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Priorities

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Windstream is committed to making a positive difference in the world and especially in the communities that we serve. This 2019 Environmental, Social & Governance Report highlights some of the efforts we are making across a broad range of issues – including supporting diversity in the workplace and in our supplier chain, protecting the environment, and conducting business with high ethical standards.

We fully understand that we succeed when our communities are growing and our customers are prospering. As a provider of critical communications and technology solutions, we are used to addressing today’s challenges while planning for long-term success. At the local level, that dual focus leads us to support STEM initiatives that prepare the next generation of innovators, food drives that fight hunger, and conservation programs that protect wild places and creatures.

At the corporate level, we celebrate the authenticity and uniqueness of our people and their ideas. We are increasing the number of women in customer-facing technician roles and providing them with mentors to ensure their success. Our award-winning program to attract and support military veterans and their spouses recognizes the invaluable skills they bring to our industry. And we are actively seeking diverse job candidates, including men and women of color.

We are equally committed to the inclusion of small, minority, veteran and women-owned businesses as part of our supply base.

Windstream expects every employee to conduct business in a manner that is ethical and promotes the best interests of all of our stakeholders, including customers and employees. Annual required training reinforces these principles.

Protecting our customers’ privacy is fundamental to our business, especially as Americans spend more and more of their lives online. As spelled out in our Privacy Statement, we do not sell any customer data to third parties.

Windstream works to ensure the long-term health of the environment. Our initiatives include promoting energy efficiency, minimizing waste through reduction, re-use and recycling, and strictly complying with all applicable laws and regulations.

Uniting all of these initiatives is our fundamental drive to be a good corporate citizen. It is an important responsibility as well as a rare opportunity, and we strive every day to give back in meaningful ways to the communities that we are privileged to serve.

Thank you for your interest in our efforts.
OUR MISSION

CONNECT PEOPLE AND EMPOWER BUSINESS
IN A WORLD OF INFINITE POSSIBILITIES.

OUR VISION

TO PROVIDE INNOVATIVE SOFTWARE AND NETWORK SOLUTIONS WHILE CONSISTENTLY DELIVERING AN AMAZING CUSTOMER EXPERIENCE.

CORE VALUES

ACCOUNTABILITY
TAKE OWNERSHIP. BE RESPONSIVE AND TRANSPARENT. FULFILL YOUR OBLIGATIONS TO YOUR CUSTOMERS, TEAM MEMBERS AND THE COMPANY.

COLLABORATION
COME TOGETHER. WORK WITH OTHERS TO ACHIEVE SHARED GOALS. FOSTER AN ENVIRONMENT OF TEAMWORK.

AGILITY
BE NIMBLE. SEEK OUT OPPORTUNITIES TO IMPROVE. THINK AND ACT IN A WAY THAT EMBRACES CHANGE.

RESPECT
SERVE OTHERS. CULTIVATE A CLIMATE OF DIGNITY, TRUST AND RESPECT FOR ALL. CONSIDER OTHERS’ OPINIONS EQUAL TO YOUR OWN.
About Windstream

Windstream provides data networking, core transport, security, unified communications and managed services to mid-market, enterprise and wholesale customers across the U.S. The company also offers broadband, entertainment and security services for consumers and small and medium sized businesses primarily in rural areas in 18 states. Windstream services are delivered over multiple network platforms including a nationwide IP network, our proprietary cloud core architecture and on a local and long-haul fiber network spanning approximately 150,000 miles.

To accomplish these technological advances, Windstream employs over 11,000 exceptional employees located across the U.S. and Canada. Windstream supports the work/life balance of employees by facilitating remote working arrangements for more than 30% of its workforce and maintains several large work locations in various cities including Little Rock, Arkansas, Charlotte, North Carolina, Greenville, South Carolina, Rochester, New York, Hiawatha, Iowa and Twinsburg, Ohio.
Community

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Community Engagement & Philanthropy

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 varying organizations across the company volunteer in the company’s Culture Crews to lead activities and events that demonstrate and celebrate our cultural values. We have 19 Culture Crews across the U.S. comprised of 180 employees that help coordinate events such as employee picnics and various fundraisers across our employee base. Employees also coordinate drives for school supplies and food for local pantries.
Girls Learn Tech Skills at Coding Camp

Presented by Windstream

Sixteen rising eighth- and ninth-grade girls in the University of Arkansas at Little Rock’s Girls Coding Camp learned skills over the summer that will come in handy for future STEM careers. This year’s participants were selected from schools statewide based on essay, grades, test scores, and recommendations.

The Girls Coding Camp, made possible with a sponsorship from Windstream, is a one-week annual residential camp that aims to motivate academically prepared females to enter the fields of computer science, information science, or web design. The program is free to participants.

The campers took a field trip to Windstream’s campus and new Network Lab where they learned how to provision a communication system, participated in binary coding exercises, and toured the lab.

Sara Lary, manager of the Law Enforcement Support Center at Windstream, led the communication provisioning exercise for the students. “As a parent of a former participant of this camp, I got to witness firsthand how my daughter’s experience sparked a level of confidence, interest and motivation in her education and career path that she didn’t have previously. Once she was given the opportunity to learn cool, relevant things with technology in a healthy environment, she became excited about her future!”

“We can do this for all young girls,” added Lary. “By fostering an interest in STEAM topics at a young age and working on the negative connotations and barriers that girls face today; educators, parents, and mentors can work together to help girls maintain confidence and curiosity in STEAM. We need to keep that enthusiasm going for generations and continue to work to provide more opportunities for young girls to succeed at an early age.”
Windstream Partners with Pack Shack to Fight Hunger

Windstream, in partnership with our Culture Crews and The Pack Shack, packed more than 200,000 meals in 2019 to donate to local hunger-relief organizations.

Since 2015, employees have packed approximately half a million meals through “Feed the Funnel” events in partnership with The Pack Shack.

Not familiar with The Pack Shack? The non-profit organization was established in 2013 to increase awareness about hunger, provide food, and encourage people to get involved with the local nonprofits serving their community. They accomplish their mission of addressing food insecurity by setting up super-fun Feed The Funnel parties that encourage people to come together to sing, dance, and laugh...but more importantly, pack meals.

Windstream hosted nine Feed the Funnel parties in 2019 in our largest employee locations.

Supporting Our Veterans

Our Veteran Employee Resource Group participates in Toys for Tots, prepares care packages for our deployed Guard and Reserve service members and places flags and wreaths at our military cemeteries. Windstream recognizes Memorial and Veterans Day by hosting special events throughout our footprint.
Lifeline Program

We believe it is important for everyone to stay connected. Lifeline is a program of the Federal Communications Commission that helps qualified individuals lower their monthly cost of telecommunications services. Windstream is a participant in this program, and eligible customers can apply their monthly Lifeline discount to either their phone or Internet service. Residents of federally recognized tribal lands may receive an additional reduction. Additional state support may be available, depending on a customer’s location.

All information about the Lifeline discount program can be found at www.lifelinesupport.org.
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Protecting the privacy of our customers is fundamental to Windstream's business. In the course of ordering services from us, sending us an e-mail, or responding to a Windstream survey, among other ways, customers may provide personally identifiable information (PII) to us. We want our customers to use our services with confidence, and therefore we employ a number of security techniques designed to protect customer information from unauthorized access. Windstream employees with access to customer information are required to comply with all applicable laws regulating disclosure of such information.

Windstream’s Privacy Statement describes how we collect information from or about our customers, how we use the information collected, and the choices customers have concerning the collection and use of such information.
The General Data Protection Regulation 2016/679 (GDPR) regulates data protection and privacy for all individual citizens of the European Union and the European Economic Area (EU), as well as the transfer of personal data outside the EU. While there is currently no comprehensive federal law in the U.S. that governs the collection and use of personal data, several states have recently enacted privacy legislation that, in many cases, may resemble the provisions of the GDPR. These state laws provide individuals broad rights with regard to access and control of their personal data and impose new technical and notice obligations on affected businesses that use, process or store such personal data.

Windstream is continually investing in our security infrastructure and our Information Security Organization, together with the Legal Department, performs risk assessments for compliance with all applicable privacy laws, identifies compliance gaps to be remediated, and executes on comprehensive remediation plans to ensure compliance within an evolving regulatory landscape. We continue to work diligently toward gaining and maintaining compliance with all applicable privacy laws, as well as enhancing our policies, procedures and training programs to ensure that all Windstream employees understand and adhere to these laws.
Protecting customer credit card data is important to Windstream, as security threats are becoming increasingly sophisticated and severe. Launched in 2006, the Payment Card Industry Data Security Standard (PCI DSS) is a set of security standards designed to ensure that all companies that accept credit cards from one of the 5 members of the Payment Card Industry Security Standards Council (American Express, Discover, JCB, MasterCard and Visa) as payment for goods and/or services maintain a secure environment. Any company that processes, stores or transmits cardholder data is referred to as a “merchant” and must be PCI DSS compliant.

As a merchant, Windstream maintains PCI DSS compliance when handling our customers’ credit card information should they choose to pay for services with a credit card, and we require PCI DSS compliance of any vendor processing, storing or transmitting or impacting the security of the cardholder data environment of our customers as part of the services they provide to us.

Additionally, Windstream offers services to assist our business customers in achieving and maintaining their own PCI DSS compliance by helping identify gaps for remediation, and providing added network security and ongoing business support. We are also able to provide Attestation of Compliance (AOC) reports covering certain Windstream services to business customers that are using one of those services and are required to demonstrate their own PCI DSS compliance as a merchant.
For our healthcare customers, we know protecting sensitive patient data is vital. With the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Final Omnibus Rule, the U.S. Department of Health and Human Services set the standard for protecting sensitive patient data, referred to as “protected health information” (PHI). Additionally, the Health Information Technology for Economic and Clinical Health Act (HITECH) addresses privacy and security concerns associated with the electronic transmission of health information. Service providers that provide transmission services to healthcare entities subject to HIPAA, including temporary storage of PHI incidental to the transmission services, are not required to comply with HIPAA's requirements. However, this doesn’t mean that Windstream doesn’t take steps to ensure such information is protected.

Should customers provide PHI to Windstream, or we otherwise obtain access to such information in the course of providing services to our customers, we commit to not using, disclosing, selling or renting PHI to any third party without our customers’ consent, except to the extent we are required by law to disclose it. Additionally, Windstream’s OfficeSuite UC® product has achieved HIPAA and HITECH compliance, and healthcare customers using OfficeSuite UC can leverage our compliance report, “Opinion on the Design & Operating Effectiveness of HIPAA and HITECH Controls over OfficeSuite Services”, as part of their overall compliance strategy. We also work closely with customers who request a Business Associate Agreement (BAA) to confirm compliance with the HIPAA requirements, and will agree to execute a BAA when appropriate.
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Environmental Compliance

Windstream is dedicated, and has strong desire, to be above the curve when it comes to environmental performance, not just minimally compliant.

Windstream maintains an inventory database of all assets (such as generators, fuel tanks, boilers, and batteries located at Windstream facilities) potentially subject to EPA regulation. This database also includes permits, inspections, and other pertinent environmental information for tracking and monitoring to ensure compliance. In addition, Windstream completes approximately 800 Emergency Planning and Community Right-to-Know Act (EPCRA) filings annually to ensure compliance of all reportable Windstream facilities with federal, state, and local regulations.

With respect to final storage tank compliance, Windstream maintains a robust inspection program for leak detection and walk-through inspections in compliance with federal guidelines. The leak detection procedures were implemented well in advance of the federal deadline. To provide enhanced protection, we are in the process of implementing a centralized monitoring system for all tanks and replacing aging underground storage tanks (UST) with more environmentally conscience solutions. Windstream maintains Spill Prevention, Control, and Countermeasure (SPCC) plans for all applicable sites that are renewed every 5-years.

As a result of Windstream’s preventive stance toward compliance, Windstream has not had any significant chemical spills and only minor environmental violations. As reflected by our actions and results, Windstream is dedicated and has a strong desire to be above the curve, not just minimally compliant for environmental related issues.
Environmental Stewardship & Sustainability

Windstream is committed to environmental stewardship. We believe that corporations have a significant role to play when it comes to reducing our society’s environmental impact to our planet. At Windstream, sustainability efforts are an obligation, not a choice. Our corporate sustainability program combines common sense strategies with more ambitious long-term initiatives to continuously become more resource-efficient. This approach allows us to make improvements while balancing the needs of our customers, employees and shareholders.

To hold ourselves accountable, set goals and measure our performance, we began voluntarily participating in CDP’s global environmental disclosure system in 2008. CDP, formerly known as the Carbon Disclosure Project, is a not-profit organization that operates a disclosure system for investors, companies, cities, states and regions to manage their risks and opportunities on climate change, water security and deforestation. CDP’s aim - and Windstream’s - is to make environmental reporting and risk management a business norm, and drive disclosure, insight and action towards a sustainable economy.
Emissions: Breakdown by Scope

Emissions Profile 2019 (CO2e metric tons)

- **Building & Other**: 10,794 | 3%
- **Vehicle Fuels**: 49,824 | 13%
- **Electricity**: 325,553 | 84%

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<tbody>
<tr>
<td>Scope 1</td>
<td>62,810</td>
<td>64,239</td>
<td>60,618</td>
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<tr>
<td>Scope 2</td>
<td>331,537</td>
<td>334,776</td>
<td>325,554</td>
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<tr>
<td>Total 1 &amp; 2</td>
<td>394,347</td>
<td>399,015</td>
<td>386,171</td>
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</tr>
<tr>
<td>Scope 3*</td>
<td>—</td>
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SCOPE OVERVIEW

1. All direct sources of emissions owned or controlled by Windstream, with the main categories being fuel to power our fleet, heat our buildings and power back-up generators.

2. Indirect emissions sources generated offsite, but purchased by Windstream. The main category is electricity to power our networks and data centers, plus a small amount of steam and heat purchased to heat our buildings.

3. Emissions from corporate business travel (air and rail) based on travel reservations.

Windstream is currently reviewing opportunities for independent external assurance of greenhouse gas (GHG) emissions and carbon intensity. Our 2019 results will be shared later in 2020.
Sustainability Efforts – Reduce, Reuse and Recycle

- **Business Travel**
  Windstream was an early provider and adopter of Unified Communications as a Service (UCaaS) solutions, which supports a geographically dispersed workforce with video and voice conferencing and chat functions. Leveraging our own OfficeSuite® UCaaS solution, we’ve reduced corporate business travel by 44% through 2019. We continue to quantify the effect of UCaaS on our environmental impact and are excited to share those results in future disclosures.
Real Estate

Increased adoption and use of UCaaS solutions internally has also allowed us to reduce our real estate footprint by increasing the number of our associates working remotely from home. This, coupled with a strategic rationalization initiative led by our Corporate Real Estate team, has allowed us to consolidate and reduce the number of facilities we lease and own by 32% since 2017, equal to a 36% reduction in rentable square feet (RSF) by the end of 2019.

Windstream IT and Network Real Estate continues to leverage new technologies with improved energy efficiencies and optimization to improve operations and footprint. Since 2018, we’ve consolidated network operations & Data Center locations by 59 facilities. The combined improvements equate to a target reduction of 17,610 Mwh of electricity, or 2.3% carbon emission reduction of our total Scope 2 into 2020.

The benefits of a smaller footprint include reductions in the miles driven, and gallons of fuel consumed by our employees who no longer commute to an office, elimination of the electricity needed to power and heat those buildings, and the water and chemicals consumed to clean and maintain the facilities and landscaping.

The combined efforts in Real Estate and Network is expected to reduce Scope 2 emissions by 3.5%, or 26,847 Mwh of electricity.

<table>
<thead>
<tr>
<th></th>
<th>Real Estate Facility Reductions</th>
<th>Network &amp; DCs Facilities Reductions</th>
<th>Estimated Electrical Reduction (Mwh)</th>
<th>Estimated Carbon Reduction (MT CO2)</th>
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<tbody>
<tr>
<td>2018</td>
<td>35</td>
<td>25</td>
<td>7,063</td>
<td>3,656</td>
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<td>2019</td>
<td>62</td>
<td>34</td>
<td>19,784</td>
<td>10,243</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>26,847</td>
<td>13,899</td>
</tr>
</tbody>
</table>
Fleet

Windstream has reduced the size of its fleet by 13% and replaced 54% of our vehicles since 2014 that are, on average, 10-15% more fuel efficient. We have also established a 2025 goal to improve fuel efficiency by 20%, to be accomplished by optimizing our assets for the roles they perform, including a continued shift from V8 to V6 engines for a portion of our fleet. As we replace aerial lifts, we are including systems that run solely on electric power or allow alternative powering sources so technicians can operate the vehicle without running the main engine, reducing idling.

Additionally, our Field Operations teams have invested in new smartphone application technologies that allow technicians to communicate directly with customers, improving installation windows and shortening routes with improved turn-by-turn directions. Windstream is also hyper-focused on reducing truck rolls by investing in new solutions that allow for better remote diagnostics and repairs, and on solutions that allow our customers to self-install next generation modems.
Paper & Printers
Across all of Windstream, we have reduced printed materials by more than 59% since 2016, and our goal is to achieve a 75% reduction by 2025. As we reduced and refreshed our printer counts, we did so with more energy efficient multi-function machines, and reset the printer defaults to double-sided and black-and-white print.

Next Generation Equipment & Solutions
Windstream has, and will continue to, explore and test new technologies that both improve our network performance and customer experience, AND reduce our environmental impact. Examples of our past and ongoing efforts include:

- A 40% reduction in energy consumption for our next generation core router solution
- Installation and testing of new products for HVAC systems to boost efficiency and reduce overall electricity consumption
- Conducting solar trials in Texas to power certain gear and elements of our network
- Examining the benefits of a shift to natural gas and propane fired generators versus diesel to reduce the stationary combustion component of our CDP disclosure
- Running low voltage for remote switch in lieu of having a powered meter at a central office/hut on the side of the road
- Creating business cases for the increased use of LED lighting in our warehouses and facilities

Paper Reduction Goal
75% by 2025
Refurbishing, Redeploying & Reusing Equipment & Materials to Avoid Waste

At Windstream, we believe that we have an obligation to avoid waste. Not only is this a good business practice that directly benefits our customers and stakeholders, but it also decreases our environmental impact by reducing landfill and carbon emissions. Here are some highlights from our recent efforts:

- **Modems**

  New supply chain software and processes have allowed Windstream to not only reduce overall modem shipments by 11% through tighter inventory management, but to repair and refurbish returned modems and redeploy them. This, coincidentally, has resulted in 11% of our 2019 modem deployments being “redeployments” using this refurbished equipment.
- **Network Equipment & Sparing Hardware**
  As Windstream continues to invest in network improvements, we are upgrading and/or decommissioning some of our locations. Project Harvest was launched to ensure we refurbished and redeployed equipment from these locations. Through 2019, we have successfully recovered over 45k units and redeployed or repurposed over 9,800 pieces of network equipment.

- **Pallets & Packing Materials**
  Despite a 20% rise in shipments in 2019 tied to increased investments in our Kinetic business unit around broadband, fixed-wireless, and fiber-to-the-premise solutions, our Warehouse teams have reduced our consumption of new materials by reusing those coming inbound to properly pack and ship outbound freight. Through 2019, new pallets are down 3%, product packaging is down 45% and shipping supplies are down 17% from the previous year.
Recycling What We Cannot Reuse Ourselves

When we cannot reuse, we recycle. Our objective is to divert customer modems, set-top boxes and other electronic devices from landfills, either to be used by someone else or recycled. We also seek to properly dispose of and recycle network equipment, batteries, poles, scrap metal and other internal supplies.

Windstream launched a Consolidated Waste Program with a third-party solutions provider in 2018 designed to help us improve our sustainability reporting in this area, improve our practices, take advantage of more recycling opportunities, and ensure we continue to meet or exceed regulatory mandates and requirements.

- Over the past three years, Windstream has avoided sending 39,000 e-waste assets to the landfill, equivalent to 276,000 pounds of equipment, 43% of which was reused and 56% recycled, avoiding 70,000 pounds of hazardous waste being send to landfills.

- We have been able to recycle more than 6,000 pieces of network gear and electronics through enhanced supply chain visibility and Project Harvest by selling this unneeded gear to other companies in the gray market.
In 2015, Windstream launched a dedicated program to help employees expand their understanding of sustainability and their responsibilities, and contribute and participate in our journey. The BGREEN program includes an online social area where employees can share suggestions, success stories, information on local sustainability events, generate and facilitate greater program awareness and interest, and volunteer to help.
Commitment to Our Employees

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Diversity & Inclusion

Windstream’s Statement on Diversity & Inclusion (D&I):
Connecting people in a world of infinite possibilities. At Windstream, we celebrate the authenticity and uniqueness of our people and ideas. The diverse voices of our employees fuel our innovation and the inclusive culture we are building empowers each one of us to create amazing customer experiences.

At Windstream, we are embracing the challenge to advance our diversity and inclusion. Windstream’s 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.

In March, Windstream proudly accepted the inaugural Olivia Farrell Gender Equity Leadership Award for our efforts to foster equality in the workplace. The award was presented to Windstream at the 31st annual Arkansas Business of the Year awards dinner.

Windstream has a Diversity and Inclusion Strategic Council led by CEO Tony Thomas and our Senior Leadership Team. The goal of the Strategic Council is to prioritize the company’s diversity and inclusion efforts, raise awareness throughout the organization and educate leaders and employees on its importance.

Windstream’s Diversity & Inclusion Operational Committee fulfills the goals and practices set forth by the Strategic Council. The Committee consists of a diverse group of 25 employees who possess a wide range of industry and leadership experience. Of the 25 Operational Committee members, 19 are female and nine are ethnically diverse.
The Operational Committee diligently works to reach the goals set forth by the Strategic Council. The Committee’s priorities for 2019 have included the reinvention of Windstream’s D&I Statement, a focused effort on increasing women in technician positions, the expansion of the Women of Windstream (WOW) program, targeted talent acquisition plans and training and awareness on unconscious biases. These activities are reported quarterly to the Governance Committee of the Board of Directors. Current activities include:

- Providing managers with a D&I Toolkit to help them speak to the company’s initiatives and actively support them;
- Increasing the number of women in customer service technician roles and providing them with mentorship to ensure success;
- Providing networking and leadership training opportunities for women across the company;
- Advertising Windstream careers in minority-focused print publications; and
- Ensuring that Windstream careers are posted on websites that target a diverse audience.

We expect our efforts to grow the current 17% diverse employee base by attracting a more diverse applicant pool and improving our female representation beyond the current 31%. In fact, in the second quarter of this year, hiring outpaced the employee base in both diversity (28%) and female hires (39%). We strive to continue this positive trajectory and are working hard to assure everyone feels included, valued, and respected at Windstream.
Employee Resource Groups

Employee Resource Groups Support Inclusion in the Workplace
Windstream currently has three internal Employee Resource Groups (ERGs). Our Veteran Employee Resource Group (VERG) assists veterans and veteran spouses, our Women of Windstream (WOW) group supports women in the workplace, and our WINPride group supports LGBTQ+ employees within Windstream.
Women of Windstream (WOW)

Mission: To connect and empower women by creating an inclusive environment for forming supportive relationships and realizing career enhancing experiences. *Windstream’s Women of Windstream (WOW) program is designed to recruit, retain, promote, develop and to support Windstream’s women both professionally and personally.*

WOW provides quarterly opportunities for networking, mentorship, professional and personal growth for women across the company. WOW also sponsors attendance to an Arkansas women’s leadership conference, which gives female employees the ability to further develop leadership skills. We host virtual and live events featuring female leaders within the company, including members of Windstream’s Board of Directors, that provide insights into work/life balance and career advice, among other topics. Our goal is to create a community where women can connect and learn from the experience of others.
WIN Pride
Mission: The Windstream Pride employee resource group seeks to increase LGBTQ+ cultural awareness to foster an environment of inclusion for all Windstream Employees. The ERG provides a venue for networking, socialization, professional development, and discussion of LGBTQ+ issues and concerns. WIN Pride encourages and assists Windstream in its efforts to achieve greater market share among the LGBTQ+ community.

Veteran Employee Resource Group (VERG)
Mission: Windstream’s Veteran Employee Resource Group (VERG) program is designed to support Windstream’s initiative regarding outreach, recruitment, and retention efforts in the military and veteran communities. Our mission is to be the pillar for our veterans, military spouses and active Guard & Reserve members; by providing networking opportunities, empowering information, and career development that equips each individual to excel in their new career paths.

A detailed onboarding program outlines what occurs within the first 30, 60, 90 days of employment so employees know what to expect as a Windstream new hire. The VERG provides a road map to success agreed to by both the recently hired veteran employee and their first line supervisor, with touch points in place to monitor the progress of the new hire, and a mentor is assigned to help guide them through the integration process. The VERG also hosts orientation for all newly hired veterans and veteran spouses. The VERG works to ensure that every new veteran and veteran spouse feels welcomed and set up for success at Windstream.
Veteran Employees and Vendors

At Windstream, we walk the talk when it comes to hiring veterans, veteran spouses and veteran-owned businesses, and Windstream has been consistently recognized for our veteran friendly approach. Here are some of our recent accolades:

**2020 Military Friendly Employer Gold Certification** – Windstream was recognized as #6 in the top 10 employers for our commitment to veterans and members of the armed forces through recruitment and support programs. In 2019 we received Gold level recognition as #8 in the top 10 employers. In 2018 we received Gold level recognition as #2 in the top 10 employers.

**2020 Military Friendly Spouse Employer** – Windstream was ranked #3 as a Military Friendly Spouse Employer for our commitment to military spouses and promoting workforce development policies that acknowledge the unique challenges of military life and skills learned through those challenges.

**2019 Best for Vets, US Veterans Magazine** – Windstream was named one of the Top Veteran-Friendly Companies by U.S. Veteran’s Magazine for the third straight year for our efforts in hiring and retaining veterans.

U.S. Veterans Magazine polled hundreds of Fortune 1000 companies for this year’s Best of the Best evaluations. The annual review is an evaluation of the nation’s employers, initiatives, government agencies and educational institutions. These non-biased studies are valuable resources for jobseekers, business owners, students, consumers, senior management, business associations, employment agencies and consumer groups.
2019 DOL Hire Vets Medallion Platinum Award – Windstream won the Platinum award in 2019 and Gold for 2018. In 2019, Windstream ranks among the 239 award recipients ranging from small businesses and community-based non-profits to leading Fortune 500 companies from 42 states, the District of Columbia, and Puerto Rico. Recipients demonstrated a commitment to veteran hiring and retention, and provided veteran-specific resources, leadership programming, dedicated human resources, and compensation and tuition assistance programs, according to the Department of Labor. The HIRE Vets Medallion Program is the only federal-level award that recognizes job creators who successfully recruit, hire, and retain America’s veterans.

2019 Military Times Best for Vets – Windstream was recognized among the Best for Vets Employers, #15, based on recruiting strategies and hiring of military personnel, veterans, and their families, as well as company culture and policies supporting valued veterans. In 2018 Windstream was #12 and in 2017 Windstream was #14.

2020 Military Friendly® Supplier Diversity Award – Windstream was among 91 companies identified that demonstrate their commitment to the veteran community by the extent to which they include veteran owned businesses in their supplier diversity programs. These corporations are eager to do business with entrepreneurs because it is good for their own bottom line.

The Military Friendly Supplier Diversity Program list is created each year based on extensive research using public data sources for more than 8,800 employers nationwide, and responses to the proprietary, data-driven Military Friendly® Companies survey from participating companies.
The survey questions, methodology, criteria, and weighting were developed with the assistance of an independent research firm. Ernst & Young, a global leader in assurance, tax, transaction, and advisory services, independently evaluated the scoring methodology used for the Military Friendly Supplier Diversity Program list using the criteria set forth by VIQTORY. The services performed by Ernst & Young are limited to advisory procedures and do not provide assurance over the scoring methodology.

**2020 Military Friendly® Company** – Windstream was selected for the first time as a 2020 Military Friendly® Company List by VIQTORY. Companies on the list are considered by VIQTORY to provide the best opportunities for veterans and military spouses. The Military Friendly Company list is based on extensive research using public data sources and responses to the proprietary, data-driven Military Friendly Employers, Spouse, Supplier Diversity and Brands survey from all participating companies.

This year, Windstream was included in three of the four Military Friendly lists: Military Friendly Employer (#6), Military Friendly Spouse Employer (#3), and Military Friendly Supplier Diversity Program. As a result, Windstream qualified for the 2020 Military Friendly Company list.
Occupational Health & Safety

Occupational Health and Safety
Windstream provides a safe, healthy, and alcohol- and drug-free work place for its employees and for visitors to Windstream's facilities. We are committed to complying with all applicable environmental laws and regulations. Employees are trained to identify and immediately report unsafe or hazardous conditions or suspected violations of the law, and are expected to follow all applicable safety, health, and environmental laws, as well as any related Windstream policies.

Environmental, Health & Safety (EH&S) Committees in our local offices play an important role in keeping our workplace safe. These Committees provide opportunities for employees and management to provide feedback on local safety related problems and weigh in on resolution of those problems. Each Committee selects a Safety Representative who meets on a monthly basis with the Corporate EH&S team to provide updates on items such as accidents and injuries in the local office, safety awareness, training initiatives, and equipment issues.

Additionally, each facility participates in the development and implementation of their own sites’ specific emergency procedures based on guidelines from the corporate Emergency Action Plan (EAP). Facility managers and employees adopt steps to ensure safe evacuation of employees and visitors in the event of actual emergencies. Responsible parties are identified, based on facility needs and periodic evacuation drills are held to ensure understanding of individual roles and compliance with conforming standards.
Safety Training and Awareness

Windstream’s EH&S and Risk Management teams continually provide guidance on safety policies and procedures. Our overall plan of action is to continuously improve and implement change that will result in an enhanced safety environment and reduce incidents. The goal is to provide effective safety training courses to ensure employees are protected from injuries and prevent incidents. To achieve this goal, Windstream employees receive over 45,000 hours of safety and environmental related training annually. Windstream is committed to the safety of our employees and we expect our employees to share in this commitment.

“In 2018-2019, we implemented a program to identify and reduce ladder weight. The EH&S team worked diligently to identify industry ladders that would perform the desired function at reduced weight. By providing lower weighted ladders to our employees, we expect to improve their day-to-day work environment and reduce the frequency and severity of ladder related injuries.”
Health & Wellness

In addition to providing a comprehensive benefits package to employees that includes medical, dental, vision, Health Savings and Flexible Spending accounts, life insurance, disability benefits, maternity and paternity leave benefits, and a 401(k) retirement plan with company matching contributions, Windstream supports the overall health and well-being of our employees with a full menu of activities and resources to assist them with maintaining and improving their overall health.
Employees can take advantage of the following ongoing wellness programs:

**Tobacco Cessation** The Magellan Clickotine program offers app and coaching based tobacco cessation support. Tobacco cessation supplements are also included in the medical plan. Visit MagellanAscend.com for more information and to register.

**Windstream’s Employee Assistance Program (EAP)** Windstream offers an Employee Assistance Program through Magellan. From online information to confidential consultations with licensed behavioral health professionals, employees and their families have access to a wealth of practical, solution-focused resources to help them reduce stress, strengthen relationships, increase productivity and improve quality of life.

**Progyny** Progyny specializes in offering families a variety of options for infertility treatment – with proven success. With over 450 clinics, Progyny offers a wide network of specialists.

**Weight Watchers** Windstream partners with Weight Watchers® to change employees’ relationship with food, for good. Try their proven weight-loss approach and powerful group support at a 50% discount. Windstream will pay half the membership cost of online access or online plus in-person meetings (meetings available to those living in non-franchise locations). Weight Watchers is a validated program and approach that supports millions of people in their weight management goals.

**Livongo** Livongo offers assistance for members seeking support for diabetes, hypertension and weight management. These programs are available at no cost to medically enrolled employees and spouses who meet clinical requirements. Participants receive the Latest Technology to Simplify Living with Diabetes including the Livongo connected glucometer blood pressure cuff, and scale which automatically upload readings, making log books and sync cables a thing of the past. Livongo enrollees also receive real-time support from coaches that includes personalized support provided from the Livongo mobile app, secure website, and certified diabetes educators. Participants also benefit from unlimited test strips at no cost that are shipped directly to the employee’s home with the click of a button.
Governance

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Corporate Ethics and Compliance

Integrity is one of our most valuable assets. Windstream is committed to conducting business in a manner that is ethical and promotes the best interests of its stakeholders, employees, and customers and complying with all applicable laws and regulations. Windstream expects every employee and member of the Board of Directors to be ethical and honest, comply with the law, and avoid any appearance of impropriety or conflict of interest. Understanding, embracing and performing our individual jobs in compliance with laws, regulations and our policies is not only the right thing to do, but it also has a real impact on our financial performance and the character of our organization.

Our Working with Integrity Guidelines (the “Guidelines”) are the foundation of our Ethics and Compliance Program, and provide a basic road map to assist employees and board members in identifying activities and behaviors that are appropriate in important areas of business conduct. Windstream expects employees, and employees have an obligation, to uphold and carry out our commitment to lawful and ethical business conduct at all times. The Guidelines build on our cultural beliefs by outlining expected ethical behaviors for our employees, board members, and other company representatives. Annual Working with Integrity training required of all employees reinforces the principals outlined in these Guidelines.
Other policies supplement the Guidelines. Every Windstream employee (as well as third-party consultants, agents, independent contractors, subcontractors, and partners) who serve government clients are responsible for understanding the legal requirements and restrictions that apply to their work, and must strictly adhere to the principles contained within our **Code of Business Ethics and Conduct in Governmental Contracting**. Additionally, Windstream’s **Supplier Code of Ethics** provides basic guidelines to assist suppliers in meeting our expectations that suppliers be ethical and honest, comply with all laws and regulations, and avoid the appearance of impropriety and conflicts of interest.

Windstream’s Chief Compliance Officer leads our Ethics and Compliance function and reports directly to the Audit Committee of the Board of Directors, with administrative reporting to the company’s Chief Financial Officer. The Audit Committee has risk oversight responsibility for ethics and compliance for the company.

One of the most important responsibilities Windstream employees have is the obligation to report possible workplace violations of law or the guidelines. Windstream encourages employees to fulfill this responsibility and to seek advice when in doubt about the best course of action in a particular situation. We offer several alternatives for obtaining compliance advice and reporting possible violations of applicable law or these guidelines, including the *Working with Integrity* helpline and website, which are staffed by an independent third party twenty-four hours per day, seven days a week. Employees may report violations anonymously and Windstream prohibits any employee from taking retaliatory action against anyone for making a good faith report or assisting in an investigation of a possible violation.

Information reported is promptly transmitted to Windstream and investigated. Windstream maintains a case management system, and when a matter is reported to the helpline or website, it is assigned a unique tracking number that enables the individual to receive updates on the complaint or provide additional information.

All ethics investigations are managed by the Ethics and Compliance function and examination results are reported on a quarterly basis to the Audit Committee, as well as the company’s Compliance Committee, which is comprised of the Chief Compliance Officer, Chief Financial Officer, General Counsel and Chief Human Resources Officer.

Human Rights

A commitment to human rights can be found throughout the Guidelines, as well as the Supplier Code of Ethics. The Guidelines address topics such as customer and employee privacy, diversity and inclusion, health and safety and harassment in the workplace. Further, we expect our suppliers to treat their employees with respect and dignity and not to use corporal punishment, threats of violence, physical abuse or other forms of physical coercion, harassment or intimidation. Suppliers’ employment, wage and benefits practices should not be based upon grounds of sex, race, age, color, religion, national origin, marital status, veteran status or disability, in accordance with state and federal law. Windstream also expects suppliers to respect the legal rights of their employees to join or not to join worker organizations, including trade unions or similar external representative organizations. Suppliers must implement hiring practices to accurately verify the age of all workers and workers’ legal right to work prior to employment.
Anti-Bribery and Fair Competition

Windstream prohibits any offer, payment, promise, or gift that is intended or appears to influence any person or entity to award business opportunities to Windstream or to make a business decision in Windstream’s favor. In accordance with the Guidelines and Supplier Code of Ethics, employees and suppliers are required to comply with all applicable anti-bribery and anticorruption laws of the United States, including the Foreign Corrupt Practices Act, and countries in which operations are being conducted. Additionally, as a government contractor, it is important that we conduct business with government entities in compliance with applicable laws and regulations; accordingly, Windstream prohibits employees from giving anything of value to government employees and officials for any reason.
Windstream encourages employees to participate in the political process by voting or otherwise being involved in political activity. Windstream maintains a political action committee, known as WINPAC, for the purpose of supporting political candidates and issues that support and advance Windstream’s business interests, and eligible employees have the opportunity to make voluntary contributions to WINPAC.

Windstream is committed to transparency in its political activity. Our Political Spending Policy is available on the Investor Relations page of our corporate website, along with an accounting of Windstream’s efforts, and is updated annually. Additionally, we comply with federal and state regulatory reporting requirements, including required filings made with the Federal Election Commission and analogous state entities. This information is supplemented by disclosures on the Investor Relations page, offering stakeholders and the public a comprehensive view of Windstream’s political activity.
Supply Chain

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Supplier Diversity

At Windstream, we value the diversity of our customers, employees and suppliers who are key partners in our success. Windstream is committed to the inclusion of small, minority, veteran, women and LGBTQ-owned businesses in our supply base. We believe that diverse and small businesses contribute capabilities to Windstream that make us a leader in the telecommunications industry, and we believe our supply base should reflect the communities and customers we serve.

Our Supplier Diversity Program promotes the development of small, minority, veteran, service disabled veteran, HUBZone, 8(a), LGBTQ and women-owned businesses, with the goal of empowering these organizations to be better able to compete with other established companies for supplier relationship opportunities with Windstream. While a supplier’s ultimate ability to deliver value for our customers is paramount, certified diverse vendor status is identified during the RFP process and is considered in our supplier selection. Our goal to ensure a level playing field for all vendors.

As a federal contractor, Windstream is required to report spend with diverse suppliers on an annual basis to the General Services Administration. Over the past three years, Windstream has reported a total spend of more than $400 million with 500 diverse suppliers. We are proud of these efforts and continue to seek out more opportunities to work with diverse suppliers.
Responsible Minerals Sourcing

Any connection between the materials used in Windstream’s products and armed violence or human rights abuses is unacceptable, and we have an internal team that oversees the design, development and implementation of our conflict minerals compliance program. Every year, Windstream files its Form SD and Conflict Minerals Report with the Securities and Exchange Commission disclosing our due diligence efforts and results; see our current SEC Conflict Minerals Report.

Windstream also expects its suppliers to take steps to ensure that their products do not include materials that either directly or indirectly benefit armed groups in the Democratic Republic of the Congo (or in any neighboring country). As part of their master purchasing agreements with Windstream, 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 not be in 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.
Supplier Sustainability Efforts

It is Windstream’s policy to work with supply partners that share our commitment to sustainable practices. We expect our suppliers to comply with applicable environmental laws and have their own sustainability programs in order to support our goals. This expectation is a key evaluation criteria during our supplier selection process and is incorporated into every supplier contract and purchase order. It is also a crucial component of our Supplier Code of Conduct.