

# Equal Employment Opportunity (EEO) & Harassment Policies



AT&T is strongly committed to a workplace that values inclusion and that is free of discrimination and harassment of any kind. AT&T's EEO and Harassment Policies apply to all AT&T employees.

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## Policy Statement

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AT&T prohibits discrimination on the basis of race, color, religion, religious creed, national origin, ancestry, age, sex, sexual orientation, gender, gender identity, gender expression, physical disability, mental disability, pregnancy, medical condition, genetic information, marital status, citizenship status, military status, veteran status, or any other characteristic to the extent protected by federal, state, or local laws. For instance, New York City also prohibits discrimination on the basis of creed. AT&T complies with these and other applicable EEO laws and prohibits discrimination.

AT&T also strictly prohibits all forms of abusive conduct or workplace harassment, including sexual and racial harassment and harassment based on any of the characteristics described above. An employee's actions, words, or behavior must not create an intimidating, hostile, or offensive environment. Employees are not permitted to ridicule, intimidate, threaten, demean, or bully other employees, customers, vendor employees, or any other individuals with whom they interact. Remarks, comments, jokes, slurs, images, gestures, messages, or social media posts of an offensive nature will not be tolerated.

It is a violation of this policy to discriminate against or harass anyone while working on behalf of AT&T, including co-workers, contractors, vendors, or customers.

## Employee Responsibilities

AT&T employees are responsible for understanding and complying with the Company's EEO and Harassment Policies. Failure to comply may result in disciplinary action, which can include dismissal even for a first offense. We all have a responsibility to ensure that AT&T is free of discrimination and harassment. Therefore, employees are responsible for reporting any violations of the EEO and Harassment Policies.

## Manager Responsibilities

All managers are responsible for enforcement of the Company's EEO and Harassment Policies by ensuring a work environment free of discrimination and harassment. If a manager observes or receives any reports or allegations of conduct that could potentially violate the EEO and Harassment Policies, the manager has a responsibility to report it immediately to Human Resources or the AT&T Hotline. Any manager who fails to do so may be subject to discipline, up to and including termination. Such allegations are investigated by a team of EEO investigators. Therefore, managers must always report them immediately and receive guidance from an investigator on the next steps. In addition, supervisors are expected to:

- Review the EEO and Harassment Policies with each direct report.
- Ensure that the EEO and Harassment Policies review with each direct report is documented in his/her training history.
- Acknowledge employees' differences and their individual value to AT&T.

## Reporting a Concern

Employees should report a violation of the EEO and Harassment Policies to a direct supervisor, any manager, Human Resources, directly to the AT&T Hotline.

AT&T has established the AT&T Hotline for reporting EEO, or harassment concerns anonymously and confidentially. The Hotline is staffed by an independent third-party vendor contracted by AT&T. The reported complaint will be summarized and forwarded to AT&T for further review.

Report concerns via **AT&T Hotline @ 1-888-871-2622** or the **AT&T Hotline Web Reporting site**.

To the extent possible, reports to the AT&T Hotline will be kept confidential as consistent with legal and ethical responsibilities on behalf of the Company. Following an investigation, AT&T will take appropriate corrective action, if warranted.

## Non-Retaliation Policy

Any individual who suspects an EEO violation and makes a report is acting responsibly in accordance with the EEO and Harassment Policies. The Company forbids retaliation against any person who makes a report or who participates in the investigative process. Allegations of retaliation will be investigated, and appropriate action will be taken. Any individual engaging in retaliatory behavior will be subject to disciplinary action, which may include termination of employment. For any suspected retaliation concerns, contact the AT&T Hotline immediately.

Additional information on AT&T's Non-Retaliation Policy may be found on HR OneStop.

## Internal Investigations

AT&T investigates possible violations of federal, state, and local EEO laws, and AT&T's EEO and Harassment Policies. Employees are required to cooperate fully with the Company's investigations, may not lie to investigators, obstruct the investigation, or retaliate against those who participate. Anyone who refuses to cooperate with an investigation, lies to investigators, obstructs, or attempts to obstruct an investigation, or engages in retaliatory conduct will be subject to discipline, including termination. To the extent possible, confidentiality will be maintained consistent with legal and ethical responsibilities on behalf of the Company.

All complaints will be handled appropriately, and remedial action will be taken if any misconduct is found.

Important additional Company guidance on internal investigations may be found on HR OneStop.

## Culture & Inclusion

AT&T is committed to serving customers across the country, being the industry's best connectivity provider, and making sure that all Americans can get connected to the internet and

enjoy the opportunities that it provides. A qualified workforce that understands our customers is crucial for meeting the needs of all Americans, driving growth, and delivering shareholder value. We welcome and value our employees' unique backgrounds, perspectives, and abilities. We believe inclusivity fuels creativity, drives innovation, and strengthens our connection to the communities we serve.

AT&T employees are responsible for promoting an environment of inclusion: one in which each individual is valued, and every voice is heard. Actions that guide employee commitment to an inclusive culture include:

- Treating others with respect
- Encouraging and skillfully incorporating opinions and ideas.
- Viewing differences as assets.
- Accommodating various strengths.
- Working together as a team to design and implement creative solutions for our business suppliers and customers.
- Serving our broad markets effectively and sensitively.
- Creating win-win solutions.
- Being professional when around others with different viewpoints, cultures, and lifestyles.
- Participating in wide-ranging activities that support self-development and positive business relationships.

More information can be found on the Culture & Inclusion website at <https://hronestop.web.att.com/group/hr-onestop/culture-inclusion>.

## Equal Employment Opportunity

AT&T provides Equal Employment Opportunity for all employees and applicants in the administration of personnel policies such as:

- Appraisals
- Benefits and privileges of employment
- Compensation and benefits
- Disciplinary actions
- Recruiting, hiring, placements, upgrades, promotions, and lateral movement
- Social and recreational programs
- Terminations of employment, layoffs, and recalls.
- Training and educational assistance
- Working conditions

It shall be a violation of this policy for an employee to administer these personnel policies in a discriminatory manner.

## The American with Disabilities Act

The Americans with Disabilities Act (ADA) is a federal law that prohibits discrimination against individuals with disabilities. AT&T's policies provide reasonable accommodations to qualified employees with disabilities when medical restrictions preclude them from performing an essential function of their current or desired job, unless the accommodation poses an undue business hardship for AT&T. Under the law and these policies, AT&T, through the Integrated Disability Service Center (IDSC), engages in an interactive process with employees who may require a reasonable accommodation of a disability as defined under the law. The IDSC has established processes and procedures regarding accommodating disabilities. Supervisors of employees who have requested an accommodation of a disability should refer such employees to the IDSC at 866-276-2278. In certain cases, a leave may be appropriate as an accommodation. Supervisors should consult Human Resources for advice in these situations.

## Confidentiality

Confidentiality is assured for applicants and employees regarding medical information, and it will be kept confidential except to the following extent: Supervisors and managers may be informed regarding necessary restrictions on the work or duties of the employee and any necessary reasonable accommodations. First aid and safety personnel may be informed where and to the extent appropriate if the disability might require emergency treatment or assistance during evacuations. Government officials who conduct compliance reviews may be informed.

All persons with responsibilities that may require information about the disability, physical or mental, are advised to treat and protect the information as strictly confidential.

More information regarding the job accommodation process may be found on HR OneStop.

## Pregnancy Discrimination

It is illegal and in violation of this policy to discriminate against or harass an employee because of pregnancy. Pregnancy discrimination involves treating a pregnant employee unfavorably because of pregnancy, childbirth, or other medical condition related to pregnancy or childbirth, including but not limited to lactation. Employees who are disabled by pregnancy, childbirth, or related medical conditions are entitled to apply for applicable disability benefits.

## Religious Discrimination

AT&T's commitment extends to respecting the religious beliefs of its employees. It is illegal and in violation of this policy to discriminate or to harass an employee because of that employee's sincerely held religious beliefs. AT&T's policies provide reasonable accommodations where an employee sincerely held religious beliefs or practices are impacted by job requirements, unless the accommodation imposes an undue business hardship for AT&T. Supervisors of employees who request a religious accommodation should consult with Human Resources for guidance.

## Military Status

AT&T respects and supports its employees who serve in the uniformed services. AT&T employees called to active duty may apply for a military service leave of absence under the Company's applicable leave policies.

## Harassment Policy

The Company prohibits all forms of harassment while working on behalf of AT&T. This includes all harassing behavior, whether physical, verbal, written, printed, or displayed as inappropriate objects or images. Attire, social media posts, jokes, gestures, comments, or other conduct that represents hateful or offensive viewpoints is inconsistent with our values and will not be tolerated. Employees are prohibited from using any Company property, including computers, mobile phones, or any other devices, to view, send, or receive offensive material.

In addition, employees are never permitted to display offensive material in the workplace, whether on Company or personal devices. All offensive materials are prohibited, including but not limited to material offensive to another person's gender, race, or other characteristic listed in the Introduction and Policy Statement.

AT&T does not tolerate any form of harassment, including sexual harassment. Sexual harassment is specifically prohibited in the workplace. In order to eliminate sexual harassment in the workplace, AT&T prohibits all unprofessional behaviors of sexual or intimate nature including some that may go beyond the legal definition of sexual harassment.

## What is Sexual Harassment?

Sexual harassment may involve unwelcome romantic or sexual advances, requests for sexual favors, and/or visual materials, verbal comments, or physical contact of a sexual nature, regardless of gender. Involved parties, either victim or harasser, could be a co-worker, subordinate, manager/supervisor, contractor, or even a customer.

Such conduct is a violation of this policy, even in instances where the offending employee may have acted jokingly. Such communications, comments, actions of a sexual nature, or unwelcome advances are prohibited at AT&T, whether or not other employees were offended.

The most obvious examples of sexual harassment involve physical behavior or physical contact. The following is a non-exhaustive list of physical behaviors that may be considered offensive:

- Touching an individual by massaging their neck or shoulders, hugging, kissing, patting, pinching, fondling, or touching/pulling an individual's clothing or hair.
- Physical gestures that imply a sexual act or sexual anatomy, touching oneself in a sexual manner.
- Brushing up against another person, standing too close, or lingering.



However, sexually harassing behavior does not always involve physical contact. The following is a non-exhaustive list of examples of verbal and non-verbal/visual behavior that may be considered offensive:

- Suggestive behavior such as “elevator eyes” (looking a person up and down), leering, staring, sexual gestures, whistling, catcalls, winking, throwing kisses, making kissing sounds, howling, groaning, or smacking/licking lips.
- Sexual comments or innuendoes about clothing, anatomy, appearance, or sexual jokes or stories.
- Discussions or inquiries about sexual fantasy, preferences, history, or sex life about self or others.
- Displaying pictures, objects, reading materials, or other materials that are sexually suggestive or demeaning. This includes any sexual materials on personal or company-owned computers or devices, shared in the workplace.
- Repeated invitations and/or pressuring for dates or sexual favors; harassing phone calls, e-mails, or other communication.
- Giving personal gifts that imply an intimate relationship.
- Sending sexually suggestive communications (e.g., instant messaging, Company message portals and/or devices, notes, letters, texts, e-mails); displaying or transmitting suggestive visual materials (e.g., pictures, calendars, posters).
- Stalking, following, or blocking an individual’s path.

In addition, it is a violation of this policy, and the law, for any employee to ever state, imply, or suggest that dating or engaging in sexual conduct with another employee could result in a workplace benefit such as a promotion, raise, better terms and conditions of employment – or that a refusal to date or engage in sexual conduct will negatively affect a person’s conditions of employment or career.

AT&T’s EEO and Harassment Policies and Code of Business Conduct (COBC) rules apply in the workplace and in work-related settings outside the workplace, such as business trips, customer visits, social events, or other functions. AT&T also does not tolerate such conduct from outside vendors and other providers of goods or services to AT&T when they are working in AT&T-related settings.

## Personal Relationships Policy

In accordance with AT&T’s EEO and Harassment and Conflict of Interest Policies, a dating relationship, romantic relationship or any similar special personal relationship, including friendships, that give the appearance of providing preferential treatment, should never exist between a supervisor and an employee for whom the supervisor has some responsibility, including employees who report directly or indirectly within that supervisor’s chain of command. In other words, a manager, and another employee above or below that manager in the same chain of command, even if not directly above or below that manager, may not have a romantic or other close, personal relationship. This includes any manager who has influence over the employee’s

work, productivity, or terms and conditions of employment, such as an employee's trainer, manager who regularly fills in as a relieving manager over the employee, or a manager who has any input regarding the employee's performance. Moreover, such a relationship should never exist between an AT&T employee and a vendor employee where that AT&T employee has some responsibility for recommending the services of or interacting with that vendor or providing input on the vendor's work. These relationships can interfere with the supervisor's independent judgment, create employee morale problems, ethical issues, or conflict of interest, and may create a hostile work environment.

To avoid these problems and to foster a positive team environment, all personal relationships that may create a potential conflict or the appearance of a conflict under this policy must be reported immediately to Human Resources. After reviewing the facts, the Company will take appropriate action, which could include transfer of either employee through job reassignment or voluntary resignation. Failure to disclose the relationship immediately or comply with the Company's decision is a violation of the EEO and Harassment Policies, the Code of Business Conduct (COBC), and Conflict of Interest Policy, and may result in discipline up to and including dismissal.

More information may be found on HR OneStop.

## **Sexual Harassment Prevention Training**

All AT&T employees are required to timely and successfully complete anti-harassment education courses, which the Company provides from time to time. More information about the training requirements for specific states may be found on HR OneStop.

## **Reporting Sexual Harassment**

As discussed above, employees should report allegations of harassment, including sexual harassment, to a supervisor, any manager, Human Resources, directly to the **AT&T Hotline @ 1-888-871-2622**, by selecting option 2, or the **AT&T Hotline Web Reporting site**.

The Company investigates any incident of harassment reported under this policy. Accordingly, it is imperative that employees give the Company the opportunity to investigate and resolve any reported concerns. The Company promptly undertakes or directs an effective, thorough, and objective investigation of the harassment allegations.

If the Company determines that an employee has engaged in conduct in violation of this policy, the Company shall take prompt, remedial action commensurate with the circumstance, up to and including termination of employment, against those who engaged in the policy violation.

The Company prohibits any retaliation against any employee who complains of alleged inappropriate harassment or who participates in an investigation. Allegations of retaliation will be investigated, and appropriate remedial action will be taken. Any individual engaging in retaliatory behavior will be subject to disciplinary action, which may include termination of employment. For any suspected retaliation concerns, contact the AT&T Hotline immediately.



Report concerns via **AT&T Hotline @ 1-888-871-2622** or the **AT&T Hotline Web Reporting site**.

## Additional Complaint Procedures

In addition to internal Company reporting methods, employees have the right to file a charge of discrimination with a federal, state, or local agency. The United States Equal Employment Opportunity Commission enforces federal anti-discrimination laws. All external charges of discrimination in which the Company is identified as a Respondent, including charges received by a Company field location, should be immediately directed to the EEO group (which is responsible for all Company communication with the agencies).

## Important Notices for Employees in Specific States

### For Illinois Employees and Their Supervisors

In addition to the reporting channels identified above, Illinois employees may also report allegations of discrimination or sexual harassment to the Illinois Secretary of State Inspector General's Office {(217) 785-2012 or (630) 424-2564}, the Department of Human Rights {Chicago office: (312) 814-6200 or Springfield office (217) 785-5100}, or the state of Illinois Sexual Harassment & Discrimination Helpline at 1-877-236-7703. Whistleblower protections are also available under the Illinois Whistleblower Act and the Illinois Human Rights Act.

### For California Employees and Their Supervisors

California state law requires employers to distribute to employees in California certain information about sexual harassment. This information is available on the brochure titled "Sexual Harassment: The Facts About Sexual Harassment" (DFEH-185) and is available on HR OneStop.

**Please note that all California employees and their supervisors are required to access this brochure and review the information.**

Supervisors, managers, co-workers and third parties are prohibited from engaging in unlawful behavior under the California Fair Employment and Housing Act.

California employees or job applicants who believe that they have been sexually harassed may file a complaint with the California Department of Fair Employment and Housing (DFEH) within one year of the alleged harassment. For more information, contact the DFEH toll free at (800) 884-1684, Sacramento and out of state at (916) 478-7200, or TTY at (800) 700-2320. You may also contact the DFEH via email at [contact.center@dfeh.ca.gov](mailto:contact.center@dfeh.ca.gov) or visit the DFEH's Web site at the following link: <https://www.dfeh.ca.gov/>.

California law requires employers to provide employees notice of their rights and obligations under the Fair Employment and Housing Act with respect to pregnancy, childbirth, and related medical conditions. This information is available in Notice B, "Family Care and Medical Leave and Pregnancy Disability Leave" and is available on HR OneStop. Please note that all California employees and their supervisors are required to access this notice and review the information.

### For New Jersey Employees and Their Supervisors

AT&T has a specific policy section regarding New Jersey equal pay laws, which must be reviewed by all New Jersey employees and their supervisors. That policy is available on HR OneStop.

In addition, the state of New Jersey requires that all employers notify employees annually of the New Jersey Gender Equity in Pay, Compensation, Benefits or Other Terms or Conditions of Employment Notification. This information is available on the NJ Gender Equity notification and is available on HR OneStop.

The state of New Jersey also requires that all employers notify employees annually of the provisions of the Conscientious Employee Protection Act (CEPA) which protects employees from retaliation for reporting inappropriate activities at their place of employment. This information is available on the NJ CEPA notification and is available at the following link: [CEPA270.1.pdf \(nj.gov\)](#).

### **For New York Employees and Their Supervisors**

In addition to the reporting channels identified above, New York employees may also report allegations of sexual harassment to the New York State Division of Human Rights (718-741-8400 or [www.dhr.ny.gov](http://www.dhr.ny.gov)) or may file a complaint in the New York State Supreme Court or call 1-800-427-2773 to receive free legal counseling regarding any complaint of workplace sexual harassment or to submit a complaint regarding such harassment. Employees who work in New York City may also file complaints of sexual harassment with the New York City Commission on Human Rights (718-722-3131 or <https://www1.nyc.gov/site/cchr/index.page>).

### **For Delaware Employees and Their Supervisors**

Delaware state law requires employers to distribute to employees in Delaware certain information about sexual harassment. This information is available on the brochure titled “Delaware Sexual Harassment Notice,” available on HR OneStop.

### **For Oregon Employees and Their Supervisors**

In addition to the policy above, the state of Oregon prohibits an employer from requiring or coercing an employee or prospective employee to enter into a nondisclosure or nondisparagement agreement or any other provision which has the purpose or effect of preventing the employee from disclosing or discussing conduct that constitutes discrimination, including sexual harassment or sexual assault.

Oregon employees who have made a complaint may voluntarily request to enter into a nondisclosure or nondisparagement agreement and the employee has at least seven days to revoke that agreement.

The state of Oregon defines sexual assault as unwanted conduct of a sexual nature that is inflicted upon a person or compelled through the use of physical force, manipulation, threat, or intimidation.

The statute of limitations to file a complaint for Oregon residents is within five years of the occurrence.

**For Puerto Rico Employees and Their Supervisors**

In addition to the reporting channels identified above, Puerto Rico law requires employers to provide notice to employees in Puerto Rico regarding its workplace harassment law. This law's provisions are available in Spanish and English on HR OneStop.

**Frequently Asked Questions****Your Responsibility as an Employee, Contractor, and/or Supervisor**

Q. Are all AT&T employees and contractors responsible for ensuring their actions are conducted in accordance with AT&T's Equal Employment Opportunity (EEO) and Harassment Policies?

A. Yes. Failure to comply with these policies may result in disciplinary action, which can include dismissal even for a first offense. Supervisors are responsible for ensuring the work environment is free of discrimination and harassment.

Q. If you believe you have been subjected to discrimination, harassment, and/or retaliation or have knowledge of conduct prohibited under the Policy, are you responsible for reporting the matter?

A. Yes. We are all responsible for speaking up if we believe that someone at AT&T has violated the EEO and Harassment Policies. If a manager observes or receives any reports or allegations of conduct which could potentially violate the EEO and Harassment Policies, the manager has a responsibility to report it immediately to Human Resources or the AT&T Hotline. Report concerns via **AT&T Hotline @ 1-888-871-2622** or the **AT&T Hotline Web Reporting site** <https://app.mycompliancereport.com/report?cid=att>

**Non-Retaliation Policy**

Q. Are employees who raise concerns or who participate in an internal investigation protected from retaliation?

A. Yes. Any individual who seeks advice, raises a concern, or reports an EEO concern is following the EEO and Harassment Policies. AT&T will not tolerate retaliation against such a person.

**Internal Investigations**

Q. Are employees guaranteed complete confidentiality or anonymity?

A. Investigators will maintain confidentiality or anonymity to the extent allowable by law and where the confidentiality and anonymity does not impede the integrity of the investigation.

**Sexual and Other Harassment**

Q. Is it okay for a supervisor and a subordinate (including contractors) to have a close personal relationship or a dating relationship?

A. No. Any dating relationship or close personal relationship within the chain of command is prohibited. This also includes a supervisor who has influence over an employee's work, productivity, or terms and conditions of employment. Failure by either party to report the relationship immediately is a violation of the policy.

Q. Can sexual harassment occur between individuals of the same sex?

A. Yes. Sexual harassment can happen between individuals of the same sex as well as the opposite sex.

Q. Are jokes about sex, race, age, religion, ethnicity, or any other jokes made at the expense of others appropriate in the workplace?

A. No. Jokes made at the expense of any person or class of persons are prohibited.

## **Disability**

Q. Does AT&T accommodate disabilities?

A. Yes. It is AT&T's policy to provide reasonable accommodations to qualified employees with disabilities when medical restrictions preclude them from performing an essential function of their current or desired job, unless the accommodation poses an undue business hardship for AT&T.