C292, C293, C294, C295, C296, C297, C298, C299, C300, C301, C302, C303, C304, C305, C306, C307, C308, C309, C310, C311, C312, C313, C314, C315, C316, C317, C318, C319, C320, C321, C322, C323, C324, C325, C326, C327, C328, C329, C330, C331, C332, C333, C334, C335, C336, C337, C338, C339, C340, C341, C342, C343, C344, C345, C346, C347, C348, C349, C350, C351, C352, C353, C354, C355, C356, C357, C358, C359, C360, C361, C362, C363, C364, C365, C366, C367, C368, C369, C370, C371, C372, C373, C374, C375, C376, C377, C378, C379, C380, C381, C382, C383, C384, C385, C386, C387, C388, C389, C390, C391, C392, C393, C394, C395, C396, C397, C398, C399, C400, C401, C402, C403, C404, C405, C406, C407, C408, C409, C410, C411, C412, C413, C414, C415, C416, C417, C418, C419, C420, C421, C422, C423, C424, C425, C426, C427, C428, C429, C430, C431, C432, C433, C434, C435, C436, C437, C438, C439, C440, C441, C442, C443, C444, C445, C446, C447, C448, C449, C450, C451, C452, C453, C454, C455, C456, C457, C458, C459, C460, C461, C462, C463, C464, C465, C466, C467, C468, C469, C470, C471, C472, C473, C474, C475, C476, C477, C478, C479, C480, C481, C482, C483, C484, C485, C486, C487, C488, C489, C490, C491, C492, C493, C494, C495, C496, C497, C498, C499, C500, C501, C502, C503, C504, C505, C506, C507, C508, C509, C510, C511, C512, C513, C514, C515, C516, C517, C518, C519, C520, C521, C522, C523, C524, C525, C526, C527, C528, C529, C530, C531, C532, C533, C534, C535, C536, C537, C538, C539, C540, C541, C542, C543, C544, C545, C546, C547, C548, C549, C550, C551, C552, C553, C554, C555, C556, C557, C558, C559, C560, C561, C562, C563, C564, C565, C566, C567, C568, C569, C570, C571, C572, C573, C574, C575, C576, C577, C578, C579, C580, C581, C582, C583, C584, C585, C586, C587, C588, C589, C590, C591, C592, C593, C594, C595, C596, C597, C598, C599, C600, C601, C602, C603, C604, C605, C606, C607, C608, C609, C610, C611, C612, C613, C614, C615, C616, C617, C618, C619, C620, C621, C622, C623, C624, C625, C626, C627, C628, C629, C630, C631, C632, C633, C634, C635, C636, C637, C638, C639, C640, C641, C642, C643, C644, C645, C646, C647, C648, C649, C650, C651, C652, C653, C654, C655, C656, C657, C658, C659, C660, C661, C662, C663, C664, C665, C666, C667, C668, C669, C670, C671, C672, C673, C674, C675, C676, C677, C678, C679, C680, C681, C682, C683, C684, C685, C686, C687, C688, C689, C690, C691, C692, C693, C694, C695, C696, C697, C698, C699, C700, C701, C702, C703, C704, C705, C706, C707, C708, C709, C710, C711, C712, C713, C714, C715, C716, C717, C718, C719, C720, C721, C722, C723, C724, C725, C726, C727, C728, C729, C730, C731, C732, C733, C734, C735, C736, C737, C738, C739, C740, C741, C742, C743, C744, C745, C746, C747, C748, C749, C750, C751, C752, C753, C754, C755, C756, C757, C758, C759, C760, C761, C762, C763, C764, C765, C766, C767, C768, C769, C770, C771, C772, C773, C774, C775, C776, C777, C778, C779, C780, C781, C782, C783, C784, C785, C786, C787, C788, C789, C790, C791, C792, C793, C794, C795, C796, C797, C798, C799, C800, C801, C802, C803, C804, C805, C806, C807, C808, C809, C810, C811, C812, C813, C814, C815, C816, C817, C818, C819, C820, C821, C822, C823, C824, C825, C826, C827, C828, C829, C830, C831, C832, C833, C834, C835, C836, C837, C838, C839, C840, C841, C842, C843, C844, C845, C846, C847, C848, C849, C850, C851, C852, C853, C854, C855, C856, C857, C858, C859, C860, C861, C862, C863, C864, C865, C866, C867, C868, C869, C870, C871, C872, C873, C874, C875, C876, C877, C878, C879, C880, C881, C882, C883, C884, C885, C886, C887, C888, C889, C890, C891, C892, C893, C894, C895, C896, C897, C898, C899, C900, C901, C902, C903, C904, C905, C906, C907, C908, C909, C910, C911, C912, C913, C914, C915, C916, C917, C918, C919, C920, C921, C922, C923, C924, C925, C926, C927, C928, C929, C930, C931, C932, C933, C934, C935, C936, C937, C938, C939, C940, C941, C942, C943, C944, C945, C946, C947, C948, C949, C950, C951, C952, C953, C954, C955, C956, C957, C958, C959, C960, C961, C962, C963, C964, C965, C966, C967, C968, C969, C970, C971, C972, C973, C974, C975, C976, C977, C978, C979, C980, C981, C982, C983, C984, C985, C986, C987, C988, C989, C990, C991, C992, C993, C994, C995, C996, C997, C998, C999, C1000).

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.