

Responsible Sourcing Statement

1. Purpose

This statement describes how FiberFed selects and manages the suppliers that support its telecommunications and managed network services, and the standards it expects those suppliers to meet.

2. Our Supply Chain

FiberFed's supply chain consists primarily of:

- **Network carriers and service providers**, including Tier-1 and regional carriers that provide transport, internet access, and last-mile connectivity.
- **Network equipment**, purchased from or through established manufacturers and their authorized distribution channels.
- **Data center and colocation providers**.
- **Professional and field service subcontractors** that support installation and maintenance work.

FiberFed does not manufacture products and does not operate in industries or regions generally considered high-risk for forced or child labor.

3. How We Screen Suppliers

FiberFed manages supply chain risk through the following practices:

- **Established suppliers.** We source from established carriers, manufacturers, and authorized distributors, many of which publish their own supply chain, human rights, and modern slavery policies and disclosures.
- **Authorized channels.** We purchase network equipment through manufacturer-authorized channels.
- **Contractual requirements.** Our supplier and subcontractor agreements require compliance with applicable laws, including labor, employment, and workplace safety laws.
- **Subcontractor qualification.** Field subcontractors are reviewed before engagement for business standing, insurance, and qualifications for the work assigned.
- **Ongoing review.** Concerns about a supplier's conduct are reviewed by FiberFed leadership and may result in corrective action or termination of the relationship.

4. Supplier Expectations

FiberFed expects its suppliers and subcontractors to:

- Prohibit forced, bonded, indentured, or involuntary prison labor, and human trafficking in any form
- Prohibit child labor and comply with all minimum-age requirements
- Pay at least legally required wages and comply with working-hour laws
- Provide safe working conditions in compliance with applicable safety laws
- Comply with applicable environmental laws and regulations
- Conduct business ethically and without bribery or corruption

These expectations mirror the standards in the FiberFed Code of Business Conduct and Ethics.

5. Product Environmental Compliance

Network equipment supplied by FiberFed is sourced from manufacturers that design and certify their products to applicable environmental regulations and standards, such as RoHS. Decommissioned equipment is reused, resold, or disposed of in accordance with applicable law.

6. Modern Slavery Reporting

FiberFed is a U.S. company and does not meet the applicability thresholds for mandatory reporting under the UK Modern Slavery Act 2015 or the Australian Modern Slavery Act 2018. FiberFed nonetheless prohibits modern slavery in its operations and expects the same of its suppliers, as described above.

7. Reporting Concerns

Concerns about FiberFed's operations or supply chain may be reported to fflegal@fiberfed.com. FiberFed prohibits retaliation against anyone who raises a concern in good faith.

8. Review

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