

G-29 Environmental Policy

Effective Date: February 21, 2020

Revision Date:

Purpose

Shentel is committed to environmental stewardship and to mitigating our potential impact on the environment, including environmental risk analyses and disclosing material environmental impacts that our operations may have. This Environmental Policy (the “Policy”) outlines measures taken by Shentel’s management and employees to integrate the consideration of environmental concerns and impacts into our decision making and activities.

Commitments

Shentel is committed to mitigating our potential impact on the environment and operating in compliance with all relevant environmental legislation. Specifically, where consistent with our fiduciary responsibilities and business models, Shentel will:

- Incorporate environmental issues into its operational and financial analysis and decision-making processes;
- Strive to incorporate environmental issues into our policies and practices where consistent with the manner in which we undertake our operations;
- Request appropriate information and disclosure on environmental issues by the entities with which we partner.

Practices

Shentel has implemented certain practices that are regularly reviewed to ensure our actions are compatible with the objectives stated in this Policy. These practices currently include:

- *Vendor/Contractor Decisions:* As part of our diligence process, Shentel asks potential partners for detail on their environmental practices and policies and incorporates that information into our risk assessment and investment strategies. This includes areas of non-compliance with environmental laws and regulations, as well as a holistic review of the partner’s environmental policies generally.
- *Network Construction:* With respect to network construction and facility deployment operations, Shentel takes significant care to ensure that our activities minimally impact air and water resources, and do not result in the release of hazardous materials to the environment. Such work is undertaken only after the appropriate permits have been obtained from the

relevant local, state, and federal authorities, and our crews are trained to ensure that we remain in compliance with all applicable environmental regulations throughout the completion of permitted projects. Our construction managers also work with local utility authorities to ensure groundwater contamination does not occur on or around our job sites.

- *Wireless Operations:* Shentel operates all such equipment in its wireless operations in compliance with all applicable Federal Communications Commission's safety requirements applicable to radiofrequency energy as well as all other applicable environmental regulations.
- *Water Usage:* Shentel acknowledges the human right to water and sanitation, and specifically, that everyone is entitled to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic uses. Shentel commits to appropriate water usage for its operations and that it will comply with all local, state, federal or international environmental laws, regulations or policies.
- *Energy Usage:* Shentel has implemented processes and procedures in its vehicle fleets and facilities to ensure that vehicle travel and operation of our facilities are undertaken in the most efficient manner possible. Shentel is committed to better understanding our energy usage and carbon footprint so as to identify further opportunities to reduce such impacts.
- *Hazardous Materials and Waste Generation:* Shentel and its subsidiaries are not hazardous waste generators. Shentel does utilize batteries in some of its facilities to support network, transportation, and other operations. All such batteries are managed and disposed of properly under applicable regulations. Shentel generates used motor and similar oils, which are appropriately recycled through verified and trusted vendors pursuant to state and federal requirements specific to those materials. With respect to general waste reduction, Shentel has implemented a recycling program at our corporate offices as well as our warehouse facilities. Shentel's warehouse facilities have a recycling program for electronics, batteries, cardboard and wire/cable items and Shentel's offices are equipped with general waste receptacles as well as a variety of recycle receptacles for paper, plastics, glass, and aluminum and our employees are encouraged to make smart choices when it comes to waste.