

Windstream Conflict Minerals Policy Statement

In August 2012, the Securities and Exchange Commission adopted rules regarding the inclusion of “conflict minerals” in products or production of materials. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Act (“Act”) defines “conflict minerals” as certain minerals mined in the Democratic Republic of Congo (“DRC”) and specified adjoining countries. The Act requires publicly traded companies to exercise diligence over the supply chains of products they contract to manufacture, and annual disclosure reporting is required regarding the presence of conflict minerals within a public company’s supply chain.

As a privately held company, Windstream is not directly subject to Section 1502 of the Act, but we do support the goals and objectives of Section 1502 and have adopted this company-wide policy to reflect those goals and objectives. Any connection between the materials used in Windstream’s products and armed violence or human rights abuses is unacceptable, and an internal team oversees the design, development and implementation of our conflict minerals compliance program to proactively eliminate conflict minerals within our supply chain and ensure that any minerals used by our vendors sourced from within the DRC are from certifiable conflict free areas.

Windstream does not typically manufacture our own products. Thus, supply chain visibility is key and we expect our suppliers to take steps to ensure that their products do not include materials that either directly or indirectly benefit armed groups in the DRC or in any neighboring country. As part of their master purchasing agreements with Windstream, we required that suppliers agree to provide us with information regarding the country of origin and source of conflict minerals used, if any, in the supplier goods sold to us. If a supplier is found to be out of compliance with these objectives, the supplier is expected to develop, implement and document plans to remedy the non-compliance, and Windstream has the right to terminate its relationship with the supplier in the event of continued non-compliance.

Currently, Windstream can represent that, based on information available from our suppliers, our products do not contain conflict minerals. We will continue monitoring efforts, and will update this statement as needed.

[April 2022]

