



Supplier Code of Conduct

Policy Owner Tom Dailey (Chief Compliance Officer)

Effective Date October 3, 2022

1 POLICY OUTLINE

This policy covers:

- I. Brightspeed's Commitment to Integrity
- II. Rules For Conducting Business
 - A. Accuracy of Business Records
 - B. Anti-corruption
 - C. Exchange of Business Courtesies
 - D. Conflicts of Interest
 - E. Conflict Minerals
 - F. Fair Competition
 - G. Interaction with Regulatory and other Government Agencies
 - H. Communication with the Media
- III. Brightspeed's Assets and Information
 - A. Company Assets and Resources
 - B. Premises Security Rules
 - C. Protecting Confidential Information
 - D. Information Security
 - E. Insider Trading
 - F. Intellectual Property
- IV. Employment Practices and Human Rights
 - A. Diversity and Inclusion; Non-Discrimination
 - B. Forced Labor and Modern Slavery
 - C. Child Labor
 - D. Freedom of Association and Collective Bargaining
 - E. Wages and Compensation
 - F. Immigration
 - G. Independence of Supplier Personnel
- V. Safety and Health
 - A. Emergency Preparedness
 - B. Reporting of Injuries and Hazardous Conditions

- C. Alcohol and Drug Use
- D. Firearms and Other Weapons
- VI. Environment and Sustainability
- VII. Reporting Concerns and Seeking Guidance

2 SCOPE

This Supplier Code of Conduct (“Supplier Code”) applies to suppliers of Brightspeed and sets the expectations for all agents, consultants, contractors, distributors, manufacturers, suppliers, and other business partners, as well as their respective employees, agents, and representatives (collectively “Suppliers”) with whom we do business to embrace and share our commitment to integrity and compliance with the law, and to follow the principles set forth within this Supplier Code.

While Brightspeed recognizes the different legal and cultural environments in which its Suppliers operate throughout the world, our Suppliers must comply with the fundamental principles described in this Supplier Code, to always act with integrity, and to take reasonable steps to ensure compliance with applicable laws and regulations.

This Supplier Code contains general rules applicable to all Brightspeed Suppliers. Particular supplier contracts may have more specific provisions addressing some of these same issues. Nothing in this Supplier Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Supplier Code and any applicable contractual provision, the provision will control unless inconsistent with applicable law.

Suppliers should take appropriate steps to communicate and ensure this Supplier Code is understood by all of their employees, agents, subcontractors, and representatives doing business with or on behalf of Brightspeed.

3 TOPICS

3.1 Rules for Conducting Business

3.1.1 Accuracy of Business Records

Suppliers must record and report information accurately and honestly. All financial books, records and accounts relating to Brightspeed business must accurately reflect transactions, payments, and events, and must conform to generally accepted accounting principles, applicable internal controls or policies, and applicable laws. All business records must be accurate, complete, filed in a timely fashion, and must conform to all other requirements as defined by written contract. Accordingly, Suppliers will provide Brightspeed with accurate and complete billing information concerning all transactions with the Company.

3.1.2 Anti-Corruption

Brightspeed prohibits bribery, in all aspects of our business, in both the public and private sectors.

Suppliers acting on behalf of Brightspeed must comply with all applicable anti-corruption laws .

Brightspeed Suppliers are prohibited from offering or providing bribes to government officials or representatives of commercial or private entities, whether in cash or any other form and whether paid directly or indirectly through an intermediary. Suppliers are also prohibited from accepting bribes.

Government Officials and Public Employees

Suppliers must not offer anything of value or make any improper payments to a government official for the purpose of obtaining or retaining business or to otherwise obtain an unfair advantage on behalf of Brightspeed. When companies are partially or wholly owned by a government entity, any representative of that company is considered a “government official.”

When representing or performing work for Brightspeed, our company prohibits Suppliers from

- Providing any business courtesy or anything of value to any employee, official, agent or representative of any government, wherever located, without written pre-approval from Brightspeed’s Ethics and Compliance Office.
- Making facilitation payments while doing business with or on behalf of Brightspeed.

3.1.3 Exchange of Business Courtesies

Brightspeed expects its Suppliers to follow all applicable laws and Brightspeed policies regarding the exchange of business courtesies, such as meals, gifts, or entertainment, when working with or representing Brightspeed. Suppliers must never offer any courtesies with the intent to improperly influence any person’s business judgment or that might create the appearance of undue influence. Suppliers should keep the following in mind:

- Ordinary business courtesies that are reasonable in value, infrequent and related to a legitimate business purpose are generally acceptable, but Suppliers must avoid offering Brightspeed employees travel, frequent meals, or expensive gifts or entertainment.
- Gifts of cash or cash equivalents, such as gift cards, are never allowed, whether to a Brightspeed employee or to a third-party recipient on behalf of Brightspeed.
- Suppliers should never offer a business courtesy to a Brightspeed employee involved in making or influencing a purchasing decision, such as a Request for Proposal or Request for Information.

3.1.4 Conflicts of Interest

Brightspeed awards business on the basis of several objective factors, including but not limited to, product or service needs, cost, project management resources, experience, and performance record.

Suppliers must disclose to the Brightspeed Ethics and Compliance Office any known family or close personal relationships with Brightspeed employees who have any influence over or involvement in Supplier's business dealings with Brightspeed or may otherwise create a conflict of interest by submitting conflict of interest disclosure forms.

Suppliers must not have any financial, employment, contracting, consulting or other business relationship with a Brightspeed employee, unless disclosed to and pre-approved in writing by the Brightspeed Corporate Ethics and Compliance Office.

3.1.5 Conflict Minerals

Suppliers must take reasonable steps to ensure that any tantalum, tin, tungsten, and gold in products they manufacture, or source do not directly or indirectly benefit armed groups that commit human rights abuses in or near the Democratic Republic of Congo.

3.1.6 Fair Competition

Suppliers and their employees and representatives who are engaged in or seek to obtain Brightspeed business must comply with all applicable laws and regulations regarding fair competition and antitrust, including laws applicable to marketing and pricing.

Suppliers must not misrepresent the products and services of Brightspeed or its competitors. They must also avoid agreements – formal or otherwise – with their competitors to restrain trade, such as agreements to fix prices, rig bids, divide territories or markets or otherwise limit the sale of our services or products.

3.1.7 Interaction with Regulatory and other Government Agencies

Brightspeed expects Suppliers to be truthful in all communications with regulatory agency representatives and government officials relating to Brightspeed business. Suppliers must comply with all applicable laws and regulations, including but not limited to, laws and regulations regarding government ethics, contact with or employment of current or former government officials, lobbying, and the handling of confidential, classified and other sensitive government information. Suppliers must provide services and/or products that meet or exceed applicable government standards, including environmental, quality and safety standards.

Suppliers are prohibited from (1) contacting legislators, federal, state, national or other regulatory officials or their staffs; or (2) making political contributions on Brightspeed's behalf, without written pre-approval from Brightspeed's Head of Public Policy and Government Affairs.

3.1.8 Communication with the Media

Brightspeed has designated spokespersons authorized to communicate with the media and the investment community on behalf of Brightspeed. Suppliers must obtain express written pre-approval from Brightspeed's Chief Communications Officer prior to (1) any communication with the media on behalf of or regarding Brightspeed, and/or (2) using Brightspeed's name and/or logo in any marketing or other public materials.

3.2 Brightspeed's Assets and Information

3.2.1 Company Assets and Resources

Brightspeed's property and resources are highly valuable. Suppliers are responsible for safeguarding Brightspeed property in their possession and control, and for using such resources only for legitimate business purposes consistent with the interests of Brightspeed.

As a Brightspeed Supplier, you must:

- Acquire assets for Brightspeed in compliance with applicable Brightspeed policies and procedures, avoiding any real or apparent conflict of interest;
- Use Brightspeed assets only for legal and ethical activities and only for the purpose intended by the Company (personal use of Company assets is prohibited);
- Protect Brightspeed assets from damage, waste, loss, misuse, or theft, and only use Brightspeed assets after appropriate training; and
- Not use the Brightspeed name or trademarks in publicity, advertising, or for any other purpose without prior written approval from Brightspeed's Chief Communications Officer.

When using Brightspeed property or resources, including computers, internet, e-mail, or voicemail, Suppliers and Supplier representatives should not expect that the information they access, send, or receive is private. Where permitted by and consistent with the rules of applicable law, Brightspeed may monitor use of its resources and block or filter information to protect its resources, employees or customers, and confidential information; to improve efficiency, collaboration, and similar business purposes; and to comply with Brightspeed Ethics and Compliance policies.

3.2.2 Brightspeed Premises Security Rules

If Supplier performs work or requires access to Brightspeed premises, Supplier representatives must comply with all required security measures and requests, including the following:

- Accessing only authorized areas
- Allowing searches of vehicles, bags, briefcases, and purses taken onto Company premises
- Complying with applicable metal detection screening and visitor log rules
- Presenting and wearing Brightspeed or government-issued identification photo/access card on or above the waist and visible at all times while on the property

- Promptly reporting known (1) security violations; (2) lost or missing access cards or keys (3) or any case of property loss or damage
- Understanding all applicable Brightspeed security guidelines and procedures

3.2.3 Protecting Confidential Information

Suppliers must protect Brightspeed confidential information in accordance with applicable law, including information about Brightspeed customers, employees, operations, finances, and business plans, and information stored or processed by its customers using its services (“Brightspeed Confidential Information”). Suppliers who have been given access to confidential information as part of the business relationship must not share this information and must adhere to all contractual provisions governing its use and protection.

Suppliers must take measures to protect against unauthorized collection, use, access to, disclosure, damage to or loss of Brightspeed’s Confidential Information and must ensure that it is stored and transmitted in electronic format securely. Suppliers must only use Brightspeed’s Confidential Information for the purposes provided for in the Supplier contract and must not make any independent use of it, commercial or otherwise. Brightspeed Confidential Information can be shared within a Supplier’s company only on a need-to-know basis and only if sufficient safeguards are taken to ensure that the information is treated appropriately, in accordance with the terms of the Supplier contract.

3.2.4 Information Security

Brightspeed administers an information security program, supports practices that meet recognized industry standards for information protection and expects Suppliers to do the same. Suppliers with access to Brightspeed Confidential Information must comply with all laws and the highest industry standards applicable to such data.

Suppliers that store and/or process Brightspeed customer payment card data must protect that payment card information per the Payment Card Industry Data Security Standard published by PCI Security Standards Council, Inc. Suppliers that store, transmit or process Brightspeed customer financial account information (e.g., bank account or credit union account information) must protect that information in accordance with the National Automated Clearing House Association’s NACHA/ACH Rules and Operating Guidelines and other applicable laws.

No later than 24 hours after discovery, Suppliers are required to promptly report any known or suspected unauthorized access, use, misuse, disclosure, destruction, theft, vandalism, modification, loss, or transfer of Brightspeed Confidential Information to the Ethics and Compliance Hotline. Suppliers must also agree to provide Brightspeed with the ability to review Supplier information security practices upon reasonable request.

3.2.5 Intellectual Property

Intellectual property (“IP”) is an important asset to Brightspeed that is essential to our

competitive advantage and must be protected. Examples of IP include the Company's copyrights, inventions, patents, plans, research, software, strategies, trade names, trademarks, and trade secrets.

Suppliers must respect and must never infringe upon the IP rights of Brightspeed or other companies and must abide by the specific IP-related terms and conditions in the Supplier contract with Brightspeed.

3.3 Employment Practices and Human Rights

Suppliers should share in our commitment to good citizenship and promoting values that foster human rights. Suppliers must uphold the human rights of workers by treating them with dignity and respect. Accordingly, all Suppliers are expected to adhere to the following standards.

3.3.1 Diversity and Inclusion; Non-Discrimination

At Brightspeed, our business culture and company policies promote mutual respect, acceptance, and cooperation. Brightspeed commits to fostering a diverse and inclusive work environment and recognize that our employees' varying backgrounds and cultures are among our greatest assets. Brightspeed expects that our Suppliers are also committed to diversity and inclusion and will not tolerate any conduct by Supplier employees or representatives that is inconsistent with a respectful and inclusive workplace while working on behalf of Brightspeed.

Brightspeed does not tolerate illegal discrimination, harassment, or retaliation in any form, and expects Suppliers to share this commitment.

Suppliers must provide equal employment opportunities to all potential workers, applicants, and employees and must maintain a workplace free from abuse, illegal discrimination, harassment, and retaliation. Suppliers must not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity or expression, gender characteristic or information, sexual orientation, ancestry, caste, citizenship, national origin, religion, covered veteran status, disability, creed, marital status, family status, pregnancy, or other legally protected status.

3.3.2 Forced Labor and Modern Slavery

Suppliers will not permit any form of forced or involuntary labor, whether bonded, imprisoned, or indentured, including debt servitude or any form of human trafficking. All work must be voluntary, and workers must be free to terminate their employment at any time.

3.3.3 Child Labor

Brightspeed does not tolerate any form of child labor in its operations or within our supply chain. Brightspeed expects Suppliers to prohibit and prevent child labor in their operations and encourages Suppliers to participate in efforts aimed at combating and eliminating these practices. Suppliers must not employ individuals under the legal minimum working age of the jurisdiction and/or country in which Supplier is operating.

3.3.4 Freedom of Association and Collective Bargaining

Brightspeed respects the rights of employees to freedom of association and collective bargaining. Suppliers must respect employee rights to form, join, or not join trade unions or organizations of their own choosing and to bargain collectively in accordance with the laws of their jurisdiction without fear of discrimination, retaliation, harassment, or intimidation.

3.3.5 Wages and Compensation

Suppliers will comply with all applicable state, federal, and international labor, wage, and work hour laws and regulations; will pay legally mandated wages and benefits; and will comply with applicable laws regarding wage deductions. Suppliers must pay their workers as required by law and contract.

3.3.6 Immigration

Suppliers must ensure that all Supplier employees who work in the United States and other regions are authorized to do so. Suppliers must also ensure compliance with all applicable immigration laws and must obtain all necessary documentation, including I-9s, visas, and/or work authorizations.

3.3.7 Independence of Supplier Personnel

Suppliers must ensure that their personnel do not represent themselves as employees of Brightspeed and do not engage in unauthorized acts, such as attempting to bind Brightspeed to obligations or attempting to speak on behalf of Brightspeed.

3.4 Safety and Health

Suppliers must maintain a healthy and safe working environment for all Supplier employees and representatives and must adhere to all applicable safety and health laws, regulations, and safety practices. Suppliers are required to protect all employees and representatives with appropriate personal protective equipment. Suppliers must also ensure that employees and representatives receive all necessary safety and health training and must enforce both Supplier's and Brightspeed's safety policies and procedures while working on Brightspeed's behalf or while on Brightspeed's premises.

Suppliers must comply with all applicable environmental, health and safety laws and regulations, as well as Brightspeed's site safety rules.

3.4.1 Emergency Preparedness

Suppliers will maintain an Emergency Preparedness plan and will educate workers on effective implementation of emergency response procedures and recovery plans.

3.4.2 Reporting of Injuries and Hazardous Conditions

Supplier employees or representatives working on behalf of Brightspeed or on

Brightspeed premises must promptly report all injuries and hazardous conditions to Brightspeed at [Placeholder for reporting mechanism].

3.4.3 Alcohol and Drug Use

Drugs and alcohol in the workplace affect everyone's safety – negatively affecting job performance and causing potentially severe safety hazards. Suppliers may not possess, distribute or be under the influence of illicit drugs while on Brightspeed premises or when conducting business on behalf of Brightspeed. In addition, Suppliers are prohibited from abusing or misusing prescription medication and possessing or being under the influence of alcohol (other than reasonable consumption of alcohol at an approved business-related social event) while on Brightspeed premises, or when conducting business on behalf of Brightspeed.

Suppliers must follow applicable laws, including Drug Free Workplace, contract, and related Brightspeed customer rules.

3.5 Environment and Sustainability

Brightspeed is committed to ensuring that our environmental compliance and sustainability efforts support our business, employees, customers, and shareholders. Brightspeed expects Suppliers to demonstrate the same commitment by complying with all environmental laws and requirements, including those relating to: (i) the management and disposal of hazardous materials; (ii) contaminants in air, soil or water; (iii) the protection of natural resources, wildlife and wetlands; and (iv) recycling. Suppliers are encouraged to implement environmental management systems and focus on continuously monitoring and improving their performance.

Suppliers must use reasonable efforts to employ environmentally preferable and energy-efficient services and must work with their own suppliers to assess and address environmental and sustainability issues within their supply chains.

3.6 Reporting and Guidelines

Brightspeed Suppliers are encouraged to report potential or actual violations of this Supplier Code and other legal or ethical concerns. For assistance in resolving a business practice concern, please work with your primary Brightspeed contact. To report a violation of the Supplier Code, an ethical concern or a legal violation involving Brightspeed, contact the Brightspeed Ethics and Compliance hotline.

Brightspeed does not tolerate any retribution or retaliation taken against any individual who, in good faith, seeks advice or reports a possible violation of this Supplier Code.

4 RESPONSIBILITIES

- All Supplier employees are responsible for understanding and adhering to this policy.
- Supplier leaders are responsible for enforcing this policy within their team.

5 RELATED DOCUMENTS

- [Insert Related Documents]

6 POLICY REVISIONS

Brightspeed may change, revoke, or supplement this policy at any time without notice, subject to any applicable laws and Collective Bargaining Agreements.

Policy Owner: Tom Dailey (Chief Compliance Officer)

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