



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Purpose. Summit Broadband and/or its subsidiaries, divisions, or affiliates (“Summit Broadband” or “Company”) is committed to conducting business ethically and in compliance with all applicable laws and regulations. Although Summit Broadband is a private company and is, therefore, not required to implement federal anti-bribery and anti-corruption regulations under the Foreign Corrupt Practices Act, the Company voluntarily chose to enforce some similar internal controls and corporate governance standards as a “best practice” in order to achieve greater risk mitigation and prevention. Summit Broadband’s Anti-Bribery and Anti-Corruption Policy (the “Policy”) establishes principles that comply with federal and state laws and strengthens the Company’s intention and obligation to act lawfully, honestly and ethically in its business dealings.

Scope and Applicability. This Policy extends to and applies to Summit Broadband and its employees, officers, managers, and directors (the “Covered Personnel”) who act for, or on its behalf in performing its business, as well as in connection with any corporate and business projects, programs, events, campaigns and other initiatives. Summit Broadband requires Covered Personnel to adhere to this Policy containing ethical standards to guide the Covered Personnel in their work and daily company dealings. This Policy applies to all of Summit Broadband’s business relationships and its dealings with both governmental and non-governmental persons and entities.

Anti-Bribery and Anti-Corruption Policy Overview. It is the policy of Summit Broadband to prohibit the direct or indirect giving or receiving of improper and illegal payments, benefits and bribes for purposes of obtaining an unlawful and prohibited benefit from a public servant or government official. Summit Broadband Covered Personnel is not allowed to knowingly and intentionally give, offer, or promise to any public servant or government official any pecuniary or other benefit not authorized by law with an intent or purpose to influence the performance of any act or omission believed to be or represented as being within the official discretion of a public servant or government official, in violation of a public duty, or in performance of a public duty. The Covered Personnel is also not allowed to unlawfully compensate or reward public servants or government officials for official behavior and to unlawfully threaten, induce or influence the performance of any act or omission by a public servant or government official. Summit Broadband also prohibits the Covered Personnel from conspiring with a public servant or government official to unlawfully induce or influence a bid or solicitation process for procurement of services by a government entity. These acts are illegal and are not tolerated by Summit Broadband.

Company Principles. Covered Personnel is held to a high standard of behavior to ensure that Summit Broadband’s business is conducted in a fair and ethical manner. Summit Broadband has zero tolerance for any unlawful act of bribery or corruption and acknowledges its affirmative duty to train Covered Personnel to recognize and report dishonest, corrupt and illegal conduct. To this end, any prohibited incident or act of bribery and corruption is thoroughly investigated and those responsible disciplined. In particular, the Company prohibits the following improper actions and activities:

- Making any illegal payments intended to affect a public servant or government official's decision;
- Seeking to unlawfully influence, induce or threaten others by unethical and illegal means that are harmful to the Company's reputation for honesty and integrity;
- Seeking or obtaining bribes in order to obtain or retain business or gain an unlawful advantage;
- Offering or making any illegal and prohibited payments to a public servant or government official in order expedite a routine government action that the official is already obligated to perform;
- Engaging with any third parties, including without limitation, sales representatives or other intermediaries, while knowing or having reason to suspect that such party is engaging in, or has engaged in, activities, the nature of which is prohibited by this Policy.

Summit Broadband requires all Covered Personnel to abide by its anti-bribery and anti-corruption rules and guidelines and provides employee training on this Policy.

Duties of Covered Parties. Summit Broadband requires Covered Personnel acting on its behalf to avoid any improper, unlawful and unethical activities that could lead to violation of its Anti-Bribery and Anti-Corruption Policy. Any Covered Personnel who observe or have reason to believe that any act of bribery or corruption has taken, or is likely to take place, must promptly report this to Summit Broadband's Human Resources or its Legal Department. In order to comply with the Policy, all Covered Personnel may be asked to complete training, acknowledge their compliance with the Policy and cooperate in any investigation of alleged wrongdoing, misconduct and violation of the Policy.

Non-Compliance and Penalties. Any actions and representations made on behalf of the Company may affect its reputation and have a serious impact on the relationship with its customers, partners and stakeholders. The purpose of this Policy is to deter wrongdoing and to promote honest, fair and ethical conduct ensuring to the greatest possible extent that the Company's business is conducted in a consistently legal and ethical manner and the Company maintains its reputation as a business leader in telecommunications and a good corporate citizen. To this end, strict compliance with the Policy is required and any personnel who fails to do so, may be subject to disciplinary action, up to and including termination of employment. Under certain circumstances, violations of this Policy and applicable laws and regulations, may result in both criminal and civil charges in the United States or other jurisdictions. It is imperative for the Covered Personnel to follow this Policy and adhere to its guidelines and pertinent legal reporting requirements in order to avoid any penalties and repercussions in the event of non-compliance.

Reporting of Suspected and Known Violations. A Covered Personnel's proper conduct can reinforce an ethical atmosphere at Summit Broadband and have a positive influence on the actions of fellow associates. Any Covered Personnel with information regarding a known or suspected violation of this Policy, should report it to the appropriate level of management. All questions regarding this Policy may be submitted to Vice President of Legal and Human Resources at Summit Broadband, Inc. at 4558 35th Street, Orlando, Florida 32811 or via e-mail at

Randall.Covard@summit-broadband.com. Any such communication will be treated with confidentiality unless disclosure is necessary in order to address the matter appropriately.

Protections against Retaliation. Summit Broadband has a strict anti-retaliation policy. The Company will not tolerate retaliation against any person for raising a good faith concern or allegation regarding actual or potential misconduct, and anyone engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment.