

Lumos Networks Operating Company dba Segra and its affiliates (collectively “Segra”) are committed to honesty, integrity and fair dealings in all of our business operations; it is the foundation of our success. Segra values your business and trusts that your company shares our commitment to doing business right. We expect our agents, contractors, suppliers and consultants (“Vendors”) to adopt their own, comparable ethical principles and by executing any contract or performing any work or services for Segra, you, as our Vendor, agree and acknowledge that as our Vendor, you will perform to the highest level of business and professional ethics, and adhere to the following guidelines for ethical and social responsibility conduct:

- Compliance with Anti-Trust and Fair Competition Laws. Vendor will comply with all applicable laws governing Vendor’s services, work or business, including, without limitation, compliance with any Antitrust and state uniform pricing laws, or any other anti-competition laws.
- Conflicts of Interest. Vendor will avoid any activity or appearance of impropriety, employment or acceptance of any contribution, if it would reasonably appear that such activity, employment, interest or contribution could compromise Vendor’s professional judgment or prevent or materially impair the Vendor from serving the best interests of Segra.
- Financial Integrity. Vendor shall provide and maintain honest and accurate reports and records regarding its financial and other performance on behalf of Segra, including without limitation, any invoicing, billing practices, charges and accounting in connection with Vendor’s performance of any contracts, including government contracts, or in the provision of services or supplies to Segra.
- Proprietary Information. Vendor shall take all actions and steps necessary to protect and safeguard the property and information of Segra, and Segra’s customers that might be shared with Vendor in accordance with our Agreement. Segra respects the same confidence you place in us.
- Labor and Human Rights. Segra is committed to conducting business in a way that respects human rights and the dignity of people. We prohibit the employment of underage children or forced labor, as well as any form of physical punishment or abuse. We expect Vendors to share our commitment to the same high standards. Vendors shall not engage in human trafficking, involuntary labor or child labor. Our suppliers should not exceed prevailing local work hours and will appropriately compensate overtime.
- Work Environment. Harassment or discrimination toward an individual because of race, color, creed, religion, sex (including pregnancy), national origin, gender, sexual orientation, age, disability or any other protected status is unacceptable in Segra’s work environment. Vendor agrees to provide for a safe and professional environment which promotes the values of teamwork, diversity and trust.
- Gifts to Foreign Officials. US companies and their employees and agents doing business outside of the US must comply with the provisions of the UK Bribery Act and Foreign Corrupt Practices Act (FCPA).
- Environment. Segra has a strong commitment to conducting business in an environmentally sustainable manner. We seek to implement measures to reduce the environmental impact of our operations. Therefore, Segra encourages Vendors to partner with us to promote environmental sustainability. Where applicable, Vendors are required to assist in reducing our environmental footprint, conduct business in an environmentally responsible way, and offer environmentally responsible products and services.

These guidelines are in addition to any requirements and obligations in any contract between Vendor and Segra, and the Vendor’s own Code of Business Conduct. Failure to comply with these obligations could result in termination of your contract.

If you have any questions or concerns about Segra's business conduct policies, please contact the Legal Team:

Lumos Networks Operating Company dba Segra
11215 N Community House Rd Ste. 1000, Charlotte, NC 28277
Attn: Segra General Counsel
Segra EthicsLine: 855-283-5141

You should report any illegal or unethical misconduct to Segra's Ethics Hotline at <https://www.whistleblowerservices.com/segra/>. Reports can be submitted anonymously without fear of retaliation by Segra.