



October 31, 2022

Subject: Business Continuity/DR Plans

To Whom It May Concern,

Windstream Business Continuity Plans, Cyber Security Incident Response Plan, and Windstream Disaster Recovery Plans (collectively "Plans") are confidential documents within our company. Windstream cannot disclose the full Plans, as they include detailed proprietary and personnel information, including IP addresses, system host names, private bridge numbers for emergency situations, known vulnerable aspects of our company, and personal information of Windstream executives and employees. Therefore, we have prepared the following summary of the Plans:

**Windstream's Business Continuity Plan** is maintained by the company and includes various scenarios that may occur in the geographic and political-economic areas in which Windstream operates, including if Windstream has to vacate any or all places of business for extended periods. The Plan is reviewed and tested annually, and Windstream makes updates to accommodate issues, acquisitions, and new situations that arise. The business continuity readiness is reported to the company's executive management annually.

Windstream conducts annual testing on each Plan throughout the year. Management conducts annual testing of the Plan utilizing tabletop and scenario testing to ensure that Windstream can maintain customer support during a business continuity event and to determine whether any tools, processes or risks should be reevaluated or remediated. In addition to customer support activities, regular facility preventative maintenance activities are performed on utility power and redundant power infrastructure and cooling infrastructure components.

**Windstream's Cyber Security Incident Response Plan** covers all high-risk security events, suspected incidents and incidents discovered by internal alerts, reports, unusual activity, external alerts, advisories or communications. It is tested and updated at least annually; and regularly updated to the extent necessary to remediate risks or to remain consistent with industry best practices.

**Windstream's Disaster Recovery Plans** are designed to enable a rapid response to, and successful recovery from, a disruption of operations at one of the Windstream IT Data Center facilities. Implementation of these plans would minimize disruption to service, mitigate financial losses, and allow a timely resumption of operations. These plans are written for a worst-case scenario and may be adapted to any situation in which operations are disrupted, including but not limited to:

- Physical damage to the facility such as fire, smoke, water, or structural damage
- Lack or restriction of access to the facility due to an emergency building evacuation or during a natural disaster or other hazardous situation
- Technical failure such as a power outage, loss of telecommunications service, or hardware or software failure
- Human interference, accidental or deliberate, including sabotage, theft, and strikes.

Windstream conducts an annual recovery exercise to provide experience to recovery teams and to validate the completeness and effectiveness of the recovery plan, hardware, off-site software, and off-site data backups.

Windstream's BC Program Manager is certified by the Business Continuity Institute and participates in continuing education programs. The Manager also conducts an annual review of all documents and meets annually with Windstream executives.

Sincerely,

A handwritten signature in black ink that reads 'Gregory Weill'.

Gregory Weill

Chief Compliance Officer, Windstream Holdings II, LLC