

Windstream Human Rights Policy

This Human Rights Policy describes Windstream and its affiliates' commitment to human rights.

Windstream recognizes the importance of and is committed to operating with respect for internationally-recognized human rights, including those affirmed in the Universal Declaration of Human Rights. Guided by the human rights due diligence framework set forth in the UN Guiding Principles on Business and Human Rights, we are committed to assessing the impacts of our business activities on human rights and to addressing adverse impacts.

Ethics and Compliance

Our commitment to human rights is integrated into our ethics and compliance program, and can be found throughout our Working with Integrity Guidelines, which governs the conduct of all managers, officers, and employees of the Company, as well as the Supplier Code of Ethics. Windstream expects its employees and vendors, and employees and vendors have an obligation, to uphold and carry out our commitment to lawful and ethical business conduct at all times. Annual training is required of all employees that reinforces these principles in the Guidelines.

Data Privacy

Windstream takes data privacy very seriously. We transmit critical communications and understand the critical role we play in ensuring the protection of employee, vendor and customer data. Windstream maintains robust information security and compliance programs which include strong governance and controls around cybersecurity and data privacy, as well as regular risk assessments and audits of the Company's practices, and includes regular reporting to the Audit Committee of Windstream's Board of Managers. Our Privacy Policy is available at <https://www.windstream.com/about/legal/Privacy-Policy>.

Government Data Requests

Windstream cares deeply about the privacy of our subscribers' information and will protect the privacy of our subscribers even while working with law enforcement to prevent criminal activity, to the extent required by applicable state and federal law. We require that all such requests for information be submitted in writing and have implemented guidelines law enforcement agencies must follow when seeking records from us which take into account our legal obligations to comply with such requests as well as the impact to a subscriber's data privacy. These processes are managed by our internal Law Enforcement Support Center (LESC), led by Windstream's Director of Corporate Security, and are publicly available at <https://www.windstream.com/Law-Enforcement-Support-Center>. Additionally, we notify subscribers via our Privacy Policy that their information may be disclosed in response to such requests when required by law.

Diversity

At Windstream, we are embracing the challenge to advance our diversity and inclusion efforts and leaders are tasked with managing a diverse, mobile, and multi-generational workforce. To recruit top talent, we embrace and promote a culture of inclusion and civility. This means taking affirmative steps to create a workplace free of discrimination, harassment, and retaliation. We are committed to fostering a diverse and inclusive work environment, and we are committed to pay equity. Windstream's Diversity & Inclusion Strategic Council, comprised of senior leadership and

led by the Company's CEO, leads D&I initiatives for the Company, and is backed by an Operational Committee comprised of employees from across the Company, which works to reach goals set by the Strategic Council.

Labor Rights

Windstream's commitment to human rights includes compliance with all applicable state and federal labor, wage and working hour laws and regulations. Our employees are treated with dignity and respect and enjoy freedom of association. We do not employ individuals under the legal minimum working age, and we require the same of our suppliers and vendors. Additionally, we have incorporated prohibitions against child labor and involuntary or forced labor in the Supplier Code of Ethics with which our vendors must comply.

Safe Workplace

Windstream is committed to providing a safe, healthy and alcohol and drug free workplace for its employees and for visitors to Windstream's facilities, and we expect our suppliers to do the same. We strongly prohibit, and address with urgency, any threats or acts of violence and ensure that our employees, customers and third parties visiting our facilities are safe.

Communities

At Windstream, we understand the important role we play in society as a corporation. We support various charities and nonprofit organizations throughout our service territory and partner with them to enhance lives and build stronger and more vibrant communities. We support numerous charitable causes, including hunger relief, domestic violence awareness, breast cancer research and STEAM (science, technology, engineering, arts, and mathematics) initiatives. Additionally, employees from across the country volunteer in the Company's Culture Crews to lead activities and events that demonstrate and celebrate our cultural values.

Reporting Concerns

Windstream's Ethics and Compliance team promptly acts, investigates, and addresses allegations of misconduct, including those involving human rights abuses. Concerns and potential or actual misconduct should be reported through the Windstream Working with Integrity Helpline at 888-898-3990, online at <https://secure.ethicspoint.com/domain/media/en/gui/58655/index.html> or by mail: Windstream Working with Integrity, Chief Compliance Officer, 4001 N. Rodney Parham Rd., Building 1 Floor 3, Little Rock, AR 72212. The Helpline and online reporting system have been established to provide channels to report possible violations confidentially and anonymously.

Windstream's Ongoing Commitment

As we continue to expand our network and our business, Windstream is committed to operating ethically in compliance with applicable law and protecting the internationally recognized human rights of those who work with us, for us, and those in the communities in which we serve.

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