



# ENVIRONMENTAL, SOCIAL, AND GOVERNANCE REPORT 2021





# Disclosure

---

This presentation (the "Presentation") has been prepared by Grain Management, LLC (together with its affiliates, "Grain" or the "Firm") for discussion and informational purposes only, and is being furnished to parties ("Recipients") who wish to learn more about Grain's strategy, funds or vehicles (the "Strategy", the "Funds" or "Vehicles", or individually, "Fund" or Vehicle"). This Presentation and the information contained herein is not intended for general distribution or publication and under no circumstances may a copy be shown, transmitted, reproduced, or redistributed, in whole or in part, or otherwise given to any person without the express written consent of Grain. All copies of this Presentation, including electronic copies, must be retained in a confidential manner and must be deleted or destroyed upon the request of Grain, except to the extent they must be retained for regulatory purposes.

This Presentation contains confidential and proprietary information and the sole purpose of this Presentation is to assist the Recipient in evaluating Grain and its Funds. Certain of the Funds are newly organized entities and have limited or no prior operating history or track record. Past performance is not indicative of future results, and there can be no assurance that any Fund or Strategy will be able to implement its investment strategy or approach, achieve comparable results, that any target results will be met or that a Fund will be able to avoid losses. The investment strategies of the Funds and Vehicles differ from each other. Nothing contained in this Presentation should be deemed to be a prediction or projection of the future performance of any Fund, Vehicle or Strategy.

Any information included in this Presentation is based upon assumptions that Grain considers reasonable as of the dates indicated herein and was not prepared with a view towards public disclosure or compliance with any published guidelines. Grain makes no representations or warrants as to the accuracy, reasonableness or completeness of any information, statements and/or estimates presented herein (including but not limited to information obtained from third parties unrelated to Grain) and makes no representation that any investment in a Fund or proprietary investment vehicle sponsored by Grain will or is likely to achieve results similar to those shown herein.

The IRRs presented on a "Gross" basis do not reflect any management fees, carried interest, taxes and allocable expenses borne by investors, which in the aggregate may be substantial. Net IRRs are after management fees, carried interest, taxes and allocable expenses. All IRRs presented are annualized and calculated based on the investment inflows and outflows on the actual dates they occurred. Nothing contained herein should be deemed to be a prediction or projection of future performance of the Fund.

This Presentation does not constitute, an offer to sell any securities or a solicitation of an offer to purchase any investment product, or any interest in any Vehicle or security. Any offer or solicitation will be made only through a confidential private placement memorandum and will be subject to the terms and conditions contained therein. No reliance should be placed on this Presentation. The information set forth in this Presentation does not purport to be complete and is subject to qualification in its entirety by the private placement memorandum, limited partnership agreement, subscription document and any other such documents that may be relevant to a Fund or Vehicle. This Presentation does not consider the particular investment objectives or financial circumstances of any Recipient.

Certain information contained herein constitutes "forward-looking statements". Due to various risks and uncertainties, actual events or results or the actual performance of a Fund or Vehicle may differ materially from those reflected or contemplated in such forward-looking statements. Such statements are made based upon Grain's views as they exist as of the date of publication of this Presentation. There is no assurance that such views are correct or will prove, with the passage of time, to be correct. Actual events, results or performance may differ materially from those reflected or contemplated by such forward-looking statements as a result of factors beyond Grain's control.

Unless otherwise noted, all of the information in this Presentation is as of the date hereof.

The information contained herein is not intended to be complete and does not include all information a Recipient may desire or need to fully evaluate Grain. No representation or warranty is made by Grain as to the accuracy, reliability or completeness of any information contained herein or as to the non-occurrence of any change in the affairs of Grain since the dates as of which information is provided herein.



# CONTENTS

05 FOUNDER AND CEO LETTER

07 GRAIN TODAY

11 ESG INTEGRATION

14 CASE STUDIES

24 DIVERSITY, EQUITY, AND INCLUSION

28 ESG AT GRAIN

32 APPENDIX



# FOUNDER AND CEO LETTER

# To Our Partners

---

## **STEWARDSHIP AND RESPONSIBILITY REMAINS AN ESSENTIAL ASPECT OF GRAIN'S APPROACH TO VALUE CREATION**

Dear partners and friends,

The past year has driven home how vital communication technology is to communities across the globe. It has made clear our responsibilities as a firm to a wide variety of stakeholders. Just as I am proud of the value we have been able to create for our limited partners and portfolio companies, I am proud of the role our Firm has played in allowing so many families to continue on during difficult circumstances.

Serving as responsible stewards of capital means more than just creating financial value. We must hold ourselves to the highest standard of excellence on issues of environmental, social, and corporate governance. In my view, that requires us to always keep in mind "R to the fourth power": to do the right things, for the right reasons, the right way, at the right time.

Grain Management has sought to weave those principles into our investment strategy. We invest in businesses that are grounded in their communities and give back in a variety of ways. Companies like Ritter Communications, which provides its employees time off to give back through community service. And companies like Hunter Communications, which worked tirelessly to build out service to the Hoopa Valley Tribe and connect communities devastated by wildfires.

Investing in companies that not only perform well, but that have strong commitments to environmental and social causes is not just the right thing to do. It leads to more creative problem-solving, opening opportunities that may not have otherwise appeared. It leads to higher profits, as communities invest back in companies that invest in them. And it leads to more innovation, as we seek to tackle the problems of tomorrow.

Our journey down this road is far from over. But I am thrilled with the progress we have made so far and at the prospect of future growth as we continue together.

David Grain



GRAIN TODAY



# Investing in Broadband Technology

## INSPIRED BY NEXT GENERATION NETWORKS AND THE GLOBAL INTERNET OF EVERYTHING

Grain Management was formed nearly 15 years ago to bring a more effective and differentiated approach to investing in global telecommunications. Along the way, the Firm has sought to examine its investments, not only for their return potential, but for their ability to connect people to the world's most valuable asset, information. To Grain, this dual approach to outperformance has been the very definition of responsible investing.

More than ever, the business of connecting our world is essential work, and Grain has taken a leadership role in creating opportunity and growth. We are passionate about investing in Broadband and helping untapped communities around the world develop critical infrastructure. What follows is a snapshot of Grain's current portfolio and the solutions those businesses provide in their respective regions.

## ACTIVE INVESTMENT PORTFOLIO



Conexão Group provides broadband services using primarily fiber to the home technology to over 450,000 homes and 20,000 business customers throughout northeastern and southeastern Brazil.



Network Wireless Solutions is a rapidly growing solutions and logistics provider to carriers and telecommunications contractors.

### NEWLEVEL II

NewLevel II is a portfolio of wireless spectrum licenses acquired through the FCC-sponsored Auction 107, commonly referred to as the C-band auction.



Hunter Communications is a leading fiber connectivity provider based in Medford, Oregon with a presence throughout southern Oregon and parts of northern California.



Summit Broadband is a leading fiber-optics telecommunications provider in central and southwest Florida.



Ritter Communications is the largest privately-held regional broadband fiber, telecom, video, and cloud services provider in the mid-south region of the United States.



Great Plains Communications is the largest privately-owned telecommunications provider serving Nebraska for over 100 years, extending to the midwest United States.



CE Workforce is a participant in T-Mobile's Premium Retailer Program with 19 stores across the southeastern United States.

### NEWLEVEL

NewLevel is a portfolio of wireless spectrum licenses in the 600 MHz band across some of the fastest growing markets in the United States.

# Grain by the Numbers



**FOCUS**



**TOTAL MANAGED ASSETS<sup>1</sup>**



**INVESTMENT  
VEHICLES**



**COMBINED YEARS  
OF EXPERIENCE**



**LOSS RATIO<sup>2</sup>**



**PROFESSIONALS**

1. "Managed Assets" represents (a) for GIF II, GSH and GSH II, the cost of assets within the investment vehicle, including those financed with debt, and (b) for GIF, GCOF, GCOF II, GSH III, and GCOF III fund equity capital commitments plus co-investment controlled by Grain as of April 1, 2021.

2. Past performance is not indicative of future results, and there can be no assurance that any Grain Investment Vehicle will be able to implement its investment strategy or approach, achieve comparable results, meet its target results or be able to avoid losses. Nothing contained herein should be deemed to be a prediction or projection of the future performance of any Grain Investment Vehicle.



# ESG INTEGRATION



Grain's approach to corporate responsibility includes the assessment of ESG factors throughout the investment lifecycle



## I. PRE-INVESTMENT

To ensure ESG considerations in the pre-investment phase, Grain assesses ESG value creation opportunities.

When material ESG matters are identified, they may be included in discussions with the Investment Committee and external advisors may be engaged to carry out additional due diligence as needed.



## II. MONITORING PROGRESS

Where there are addressable and material factors identified during the diligence process, Grain includes their management in a 100-day post-close plan, or may otherwise monitor ongoing progress on ESG matters, as applicable.

Where the management of a material issue is considered by Grain to need improvement, Grain works with management teams to support the development of a corrective action plan.



## III. ENGAGEMENT AND TRANSPARENCY

Grain seeks to be transparent in its approach to incorporating ESG considerations in its investments by reporting at least annually on its progress and outcomes across its portfolios.

Throughout the investment cycle, Grain looks to actively engage with companies to improve ESG metrics in ways Grain believes are beneficial to the company and can mitigate risk.



# CASE STUDIES



# HUNTER COMMUNICATIONS

ACQUIRED IN APRIL 2020  
OREGON, UNITED STATES



# Case Study: Hunter Communications

## Providing connectivity to rural and tribal lands in Oregon and California

Hunter Communications delivers reliable internet and phone services to businesses and homes in southern Oregon and northern California. Founded in 1994, Hunter has established a legacy of service excellence and commitment to local communities. From its wildfire response to its extensive work with the Hoopa Valley Tribe, Hunter has shown its dedication to keeping employees, customers, and communities connected and safe. Most recently, Hunter was awarded \$19.2 million through the Federal Communication Commission's Rural Digital Opportunity Fund, designed to inject billions of dollars into the construction and operation of rural broadband networks. Through this fund, Hunter will deploy 100% fiber-optic broadband networks to offer up to 1 gigabit symmetrical internet services to 5,771 underserved homes and businesses in rural Oregon and northern California communities.

### CONNECTING THE HOOPA VALLEY TRIBE

Hunter worked with the Hoopa Valley Tribe to install fiber-optic networks to their lands, spanning 92,000 acres across northwestern California. This area of California has heretofore been underserved, due to its remote, challenging terrain. Hunter's crews lived and worked in the community while conducting the build, connecting 60 tribal locations.

Since the initial build, Hunter continues to bring higher connectivity to the Tribe through subsequent initiatives. Most recently, Hunter was awarded \$8 million in funds from the California Advanced Services Fund and the California Public Utilities Commission to provide high-speed broadband internet services to the Tribe. It is estimated that 1,198 unserved households will benefit from the proposed activities. Hunter's activities will also provide a safe and reliable network in the event of hazardous weather or wildfire.

### HUNTER HEROES RECONNECT FIRE-RAVAGED COMMUNITY

Hunter crews and employees worked tirelessly, up to 20 hours per day, to restore critical fiber broadband connectivity to areas devastated by southern Oregon's wildfires – Almeda, South Obenchain, and Table Rock Fires. Hunter's workers also restored internet service to firefighters and other first responders to the damaged region.

The Hunter Heroes crews assisting with the wildfires restored 71,298 feet of fiber within 13 days.

## Hunter's ESG Highlights

Hunter had an eventful year exemplifying the principles that make the Grain family excel. Stewardship and corporate responsibility came to the fore both in Hunter's work with the Hoopa Valley Tribe and in the restoration of the areas of southern Oregon damaged by wildfires.

Here are the highlights:

---

1,198

Hoopa Valley Tribe households  
connected

---

71,298

Feet of fiber restored after Oregon  
fires

---

\$19.2M

Broadband expansion funding to  
connect underserved Oregon homes  
and businesses



# SUMMIT BROADBAND

ACQUIRED IN JANUARY 2020  
FLORIDA, UNITED STATES



# Case Study: Summit Broadband

## Expanding community and business connectivity across Florida

Summit Broadband is a leading fiber-optics telecommunications provider in Central and Southwest Florida. The business provides data, voice, video, and high-speed internet services to commercial and residential customers, as well as Ethernet and dark fiber transport to enterprise and wholesale customers. Providing a superior customer service experience since 1994, Summit owns and operates its own fiber-optic networks, with a reach of more than 2,700 route miles, serving multiple industries and communities.

### CREATING SMARTER CITIES

Further expanding its reach, Summit was awarded a private-public partnership with the city of Lakeland – one of the largest inland communities in Florida – to provide high-speed internet services to homes and businesses. As it has in many cities globally, internet access in Lakeland has become even more important in the wake of the pandemic. Lakeland currently owns and operates a 350-mile fiber-optic network providing internet to its school district, local libraries, public safety entities, and electric utilities for substation monitoring. The city's long-term broadband plan is to become a "Smart City" leveraging its existing network to offer all residences in the city broadband services via a city-wide network.

In 2020, Summit also won a contract to participate in the City of Lakeland's Digital Divide program – providing affordable broadband access at reasonable speeds to low-income citizens. Summit also became a sponsor of the Wi-Fi grant for after-school communities.

Lee County, a school district in Florida, awarded Summit a contract to provide internet and transport services to 98 school and administration sites. The Summit team is proud to connect these education sites through the federal E-Rate program.

## Summit's ESG Highlights

### COMMUNITY INVOLVEMENT

- In April 2020, Summit sponsored the local Special Olympics chapter and was named Allied Member of the month by the Allied Relations Council Board
- Summit donated formal evening wear to Central Florida Hotel & Lodging Association to benefit students affected by housing insecurity, a meaningful gesture towards families that may be experiencing challenges. The students helped were able to confidently attend their school's annual promenade dance, often a night of celebration and excitement before graduation

---

# 50,700

Homes connected by Summit's networks

---

# 2,700

Fiber route miles network-wide



# GREAT PLAINS COMMUNICATIONS

ACQUIRED IN OCTOBER 2018  
NEBRASKA, UNITED STATES



# Case Study: Great Plains Communications

## Pledging to keep America connected during the COVID-19 pandemic

Great Plains Communications has provided fiber-based custom technology services to over 200 communities across Nebraska and beyond, powered by its 13,500 mile fiber network. Helping to sustain and advance the communities that Great Plains serves is a key aspect of its corporate culture, which has been passed on for over a century. To support the company's culture, Great Plains dedicates resources and time to local organizations through a variety of aid efforts, grants, sponsorships, and donations.

### **SUPPORTING ITS COMMUNITIES DURING THE COVID-19 PANDEMIC**

Great Plains ensured its customer businesses, homes, schools, and healthcare institutions have working services during the pandemic.

- After signing the Federal Communications Commission's "Keep America Connected" Pledge, Great Plains waived new customer installation fees and speed upgrade fees to accommodate working and learning from home. The company also committed to suspending disconnections for non-payment on a temporary basis
- Great Plains re-routed funds from its internal IMPACT program, an initiative designed to work with non-profits to fund community projects, to provide free or reduced internet rates to customers affected by COVID-19
- The COVID-19 pandemic and resulting shift to remote learning for many students exposed the depth of the "homework gap" that already existed for some families. While Great Plains currently connects 83 sites and schools through the E-rate program, the company is working to roll out fiber-to-the-home to seven Nebraska areas utilizing funding from the 2020 CARES Act. These efforts will promote fiber access students need for learning and may benefit families and businesses alike in telework, telehealth, and more, with the potential to connect 4,800 homes and businesses in the region

## Great Plains' ESG Highlights

### **GREAT PLAINS SUPPORTS ENTERPRISE CUSTOMERS AND THE FUTURE OF WORK**

Great Plains provided free trials of its Unified Communications platform to enterprise customers to facilitate the new remote work environment. The Unified Communications platform offers a hosted voice system, scalability, and collaboration for enterprises with multiple locations.

# 13,500

Fiber route miles in Great Plains' network

# 4,800

New homes and businesses to gain access through Great Plains' expansion



# RITTER COMMUNICATIONS

ACQUIRED IN OCTOBER 2019  
ARKANSAS, UNITED STATES



# Case Study: Ritter Communications

Serving its local communities with advanced, affordable technology

Founded in 1906, Ritter Communications is a leading communications provider, offering business, residential, and wholesale customers advanced internet, phone, video, and cloud services. Ritter invests heavily in the communities they serve by employing locally and deploying proven, best-in-class infrastructure and technology. With a focus on its employees and world-class customer experience, Ritter is committed to growing and evolving to meet the demands of today's ever-connected world.

## COMPETITIVE ADVANTAGES OF AN INTENTIONAL CORPORATE CULTURE

In 2015, Ritter formed a Culture Committee comprised of a diverse set of its employee population. The Culture Committee conducts a biennial culture survey to measure employee satisfaction, engagement, and how well the company is living up to its core values. The culture score is measured by likelihood to recommend Ritter as a place of employment. In its most recent survey, Ritter's culture score was 40, well above the industry average for employee satisfaction. Culture scores range from -100 to +100, where scores between -20 and +20 are considered neutral, and a score of -2 is average.

---

45,000

Customers served

---

3,400

Fiber route miles

---

100

Communities served

## Ritter's ESG Highlights

0.6

In 2020, Ritter's Occupational Safety and Health Administration recordable incident rate was 0.6, well below the 2.6 industry average

343

Ritter employees offered 343 hours of community service using Ritter's community service paid-time off policy



# DIVERSITY, EQUITY, AND INCLUSION



# DE&I as a Competitive Advantage

## WHY IT MATTERS

Grain is committed to diversity, equity, and inclusion at all levels of the Firm. We believe our commitment provides a strategic, long-term edge as a partner to investors and management teams alike.

In McKinsey & Company's 2019 analysis *Diversity Wins: How Inclusion Matters*<sup>1</sup>, companies in the top quartile for gender diversity on executive teams were 25% more likely to have above-average profitability than companies in the fourth quartile. Ethnic and cultural diversity are similarly correlated with performance: companies in the top quartile for ethnic and cultural diversity outperformed companies in the fourth quartile by 36%.

\$12T

ADDITIONAL GDP IF GENDER GAP IS NARROWED BY 2025<sup>2</sup>

\$2B

POTENTIAL REVENUE IF FINANCIAL INCLUSION EFFORTS BROADEN SERVICES FOR BLACK AMERICANS<sup>2</sup>

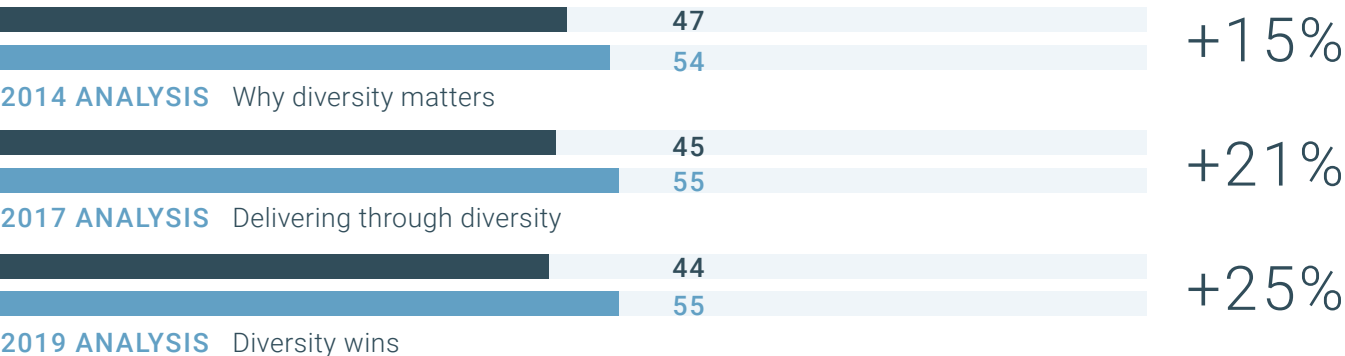
160M

WOMEN THAT MAY NEED TO CHANGE JOBS THROUGH 2030 DUE TO AUTOMATION<sup>2</sup>

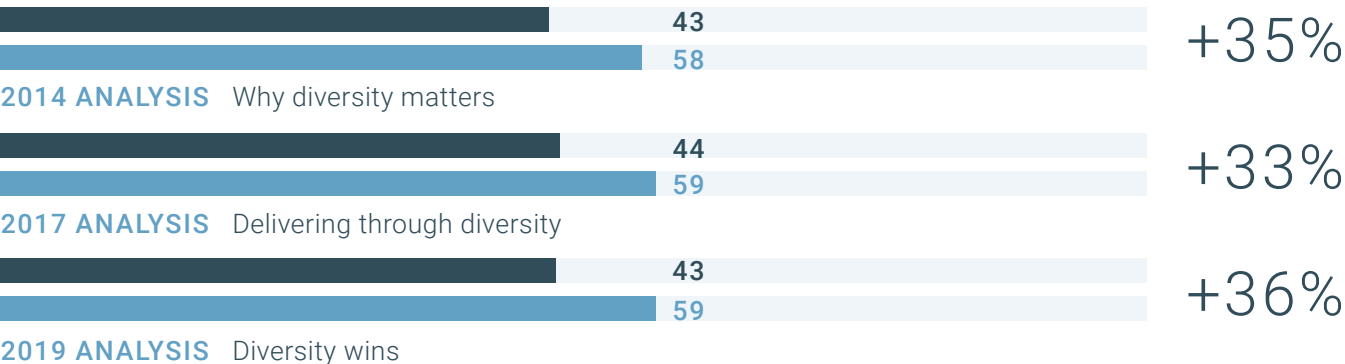
## THE BUSINESS CASE FOR DIVERSITY IN EXECUTIVE TEAMS REMAINS STRONG<sup>1</sup>

### LIKELIHOOD OF FINANCIAL OUTPERFORMANCE (%)

#### BY GENDER DIVERSITY



#### BY ETHNIC DIVERSITY



● Top quartile ● Bottom quartile

1. [Diversity Wins: How Inclusion Matters | McKinsey & Company.](#)  
2. [Featured Insights: Diversity and Inclusion | McKinsey & Company.](#)



# Strength in Diversity

## DE&I IS AT THE HEART OF GRAIN'S PHILOSOPHY

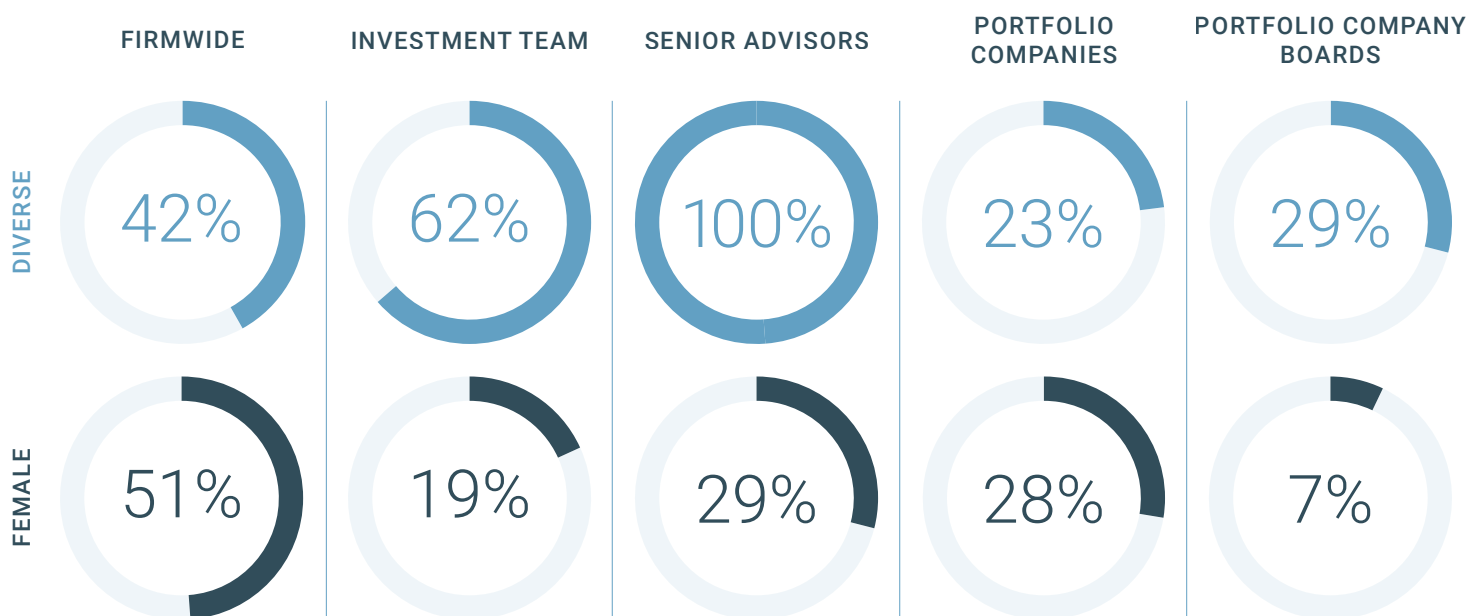
Do the right things, for the right reasons, the right way, at the right time. These “four R’s” drive everything we do.

We are committed to ensuring an inclusive, high-performing environment that drives growth. Grain regularly combs the market for unique, exceptionally skilled people with varied backgrounds, ethnicities, identities, perspectives, and orientations, and we proactively develop our team’s talents to enrich and advance them.

We leverage the strength of our diverse team of seasoned professionals to foster a culture of continuous progress and improvement, thoughtful execution, constructive feedback, and accountable collaboration.

We extend our philosophy at the Firm level down to our portfolio companies, committed to the idea that diversity of background and perspective leads to smart, differentiated investment and operating decisions.

In 2020, Grain added eight investment professionals, a compliance professional, a human resources and talent professional, two finance professionals, two investor relations professionals, and two senior advisors. Of Grain’s new hires in 2020, 50% were women and 56% were diverse professionals. We are committed to expanding our team with the best industry talent to develop the Grain platform and further our extensive sector knowledge and rigorous, analytic process.



Note: Diverse includes individuals who self-identify as American Indian or Alaskan Native, Asian, Black or African American, Hawaiian or Pacific Islander, Hispanic or Latino, Two or More Races or Other Ethnic Group.



# ESG AT GRAIN



# Impact in Action

## ACCELERATING DIGITAL INCLUSION WITH THE EDISON ALLIANCE

Grain has joined the Essential Digital Infrastructure and Services Network, or The EDISON Alliance, a global partnership launched by the World Economic Forum dedicated to addressing the digital divide to ensure more people have access to the technologies that connect our world. As a member of The EDISON Alliance, Grain will work alongside a multi-sector collection of premiere corporate leaders and entities to create global and equitable access to the digital economy. In partnership with the Alliance, Grain will work to bring together telecommunications operators, technology companies, public sector leaders, and leading thinkers and innovators in our space to bridge the digital divide. Through this partnership, Grain has a hand in shaping the systems necessary to ensure millions, and potentially billions, more people are connected to technology and information.

25,500

FACE MASKS SECURED FOR OUR  
PORTFOLIO COMPANIES

125,000

HAND SANITIZER PACKETS DISTRIBUTED TO  
OUR PORTFOLIO COMPANIES

## MAINTAINING COVID-19 RESPONSE SUPPORT FOR OUR PORTFOLIO COMPANIES

The COVID-19 pandemic presented a unique opportunity to reflect on our business and the businesses of our portfolio companies while maintaining and sustaining business continuity. COVID-related circumstances, such as remote work arrangements, have not impacted Grain's ability to maintain operations. While Grain's teams transitioned to remote work without incident, the Firm established a team comprised of the Chief Operating Officer, Chief Compliance Officer, and Chief Talent Officer to address firmwide COVID-related matters. In support of our portfolio companies, Grain organized and facilitated regular calls with leaders to share their experiences, cross-pollinate solutions, and support each other in solving common issues. Early in the pandemic, Grain's procurement team responsibly sourced PPE, including masks, hand sanitizer, and washable reusable masks for our portfolio companies. These items helped our companies protect their employees and customer bases while employees provided essential services for customers to stay connected to work and school.



# Impact in Action

## CLOSING THE OPPORTUNITY DIVIDE

Grain supports several organizations whose mission is to advance education, mentorship, and career opportunities for diverse groups, including Sponsors for Educational Opportunity, the Robert Toigo Foundation, and Year Up, a non-profit focused on closing the opportunity divide for under and unemployed young adults in the Washington metropolitan area.

In 2020, Grain went a step further and partnered with Diligent Corporation for Modern Leadership, a governance software company, in catalyzing diversity. Grain committed to increasing visibility and transparency in its searches for open board of director roles, supporting the move towards broader representation.

At the Firm level, the investment team takes an active role in recruiting diverse team members. Jenny Zhang, investment team Principal, manages recruiting at the junior level, building a pipeline of strong candidates from a variety of backgrounds, encouraging diversity of ethnicity, gender, and experience. Jenny was acknowledged as one of Mergers & Acquisitions' 2020 Rising Stars of Private Equity, exemplifying the importance Grain places on giving its talent a platform to develop and succeed.



*"We have a uniquely diverse team already, and as we grow the Firm we want to not only maintain that diversity but further enhance it. As the most senior female dealmaker on the team, I am acutely aware that women are significantly underrepresented across the private equity industry, and I am committed to bringing on more female talent to our investment team."*

– JENNY ZHANG, PRINCIPAL

## INVESTING IN THE FUTURE OF OUR INDUSTRY

Grain has been a long-standing member of the National Association of Investment Companies (NAIC), the largest network of diverse-owned private equity firms and hedge funds. Through education, advocacy, and innovation, the NAIC is focused on increasing the flow of capital to high-performing diverse investment managers. During NAIC's 2020-2021 MBA Fellowship class, Grain sponsored Nicole Allain-Stockton, a young professional who has been an invaluable part of the program and to NAIC's Women in Alternatives initiative. Grain is proud to sponsor talented and driven professionals like Nicole as we aim to continue increasing the pipeline of diverse talent among the industry.



*"Through the NAIC MBA Fellowship program, I have been given the opportunity to gain greater exposure to the private equity industry and more importantly, the chance to help to increase the number of women within the industry through NAIC's Women in Alternatives Initiative. The program has offered me an enriching experience to broaden my understanding of the innerworkings of private equity firms like Grain."*

– NICOLE ALLAIN-STOCKTON, 2020-2021 NAIC MBA FELLOW



# APPENDIX



# Select Environmental Data

Our portfolio companies have implemented initiatives, policies, programs, and plans where applicable to their operations in order to be a good steward of our environment

POLICY / INITIATIVE	COMPANY 1	COMPANY 2	COMPANY 3	COMPANY 4	COMPANY 5
Energy Usage / Efficiency Initiative					
Materials Disposal / Recycling Policy					
Internal COVID-19 Response Policy					
Climate Change / Pandemic / Natural Disaster Response <sup>1</sup>					
Pollution / Waste Management Policy					
Electronic Waste Management Policy					
Green Certifications Held					

POLICY OR INITIATIVE IN PLACE

IMPLEMENTING POLICY

NO POLICY OR INITIATIVE IN PLACE

COMPANY DID NOT REPORT

1. Including within a business continuity plan.



# Select Social Data

Every company operates within a broader, diverse society. Our companies acknowledge the importance of these relationships and have adopted initiatives, plans, and programs across these areas

POLICY / INITIATIVE	COMPANY 1	COMPANY 2	COMPANY 3	COMPANY 4	COMPANY 5
Customer Satisfaction Tracking	●	●	●	●	●
Employee Satisfaction Tracking	●	●	●	●	●
Internal Mentorship Program	●	●	●	●	●
Community Mentorship Program	●	●	●	●	●
Equal Employment Opportunity (EEO) Policy	●	●	●	●	●
Charitable Contributions <sup>1</sup>	●	●	●	●	●
Community Restoration and Aid Initiatives	●	●	●	●	●
Community Scholarships, Sponsorships and Grants	●	●	●	●	●
Native American Tribes Served	●	●	●	●	●
Rural or Underserved Communities Served	●	●	●	●	●
Non-profits Served	●	●	●	●	●
Hospitals Sites or System Served	●	●	●	●	●
Government, Education, and Medical Served	●	●	●	●	●
E-Rate / Schools Served	●	●	●	●	●
Employee Volunteerism Program	●	●	●	●	●
Employee or Company Honors / Awards Received	●	●	●	●	●
System Average Interruption Tracking	●	●	●	●	●
Customer Average Interruption Tracking	●	●	●	●	●
Free Service Programs Offered	●	●	●	●	●
Community COVID-19 Program / Assistance	●	●	●	●	●

● POLICY OR INITIATIVE IN PLACE
 ● IMPLEMENTING POLICY
 ● NO POLICY OR INITIATIVE IN PLACE
 ● COMPANY DID NOT REPORT

1. Includes charitable contributions or other community financial commitments.



# Select Governance Data

Governance is demonstrated by policies, procedures, and oversight designed to ensure the company is able to govern itself, make effective decisions, comply with regulation, and meet its ethical standards and cultural goals

POLICY / INITIATIVE	COMPANY 1	COMPANY 2	COMPANY 3	COMPANY 4	COMPANY 5
Business Continuity Plan	●	●	●	●	●
Code of Ethics	●	●	●	●	●
Employee Development / Wellness or Training Program	●	●	●	●	●
Employee Turnover Ratio Tracking	●	●	●	●	●
Wage and Fair Benefits Initiatives	●	●	●	●	●
Salary / Benefits Benchmarking	●	●	●	●	●
Cybersecurity Policy	●	●	●	●	●
Data Privacy / Protection or Data Confidentiality Policy	●	●	●	●	●
Fraud, Bribery, Corruption or Conflicts of Interest Policy	●	●	●	●	●
Fleet Management Policy	●	●	●	●	●
Anti-Harassment Policy or Reporting Procedure	●	●	●	●	●
Whistleblower or Anti-Retaliation Policy	●	●	●	●	●
Procurement Policy	●	●	●	●	●
Injury Reporting Procedure	●	●	●	●	●
Regular Board Meetings Held	●	●	●	●	●
Employee Open-Door Policy	●	●	●	●	●
Employee Health and Safety Policy	●	●	●	●	●

● POLICY OR INITIATIVE IN PLACE
 ● IMPLEMENTING POLICY
 ● NO POLICY OR INITIATIVE IN PLACE
 ● COMPANY DID NOT REPORT

