



POLICY FOR REPORTING VIOLATIONS AND COMPLAINTS

One of Anterix's most valuable assets is its integrity. Protecting this asset is the job of everyone in the Company. To that end, we have established our [Code of Business Conduct](#) (the "**Code**") to help our employees comply with the laws and regulations applicable to our business and to maintain the highest standards of ethical conduct.

Purpose of Policy

This for Reporting Violations and Complaints, sometimes referred to as Whistleblower Policy, ("**Policy**") is meant to supplement our Code by encouraging employees to report any suspected violations or concerns as to compliance with laws, regulations, our Code of Business Conduct or other Company policies, or any complaints or concerns regarding the Company's accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters. In this Policy, "we" and "our" refer to Anterix, Inc. and its subsidiaries.

Scope of Policy

This Policy applies to all employees, officers, directors and independent contractors of Anterix, Inc. and its subsidiaries ("Anterix" or "Company"), all of whom are referred to collectively as "**employees**" or "**you**" throughout this Policy.

As an Anterix employee, if you are aware of a potential Violation (defined below) and do not report it according to this Policy, your inaction may be considered a Violation itself, which may result in disciplinary action, up to and including termination of your employment or any other relationship that you may have with Anterix.

Obligation to Report Suspected or Actual Violations; Anonymous Reporting

Reporting Generally

It is every employee's obligation to report suspected or actual violations of laws, government rules and regulations, the Code, or other Company policies. If an employee has reason to believe that questionable or illicit conduct exists, including conduct related to the reporting of the Company's financial performance, the Company's accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters (a "**Violation**"), the employee should immediately report those facts to their supervisor or manager or by using the anonymous reporting procedures set forth below. As noted below, supervisors and managers are required to report to the Chief Legal Officer and Corporate Secretary ("**CLO**") any time they receive a report of a concern about our compliance with laws, the Code or other Company policy, any notice of any suspected wrong-doing by any employee, officer or director, any complaint or concern about the Company's accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters.



Anonymous Reporting

Alternatively, if you wish to report any such matters **anonymously**, you may do so as follows:

- submit an online report through the Anterix Ethics and Compliance hotline at [Anterix Compliance Hub](http://anterix.navexone.com/intake/) (anterix.navexone.com/intake/)
- call The Anterix Ethics and Compliance hotline at **855-813-7348**

or

- mail a description of the suspected violation or other complaint or concern to:

Anterix Inc.
3 Garret Mountain Plaza
Suite 401
Woodland Park, NJ 07424
Attention: Chief Legal Officer and Corporate Secretary

or

Anterix Inc.
3 Garret Mountain Plaza
Suite 401
Woodland Park, NJ 07424
Attention: Chair, Audit Committee.

Treatment and Retention of Complaints and Reports

Each supervisor and manager shall report any suspected violation, concern or complaint reported to such person by employees or other sources to the CLO to assure proper treatment and retention of complaints, concerns or notices of potential violations. In addition, employees should note that persons outside the Company may report complaints or concerns about suspected violations, or concerns regarding internal accounting controls, accounting or auditing matters. These concerns and complaints should be reported immediately upon receipt to the CLO.

Supervisors and managers as well as the CLO shall promptly consider the information, reports or notices received by them under this Policy or otherwise. Each person shall take appropriate action, including investigation as appropriate, in accordance with applicable laws, governmental rules and regulations, the Company's Code of Business Conduct and otherwise consistent with good business practice.

Upon receipt by CLO, all notices or reports of suspected violations, complaints or concerns received pursuant to this Policy shall be recorded in a log, indicating the description of the matter reported, the date of the report and the disposition thereof, and the log shall be retained for five years. This log shall be maintained by the CLO.



Statement of Non-Retaliation

It is a federal crime for anyone to retaliate intentionally against any person who provides truthful information to a law enforcement official concerning a possible violation of any federal law. Moreover, the Company **will not permit** any form of intimidation, discrimination, retaliation or harassment by any officer, employee, contractor, subcontractor or agent of the Company against any employee because of any lawful act done by that employee to:

- provide information or assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulations, the Company's Code of Business Conduct, or any Company policies; or
- file, testify, participate in, or otherwise assist in a proceeding relating to a violation of any law, rule or regulation.

Any such action is a violation of Company policy and should be reported immediately under this Policy. Persons who discriminate, retaliate or harass may be subject to civil, criminal and administrative penalties, as well as disciplinary action, up to and including termination of employment.

Statement of Confidentiality

The Company will, to the extent reasonably possible, keep confidential both the information and concerns reported under this policy, and its discussions and actions in response to these reports and concerns. In the course of its investigation, however, the Company may find it necessary to share information with others on a "need to know" basis.

Violation of This Policy

Any employee, regardless of position or title, who violates any provision of this Policy will be subject to discipline, up to and including termination of employment.

Administration of This Policy

Anterix expressly reserves the right to change, modify, or delete the provisions of this Policy without notice.

The Legal Department administers this Policy. All employees are responsible for consulting and complying with the current version. If you have any questions regarding this Policy, please contact the Legal Department.

Related Policies: [Code of Business Conduct](#)

Templates and Forms: None

Reference Material and Additional Guidance: [Anterix Compliance Hub](#)

Acknowledgment of Receipt and Review

By selecting "finished", I acknowledge that I read the Reporting Violations and Complaints, understood it, and agree to comply with it. I understand that Anterix has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this Policy at any time, with or without notice. I also understand that any delay or failure by Anterix to enforce any work policy or rule will not constitute a waiver of Anterix's right to do so in the future. I understand that neither this Policy nor any other communication by a management representative or any other employee,



whether oral or written, is intended in any way to create a contract of employment. I understand that unless I have a written employment agreement signed by an authorized Anterix representative, **I am employed at will, and this Policy does not modify my at-will employment status**. If I have a written employment agreement signed by an authorized Anterix representative and this Policy conflicts with the terms of my employment agreement, I understand that the terms of my employment agreement will control.

Owner: Legal Department

Effective Date

This Policy is effective as of June 9, 2014

Revision History: 10/23/2019

03/05/2025