



Supplier Code of Conduct

FiberLight is committed to conducting business with honesty, transparency, and integrity. This commitment applies equally to our supply chain. This Supplier Code of Conduct outlines the ethical standards and business practices expected of our suppliers, vendors, subcontractors, consultants and service providers and their employees, agents, and subcontractors ("Suppliers"). All Suppliers must comply with these requirements when conducting business with FiberLight. Suppliers are also expected to have their own policies, practices, and employee training to support such compliance.

1. Ethical Business Practices

FiberLight expects its Suppliers to operate ethically and responsibly and to win business fairly, including at a minimum the following:

Conflicts of Interest. Avoid any actual or perceived conflicts of interest that compromise Supplier's ability to make objective and fair decisions when performing work for FiberLight. This includes using FiberLight information or relationships for personal or financial benefit or to promote a competing business or activity. Additionally, Suppliers must promptly report to FiberLight any conflicts of interest.

Anti-Bribery/Anti-Corruption. Never engage in any form of bribery or corruption. All gifts and business entertainment involving FiberLight must be offered with a valid business purpose and reasonable and must never be offered in an effort to influence a business decision. Suppliers must not pay or receive bribes, kickbacks, or unlawful payments to or from any public or government official to secure a contract, concession, or favorable treatment.

Compliance with Laws. Operate in full compliance with all laws, rules, and regulations of the jurisdictions in which Supplier conducts business, including antitrust and competition laws, laws relating to financial crime, fraud and tax evasion and employment laws.

Books and Records. Maintain books and records accurately and completely. Never make any entry in your books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction.

Insider Trading. Never buy or sell securities when in possession of material, non-public information, and do not share such information with others for improper purposes.



2. Health and Safety

FiberLight expects its Suppliers to maintain a safe work environment for its employees and contractors, as well as members of the general public and anyone with access to job sites. This includes developing and enforcing safety practices, including at a minimum the following:

Occupational Safety. Suppliers must: (i) implement and enforce safety management practices that meet or exceed Occupational Safety and Health Act of 1970 requirements and industry standards; (ii) supply workers with protective equipment; and (iii) provide regular safety training to workers.

Tracking and Reporting of Injuries and Illness. Suppliers must: (i) foster open and transparent communication of safety-related incidents; (ii) track and report injuries and illnesses; (iii) perform post-incident investigations and encourage process improvements to prevent future incident recurrence; and (iv) promptly report to FiberLight any safety-related incidents or inquiries from any regulatory agency related to the performance of work for FiberLight.

Emergency Preparedness. Suppliers must have emergency plans and response procedures, including: (i) emergency preparedness, reporting, and notification; (ii) evacuation procedures; (iii) hazard detection and suppression equipment; and (iv) restoration and recovery procedures.

3. Labor & Human Rights

FiberLight expects its Suppliers to demonstrate a commitment to human rights, including, at a minimum the following:

Fair Treatment. Provide a workplace free of harassment, discrimination, violence, abuse, and inhumane treatment of workers. This includes prohibiting any form of harassment or discrimination based on an individual's race, ethnicity, gender identity or expression, sexual orientation, veteran status, religion, age, marital status, national origin, ancestry, pregnancy, medical condition, physical or mental disability or any status that is protected by law. This also includes treating workers with dignity and enhancing the overall quality of life of your workers.

Forced and Child Labor. Prohibit human trafficking, forced labor, and use of child labor. This includes recruiting responsibly and holding agents and recruiters to the same standards. Suppliers must ensure that workers are free to move about and exit the workplace and must not have their government-issued identification or travel documents withheld. All workers must meet applicable legal minimum age requirements.



Compensation and Working Hours. Comply with all laws regarding minimum wage, compensation and overtime and limit the number of working hours to the maximum allowed by law.

Freedom of Association. Follow applicable laws and regulations governing the rights of workers to join worker organizations.

Diversity. A diverse supply base is key to FiberLight's success. Supplier selection processes must be based on fair and competitive evaluations. We actively encourage and promote diversity and inclusion in our Supplier selections and expect our Suppliers to do the same.

Work Authorization. Suppliers must employ only individuals who are legally authorized to work in the jurisdiction where the work is performed. Suppliers shall have and maintain processes to verify the employment eligibility of all workers, including compliance with applicable immigration and employment laws. Suppliers shall not hire or continue to employ any person who does not have valid work authorization, and they must maintain all records necessary to demonstrate compliance.

4. Sustainable Business Practices

We expect our Suppliers to operate in an environmentally responsible manner and comply with applicable environmental laws, permits and regulations. At a minimum, this includes: (i) minimizing Supplier's environmental footprint and properly managing waste and hazardous materials; (ii) encouraging sustainable sourcing and eco-friendly manufacturing and packaging; and (iii) mitigating and managing Supplier's impact on natural resources, emissions, and discharges of pollutants.

5. Data Privacy and Security

FiberLight expects Suppliers to protect FiberLight's assets and confidential information and comply with the following, at a minimum:

Confidentiality. Safeguard confidential and proprietary information of FiberLight and its customers. This information includes all non-public information, including business plans, financial and competitive information, strategies, technology, marketing, pricing, and operational data. Suppliers must comply with all privacy and data protection laws.

Protection of Assets. Use best efforts to protect from loss, theft, abuse, and unauthorized access to any physical assets of FiberLight to which Supplier has been given access. This includes ensuring that FiberLight's assets are used only for legitimate business purposes.

Security. Implement encryption and security protocols to protect confidential information and prevent unauthorized use and disclosure.



6. Reporting Violations

Suppliers must report violations of this Supplier Code of Conduct, data breaches or misconduct promptly through FiberLight's confidential, third-party ethics hotline at: website: <https://report.syntrio.com/fiberlight/>; e-mail: reports@syntrio.com (must include company name with report); toll-free telephone: English speaking USA and Canada: 833-759-7300; Spanish speaking USA and Canada: 800 800-216-1288 or to legal@fiberlight.com.