

## CODE OF BUSINESS CONDUCT AND ETHICS

Summit Broadband (“Company” or “Summit Broadband”) is firmly committed to complying with its legal and ethical obligations under all federal, state and local laws. Summit Broadband strives to ensure that its activities are ethical and meet the expectations of its customers, investors, host communities, and stakeholders. Its reputation for honesty, fairness, integrity and trust is of the utmost importance and each employee, officer and director of the company must contribute to the care and preservation of this asset. Summit Broadband’s goal is to always maintain the highest ethical standards in the conduct of its business and in its relationships with customers, suppliers, employees, advisors, and the communities in which it is located.

Summit Broadband’s employees, officers and directors must conduct themselves in accordance with the principles of this Code of Business Conduct and Ethics (the “Code”) and seek to avoid any improper behavior and illegal activities. The Code is intended to deter wrongdoing and to promote ethical conduct as follows:

- Conducting Company affairs honestly and ethically;
- Acting with integrity and affording respect and courtesy to those Summit Broadband employees, officers and directors come into contact and work with in the course of performing their job duties;
- Complying with the law and all relevant rules, policies and regulations.
- Promoting fair dealing practices in transacting with customers, suppliers, partners, service providers, competitors, and employees;
- Maintaining confidentiality, where required, to ensure the protection of corporate, personal and third-party information;
- Taking reasonable steps to avoid any conflicts of interest, either real or perceived;
- Behaving in ways which uphold and reflect Summit Broadband's values of integrity, honesty and quality;
- Maintaining a safe and healthy workplace environment by following and encouraging others to follow safety and health rules and by reporting accidents, injuries and unsafe equipment, conditions or practices;
- Taking necessary steps to protect Company’s assets and ensuring their efficient use;
- Safeguarding Company’s proprietary information, trade secrets and trademarks;
- Protecting proprietary and confidential information of Summit Broadband’s customers;
- Prohibiting any violent or threatening behavior at the workplace;
- Prohibiting any use of illegal drugs or substances at the workplace;
- Safeguarding against one’s improper use of power or status in an effort to gain undue benefit or advantage over others;

- Making sure any private and personal information of other employees is kept confidential unless disclosure is necessary in the course of employment, or expressly authorized or required by law;
- Helping communities in which the Company operates and treating members of these communities with respect; and
- Committing to protecting the environment and following Summit Broadbands' Environmental, Social and Governance policies.

Adhering to the law, regulations and ethics is the foundation on which Summit Broadband's ethical standards are built. Summit Broadband's employees, officers and directors must comply with all laws, rules, and regulations applicable to the business and operations of the Company. Accordingly, an employee, officer or director's failure to fulfill his or her responsibilities under this Policy may result in disciplinary action, up to and including termination. Any Company employee, officer or director who is unsure about any aspect of these laws has to seek advice from supervisors, managers or other appropriate personnel.

An employee who becomes aware of a noncompliance with this Policy or a violation of a legal or ethical obligation must report the matter to Human Resources in order for appropriate measures to be taken. Summit Broadband prohibits any acts of reprisal or retaliation towards anyone reporting such violations as provided in its ***Anti-Retaliation Policy***. The Company will treat such information as confidential to the extent it can do so without failing to fulfill its legal obligations. In addition, employees who do not wish to identify themselves can report information anonymously.