AT&T Principles of Conduct for Suppliers

AT&T is committed to operating with the highest standard of integrity and ethics – and with an emphasis on corporate citizenship and sustainability. Suppliers are a key part of our business and therefore an integral part of our approach to corporate social responsibility. We require our suppliers and their suppliers (“Suppliers”) to comply with all applicable laws and regulations, both domestic and foreign.

We also require Suppliers to adhere to the following Principles of Conduct for Suppliers and the AT&T Human Rights Policy, or an equivalent set of principles. AT&T expects Suppliers to review these Principles at least once every three years to ensure ongoing adherence. For information on AT&T’s corporate citizenship and sustainability program please visit www.att.com/csr.

Sustainable Business Practices

AT&T expects Suppliers to apply a continuous improvement approach to enhancing economic, social, and environmental conditions. This is possible through Suppliers’ use of innovative products and services, ruling out wasteful practices, improving energy efficiency, reducing total cost of ownership, reducing greenhouse gas emissions, using more sustainable packaging, reducing water use, creating end-of-life recycling alternatives, ensuring adequate treatment of hazardous waste, and reducing the total use of substances of concern. Suppliers should reduce the environmental impact of their products and services, including minimizing or eliminating the use of hazardous substances in products that we buy.

Environment, Health and Safety

AT&T expects Suppliers to apply robust environment, health, and safety (EH&S) policies and practices. Suppliers should also provide a safe and healthy workplace that complies with international and national standards, laws, rules, and regulations. Suppliers should
give appropriate health and safety information and training to their employees. We expect Suppliers to minimize the impact of emergency events by proactively using business continuity plans and response procedures.

Supplier Diversity

AT&T is committed to supporting the growth and value creation within diverse businesses and communities throughout the U.S. We expect Suppliers to comply with the requirements of AT&T’s Prime Supplier Tier 2 Subcontracting Program. Suppliers are expected to:

- Set and meet diversity spending goals through subcontracting opportunities.
- File Tier 2 subcontracting plans and monthly spend reports documenting the achievement of supplier diversity spend goals.
- Include businesses certified as Minority-, Women-, Disabled Veteran-, LGBTQ+, Veteran-, or Disability-Owned Business Enterprises in the production of products and services that we procure.

We offer training and tools to guide Suppliers as they meet these expectations. We sustain our commitment to supplier diversity through sound business values and our focus on supporting economic prosperity within the communities we serve. Find more on AT&T’s supplier diversity program here.

Ethics

We demand the highest standard of ethics, integrity, and responsibility in our operations. Suppliers are expected to institute and maintain anti-bribery and anti-corruption policies in line with AT&T’s Anti-Bribery and Anti-Corruption Policy. Suppliers must not pay bribes or engage in corrupt practices to advance any interests with AT&T. This includes directly or indirectly offering, promising to pay, or authorizing the payment or provision of money or anything of value to government officials, political parties, or candidates for political office for the purpose of inducing acts or decisions. Suppliers may not engage in illegal activities including, but not limited to money laundering, modern slavery, actions related to terrorism, or doing business with parties or persons upon whom sanctions have been imposed by the U.S. Government. Without prior approval from AT&T, Suppliers are
prohibited from contacting legislators, federal or state regulatory officials or their staffs, or from making political contributions on behalf of AT&T. Suppliers may not contact any foreign government agency or official on behalf of AT&T without our express prior written consent. We prohibit the use, possession, distribution, or sale of illegal drugs or alcohol on our premises and in our vehicles while AT&T business is being conducted.

**Freedom of Association**

AT&T expects Suppliers to respect the legal rights of their employees to join or not join worker organizations, such as collectively bargained trade unions or similar external representative organizations. Suppliers should use good employee communication to promote positive employee relations.

**Conflict Minerals**

AT&T is not a manufacturer, but we are concerned with the use of conflict minerals. AT&T commits to not source conflict minerals from the Democratic Republic of Congo (DRC) and adjoining areas and expects its suppliers to do the same. We expect any products that we purchase from Suppliers and manufacturers will not contain conflict minerals that directly or indirectly finance, or benefit armed groups. We also expect our Suppliers to share this objective and act to conform. AT&T reserves the right to suspend or terminate Suppliers who fail to commit to this expectation.

**Labor Practices**

Suppliers are prohibited from using or being complicit in modern slavery, involuntary labor, child labor, prison labor, debt bondage or indentured or forced labor. No person employed by a Supplier may be below the minimum legal age for employment. Contractually, Suppliers must comply with all applicable labor, wage and hour laws, and regulations, including, but not limited to, those relating to minimum wage, overtime, piece rates and other elements of compensation, and legally mandated benefits. Suppliers’ employees should understand their employment conditions including payment terms and benefits.
Human Rights

AT&T expects Suppliers to treat all employees with respect and dignity and provide formal channels for their employees to report grievances. Suppliers should institute standards to pay competitive, fair, and equitable wages, cap maximum working hours and, where applicable, provide acceptable living conditions. In accordance with AT&T’s Equal Opportunity and Harassment Policy, the use of corporal punishment, threats of violence, physical abuse or other forms of physical coercion, harassment, or intimidation are not tolerated. Suppliers’ employment, wage and benefits practices cannot be based on color, race, caste, religion, age, maturity, nationality, social or ethnic origin, status, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, union membership, or disability. We also expect Suppliers to work toward having a diverse work force.

Circular Economy

We expect Suppliers to support the idea of a circular economy that keeps resources in use for as long as possible, seeking to recover and recycle them once the maximum value has been reached. This includes reducing total cost of ownership of services and products; by minimizing the materials that go into products and packaging; and designing for product reuse, restoration, regeneration, and recyclability.

Conflicts of Interest

AT&T awards business based on product and service performance, cost, quality, and other factors we deem appropriate. Suppliers and supplier representatives should not have a relationship with any AT&T employee that affects or may appear to affect the employee’s judgment or appears to be a conflict of interest.

Company Property and Resources

AT&T’s property and resources are highly valuable. Suppliers are responsible for protecting AT&T’s tangible and intangible property, and ensuring its legitimate AT&T-
related business use. AT&T property may not be taken, sold, loaned, given away, licensed, assigned, damaged, or otherwise disposed of regardless of its condition or value without specific written authorization from AT&T to do so.

Confidential Information and Privacy

AT&T values and protects confidential information, like information about its customers, employees, operations, finances, and business plans. We may execute a non-disclosure agreement or enter into an agreement with confidentiality provisions with a supplier before providing access to confidential information. We may also include a proprietary or confidential legend on confidential information. Suppliers are required to protect AT&T’s confidential information in accordance with those agreements and proprietary/confidential legends.

Any Supplier or third party with authorized access to AT&T customer information is required to comply with all applicable laws, regulations, and requirements and AT&T’s Privacy Policy. Our Privacy Policy explains how we collect, use, and protect information. It also requires many safeguards and commitments such as:

- Keeping our customers’ information safe using encryption or other appropriate security controls.
- Keeping our customers’ personal information only for the length of time that it is needed for business, tax, or legal purposes.
- Prohibiting our suppliers from disclosing, using, marketing, or otherwise selling customer information, except on behalf of AT&T as authorized by, pursuant to written agreement, and as required or allowed by law.