

HUMAN RIGHTS

Principles. Summit Broadband and/or its subsidiaries, divisions, or affiliates (“Summit Broadband” or “Company”) is committed to protecting and respecting human rights as set out in the United Nations Guiding Principles on Business and Human Rights. Summit Broadband is conscious of an increasing awareness of and scrutiny of how companies impact people and communities around the world and it wants to make a positive impact on society by promoting policies that protect and respect human rights. Its Human Rights Policy (the “Policy”) focuses on key principles that it always strives to adhere to when conducting its business operations:

- Recognizing Company’s responsibility to respect and support human rights in all its business areas and operations;
- Respecting and supporting human rights of all people affected by the Company’s business throughout societies where it operates;
- Identifying and engaging in business opportunities and using Company’s leverage to proactively support human rights in the communities where the Company operates;
- Proactively engaging with business partners, government and other stakeholders to uphold the highest standards of human rights throughout its business operations and value chain;
- Providing a work environment where human rights are respected and discrimination and harassment are strictly prohibited;
- Striving to avoid complicity in human rights abuse and violations and seeking to provide for, or cooperate in, their remediation, if any are discovered; and
- Ensuring transparent and open communication methods to allow all internal and external stakeholders to raise concerns without fear of retaliation or reprisal, and providing fair investigation and grievance mechanisms as outlined in the Company’s Code of Business Conduct and Ethics.

Focus Areas. Summit Broadband’s recognizes that human rights protection has become of great importance to its employees, shareholders, investors, customers and the communities where it operates. To this end, Summit Broadband is committed to applying its Human Rights Policy into the following areas of its business:

- **Diversity, Equity and Inclusion:** Summit Broadband fosters an environment of diversity, equity and inclusion. The Company is an equal opportunity employer that is committed to

diversity and prohibits discrimination and harassment of any kind based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The Company makes hiring decisions based solely on qualifications, merit, and business needs at the time.

- **Safety, Health and Security:** Summit Broadband is committed to providing a safe and healthy work environment to all its employees. Safety, security and health are an integral part of the way Summit Broadband conducts and manages its business. To this end, the Company is committed to complying with all federal, state and local regulations while making every reasonable effort to identify and control exposures in its business operations that can lead to unsafe practices and workplace hazards. In order to provide a safe and healthy work environment, Summit Broadband resolves to act as follows: focus on the prevention of workplace injuries and damages to property; provide employees with the necessary training, guidance and resources necessary to meet safety responsibilities; consult and collaborate with its employees, contractors and other stakeholders on safety matters; comply with all relevant laws, regulations, and industry practices; and continually improve safety performance in order to minimize unsafe practices.

- **Forced Labor and Human Trafficking.** Summit Broadband does not tolerate any forms of forced labor, including any modern forms of slavery, human trafficking or other labor practices that involve exploitation or inhumane treatment. The Company is also committed to working with vendors, contractors and suppliers who take appropriate steps to mitigate the risk of human trafficking and slavery from occurring and does not engage with any outside third parties that are not also opposed to and safeguarded from all forms of forced labor and human trafficking.

- **Child Labor:** Summit Broadband does not tolerate child labor, including any type of abuse and exploitation of children throughout its business operations and supply chains. Summit Broadband believes that companies have a responsibility to protect children from harm and abuse and, therefore, it prohibits the hiring of individuals under eighteen (18) years of age.

- **Work Compensation.** Summit Broadband believes employees should be compensated fairly and it fully complies with applicable wage, work hours, overtime and benefits laws. The Company is committed to paying a competitive wage relative to the industry and local labor markets. It also recognizes that employees should be rewarded according to their level of achievement and accomplishment.

Summit Broadband always strives to make the right decisions to identify, address and mitigate any actual or potential adverse impacts its business operations and activities may have on human rights. This Human Rights Policy helps guide it and its employees, directors and officers in their commitment to protect and respect human rights.