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June 2020

MODERN SLAVERY STATEMENT
June 30, 2020

Zayo Group UK Limited is a private company limited by shares, incorporated in England and Wales with company number 03726666, having its registered office at 100 New Bridge Street, London, EC4V 6JA ("Zayo"), and a Fiscal Year ending on December 31 of each year. Zayo's activities and products include the delivery of communications infrastructure planning, service integration design, delivery and operation of dedicated fibre optic communications, wavelength and network solutions to customer requirements.

Zayo is committed to the improvement of the environment surrounding its activities, products and services for the benefit of employees, customers and those within Zayo's sphere of influence.
Zayo is accredited to ISO 9001:2015 Quality and ISO 14001:2015 Environmental and ISO 27001:2013 Information Security Management System.

Zayo is committed to prohibiting and driving out acts of modern day slavery within its business and its supply chains, including sub-contractors and partners.

Zayo acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

As part of Zayo's due diligence processes into modern slavery, Zayo's supplier approval process will incorporate a review of the controls undertaken by our suppliers. Zayo considers that the risks associated with modern slavery are low in the UK and in the sector in which Zayo operates. Imported goods from sources from outside the UK and EU are potentially more at risk for modern slavery issues. The level of management control required for these sources will be continually monitored.

Zayo will not support or deal with any business knowingly involved in modern slavery.

Zayo's directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that modern slavery is not taking place within the organisation and within its supply chains.

A full copy of this statement and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the Legal department upon request.

This statement takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 27001:2013. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning modern slavery have been established, including disciplinary procedures where they are breached.

Additional procedures ensure that this policy statement is understood and communicated to all levels of Zayo, and that it is regularly reviewed to ensure its continuing suitability and relevance to the Zayo's activities.

The ultimate responsibility for modern slavery not taking place within the organisation and its supply chain lies with the Managing Director, who will ensure that it is given equal priority with other major business objectives.

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Implementation of this policy statement is a line management responsibility at all levels together with participation of all employees.

This statement, supported by instructions, procedures and organisational arrangements within Zayo and its subsidiaries are to be applied to all activities, products and services carried out by Zayo. All directors, managers, supervisors, employees and sub- contractors will enforce this policy. The policy will be revised and updated as necessary.

This statement was approved by the Board of Directors on June 30, 2020.

DocuSigned by:
Matt Steinfort
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W. Matthew Steinfort, Director

June 30, 2020

Date