Uniti Group Inc.

Code of Business Conduct and Ethics and Whistleblower Policy

(Effective December 8, 2023)

1. Introduction

It is the policy of Uniti Group Inc. (together with its subsidiaries, "<u>Uniti</u>" or the "<u>Company</u>") that its business shall be conducted in accordance with the highest moral, legal and ethical standards. The Company's reputation for integrity is of the utmost importance and each officer, director and employee must contribute to the care and preservation of that asset.

This Code of Business Conduct and Ethics and Whistleblower Policy (this "<u>Code</u>") covers a wide range of business practices and procedures and provides guidance to en4nf TD Tc 0 Tw (")Tj0.003 Tc -0.002 Tw 1

ethical standards are built. All officers, directors and employees of the Company must respect and obey all applicable laws, rules and rey

• Seek help from Company resources. If you do not feel that it is appropriate to discuss an issue with your supervisor or you do not feel comfortable approaching your supervisor with your question, you can either: (i) discuss the issue with the next level of management above your supervisor or (ii) discuss the issue via telephone, e-mail or written correspondence with the Company's

of improper influence include purposefully providing misleading information to an auditor or arranging with another person to provide misleading information to an auditor, offering incentives implicitly or explicitly linked to the outcome of the audit or purposefully providing an auditor with an inaccurate legal analysis or business rationale.

6. Expense Reporting

C. Payments to Government Personnel

The U.S. government has a number of laws and regulations regarding business gratuities that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of

Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following and encouraging others to follow safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted.

Employees should report to work free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.

10. Use and Protection of Company Assets

All officers, directors and employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability.

Any suspected incident of fraud or theft should be immediately reported to the Company's General Counsel for investigation. Company equipment should not be used for non-Company business, though incidental personal use may be permitted with the approval of your supervisor or an officer of the Company.

The obligation of officers, directors and employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy and may also be illegal and result in civil or even criminal penalties.

11. Customer Information

Customer account information, customer communications and customer call records are considered proprietary and confidential in nature. As such, all officers, directors and employees of the Company should protect the use of and access to this information. Only those who need to know such information in the course of employment should access customer information. Falsifying or altering customer accounts or customer transactions is prohibited. Accessing your own personal billing account information or account information of family members and friends is also strictly prohibited. Except as required to comply with law, you should never disclose customer information to any party other than the customer or an individual whose access has been authorized by the customer.

12. Employee Privacy

Employee compensation, benefits, and personnel records and information are confidential. Only officers, directors or employees who need to know such information in the course of employment should access such employee information through Company records. Therefore, if you are an individual with access to such information as a part of your responsibilities with the Company, you should not disclose this information to any other employee of the Company unless that employee has a need to know such information in the course of employment. Except as required to comply with the law, you should never disclose this information to any party other than the employee or an individual whose access has been authorized by the employee. This does not prohibit you from disclosing or discussing personal, confidential information with others, so long as you did not come into possession of such

information through access you have as a part of your formal duties to the Company.

13. Inside Information

Officers, directors or employees may learn information about the Company, or other publicly traded companies, that is not generally known to the public and that could affect a person's decision to buy, sell or hold that company's stock. Such information is known as "material non-public information." Examples of material non-public information include financial results, financial forecasts, possible mergers, acquisitions or dispositions, significant financial developments, and significant business plans or programs. Any non-public information that would influence your own decision to buy or sell that company's stock probably is material, non-public information.

Material non-public information must be held in the strictest confidence. You must not disclose such information to anyone unless such disclosure is necessary to carry on the Company's business in an effective and proper manner and appropriate steps have been taken by the Company to prevent the misuse of the information.

If you know material non-public information about the Company or another publicly traded company, you are prohibited from trading in that company's stock until such information has been publicly disclosed. You are also prohibited from recommending or suggesting that another person buy, sell or retain stock in the company until such information has been publicly disclosed.

The Company imposes specific insider trading compliance procedures on its directors and certain officers to prevent such individuals from violating the insider trading policy described in this Section. These procedures are designed to prevent the covered individuals from violating, or causing the Company to violate, certain securities laws applicable to such individuals or the Company. For more information, please refer to the Company's *Insider Trading Policy*. If you have any questions, please consult the Company's General Counsel.

14. Confidentiality

The information gathered and developed in the management and operation of the Company's business is a valuable asset. Some of this information is considered confidential and is not known to the public or the Company's competitors. Additionally, in the conduct of business, the Company will, from time to time, receive and use proprietary information of others pursuant to specific

personally identifiable information received from employees, customers, suppliers and third parties, which if misused, could result in identity theft or other fraud.

Officers, directors and employees must maintain the confidentiality of confidential information entrusted to them by the Company or its customers, except when disclosure is authorized in accordance with the Company's *Regulation FD Corporate Disclosure Policy* or as required by other laws or regulations. You may not use for any personal purpose confidential information that belongs to the Company, its customers, suppliers, employees or other persons. Company technology and equipment should not be used in a manner that would reasonably result in the disclosure of confidential information to a third party. The obligation to preserve such confidential information continues even after your employment ends.

Employees should raise questions about the appropriate treatment of personal or confidential information with the Company's General Counsel.

Unless compelled to do so by law, current or former employees of the Company may not disparage or defame the Company, its officers or its directors during or after employment or take any action that would reasonably be expected to lead to unwanted or unfavorable publicity to the Company.

Nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours or other terms and conditions of employment. Company employees have the right to engage in or refrain from such activities.

If you have any questions regarding confidentiality, including doubts as to what information is confidential or whether information qualifies as proprietary, please consult the Company's General Counsel.

15. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Each officer, director and employee should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. No officer, director or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair-dealing practice.

To maintain the Company's valuable reputation, compliance with the Company's quality processes and safety requirements is essential. In the context of ethics, quality requires that the Company's services be designed to meet the obligations of the Company's customers. All services must be performed in accordance with all applicable regulations.

16. No Contractual Right or Fair Procedure Created

Nothing in this Code shall interfere with or limit in any way the right of the Company to terminate any individual's employment with the Company or modify or change the "at will" employment relationship of any person's employment with the Company. The policies contained in this Code are not intended to create any contractual rights, express or implied, with respect to employment, or termination thereof, and shall not be construed to create any type of right to a "fair procedure" prior to termination or other disciplinary action.

17. Waivers & Amendments

Any waiver of this Code for executive officers or directors may be made only by the Board and will be promptly disclosed to the Company's shareholders as required by law or stock exchange rules or regulations. This Code may be amended or modified at any time by the Board.

18. Acknowledgement

The Company's officers, directors and employees will be asked annually to sign a statement affirming that they have read and understood this Code and other Company policies referenced herein and that they are in compliance, and will remain in compliance, with this Code and each such policy.

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