
Code of Business Conduct and Ethics

1. Purpose and Scope

This Code sets out the standards of conduct FiberFed expects of everyone who works for or on behalf of the company. It applies to all employees, officers, contractors, and subcontractors of FiberFed ("FiberFed" or the "Company"). Everyone covered by this Code is expected to read it, follow it, and raise concerns when something does not appear to meet it.

2. Compliance with Laws

FiberFed conducts business in compliance with all applicable federal, state, and local laws and regulations, including those governing telecommunications services, employment, workplace safety, data privacy, anti-corruption, and trade. Where this Code sets a higher standard than the law, this Code applies.

3. Honest and Fair Dealing

We deal honestly with customers, carriers, suppliers, and one another. We do not misrepresent our services, capabilities, pricing, or circuit and service status. Proposals, quotes, and service commitments must be accurate and supportable.

4. Conflicts of Interest

Personnel must avoid situations where personal interests conflict, or appear to conflict, with the interests of FiberFed or its customers. Potential conflicts, including outside business interests with a customer, supplier, or competitor, must be disclosed to management in advance.

5. Anti-Bribery and Anti-Corruption

FiberFed prohibits offering, giving, requesting, or accepting bribes, kickbacks, or any improper payment or benefit to influence a business decision. Gifts and entertainment must be modest, customary, and never intended to secure an improper advantage. FiberFed complies with the U.S. Foreign Corrupt Practices Act and similar laws.

6. Confidentiality and Data Protection

We protect confidential information belonging to FiberFed, our customers, and our partners, including network configurations, credentials, pricing, and contract terms. Customer data and customer proprietary network information are accessed only as needed to deliver and support services, and are handled in accordance with applicable law and our contractual obligations. Confidentiality obligations continue after employment or engagement ends.

7. Fair Competition

FiberFed competes on the merits of its services. We do not enter into agreements with competitors to fix prices, allocate customers or markets, or rig bids, and we do not obtain competitor information through improper means.

8. Accurate Records

Business, financial, and operational records, including invoices, time records, trouble tickets, and network documentation, must be complete, accurate, and timely. Records are retained and disposed of in accordance with legal and contractual requirements.

9. Human Rights and Labor Standards

FiberFed respects the human rights of its workers and of workers in its supply chain.

- **Forced labor.** FiberFed prohibits the use of forced, bonded, indentured, or involuntary prison labor, and any form of human trafficking or modern slavery. Workers are free to end their employment on reasonable notice, and FiberFed does not retain workers' identity documents or require recruitment fees.
- **Child labor.** FiberFed prohibits the use of child labor. FiberFed does not employ anyone under the minimum age permitted by applicable law, and complies with all legal restrictions on work by minors.
- **Wages and hours.** FiberFed pays at least the legally required wages, provides legally required benefits, and complies with applicable laws on working hours and overtime.
- **Suppliers.** FiberFed expects its suppliers and subcontractors to meet these same standards, as described in the FiberFed Responsible Sourcing Statement.

10. Workplace Conduct

FiberFed expects a professional workplace in which people treat one another with respect. Harassment, threats, violence, and unlawful discrimination are prohibited. Employment decisions are made in accordance with the FiberFed Equal Employment Opportunity and Anti-Harassment Policy.

11. Health and Safety

Everyone is responsible for working safely and for stopping work that is unsafe. Safety requirements are set out in the FiberFed Occupational Health and Safety Policy.

12. Environmental Responsibility

FiberFed complies with applicable environmental laws and regulations. Decommissioned electronic equipment is reused, resold, or disposed of in accordance with applicable law.

13. Use of Company Assets

Company equipment, vehicles, systems, network access, and funds are used for legitimate business purposes and protected from loss, misuse, and unauthorized access.

14. Reporting Concerns and Non-Retaliation

Anyone who believes this Code, a law, or a company policy has been violated should report it to their manager or to company leadership at fflegal@fiberfed.com. Reports are reviewed promptly and handled as confidentially as practical. FiberFed prohibits retaliation against anyone who raises a concern in good faith or cooperates in an investigation.

15. Enforcement

Violations of this Code may result in disciplinary action, up to and including termination of employment or of a contractor or supplier relationship, and may be referred to authorities where required by law.

16. Review

This Code is reviewed periodically by FiberFed leadership and updated as needed.