

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY

SCOPE

This policy applies to all divisions and subsidiaries of Orlando Telephone Company, Inc. d/b/a Summit Broadband (“Summit”), including but not limited to all company’s facilities, job sites, customer premises and company sponsored activities.

STATEMENT

Summit is an Equal Opportunity Employer, and as such it prohibits any form of discrimination on the basis of race, color, religion, age, sex, pregnancy, sexual orientation, gender identity and expression, genetic information, national origin, disability, marital status, citizenship status, veteran status, relationship or association with a protected veteran, military status or any other protected classification, to the extent it is protected by federal, state or local law(s) (“Policy”).

Summit is committed to ensure its work environment is free from discrimination, coercion, harassment, intimidation, or any type of action that is inconsistent with company Policy regardless of whether it is instigated by Summit’s employees or non-employees, including contractors, interns, customers, vendors, suppliers and visitors.

Summit takes appropriate affirmative action not to discriminate against any applicant for employment or any employee, and its decisions concerning employment are made without regard of any of the protected classifications, but on individual merit only.

RESPONSIBILITY

Summit requires all employees to comply with the Policy and to report any action that deviates from it, as this will result in appropriate corrective action. Employees that hold a managerial position are responsible for the enforcement of the Policy and are required to ensure those under their supervision always abide by it. Any violation of the Policy should be immediately reported to a direct supervisor or to Summit’s Legal Department at legal.department@summitbb.com.

RETALIATION

Summit prohibits any form of retaliation against applicants or employees for filing a complaint, reporting alleged violations or for cooperating in an investigation. Any act of retaliation will be investigated, and appropriate corrective action will be taken. Individuals engaging in such an act will be subject to disciplinary action, which may include termination of employment.