

G-35 Human Rights

Effective Date: January 1, 2023

Revision Date: February 16, 2023

Purpose

Shentel believes that our business succeeds in environments where human rights are protected and respected. Human rights are a growing area of importance to our employees, shareholders, investors, customers and the communities in which we operate. This Human Rights Policy (the “Policy”) contains over-arching principles that we strive to respect and promote through our corporate operations.

Commitments

Shentel complies with all applicable national laws and international treaties concerning human rights, social rights, and labor rights, consistent with the principles of the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. Shentel strives to respect human rights within the communities in which we operate and to respect the human rights of all people affected by our business footprint. Shentel expects its employees, sub-contractors, suppliers, and vendors to comply with this Policy by consistently applying its standards in all business dealings and transactions. Shentel commits to:

- Engage with business partners and other stakeholders to respect the human rights of communities throughout its business footprint;
- Commit to communicate expectations to our employees, subcontractors, suppliers, and vendors and proactively engage with them when areas of concern are identified;
- Maintain a work environment that reflects respect for human rights and is free from discrimination and harassment, aligned with our Code of Business Conduct and Ethics;
- Strive to avoid complicity in human rights abuse and violations and to provide for or cooperate in their remediation; and
- Promote and ensure channels for transparent and open communication where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal.

Focus Areas

Shentel strives to incorporate the commitments contained in this Policy into the following areas of its business footprint:

- **Diversity and Inclusion.** Shentel values diversity and promotes practices that advance the inclusion of all people with whom we work. Shentel is committed to equal opportunity and strives to maintain safe work environments that are free from harassment or discrimination based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression or any other status protected by applicable law. Shentel believes that focusing on promoting practices that advance the inclusion of all people best helps us recruit a talented workforce that possesses the qualifications, performance, skills and experience that we value.
- **Safe, Healthy and Secure Workplace.** Shentel maintains a comprehensive set of health and safety programs, as well as workplace security plans. Shentel seeks to provide a safe and healthy workplace for each and every member of our workforce.
- **Forced Labor and Human Trafficking.** Shentel prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking and expects its outside third-party contractors, suppliers and vendors to oppose the same and to safeguard its workforce from all forms of forced labor and human trafficking.
- **Child Labor.** Shentel opposes the use of child labor, including abuse and exploitation, throughout our business operations and supply chains. Shentel acknowledges its obligation to protect children from harm and we therefore prohibit the hiring of individuals under the lawful age limit for each respective position.
- **Work Hours, Wages and Benefits.** Shentel strives to provide fair and just compensation and is committed to paying a competitive wage relative to the industry and local labor markets. Shentel strives for full compliance with all applicable wage, work hours, overtime and benefits laws.
- **Employee Privacy.** Shentel is committed to providing privacy protection of employee data maintained by us, and employee data will be used for the sole purpose of supporting our operations and providing employee benefits. The Company has safeguards in place to ensure personal data is protected from unauthorized access and disclosure, including limiting access to such data only to individuals with a legitimate business purpose.

Summary

Shentel will cooperate with customers, vendors, and employees to minimize any actual or potential adverse impacts our business activities may have on human rights, and



encourages our customers, sub-contractors and suppliers to adopt similar policies and objectives.