



# SUPPLIER CODE OF CONDUCT

FOR DIRECTV SUPPLIERS, SERVICE PROVIDERS & VENDORS

***Straightforward Values – Excelling with Integrity***

Effective as of December 1, 2022

# 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 compliance with all applicable laws.

We have the same expectations of our suppliers, service providers and vendors (collectively, "Suppliers"). This Supplier Code establishes the values and expectations we have for all DIRECTV Suppliers.<sup>1</sup> 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 833.DTV.7989 or [DIRECTV Speak Up Helpline](#).

In addition to these resources, [AskEthics@directv.com](mailto:AskEthics@directv.com) is a quick and easy resource for connecting with DIRECTV's Ethics & Integrity Team, raising questions, and getting support.

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<sup>1</sup> 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 must do so with integrity, executing each interaction with honesty, professionalism, and respect—and always in compliance with 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 to abide by all applicable laws relating to antitrust and fair competition.

## **BRIBERY, CORRUPTION, AND MONEY LAUNDERING**

DIRECTV has a zero-tolerance policy toward bribery and corruption of any kind. We expect the same of 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 the Supplier relationship (so long as they are not involved in the conflict) or raised via DIRECTV's Speak Up Helpline or an email to [AskEthics@directv.com](mailto:AskEthics@directv.com).

## GIFTS AND ENTERTAINMENT

Giving and receiving gifts, hospitality, and entertainment can be an appropriate way to develop professional relationships and showcase our business. 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 any gift, hospitality, or entertainment (received or given) 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 WORKPLACE**

We operate at our best when we work together and perform our duties in a professional and collaborative environment. Harassment 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 own workplace, and to prohibit harassment in any interaction with DIRECTV or our customers.

### **SAFE AND HEALTHY WORK ENVIRONMENT**

At DIRECTV we believe each employee has 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 and the use of illegal drugs and the misuse of alcohol, legal drugs, and other substances is prohibited in the workplace. DIRECTV expects its Suppliers to reflect these values in interacting with DIRECTV and our customers.

### **DIVERSITY**

Just as DIRECTV values the diversity of its workforce as a competitive advantage, DIRECTV values diverse Suppliers and is in the process of creating a Supplier Diversity Program for its Suppliers in the near future. Diverse Suppliers are those that are certified as Minority, Women, Disabled Veteran, LGBTQ+, Veteran, or Disability Owned Business Enterprises. DIRECTV encourages its Suppliers to have a diversity program and may request information from a Supplier regarding its diversity program, in a format and manner acceptable to DIRECTV.

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## LABOR PRACTICES

DIRECTV is committed to high labor standards and human rights. We trust, value, and respect our employees, recognizing they are one of our greatest assets. 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, and ensure that all work is voluntary, having a zero-tolerance toward 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.

## 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 protect the security and privacy of personal information at all times. We utilize programs, processes, and controls designed to drive compliance with all applicable privacy laws. DIRECTV expects Suppliers to share its commitment to data privacy and protection, and to act in full compliance with all applicable laws in collecting, using, and sharing data.

### 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 are obligated to protect it as they would protect their own and in accordance with any applicable law 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 which can be, for example, 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 any applicable law and agreements.

## **MAINTAIN ACCURATE RECORDS**

### **BUSINESS AND FINANCIAL RECORDS**

DIRECTV records serve as 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 to 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 complying with applicable DIRECTV policy, purchase orders, and agreements.

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## CLOSING THOUGHTS

When Suppliers make a commitment to work with DIRECTV, they also commit to maintaining the standards, ethical business practices and compliance requirements stated in this Supplier Code. Suppliers must ensure that their actions and performance always reaffirm their commitment to this Code, and we ask our Suppliers to share this Code with the individuals assigned to perform work for, or on behalf of, DIRECTV and expect our Suppliers' commitment to adequately train their employees on its requirements. The Code also encourages Suppliers to inform DIRECTV if they see a DIRECTV employee, or another Supplier, engaging in questionable behavior or acting in violation of our Code. We value our relationship with each Supplier and expect you to follow our ethical business practices and to support effective ethics and integrity programs within your own organizations. We trust that you will be an integral part of our ever-growing ethical culture. With your help and cooperation, we will be able to avoid unethical behavior and promote a respectful and positive environment in our workplace. We appreciate your commitment to making ethics and integrity a top priority as you work with DIRECTV.