



OUR CODE OF CONDUCT

STRAIGHTFORWARD VALUES

Excelling with Integrity

Effective as of May 1, 2023

DIRECTV CODE OF CONDUCT

TABLE OF CONTENTS

Introductory Letter from Bill Morrow 3

STRAIGHTFORWARD VALUES 4

OUR RESPONSIBILITIES UNDER OUR CODE 4

WE KNOW WHERE TO GO WITH QUESTIONS OR TO RAISE CONCERNS 5

WE SAFEGUARD CONFIDENTIALITY AND PROHIBIT RETALIATION 6

WE EXECUTE OUR BUSINESS ETHICALLY, FAIRLY, AND IN COMPLIANCE WITH ALL LAWS AND REGULATIONS 7

ETHICAL SALES PRACTICES 7

FAIR COMPETITION 7

ANTI-BRIBERY AND ANTI-CORRUPTION 8

EXPORT, IMPORT, AND SANCTIONS LAWS 9

WE AVOID CONFLICTS OF INTEREST 10

GIFTS & ENTERTAINMENT 10

FINANCIAL INTERESTS IN OTHER COMPANIES 11

OUTSIDE EMPLOYMENT 11

PERSONAL RELATIONSHIPS 11

CORPORATE OPPORTUNITIES AND THIRD-PARTY INTELLECTUAL PROPERTY 11

WE DO NOT ENGAGE IN DISCRIMINATION, HARASSMENT, OR HOSTILITY 12

EQUAL OPPORTUNITY 12

HARASSMENT-FREE WORKPLACE 12

SAFE AND HEALTHY WORK ENVIRONMENT 13

LABOR PRACTICES 13

WE EMPOWER OUR PEOPLE AND SUPPORT OUR COMMUNITIES 13

COMMUNITY SUPPORT 14

ENVIRONMENTAL RESPONSIBILITY 14

POLITICAL ACTIVITIES 14

WE RESPECT PRIVACY AND INTELLECTUAL PROPERTY 15

DATA PRIVACY & PROTECTION 15

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY 16

WE PROTECT AND SECURE COMPANY ASSETS 16

COMPANY ASSETS 16

INSIDER TRADING 17

COMMUNICATIONS WITH THE PUBLIC 17

SOCIAL MEDIA 18

ELECTRONIC COMMUNICATIONS 18

WE MAINTAIN ACCURATE RECORDS 19

ACCURATE BUSINESS RECORDS 19

RECORDS MANAGEMENT 19

EMPLOYEES' RIGHTS 20

Since 1994, DIRECTV has been pushing the boundaries of entertainment to deliver an unmatched service and best-in-class experience for our customers. We've navigated great change in an ever-evolving industry, yet remain committed to putting customers, employees and communities at the center of everything that we do.

At DIRECTV, our values are straightforward: caring about people, challenging convention and delivering on what matters. In staying true to these values, our passion goes beyond what we do - it's also about how we do it.

To that end, we must operate with a shared sense of purpose built on integrity and trust. Our Code guides us in our pursuit to show up every day with intentions of doing good work, particularly when there may be questions along the way. This Code belongs to all of us and extends to the suppliers with whom we collaborate.* To uphold Our Code means trusting one another to do our work ethically and responsibly.

I encourage you to use the DIRECTV Speak Up Helpline if you ever have questions or concerns related to Our Code. This confidential resource helps facilitate open and honest communication and enables us to better track and follow up on issues.

Thank you for standing with me and placing a premium on how we show up for our customers, each other, and our communities. We are DIRECTV, this is Our Code, and this is how we do it.



Bill Morrow
Chief Executive Officer
DIRECTV

**Our Supplier Code of Conduct can be found at <https://www.directv.com/legal/>*

STRAIGHTFORWARD VALUES

The DIRECTV family is built on integrity, respect, and trust, instilling pride in our brand and challenging us to achieve our shared purpose.

- We care about our employees, customers, and vendors.
- We challenge ourselves, each other, and the status quo.
- We deliver on what matters.

Our Code of Conduct, or “Our Code”, reflects these values. It is our cornerstone and guide for how we do business. Our Ethics & Integrity Program integrates industry best practices to ensure we share the responsibility to operate with integrity and continuously improve.

OUR RESPONSIBILITIES UNDER OUR CODE

The foundation of our success is a commitment to executing our business according to our values, the highest standards of ethics, and the law.

This means we ...

- speak up, and know where to go with questions or to raise concerns
- listen up, safeguard confidentiality, and prohibit retaliation
- execute our business ethically, fairly and in compliance with all laws and regulations
- avoid conflicts of interest
- do not engage in discrimination, harassment, or hostility
- empower our people and support our communities
- respect privacy and intellectual property
- protect and secure Company assets
- maintain accurate records
- participate in and answer questions truthfully during any investigation

Our Code applies equally to all employees of DIRECTV, regardless of rank, title, or location. We are each responsible for understanding Our Code and how it applies to us. Violating Our Code and/or applicable laws may subject employees to disciplinary action, up to or including termination.

To help protect the Company’s reputation and business, we also understand our obligation to self-report events covered by the On and Off Duty Misconduct Policy.

Our Responsibilities as Employees

Each of us must act with integrity, consistent with our values and all applicable laws.

If you are ever unsure what to do – contact our Ethics & Integrity Team (AskEthics@directv.com) or use any of the resources noted below to get help.

There are no exceptions to Our Code. No one – regardless of rank, seniority, or title – has the authority or right to mandate that we execute our business contrary to law or Our Code. Period.

When Making a Decision – Ask:

- Is this consistent with our values, Our Code and other Company policies?
- Does this feel right?
- Do I know the requirements that apply? Should I consult others for input?
- How would this action be viewed in the media? By our customers? By the person I respect the most?

Still unsure? Contact the Ethics and Integrity Team for guidance.

Our Responsibilities as Supervisors

Supervisors at every level are integral to our culture and must demonstrate personal commitment to our values – managing our business and our teams consistent with our values and Our Code.

We're doing it right when we create an environment where diversity, equity, inclusion, and belonging are respected and valued, when excellence is rewarded, and when every employee feels comfortable asking questions and raising concerns.

Supervisors are responsible for seeking guidance when needed from the Ethics and Integrity Team for any matters employees bring to their attention.

WE KNOW WHERE TO GO WITH QUESTIONS OR TO RAISE CONCERNS

We encourage a culture of truthful and open communication where employees can freely ask questions and raise concerns in **good faith**. There are many options available to you to raise questions or issues, including through any DIRECTV supervisor or leader, any member of the Ethics & Integrity Team, Human Resources or any member of the Legal Department.

You may also call the DIRECTV Speak Up Helpline at 888.DTV.HELP (888.388.4357), a service run by an independent third-party that allows you to raise concerns anonymously. You can submit questions or concerns online at <http://speakup.directv.com>, or text the word SPEAKUP to 732.538.8290.

In addition to these resources, AskEthics@directv.com is a quick and easy way to connect with the Ethics & Integrity Team, to ask questions, and get support.

The Company takes seriously all concerns. Each concern raised is considered by a designated team via a process designed to facilitate appropriate review and response, protect confidentiality, and avoid retaliation.

WE SAFEGUARD CONFIDENTIALITY AND PROHIBIT RETALIATION

The building blocks of our “speak up” culture are confidentiality and non-retaliation.

Confidentiality

Confidentiality is a priority when asking questions or raising concerns. Every effort is made to maintain confidentiality, recognizing that there may be times where the law, nature of the concern, or other circumstances limit our ability to protect confidentiality.

No Retaliation

We trust, value, and respect each other. Any employee who, in good faith, seeks counsel, raises a concern, or reports possible misconduct is doing the right thing. Period.

Each of us has a right to report concerns and raise questions without fear of retaliation or harassment.

Disciplinary action relating to violations of law, regulation, or Company policy, including Our Code, is not retaliation.

We Prohibit Retaliation

Retaliation may include any action taken against someone for raising a concern in good faith, participating in an investigation, or attempting to deter someone from violating Our Code. Examples include:

- Demotion
- Termination
- Reduced salary
- Job reassignment
- Threats or harassment

WE EXECUTE OUR BUSINESS ETHICALLY, FAIRLY, AND IN COMPLIANCE WITH ALL LAWS AND REGULATIONS

We believe that fairness, integrity, and full compliance with laws are the foundation of a successful business.

ETHICAL SALES PRACTICES

We act with integrity and always conduct ourselves in an honest, professional, and respectful manner. We represent our products and services accurately and fairly, and we work to earn and maintain our customers' trust every day. Quite simply, we do what we say, and we say what we mean.

We seek relationships and conduct business with ethical suppliers, vendors, third parties, and business partners (referred to in Our Code as "Suppliers") who share our commitments to customer satisfaction and interact with our customers consistent with our values.

This means we ...

- never sell and/or charge a customer for an unauthorized service or product
- deliver to customers what we promise
- hold our Suppliers to the same standards, client service and ethical sales practices that we require of ourselves
- use customer information and systems in a responsible and ethical way

FAIR COMPETITION

Everyone benefits from a competitive marketplace, free from unfair restrictions. We work hard every day to earn business on the merits of our products. We avoid activities that may limit competition through illegal or unfair means. Violating antitrust and fair competition laws can have severe implications both for DIRECTV and those involved.

Potentially Anticompetitive Activities ...

Whether in formal professional settings, or informal personal ones, remain alert to the types of conduct and agreements that can trigger competition concerns – such as:

- discussing or agreeing on pricing strategies with a competitor
- discussing or exchanging confidential or proprietary information with a competitor, except pursuant to an appropriate confidentiality agreement with approval from Legal
- agreeing with competitors to exclude other competitors or divide markets or customers
- agreeing to anything related to employment or recruitment with another employer

If you have any doubts about whether an action you are considering could be considered an anticompetitive activity, send a note to AskEthics@directv.com or reach out to a member of the Legal Department.

This means we ...

- carefully guard our confidential and proprietary information from competitors
- never manipulate a competitive bidding process
- avoid having and never use proprietary confidential information about our competitors
- never discuss pricing, marketing allocations, employment or recruitment practices or other similarly material information with competitors
- contact the Legal Department prior to any meeting/interaction with a competitor

ANTI-BRIBERY AND ANTI-CORRUPTION

We have a zero-tolerance policy toward bribery and corruption. DIRECTV prohibits anyone working for, with, or on behalf of our Company from offering, giving, requesting, accepting, or receiving a bribe. We must never offer or give anything of value to anyone, including Suppliers, customers, or Government Officials, in an attempt to influence decisions or gain a business advantage.

A Government Official includes any individual who works for a government-owned or -controlled institution, including but not limited to:

- any person elected or appointed to a government or royal position.
- any person who works for, or on behalf of, a government official, government agency, or an enterprise performing a government function.
- any person who works for, or on behalf of, a state-owned or -controlled entity. This includes professors in a public university, or employees of a customer, business, enterprise, or instrumentality that is majority-owned or significantly controlled by a government.
- any officer of a political party or candidate running for public office.
- any person acting for, or on behalf of, a public international organization, such as employees or representatives of the United Nations or the World Bank.

Suppliers working with us, or working on our behalf, are also expected to uphold our commitment to ethics and integrity, and to avoid all forms of corruption. We carefully select our Suppliers, and never engage, instruct, or permit a Supplier to undertake corrupt activities on our behalf.

Bribery and Corruption Laws

Many countries around the world – including the United States – have and actively enforce laws prohibiting bribery and corruption (known as **anti-bribery and anti-corruption** or **ABAC** laws). ABAC laws prohibit any form of corruption, such as providing a benefit to an individual to gain a business advantage. Some laws, including the U.S. Foreign Corrupt Practices Act (FCPA) focus on corrupt activities involving Government Officials. These laws often do not have value thresholds – any item of any value given to induce or reward improper activity can result in significant criminal and civil penalties, not only for DIRECTV but also the individuals involved.

This means we ...

- comply with all applicable laws
- do not offer or accept bribes, kickbacks, or any other improper payment or incentive
- avoid actions that could suggest improper influence
- never utilize a Supplier to undertake corrupt activities

EXPORT, IMPORT, AND SANCTIONS LAWS

International business transactions are subject to various domestic and international laws and regulations, such as limits on certain exports and imports, or restrictions on doing business with certain entities or individuals. Violating these laws can result in significant civil and/or criminal penalties. We must protect ourselves and the Company by understanding and abiding by these restrictions.

Sanctions, Boycott and Trade Laws

- **Sanctions Laws:** U.S. and international laws and executive orders that impose sanctions on business activities with certain prohibited countries, entities, and individuals.
- **Anti-Boycott Laws:** A set of regulations that prohibit U.S.-based companies from participating in or supporting international boycotts.
- **Export/Import Laws:** Regulations restricting the export and import of “controlled” items. Examples include “dual-use” items, which have both a military and commercial use, encryption technology, certain high-end computers, and satellite telephones.

This means we ...

- comply with all applicable export, import, anti-boycott, and sanctions laws
- consult with the Legal Department or the Ethics & Integrity Team before proceeding with international transactions, shipments, or imports that may be covered by these laws

WE AVOID CONFLICTS OF INTEREST

Each of us must avoid any situation that is, or may create the appearance of, a conflict of interest.

If a DIRECTV employee personally benefits from actions or decisions made or influenced by that DIRECTV employee, a conflict likely exists.

The appearance of a conflict of interest can exist when anyone could – even without complete or correct information – believe that a conflict may exist.

Many conflicts (or apparent conflicts) of interest can be managed by simply disclosing the potential conflict to the Ethics & Integrity Team and speaking with your leadership team before you engage in the activity that could result in an actual or perceived conflict.

Your Ethics & Integrity Team will help you and local leadership work through any reporting or clearance obligations.

Common examples of conflicts of interest include:

GIFTS & ENTERTAINMENT

Giving and receiving gifts and entertainment can be an appropriate way to develop professional relationships and showcase our business. However, if the value you derive is excessive, it can create a conflict of interest, or the appearance of a conflict. To minimize this risk, any gift or entertainment that you give or receive with a value above \$100, must be disclosed to your supervisor and the Ethics & Integrity Team. This allows the Company to record all gifts and entertainment accurately and transparently on its books and records.

In some situations (government officials, companies with which we are negotiating a contract, labor union representatives, etc.), a gift of ANY value can be problematic. Ask for guidance if you are unsure. If you ever have any doubts about whether a work-related gift or outing creates a conflict, play it safe and notify the Ethics & Integrity Team and your supervisor.

Remember ...

Business gifts and entertainment are generally acceptable if they are:

- Furthering a business relationship
- Not requested or solicited
- Not excessive, either in appearance or cost
- Infrequent
- Not cash or cash equivalents
- Not likely to influence business decisions

FINANCIAL INTERESTS IN OTHER COMPANIES

Investments in any of our Suppliers or competitors can create an actual or perceived conflict of interest. They are, therefore, prohibited unless they consist of less than 1% of stock of a publicly traded company or are otherwise approved in advance by the Ethics & Integrity Team.

OUTSIDE EMPLOYMENT

As active members of our communities, we may wish to use our free time to perform services for another non-competing company, such as supporting a family member's business or serving on the board of a company or charity.

This means that any outside opportunity or employment:

- is done on our own time, using our personal resources, and not DIRECTV's
- does not interfere with or improperly influence our job performance, availability, or decision-making

PERSONAL RELATIONSHIPS

Recommending or working with third parties owned or controlled by, or employing our relatives or others with whom you have a close personal relationship can create a conflict of interest. Similarly, offering employment to, working with, or supervising a relative or anyone with whom you have a close personal relationship can be a conflict of interest and may raise discrimination concerns. "Close personal relationship" means a regular and ongoing relationship that is romantic, familial, or financial. Such relationships include (but are not limited to) married couples, unmarried couples, regular or occasional dating relationships, live-in relationships, business partners, others with whom the Employee has business or financial dealings, or any other close personal friendships that might influence judgment.

Discuss any potential conflict with the Ethics & Integrity Team, and if appropriate, safeguards can be implemented to protect all involved.

This means we ...

- don't directly or indirectly hire, supervise, or report to our relatives, significant others, or others with whom we have a close personal relationship.
- disclose close personal relationships, dating or other significant relationships that we have with anyone within our Chain of Command.
- maintain a wall of separation and do not exert any influence when recommending or working with our relatives or those with whom we have close personal relationships.

CORPORATE OPPORTUNITIES AND THIRD-PARTY INTELLECTUAL PROPERTY

Any business or investment information we obtain during our work for DIRECTV is corporate information, which may not be mishandled or used for personal gain. Similarly, we may not participate in any business that

involves developing any work, process, or content in the same area as performed by DIRECTV, or that is in competition with DIRECTV without pre-approval of that involvement by the Ethics & Integrity Team.

This means we ...

- avoid situations or activities that could create an actual, potential, or perceived conflict of interest
- when required, we disclose and seek pre-approval for any activities, investments, transactions, interactions, or relationships that could create an actual, potential, or perceived conflict of interest
- avoid accepting or offering gifts or entertainment that influence or appear to influence, a business decision
- never provide gifts or entertainment to government officials or their staff without prior approval from External Affairs

WE DO NOT ENGAGE IN DISCRIMINATION, HARASSMENT, OR HOSTILITY

EQUAL OPPORTUNITY

Each one of us contributes unique backgrounds, talents, perspectives, and ideas. We are committed to creating and fostering an environment where each employee is treated fairly and with respect and is given equal opportunity to succeed. We base our work-related decisions on merit, experience, and personal aptitude. We never discriminate on the basis of race, religion, color, ethnic or national origin, gender identity, age, disability, sexual orientation, or other protected status. We also expect our Suppliers to act in a way that reflects our values, including our commitment to equal opportunity.

This means we ...

- value each other and our respective differences
- recognize we are all responsible for creating and fostering a culture of inclusiveness
- encourage, support, and listen to each other as we share thoughts, ideas, and opinions
- treat each other equitably, fairly, and with respect

HARASSMENT-FREE WORKPLACE

We operate at our best when we collaborate and perform our duties in a professional and collaborative environment. Harassment of any kind, including sexual harassment, has no place in our Company and is not tolerated. Period.

Harassment includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive, or hostile work environment. Harassment can take many forms, including verbal or non-verbal, physical actions, written or spoken comments, videos, pictures, or innuendo.

This means we ...

- think before we speak or act; if it might be offensive—we don't say it, write it, share it, or do it
- treat employees with the same civility, respect, and dignity that we expect for ourselves
- create an environment free of hostility, bullying, or intimidation
- speak up when we see activity that is – or could lead to – harassment

SAFE AND HEALTHY WORK ENVIRONMENT

We all have the right to work in a safe and healthy environment. Wherever we are working, we are committed to operating in a safe and responsible manner. We do not tolerate violent conduct or threats of violence. We speak to customers, Suppliers, and one another with respect and refrain from using language that has the potential to intimidate, humiliate, or offend those around us. Any employee who engages in this behavior will be subject to disciplinary and potentially legal action.

DIRECTV is a substance abuse-free workplace. The use of illegal drugs and the misuse of alcohol, legal drugs, and other substances is prohibited in the workplace – which is anywhere we are while conducting business.

This means we ...

- each of us have a role in complying with all applicable workplace, health, and safety laws
- report potential and actual hazards, incidents, or illnesses immediately

LABOR PRACTICES

DIRECTV is committed to high labor standards and human rights. We trust, value, and respect our employees and the people working for our Suppliers. We abide by all labor laws applicable to our business—including those regarding child labor, minimum age and working conditions, hours of work, and wages, earnings, and benefits. We expect each of our Suppliers to do the same, ensuring that all work is voluntary, avoiding any participation in the trafficking of persons, and prohibiting the use of any form of slave, forced, bonded, indentured, or prison labor. The United States government also has a zero-tolerance policy against trafficking in persons as defined in 48 CFR 52.222-50, which is applicable to all of our Employees, Agents, and Suppliers.

This means we ...

- respect and promote human rights
- hold our Suppliers to the same high standards that we require for DIRECTV
- immediately report concerns about potential or actual labor standards and human rights violations

WE EMPOWER OUR PEOPLE AND SUPPORT OUR COMMUNITIES

Our most valuable investment is our talented and dedicated employees. Working together, we can accomplish more for ourselves, our Company, and the communities in which we live and work.

COMMUNITY SUPPORT

At DIRECTV, we take pride in supporting the communities where we live and work. We aspire to be positive leaders and contribute to positive social change while creating value for our stakeholders. Our focus in our communities is to provide good jobs, donate our time and

Remember ...

DIRECTV email, the Workplace platform, and other company resources may only be used to promote participation in company- and department-sponsored community activities. All other requests for support or participation in charitable activities must be made using your personal time outside of work hours, as well as your own resources and personal contact information. Always carefully consider whether soliciting a contribution or other support from a coworker could put unwelcome pressure on that individual or create a potential conflict of interest.

resources (including money), and promote programs and opportunities that empower people and families to achieve a brighter future.

This means we ...

- actively engage in the communities in which our employees and our customers live and work
- ensure that all our community support is consistent with our values and complies with applicable law and Company policy
- never leverage our community support - in any way - to solicit, procure, or reward an inappropriate advantage for our Company or our Suppliers

ENVIRONMENTAL RESPONSIBILITY

We are committed to operating our business in an environmentally responsible and sustainable manner. We follow relevant laws, regulations, and guidelines related to the environment, strive to minimize our environmental impact, and proactively support the environment.

This means we ...

- ensure compliance with all applicable environmental laws and regulations
- integrate our environmental responsibilities into daily activities and business decision-making processes

POLITICAL ACTIVITIES

Employees are free to use their personal time and resources to respectfully participate in political activities and contribute to the political candidates, causes, and parties they choose. We must take care to do so without

involving the Company in any way. As laws in many countries prohibit or set limits on corporate contributions to political parties and candidates, it is important we participate in political activities as individuals only.

Company resources must never be given or obligated for political purposes without first consulting External Affairs. This includes federal, state, or local office holders and candidates for office, campaign or political committees, and charitable enterprises closely associated with elected officials or senior government officials.

This means we ...

- ensure our personal political activities and opinions are viewed as ours alone, and not those of the Company
- refrain from using Company time, property, or resources for personal political activities

WE RESPECT PRIVACY AND INTELLECTUAL PROPERTY

DATA PRIVACY & PROTECTION

We collect, use, and share personal information from our customers, employees, and business partners during many of our business activities. We must be responsible data stewards and protect the security and privacy of that personal information at all times. We achieve this by following all applicable privacy laws, our privacy and data security policies and notices, the terms of our customer agreements, and the commitments we make to our business partners.

Personal Information

Although the definitions of personal information and sensitive personal information vary under applicable laws, personal information typically means information that is linked or reasonably linkable to an identified or identifiable natural person and includes information like a person's name, address, phone number, and account name. Sensitive personal information is typically personal information that receives heightened protections under the law and includes information like a person's Social Security Number, driver's license number, racial or ethnic origin, religious beliefs, mental or physical health diagnosis, and sexual orientation.

This means we ...

- comply with applicable laws and regulations overseeing the access, disclosure, use and protection of personal information
- collect and use personal information only where necessary for legitimate business purposes
- keep personal information only as long as necessary and dispose of it properly
- apply heightened protections for sensitive personal information in accordance with applicable laws

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Confidential and proprietary information are key to our business and help us succeed in the marketplace. We are each required to take steps to protect confidential information to which we have access.

All confidential information and company-owned data are considered proprietary and the property of DIRECTV. We are committed to protecting our own Intellectual Property (IP), as well as respecting the IP rights of others.

Intellectual Property (IP)

IP is the result of human creativity, talent, and hard work. It has commercial value and may also be confidential.

Examples may include inventions, content, software, designs, branding, web pages, and domain names as well as material protected by law through patents, copyright, trademarks, and trade secrets.

This means we ...

- use and disclose confidential information for legitimate business purposes only
- avoid discussing or sharing confidential information in public, through applications that are not company-approved, or with anyone (human, AI, or otherwise) who may not be authorized to access that information
- collect, store, use, disclose and destroy confidential information only in accordance with Company policies and applicable laws

Confidential Information

Confidential information includes any non-public information relating to our business.

Examples may include an employee's personal or work address and/or phone number, date of birth, marital status, compensation data, and performance reviews; internal business plans, financial information, new inventions, software code, or trade secrets; sales numbers, earnings, or other Company accounting or financial information; and third-party vendor information and records.

WE PROTECT AND SECURE COMPANY ASSETS

COMPANY ASSETS

We are all responsible for protecting our company assets, which include anything of value belonging to DIRECTV. Company assets can be, for example, communications, information, physical property, cash and cash equivalents, or technology. Protecting company assets is essential to our ability to grow, innovate and succeed.

This means we ...

- protect company assets against theft, loss, damage, or misuse
- use only software that has been properly licensed
- never use company assets for personal gain
- protect user IDs and passwords
- protect against cyberattacks, social engineering, etc.
- report any related concerns, incidents and potential or actual loss of assets immediately

INSIDER TRADING

During our day-to-day business activities, we may learn of or be given access to **inside information** that is not public or would be material to investors in AT&T, our largest shareholder. We may also acquire inside information about our customers or Suppliers. Buying or selling securities on the basis of Material Non-Public Information is considered insider trading and is prohibited by Company policy and federal law. Sharing inside information with others who then use the information to buy or sell securities is also prohibited.

Inside Information

Examples may include news of pending/proposed mergers or acquisitions, income or loss predictions, changes in leadership or management, new or changing supplier relationships, significant new products or content, major litigation or enforcement matter developments, or other legal matters.

This means we ...

- do not share inside information
- do not buy, sell, or transfer securities on the basis of Material Non-Public Information

Material Non-Public Information

Includes any information that a reasonable investor would consider important when deciding whether to buy, sell, or hold a security such as AT&T stock. Information is “non-public” until it is publicly disclosed with sufficient time for investors to digest or evaluate the information.

COMMUNICATIONS WITH THE PUBLIC

It is important that our communications with the public be clear, accurate, consistent and responsible. None of us may disclose internal information about DIRECTV to third parties or the public without pre-approval. Only authorized Company employees may communicate on behalf of DIRECTV – particularly with outside entities like the media, members of the investment community and government officials.

Authorized employees include the Vice President of Communications & Community, Chief Executive Officer, General Counsel, Chief External Affairs Officer, and the Chief Financial Officer. Others may be designated to speak on behalf of DIRECTV as delegated, in writing, by a DIRECTV employee. All requests from reporters or other media for an interview or a statement by DIRECTV should be channeled through DIRECTV Communications & Community. Instead of saying “no comment”, ask media outlets to submit their questions to media@directv.com.

This means we ...

- do not conduct business outside the office where confidential Company information could be read, overheard, or recorded by unauthorized people
- do not respond to external inquiries regarding the Company
- consult a supervisor, Communications & Community or the Legal Department whenever in doubt

SOCIAL MEDIA

We must always be mindful of how we use social media and other digital forums, both personally and professionally. We cannot give the impression we are speaking on behalf of the Company unless we are authorized to do so or share specific content.

Our personal posts about DIRECTV, including any non-confidential information about our business, products, employees and former employees, work environment, policies, research, relationships, Suppliers and competitors, must be respectful and transparent.

This means we ...

- obtain necessary permissions before publishing posts on behalf of the Company
- add #employee to any personal posts about DIRECTV, and note that statements/opinions do not represent those of the Company
- never disclose confidential information about the Company, employees and former employees, our customers, Suppliers, competitors, or other business partners
- never post anything that might constitute a threat, intimidation, harassment, or bullying

ELECTRONIC COMMUNICATIONS

Our technology and communications are important company assets and critical tools for conducting business. We use technology and communicate professionally and with good judgment. The Company reserves the right to monitor the use of its technology and assets and to access and monitor any information or communications you create, share, or download onto its systems.

This means we ...

- are thoughtful, careful, and professional when writing e-mails, text messages, sharing on Workplace (our internal social platform), and in all other electronic communications
- utilize only company-approved platforms and communication tools to conduct business communications
- do not communicate in any medium or post or provide any content that is or could be harmful to our Company, or contrary to our values or Our Code

WE MAINTAIN ACCURATE RECORDS

DIRECTV records serve as the basis for managing our business and fulfilling our responsibilities to our owners, employees, and other stakeholders.

ACCURATE BUSINESS RECORDS

We are committed to maintaining accurate and complete records and to making accurate, timely and understandable disclosures to regulatory bodies about our business. We are individually responsible for recording accurate and honest information in all Company records that we produce, such as expense reports and financial statements. We must never conceal or blur our records in any unapproved way or make or approve false or misleading submissions or entries.

Remember ...

Never omit relevant information or make an inaccurate or misleading representation. This applies to everything from travel expenses to sales performance reports. When in doubt, consult your supervisor or AskEthics@directv.com.

This means we ...

- record information clearly, accurately and completely so that expenses are reported honestly, and company funds are not used for illegal purposes
- only submit and approve lawful, legitimate, and appropriate business expenses, supported by required documentation
- only sign or approve documents we believe to be truthful, accurate and complete and only as authorized
- submit, approve, and make payments with appropriate supporting documentation

RECORDS MANAGEMENT

Part of protecting our confidential information includes the proper retention and disposal of Company records and documents. Each of us is responsible for knowing and following the policies that relate to the maintenance, storage, and disposal of Company records. Never destroy or dispose of information that might be needed for an ongoing investigation, an audit, or a legal proceeding. If you receive a legal hold notice, follow the guidelines in the notification.

What is a Company record?

A Company record is any recorded information captured in any medium reflecting or relating to Company business.

This means we ...

- maintain the confidentiality of Company records
- create, maintain, and store records in a secure and appropriate manner and according to our Document Retention Schedule
- cooperate fully with requests relating to internal and external audits and legal proceedings

EMPLOYEES' RIGHTS

While Our Code is our guide, it is not a contract of employment, nor does it address every situation. Our Code does not and is not intended to interfere with employee rights, including the rights to discuss terms and conditions of employment, or report concerns, including to government and regulatory authorities.