



## **Anti-Bribery Anti-Corruption (ABAC) Policy**

AT&T does not tolerate bribery, kickbacks, improper payments, and corruption. We are committed to compliance with all applicable ABAC laws, including the U.S. Foreign Corrupt Practices Act. Employees, contractors, and agents must comply with this Policy.

- Never offer, give, request, or accept anything of value to gain business or unfair advantage, including charitable or political contributions or employment.
- Follow the Gifts and Hospitality Policy and consult the Global Trade Organization (GTO) before providing any gift, hospitality, contribution, or job opportunity to government officials, their relatives, or associates. Facilitating payments are prohibited unless they are lawful, published government fees or documented payments to official government accounts. Payments, gifts, or hospitality must not be concealed or fraudulently recorded in company records.
- Duress payments are permitted only to prevent imminent physical harm and must be reported to Global Security.
- When using third parties to engage with government officials, the sponsoring BU must conduct risk-based due diligence, confirm third-party qualifications, and ensure fair market compensation, per Global Supply Chain and BU contracting processes. For U.S. matters, consult the Legal Department; for non-U.S., follow ABAC Third-Party Due Diligence Procedures and obtain GTO approval.

### **Failure to Comply and Reporting Concerns**

Failure to comply may result in disciplinary action, up to and including termination. If you observe any violation of this Policy, report it to the AT&T Speak Up Line or Portal, Human Resources, or the Legal Department. AT&T promotes a Speak Up culture and does not tolerate retaliation.

### **Policy Owner and Date**

Chief Compliance Office, January 2026