

# 2024 Consolidated Communications Environmental, Social and Governance Report





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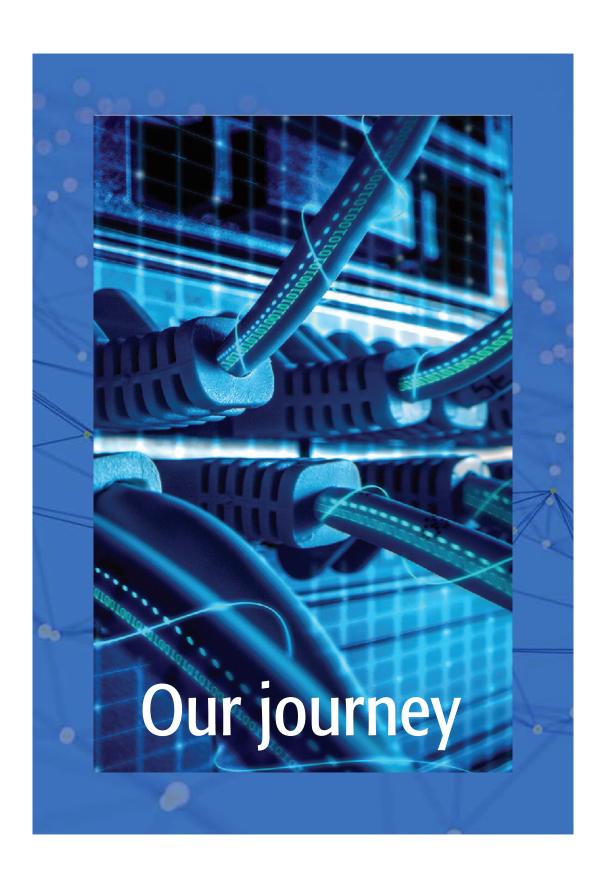
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# Message from our CEO

As I reflect on our incredible journey, I am filled with immense pride and gratitude. From our humble beginnings connecting people in Mattoon, Ill., we have transformed into a leading fiber broadband provider who has transformed how people work and live. This remarkable evolution is a testament to our unwavering commitment to innovation, excellence and, most importantly, to our valued customers and dedicated team members.

2024 marked a significant milestone in our history as we achieved more than 50% fiber passings and returned to growth, ending the year as a newly private company, following shareholders' approval of Searchlight's acquisition. Our strong position enables us to accelerate our growth and expansion of our fiber broadband services across our service area. Our vision is clear: to be America's favorite fiber provider. We'll do this by bringing the best technology and fastest-speed internet to rural America, ensuring that everyone has access to the life-changing opportunities fiber offers.

I am incredibly excited about our future. We are on the cusp of a new era, one where our advanced fiber network will empower communities, drive economic growth and enhance the quality of life for countless individuals. Our dedicated team is more energized than ever, ready to embrace the challenges and opportunities that lie ahead.

Thank you for being a part of our journey. Together, we will create a brighter, more connected future for all.

With heartfelt gratitude and boundless enthusiasm,



Bob Udell
President & CEO

# **About us**

### **Becoming America's favorite Fiber provider**

In the past four years, we have successfully grown our fiber network from 10% to more than 50% fiber for our serviceable locations. This monumental effort is changing lives throughout Northern New England and our expanded service area. In our continued work to expand future-proof fiber connectivity to more rural communities, we are aiming higher than just connecting people. We are committed to delighting our customers and our communities, both with the phenomenal difference fiber internet makes and with our exceptional customer service. Follow along on our journey to become... America's Favorite Fiber Provider.



## One team, one purpose.

We elevate each other, are empowered by purpose, and act with integrity.



## Continuously improve, explore new ideas.

We strive to be better tomorrow than today.



## Bring our best, driven to win.

We are committed to providing exceptional experiences.

#### **Customer-first focus**

Our three customer channels have distinct needs and we're here with the right solutions to drive residents, businesses and wholesale carriers forward to a future of greater connectivity and opportunities. Our customers come first and we're working 24/7 to enhance how we serve each customer group.





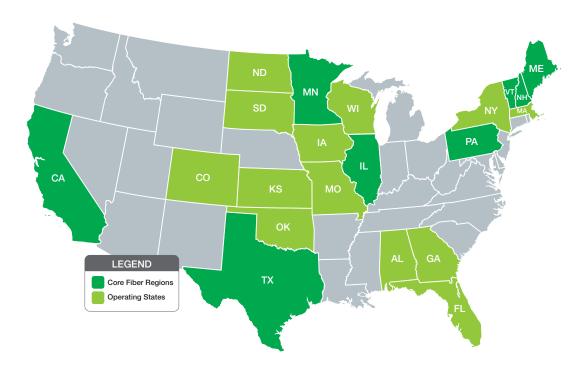
**Business** 



Wholesale Carrier

### **Our Fiber expansion**

We are in our strongest position yet to expand our fiber network and make a meaningful difference for the residents, businesses and communities we serve. In just a few years, we've grown from providing fiber to only 10% of our service area in 2020 to now offering Gig-capable fiber to over 50% of our serviceable locations. Every day, we continue to accelerate our fiber buildout, working toward our goal of reaching 80% fiber coverage across our entire footprint.



We reached 1.4 million fiber passings in 2024, having invested approximately \$453 million in capital expenditures, including substantial fiber broadband infrastructure investment.



# Our responsibility

As we build the broadband infrastructure that will empower our communities for generations, we embrace our responsibility to grow and operate in ways that uplift our planet and each other. We are dedicated to creating a sustainable future.





# Our environmental commitment

We are committed to preserving and sustaining the natural environment and we know our actions have direct and indirect impacts locally, regionally and globally. Read on to learn more about our work to minimize our environmental footprint.





# **Our operations**

### **Transforming our network**

As we step into the future as a fiber-first company, we are changing the future of connectivity for the communities we serve and delivering tremendous benefits to our customers. Beyond these enhanced services, we're also taking advantage of the environmental opportunity that fiber expansion provides to build a more sustainable network. Optical fiber itself is made entirely from readily available materials, reduces power consumption of our network and is more reliable, reducing truck rolls to address service disruptions, further reducing our carbon footprint.

The impact of fiber broadband is exponential, giving each customer served the power to reduce their own carbon footprint by empowering customers to work, play and communicate digitally while avoiding emissions related to traditional means of travel for meetings and gathering.

As our fiber expansion continues to change the trajectory of communities across our service area, we are strategically decommissioning portions of our copper facilities. According to a 2024 white paper from the Fiber Broadband Association, the carbon footprint associated with manufacturing the components of an all-fiber network is approximately 60% less than that of an equivalent hybrid fiber coaxial (HFC) network, and the operational carbon footprint is up to 96% lower. This allows us to minimize environmental impacts of building and maintaining copper facilities, transition to more energy-efficient fiber equipment and invest more in our fiber expansion.

### **Tracking our environmental impact**

Measuring our resource use is crucial to effectively managing our environmental footprint. For the year ending Dec. 31, 2024, our company reports the following environmental metrics:

- Greenhouse Gas Emissions:
  - Scope 1 GHG Emissions: 5,728 mt CO2e
  - Scope 2 GHG Emissions: 62,203 mt CO2e
- Total Electricity Usage: 217,630 MWHs;
  - 32% of electricity used from renewable sources
- Total Water Usage: 23,168,970 gallons;
  - 8% reduction from 2023.

### Strategic energy use

As a critical infrastructure provider, we constantly balance communities' need for always-on connectivity with the needs of our planet. Our operations require power intensive equipment and a vehicle fleet to provide ongoing maintenance and customer service. We understand that as a result, our energy usage poses environmental risks via greenhouse gas emissions. The investments we make in our fleet and our network are paving the way for reduced environmental impacts for years to come.

#### **Solar initiatives**

Our teams continuously evaluate Community Solar initiatives across our footprint in states where Community Solar enabling programs exist. The company is also closely monitoring new legislation that could expand Community Solar in other states within our footprint.

Community Solar is a legislative framework that enables members of a local energy grid community to participate in local large-scale renewable projects, supporting state renewable energy goals. When businesses, organizations or individuals subscribe to solar farms, the clean energy produced is fed directly to the utility grid, generating credits on subscribers' electric bills for the value of the energy generated by their share of the farm. Community solar also benefits local economies by creating jobs, increasing tax revenues and generating income to support landowners.

Our largest Community Solar participation is in Maine, Illinois and Minnesota, respectively. In 2024, our Community Solar initiatives injected approximately 13,000 MWHs of renewable energy into the grid. In 2025, additional contracted projects are expected to come online in Maine and Illinois. Once all remaining contracted projects are operational, a projected 24,000 MWHs of renewable energy will be injected into the grid annually.

We're continuing to pursue new opportunities while closely monitoring legislative developments in states such as New Hampshire, California and Texas that could further expand Community Solar programs. By participating in these projects, Consolidated is helping our communities achieve their renewable energy objectives.

In 2024, our Community Solar initiatives injected approximately 13,000 MWHs of renewable energy into the grid.

## Minimizing waste through responsible recycling

We continue to find sensible ways to minimize waste in our offices and facilities and to encourage our customers to properly recycle electronic equipment that is past its useful life.

In another year of intense fiber expansion and network upgrades, we were careful to avoid waste and to properly recycle wire and cable.

As we work strategically to decommission energy-hungry copper-based facilities, we are dedicated to recycling the copper we remove from our networks. Through both our copper recycling and energy savings, reducing copper in favor of fiber networks is increasing our positive impact on the environment.

Since 2022, 100% of our waste vendors are ISO 14001 certified.

## **Environmentally conscious suppliers and partners**

By working with business partners who also embrace green initiatives and the conservation of natural resources, we continuously ensure sustainability from within our supply chains. We strive to balance environmental and fiscal responsibilities when making purchasing decisions.

## **Reducing fleet's environmental impacts**



In 2024, we invested \$8 million in modernizing our fleet vehicles, adding 79 vehicles with better fuel-efficiency than aging vehicles. We began an initiative to identify and remove older and underutilized vehicles, reducing the impact of these less fuel-efficient vehicles and avoiding the negative impact of maintaining older trucks, vans and cars.



# **Environmental awareness and education**

By educating our employees, partners and customers on environmental issues and sustainability goals, along with providing them with information on how they can put environmentally friendly practices in place at home and work, we can establish and maintain a culture of awareness and action.

Our robust training library includes modules on environmental regulations, properly managing ozonedepleting chemicals, used oil management and more.

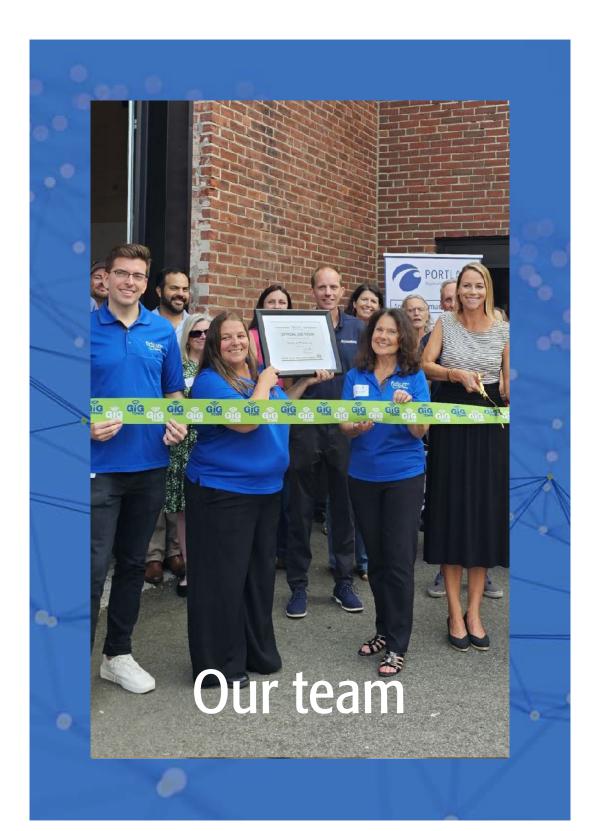
### **Climate risks, opportunities and impacts**

Each year, our emergency operations group evaluates specific environmental and weather-related threats to our business. Our service footprint risks include hurricanes, snow and ice storms, wildfires, drought, and extreme heat. The team tracks potential climate-related risks as they develop, enacting comprehensive interdepartmental plans for risk mitigation, impact prevention, effective communication and swift recovery of service and facilities.

#### Staying connected during Hurricane Beryl

On July 8, 2024, Hurricane Beryl made landfall in eastern Texas, bringing with it severe flooding and widespread power outages. As millions of Texans endured sweltering heat without power for days following the storm, employees across the country were working round-the-clock to deploy generators, repair downed telecommunications lines, restore connectivity, and take care of impacted customers. As the community reckoned with the aftermath of the storm, our teams restored service to all impacted customers within a few short days, without the help of commercial power.

In addition to keeping people connected during and after the storm, employees jumped into action to help their neighbors near and far. Locally, teams helped sort and package food for those in need. Thousands of miles away, employees donated funds to support the Montgomery County Food Bank.





# **Building our culture**

As we enter the next chapter of our journey, we are committed to cultivating a culture that values and rewards the contributions of engaged employees by connecting them to meaningful work aligned with our company's vision and purpose. We're taking deliberate steps to empower our team through a range of initiatives designed to support employees at every stage of their career including onboarding and acclimating to their roles, growing their skills, and pursuing opportunities for professional development. Together, we're building a workplace where individuals thrive, grow and make an impact.

In 2024, we launched several key training programs to provide skills development opportunities for our employees:

- Altitude Learning brings more than 20,000 video courses from LinkedIn Learning to our employees. Courses cover more than 40,000 hard and soft skills, tutorials for new technology, and more.
- ASCEND Onboarding Journey warmly welcomes new employees, setting them up for success. ASCEND includes live webinars, checklists for managers and new hires, senior leadership speakers, and a dedicated collaboration site.
- COMPASS Leadership Development Program offers monthly development topics and discussion sessions to all people leaders. COMPASS helps leaders improve their skills and better develop their teams.

Our employees have an average of 17 years of experience.



# Supporting our employees

We offer competitive pay and a comprehensive benefits package to all eligible, full-time employees that supports the health and wellbeing of employees and their families. The package includes premium healthcare benefits and a robust 401(k) program with immediate enrollment upon hire.

Company health benefit offerings include medical, dental and vision insurance; prescription coverage; telehealth; accident, critical illness, life, and accidental death and dismemberment coverage; employee assistance program; disability coverages; flexible spending accounts; health savings accounts; and medical and pharmacy advocacy programs.

We offer and incentivize employees to participate in a holistic Employee Wellness program that provides resources and discounts to help employees take control of their mental, physical and financial health.

#### **Tuition assistance**

Providing opportunities for ongoing development is a key component in building a positive culture and retaining highly talented employees. All regular full-time Consolidated employees who are actively working (when courses begin and at the time of reimbursement) are eligible to participate in our tuition reimbursement program.

The company pays up to the maximum IRS amount outlined in a calendar year for expenses related to the pursuit of a degree through a regionally or nationally accredited educational institution. Upon satisfactory completion of approved courses, we reimburse normal enrollment costs, including required fees and textbooks.

#### **Service Anniversary Awards**

In 2024, more than 430 employees celebrated milestone service anniversaries and were recognized with a service award in the form of a gift card as well as an opportunity to participate in a monthly virtual celebration. During these engaging, interactive virtual celebrations hosted by senior leaders, employees and their supervisors recall historical company milestones and pop culture highlights from the year they started their Consolidated careers, congratulate each other on their accomplishments and enjoy the spotlight.



### Safety and healthy workplace

Safety remains our top priority. The Company is committed to providing a healthy, safe and productive work environment for all employees and customers. In collaboration with established local and regional safety committees, the Safety and Risk Management group assesses job-related hazards, corrects deficiencies and develops updated policies and training for all employees.

Our risk management team continually evaluates employee injuries to determine the root cause. Musculoskeletal injuries are a leading cause of work-related injuries for our employees. Our teams continue to work on engineering and administrative controls to reduce these types of injuries.

By enforcing safe and responsible work habits in the field, on the road and at the office, we benefit the communities and neighborhoods we serve and help to make them better places to live and work. Moreover, a sincere commitment to safety at all levels of the company supports our vision to be America's favorite fiber provider.

We have a strong, ongoing commitment to providing a safe and healthy workplace and to ensuring employees are properly trained and have appropriate safety and emergency equipment. We provide employees with annual safety and compliance training, including job

specific and general environmental health and safety training, anti-harassment training and relevant job-related, instructor-led training on hazards they may experience. In 2024 employees completed more than 12,000 safety and human resource-compliant training modules.

#### **Labor relations**

We are proud of our long history of positive and respectful relationships with the Communications Workers of America (CWA) and the International Brotherhood of Electrical Workers (IBEW), representing more than 1,000 employees.

We are committed to securing labor agreements that provide competitive pay, benefits and investments in our employees; improve our operational efficiency and business sustainability; provide flexibility to effectively meet our customers' needs; and improve the customer experience.

We work hard to keep lines of communication open with union leadership to discuss key issues, plans and operational performance while ensuring employees' needs and customers' expectations are met.

In 2024, the company successfully negotiated new collective bargaining agreements with five local unions across five states.



# Inclusion and employee experience

We seek high-quality employees of all backgrounds. We welcome differences and diversity as qualities that enhance our efforts as a team and believe embracing diversity and a culture of inclusion is the backbone of a strong company. We believe recognizing strength in our differences contributes to an expansion of ideas and better decisions, which in turn drives better results for our customers and our communities. Together, we're working to ensure we provide support, resources and opportunities to everyone, according to their needs.





# Investing in our communities

We have a strong legacy of supporting our communities through volunteerism, community investment and our fiber expansion. Combined, our employees' efforts are changing lives in the communities we serve. Last year, we contributed \$1.6 million in support of more than 550 community nonprofits and organizations through our company giving programs, educational grant program, foundation grants, economic development initiatives, community events and sponsorships. Our employees perform thousands of hours each year in support of the nonprofit organizations that touch their hearts and improve their communities.

In 2024, our employees volunteered more than 4,600 hours to enhance and strengthen their communities.



# **Celebrating Gig Towns**

As we expand fiber broadband services to more communities across the United States, it is our privilege to celebrate the new opportunities it brings with town leaders, residents and the business community through our Fidium Gig Town Events.



2024 Gig Town events included celebrating two
Communications Union Districts (CUDs) in Vermont.
CUDs are groups of towns that work together to build
communication infrastructure. Otter Creek CUD
represents Benson, Brandon, Castleton, Chittenden,
Fair Haven, Goshen, Hubbardton, Mendon,
Pawlet, Pittsford, Poultney, Rutland City, Rutland Town,
Shrewsbury, Sudbury, Wells, West Haven and West
Rutland; and Lamoille Fibernet represents: Belvidere,
Cambridge, Eden, Elmore, Hyde Park, Johnson,
Morristown, Stowe, Waterville and Wolcott. In these
two rural regions of Vermont, we built more than
28,000 fiber passings. Partnering with CUDs helps us
expand fiber deeper into rural communities, and helps
CUDs achieve their coverage goals. It's a win-win!



# **Company Giving**

### **Educational grants**

The Consolidated Connects Educational Grant Program provided funding for innovative, technology-focused initiatives at K-12 schools within the company's service area. The learning programs advance creative student learning, develop 21st century skills, promote critical thinking and utilize innovative technologies.

In 2024, we awarded \$50,000 to 12 schools through the grant program, serving hundreds of students.

- \$5,000 to South Portland HS (ME)
  - To support competitive robotics programming
- \$5,000 to Hudson HS (TX)
  - For experiential learning through competitive e-sports
- \$5,000 to White Mountains Regional HS (NH)
  - To provide equipment for geospatial technology program
- \$5,000 to Prairie Winds MS (MN)
  - To provide video editing software for school programming
- \$5,000 to John Adams Academy (CA)
  - For digital storytelling and early education programming technology
- \$5,000 to Canaan School District (VT)
  - For interactive technology to support educational programming
- \$5,000 to Eastern IL EES (IL)
  - For maker space equipment to support work-based learning

- \$5,000 to Mattoon HS (IL)
  - To support growth of technology and multimedia support program
- \$2,500 to Webster Elementary (NH)
  - To increase access to digital literacy resources
- \$2,500 to Dakota Meadows MS (MN)
  - To support competitive robotics programming
- \$2,500 to Shelbyville HS (IL)
  - To support competitive robotics programming
- \$2,500 to Sacramento Country Day (CA)
  - To support competitive robotics programming

Since 2021, we've provided \$162,500 in grant funding to 42 schools through our Consolidated Connects Educational Grant Program.





## **Minnesota Community Fund**

Over the past 60 years, the Consolidated Communications Community Fund (formerly the Mankato Citizens Telephone Company / HickoryTech Foundation) has given more than \$6.5 million to nonprofit organizations throughout southern Minnesota. The Community Fund is a donor-advised fund, administered by the Mankato Area Foundation, with an advisory board comprised of our local employees who direct grants and gifts. In 2024, 22 nonprofit organizations received grants totaling \$150,000 from the Fund. In addition, the Community Fund provides an employee matching gift and volunteer program to eligible employees.

### California's Consolidated Communications Foundation

The Consolidated Communications Foundation has given over \$5.5 million to local nonprofits and organizations that serve those in need and create more vibrant communities.

Each year, the Foundation is funded through the generosity of California employees who make voluntary payroll contributions matched by a company gift. In 2024, the Foundation gave more than \$86,000 to 66 local organizations.

We are proud to support programs and organizations that address essential community needs and key community and educational initiatives, improving the quality of life for our friends and neighbors.







## Special Olympics Family Festival (SOFF)

In 2024, we hosted our 41st Annual Special Olympics Family Festival (SOFF) in Mattoon, Ill. Hundreds of Special Olympic Athletes from east central Illinois gathered for a full day of activities with their Friend-For-A-Day volunteers.

SOFF is planned and executed by a volunteer committee made up of our employees and local community and business leaders. More than 1,000 volunteers from throughout the state and far beyond create a carnival-like atmosphere, filled with singing, dancing, non-competitive games, tractor rides, a parade and a steady stream of performances from the SOFF stage.

Memories are made, with many athletes sharing that they look forward to SOFF as though it was their own birthday. Lifelong friendships are formed between the athletes and their dedicated Friend for a Day, as they return year after year.

More information is available at consolidated.com/SOFF

Learn more about the festival in this video.

### **Roseville Telephone Museum**

Home to one of the most extensive collections of antique telephones and telecommunications memorabilia in the nation, the Roseville Telephone Museum chronicles and celebrates more than a century of communications technology and a unique perspective of the history of Roseville, California.





### **Assistance programs**

As part of our ongoing commitment to expand the reach of Internet services, we participate in the Lifeline broadband discount for qualifying services. The Lifeline Program is a government benefit program, offering eligible subscribers a monthly federal Lifeline Program discount to a voice service OR a qualifying Internet service.

#### Robocalling

We are committed to protecting our customers' privacy and ensuring a harassment-free experience by actively combating illegal robocalling and safeguarding their right to secure and uninterrupted communication.

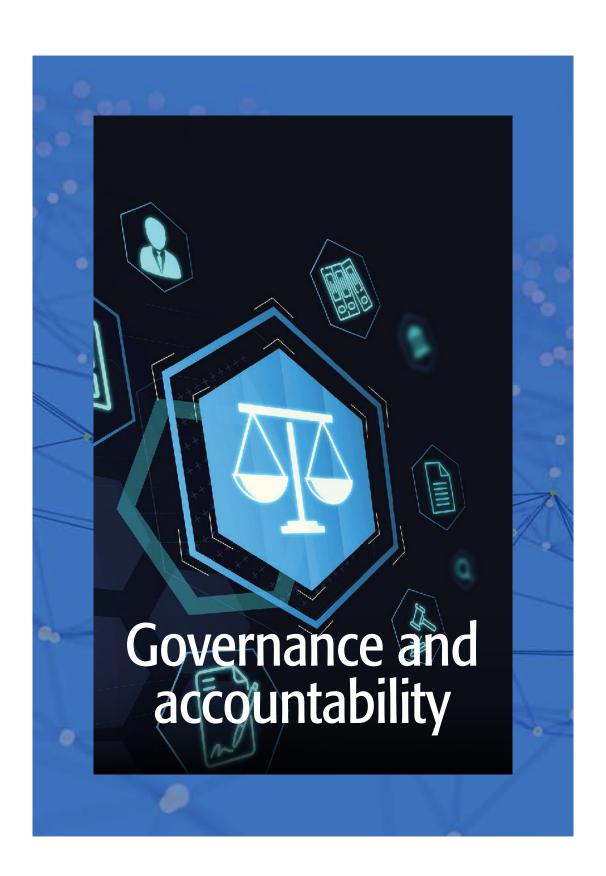
We are proud to have partnered with the state Attorneys General to support the eight (8) Anti-Robocall Principles for Voice Service Providers. These principles guide our efforts to protect voice service customers from illegal robocalls and make it easier for attorneys general to investigate and prosecute perpetrators.

Committed to advancing broadband to create new opportunities to compete, grow and thrive through connectivity, Consolidated is also a member of the

USTelecom Industry Traceback Group. This industry-led organization identifies the origin of suspicious robocall traffic, disrupting illegal robocalls in real time and empowering the enforcement community to hold illegal robocallers and their enablers accountable. In addition, we are active participants in other USTelecom and industry peer efforts to collaborate on implementing robocall mitigation tools.

To assist customers in blocking calls from unwanted callers or telemarketers, we offer call blocking, caller ID (with name and number), call intercept and anonymous call rejection. Consolidated customers can also register with State and/or National Do Not Call registries. Customers can find out more information on these features under our Support section at consolidated.com/support.

In 2021, we implemented "STIR/SHAKEN" call authentication technology to help confirm whether an incoming calling number is spoofed. STIR/SHAKEN digitally validates the handoff of phone calls passing through the complex web of internet protocol networks, allowing the service provider of the consumer receiving the call to verify that a call is in fact from the number displayed on Caller ID.





# **Business practices and ethics**

We're committed to the highest standards of legal and ethical business conduct. Our Code of Business Conduct and Ethics (available at consolidated.com/ethics) summarizes the legal, ethical and regulatory standards we follow and is a reminder to our directors, officers, employees, customers and vendors of our obligation to uphold this commitment.

We have built our business on standards of excellence and quality in services and products. Our employees and representatives adhere to the highest standards of honesty, ethics and fairness in their business dealings, contributing to a culture of compliance and accountability. Our culture is built on trust. Honesty, accountability and transparency are how we build relationships and serve our customers.

We place the highest value on the integrity of our directors, officers and employees and demand the same level of integrity in all business transactions. We insist on ethical dealings with others and on the swift, transparent handling of actual or apparent conflicts of interest within personal and professional relationships.

Directors, officers and employees are required to deal honestly and fairly with our customers, collaborators, competitors and third parties. In our dealings with customers and suppliers, we prohibit making or receiving bribes, kickbacks or any other improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, commercial benefit or government action.

When an ethical issue or concern needs to be addressed with a supervisor, we respond quickly and have built an environment where difficult discussions can take place without the fear of retribution or retaliation. Information on reporting and access for anyone who wishes to report a suspected violation are clearly defined and available to all stakeholders via our investor relations website: ir.consolidated.com.

If it is determined that our Code of Business Conduct and Ethics was violated, we will take the necessary corrective action to address and to correct the violation..



## **Vendors and suppliers**

Consolidated Communications is committed to doing business with suppliers and vendors that positively influence our strategic and operational goals, as outlined in our Vendor Code of Conduct (available at consolidated.com/vendorpolicy). Notwithstanding compliance with all applicable laws and regulations, vendors must also provide high-quality goods and services, exceptional customer service and competitive pricing.





### **Privacy and data security**

The safeguarding of our customers' personal information is of the highest importance to every employee. We do not sell, rent or disclose personally identifiable information to any third party for any reason that is not directly related to providing products and services, except as required by applicable law or specifically allowed in our privacy policy.

Occasionally, we will use personally identifiable information to offer a customer new products and services; however, customers can opt out of such marketing at any time.

As a data privacy champion, we provide ongoing consumer education on how to protect personal data and more broadly, how to keep consumers and their families safe online. We recognize and support the principle that all organizations share the responsibility of being conscientious stewards of personal information. As such, we've undertaken significant efforts to educate our customers, employees and communities on safe online practices. We maintain and regularly update actionable tips on online safety and data privacy practices at consolidated.com/staysafeonline.

More information on our Customer Privacy Policy is available at <u>consolidated.com/privacy</u>.

Internally, our employees are kept abreast of the latest cybersecurity risks and threats and are regularly required to participate in trainings and simulated attacks to keep our employees aware and attentive, thereby minimizing risks to our network and business systems.

### **Information security**

We take Information Security very seriously and are constantly monitoring and taking proactive steps to ensure the safety of our networks, systems and data. Consolidated continuously strives to implement standards-based security and risk management best practices to protect our data, people, brand and shareholders. We are a trusted partner with a risk-based focus designed to support business growth while consistently exceeding our customers' needs and expectations.

Business and personal interaction in the world today has become increasingly reliant upon the delivery of data of all types across telecommunications carrier networks. We recognize the need for these networks to be as secure, resilient and reliable as possible. Our company management takes a vigilant approach to identifying and addressing data security risks through its Information Security Risk Management and Governance programs. These programs include supply chain and vendor risk management activities, software

component analysis, and business impact analysis. Additionally, we have a comprehensive infrastructural security program which includes active monitoring and detection along with detailed triage and response plans that outline the steps necessary to investigate, identify and mitigate cyber security risks to company business processes. As part of its cyber security risk mitigation program, we carry Cyber Security Insurance, and senior leadership briefs the board of directors on information security matters quarterly. Biennially, we are assessed by the Department of Homeland Security against National Institute of Standards and Technology (NIST) 800-53 controls. In 2022, our company rolled out a comprehensive cybersecurity awareness program to educate employees about the cyber risks related to the technology they use.

As online activities and connected devices increase, legitimate concerns about data security, scams and identity theft are also increasing among consumers. We proactively monitor network traffic and use industry trusted best practices, tools, software and systems to keep our customers safe.



Consolidated's technicians are in the unique position of frequently working inside homes and businesses. To help protect vulnerable people and communities, technicians in Mankato, Minn., participate in civilian training to identify and report signs of human trafficking through partnership with the Lutheran Social Service Sex Trafficking Prevention Program.

## **Human and labor rights**

We believe it is critical to promote and protect human rights in all communities we serve and in our relationships with our employees and vendors. As a long-standing employer and business partner, we strive to foster a work culture that respects fundamental human rights and ensures that our business practices in no way contribute to human rights abuses. Consistent with these goals, we have established a Human and Labor Rights Policy (additional information noted in appendix and at **consolidated.com/laborpolicy**) to create awareness and establish expectations related to legal requirements, ethical practices and human rights.





# Political support and transparency

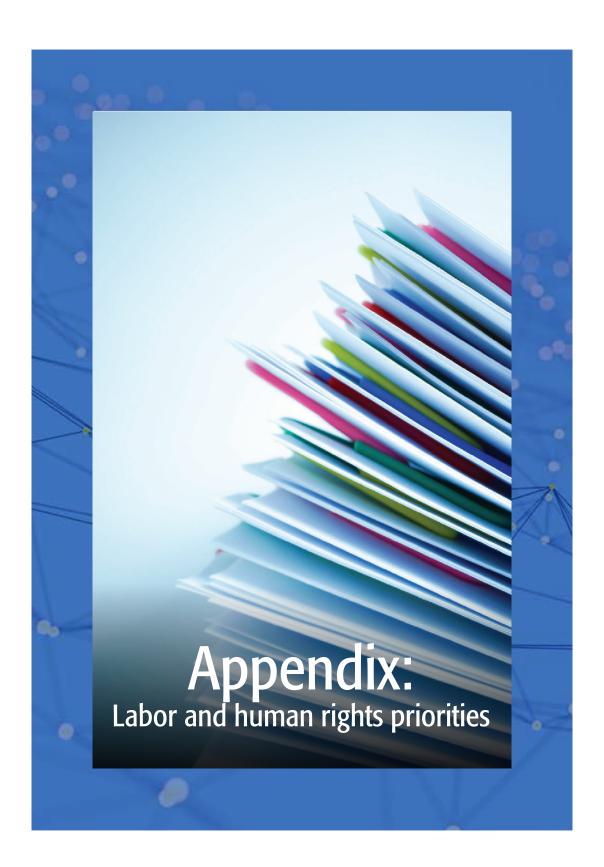
Rapid changes in policy require our company to assert its voice to continually inform and educate lawmakers on issues affecting all stakeholders and, most importantly, the needs of our customers. While we are members of various trade organizations that advocate on our behalf, at times our position on an issue may differ from that of other members.

### **Net neutrality statement**

We are committed to protecting our customers' privacy and will not block or degrade service to any service location. Our customers will continue to have unfettered access to all legal internet content, just as we have always provided. Customers can read about our internet policies on our website – consolidated.com – where we will continue to disclose our network practices.

#### **Data usage**

Many internet providers enforce monthly data restrictions. When a data cap is in place, a provider can charge for the extra data you use beyond a certain amount in any given month. We want our customers to fully experience the Internet and all of its benefits. As such, we do not charge additional fees for data usage or overage and never cap customers' internet data usage.



# Labor rights areas of focus

# Commitment to value the human rights of our employees

As an employer, we strive to be respectful and supportive of our workforce and to embrace a respectful and diverse culture. We recognize that our employees are the lifeblood of our company, and that we must respect the fundamental human rights of our employees and provide an inclusive work environment, free from any forms of harassment, discrimination or coercion. We periodically monitor and survey employee satisfaction and engagement to ensure that we receive the feedback we need to maintain this commitment. The following principals are reflective of our commitment to human and labor rights:

#### Non-Discrimination

We respect our employees' human rights and do not tolerate discrimination on the basis of race, color, ethnicity, religion, sex, gender identity, gender expression, age, national origin, veteran status, disability or any other factor prohibited by law.

#### Child labor

We abide by all applicable child labor laws and adhere to the Convention on the Rights of the Child of the United Nations and Convention 138 of the International Labor Organization. We do not use or recruit underage children for labor.

#### Forced labor

Any and all employment undertaken at Consolidated or any of Consolidated's vendors must be voluntary.

#### Freedom of Association and Collective Bargaining

We maintain a healthy dialogue with our employees and where applicable, their labor representatives. Consistent with applicable labor organization laws, employees are not restricted from membership in labor organizations.

#### Health and safety

Maintaining a high standard of health and safety is key to the operation of our business. We take great lengths to ensure a safe and healthy environment for our employees and to avoid the possibility of injuries to customers or the public.

#### Working conditions and work hours

All employees are given reasonable rest breaks, access to facilities, potable water, and holiday leave in accordance with applicable law. We comply with all applicable wage, hour, overtime and benefits laws.

### Fair wages and compensation

We pay our employees a fair wage at levels sufficient to satisfy their basic needs and those of their direct dependents. At the very least, we require vendors to pay the minimum wage required by local law and provide all legally required benefits.

#### Harassment and employee treatment

We do not implement or condone threats, violence or any other type of mental, verbal or physical coercion. Likewise, we do not engage in or allow any harassment or abuse to or from our employees, or the employees of the vendors with which we do business. We construe harassment broadly to mean any conduct that embarrasses, humiliates, or insults an employee, along with any type of intimidation.

# Human rights areas of focus

#### Digital equity

We have invested in and are committed to expanding high-speed internet access to communities that have been historically unserved or underserved.

#### Human trafficking

Our technicians are in the unique position of frequently working inside homes and businesses. To help protect vulnerable people and communities, technicians in Mankato, Minn., participate in civilian training to identify and report signs of human trafficking through partnership with from Lutheran Social Service Sex Trafficking Prevention Program.

#### Freedom of expression and privacy

As a telecommunications service provider, we promote the right of our users to hold and freely share ideas and opinions, without causing harm to others. We also respect our users' rights to privacy by protecting our customers' personal information and notifying them of the types of information we collect, how and with whom it may be shared, how it may be used and how it will be protected. At the same time, we cooperate with governmental agencies and law enforcement in response to lawfully authorized government requests to produce information.

#### Indigenous and tribal communities

In our attempts to provide telecommunications services to historically unserved or underserved areas, we know that we must observe a proper level of respect for the culture, traditions and land rights of Tribal Communities, and promote the protection of cultural heritage sites, consistent with ILO Convention No. 169.

Additional details on these areas of focus are available at **consolidated.com/laborpolicy**.





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