



SUPPLIER CODE OF CONDUCT

FOR DIRECTV SUPPLIERS, SERVICE PROVIDERS & VENDORS

Straightforward Values – Excelling with Integrity

Effective as of January 11, 2024

DIRECTV

INTRODUCTION

At DIRECTV, we maintain a community built on integrity, respect, and trust, instilling pride in our brand and challenging us to achieve our shared purpose. 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.

The foundation of our success is a commitment to executing our business according to our values, the highest standards of ethics and integrity, and in compliance with all applicable laws.

We have the same expectations of our suppliers, service providers, and vendors (collectively, “Suppliers”). This Supplier Code establishes DIRECTV’s expectations for all Suppliers.¹ If a Supplier’s employees, representatives, or contractors engage in any actions that violate the DIRECTV Supplier Code and/or any applicable laws (including human trafficking and child labor laws), the Supplier’s contract will be subject to termination.

KNOW WHERE TO GO WITH QUESTIONS OR CONCERNS

DIRECTV is committed to a culture of truthful and open communication where all—including Suppliers—are encouraged to ask questions and raise good faith concerns freely. DIRECTV’s Speak Up Helpline provides multiple options to speak up confidentially and anonymously at 888.DTV.HELP (888.388.4357) or [our DIRECTV Speak Up Helpline](#).

¹ The Supplier Code contains general requirements applicable to all DIRECTV Suppliers. Additional terms in contracts, purchase orders, and elsewhere may contain more specific provisions. Nothing in this Supplier Code is meant to supersede a more specific contractual provision, and to the extent there is any inconsistency between this Supplier Code and any contractual provision, the contract will control.

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SAFEGUARD CONFIDENTIALITY AND PROHIBIT RETALIATION

DIRECTV guards confidentiality appropriately and prohibits retaliation against anyone who raises questions or concerns in good faith. We expect our Suppliers to do the same.

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

Consistent with our values, we expect each of our Suppliers to conduct business activities ethically, fairly, sustainably, and in full compliance with all applicable laws.

ETHICAL SALES PRACTICES

Our business is our customers. Any Supplier interacting with a DIRECTV customer or potential customer must do so with integrity, executing each interaction with honesty, professionalism, and respect—and always in compliance with DIRECTV policy and all applicable laws and regulations.

FAIR COMPETITION

At DIRECTV, we believe everyone benefits from a competitive marketplace, free from unfair restrictions. We avoid activities that may limit competition through illegal or unfair means. DIRECTV expects each of its Suppliers to share our commitment to a competitive marketplace and abide by all applicable antitrust and fair competition laws.

BRIBERY, CORRUPTION, AND MONEY LAUNDERING

DIRECTV has a zero-tolerance policy against bribery and corruption of any kind. We expect the same from our Suppliers. Suppliers are prohibited from offering, giving, requesting, accepting, or receiving a bribe and must comply with all applicable anti-bribery and anti-corruption laws. Suppliers must also comply with anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations.

EXPORT, IMPORT, AND SANCTIONS LAWS

DIRECTV strives to conduct all operations in full compliance with applicable laws and regulations restricting international business transactions. We expect our Suppliers to

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comply with applicable export, import, anti-boycott, and sanctions laws and to work with us to identify and appropriately manage international business transactions.

ENVIRONMENTAL RESPONSIBILITY

At DIRECTV we are committed to operating our business in an environmentally responsible and sustainable manner. We expect our Suppliers to share this commitment, following all applicable laws, regulations, and guidelines related to the environment, and striving to minimize environmental impact.

AVOID CONFLICTS OF INTEREST

DIRECTV expects its employees to be free from actual, potential, or perceived conflicts of interest—including in interactions with our Suppliers. A conflict of interest may occur where a bias or personal interest interferes (or could interfere) with the ability to make an objective business decision in the best interest of DIRECTV. We expect our Suppliers to avoid creating actual or perceived conflicts of interest with DIRECTV. Any potential conflict of interest between a Supplier and DIRECTV or a DIRECTV employee, actual or perceived, should be discussed with the DIRECTV employee responsible for managing the Supplier relationship (so long as they are not involved in the conflict) or raised via DIRECTV's Speak Up Helpline.

GIFTS AND ENTERTAINMENT

Giving and receiving gifts, hospitality, and entertainment can be an appropriate way to develop professional relationships. However, where the value is (or appears to be) excessive, it can create a conflict of interest, or the appearance of a conflict. To minimize the risk of a conflict, DIRECTV employees must report all business expenditures accurately and report any gift, hospitality, or entertainment received with a value of above \$100. Gifts, hospitality, and entertainment are not necessary to do business with DIRECTV. DIRECTV employees must refrain from accepting or providing gifts or entertainment that may influence or appear to influence business decisions. We expect our Suppliers to be aware of and adhere to these standards and to respect any DIRECTV employee's refusal to accept gifts, hospitality, or entertainment.

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PROHIBIT DISCRIMINATION, HARASSMENT, OR HOSTILITY AND PROMOTE A POSITIVE WORK ENVIRONMENT

EQUAL OPPORTUNITY

We believe in equality and impartiality among individuals in our Company. We provide equal employment opportunities and strive for a diverse and inclusive workforce. Consequently, we must all comply with fair employment practices and applicable non-discrimination laws. DIRECTV expects its Suppliers to do the same.

HARASSMENT-FREE AND HOSTILITY-FREE WORKPLACE

We operate at our best when we work together and perform our duties in a professional and collaborative environment. Harassment, hostility, bullying, and disrespect of any kind, including sexual harassment, has no place at DIRECTV and will not be tolerated. Harassment includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive, or hostile work environment. We expect each of our Suppliers to reflect these values in their workplace and to prohibit harassment and hostility in any interaction with DIRECTV or our customers.

SAFE AND HEALTHY WORK ENVIRONMENT

At DIRECTV we believe employees have the right to work in a safe and healthy environment. DIRECTV does not tolerate violent conduct or threats of violence. We are a substance abuse-free workplace. DIRECTV prohibits the use of illegal drugs and the misuse of alcohol, legal drugs, and other substances in the workplace. DIRECTV expects its Suppliers to reflect these values in interacting with DIRECTV and our customers.

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 child labor, minimum age, working conditions, hours of work, wages, earnings, and benefits. We expect each of our Suppliers to comply with all applicable labor and employment laws, rules, and regulations, and avoid any participation in the trafficking of persons or use of any form of involuntary, forced, bonded, indentured, or prison labor. The United States

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government also has a zero-tolerance policy against trafficking in persons, as defined in 48 CFR 52.222-50, which applies to all of our Employees, Agents, and Suppliers.

RESPECT PRIVACY AND INTELLECTUAL PROPERTY

DATA PRIVACY & PROTECTION

DIRECTV collects, uses, and shares personal information from our customers, employees, and third parties during many of our business activities. We are committed to being responsible data stewards and always protecting the security and privacy of personal information. We utilize programs, processes, and controls to drive compliance with all applicable privacy laws. DIRECTV expects Suppliers to share its commitment to data privacy and protection, and to comply with all applicable laws in collecting, using, and sharing data.

Recordings of audio or visual content, including phone calls and meetings, create privacy concerns and may only be created when there is a clear business need. Irrespective of state or federal law, it is a violation of our Company policy to record without prior notice to and consent from all parties. No secret recordings may be made.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

DIRECTV values and protects confidential information, such as information about its customers, employees, operations, finances, and business plans. All confidential information and company-owned data are considered proprietary and the property of DIRECTV. Suppliers with access to DIRECTV's confidential information and intellectual property must protect it as they would protect their own under applicable laws and agreements.

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PROTECT AND SECURE DIRECTV ASSETS

At DIRECTV, we are committed to using all our assets responsibly as we innovate, grow, and serve our customers. Suppliers are responsible for protecting DIRECTV's assets such as communications, information, physical property, cash and cash equivalents, or technology. Suppliers should guard DIRECTV assets as though they were their own, and access, utilize, and share them only as consistent with applicable laws and agreements.

MAINTAIN ACCURATE RECORDS

BUSINESS AND FINANCIAL RECORDS

DIRECTV records are the basis for managing our business and fulfilling our responsibilities to our owners, employees, and customers. We are committed to maintaining accurate and complete records and making accurate, timely, and understandable disclosures about our business. We expect our Suppliers to do the same.

Suppliers are required to provide complete, accurate, and timely information about work related to DIRECTV. Each Supplier must provide accurate and transparent records and invoices, consistent with our values and in compliance with applicable DIRECTV policy, purchase orders, and agreements.

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CLOSING THOUGHTS

When Suppliers commit to working with DIRECTV, they also commit to maintaining the standards, ethical business practices, and compliance requirements in this Supplier Code. We ask our Suppliers to share this Code with the individuals assigned to perform work for, or on behalf of, DIRECTV. Our Code also encourages Suppliers to inform DIRECTV if they see a DIRECTV employee or another Supplier engaging in questionable behavior or violating Our Code.

We value our relationship with each Supplier and appreciate your commitment to prioritizing ethics and integrity as you work with DIRECTV.