



SUPPLIER CODE OF CONDUCT

FOR DIRECTV SUPPLIERS, SERVICE PROVIDERS, VENDORS & CONTINGENT WORKERS

Straightforward Values – Excelling with Integrity

Effective as of January 1, 2025

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, vendors, and contingent workers (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 and encourages all stakeholders - including Suppliers - to ask questions and raise good faith concerns related to DIRECTV. DIRECTV's Speak Up Helpline provides options to speak up confidentially and anonymously at 888.DTV.HELP (888.388.4357) or [online at http://speakup.directv.com](http://speakup.directv.com).

SAFEGUARD CONFIDENTIALITY AND PROHIBIT RETALIATION

DIRECTV takes seriously all concerns raised in good faith. Each concern is reviewed by a team trained to ask the right questions, determine a response and/or action plan, and do so in a way that protects confidentiality as much as possible, and protects

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.

DIRECTV

employees from retaliation. We expect our Suppliers to similarly address concerns, protect confidentiality as much as possible, and safeguard against retaliation.

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 compliance with 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 in compliance with DIRECTV policy and 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 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 compliance with laws and regulations governing international business transactions. We expect our Suppliers to comply with applicable export, import, anti-boycott, and sanctions laws and to work with us to identify and appropriately manage international business transactions.

DIRECTV

ENVIRONMENTAL RESPONSIBILITY

At DIRECTV we are committed to operating our business in an environmentally responsible and sustainable way. We expect our Suppliers to share this commitment, and comply with 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. If there is an actual or perceived conflict of interest between a Supplier and DIRECTV or a DIRECTV employee, it should be reported through DIRECTV's Speak Up Helpline (888.DTV.HELP or <http://speakup.directv.com>).

DIRECTV employees should have no relationship, financial or otherwise, with any Supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of DIRECTV. For example, Suppliers should not employ or otherwise make payments to any employee of DIRECTV during the course of any transaction between the supplier and the Company.

Friendships outside of the course of business are inevitable and acceptable, but Suppliers should take care that any personal relationship is not used to influence an employee's business judgment. If a Supplier's employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, in-law, or same or opposite sex domestic partner) to an employee of DIRECTV, or if a Supplier has any other relationship with an employee of DIRECTV that could represent a conflict of interest, the supplier should disclose this fact to DIRECTV

GIFTS AND ENTERTAINMENT

Giving and receiving gifts 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

DIRECTV

report any gifts, meals, or entertainment received with a value of above \$100. Gifts, meals, and entertainment are not necessary to do business with DIRECTV. DIRECTV employees must refrain from accepting or providing gifts, meals, 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 or entertainment.

Ordinary business meals and small tokens of appreciation such as gift baskets during the holidays generally are fine, but Suppliers should avoid offering DIRECTV employees travel, frequent meals, or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed. When providing services to DIRECTV or otherwise acting on behalf of DIRECTV, we expect our Suppliers' employees to be mindful of DIRECTV's guidelines and avoid creating actual or perceived conflicts of interest.

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

EQUAL OPPORTUNITY

We believe in equality and inclusivity. We base our 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.

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. DIRECTV does not tolerate harassment, hostility, bullying, or disrespect of any kind, including sexual harassment. 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 other Suppliers or customers.

DIRECTV

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 expects the same of its Suppliers.

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 the 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 laws, including 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 government also has a zero-tolerance policy against trafficking in persons, under 48 CFR 52.222-50, which applies to all Employees, Agents, and Suppliers.

RESPECT PRIVACY AND INTELLECTUAL PROPERTY

DATA PRIVACY & PROTECTION

DIRECTV may collect, use, and share 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. Even if legally allowed, it is a violation of DIRECTV policy to record without prior notice to and consent from all parties. No secret recordings may be made.

DIRECTV

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 proprietary and remain the exclusive 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. Suppliers should not give DIRECTV information related to any other company if the Supplier is contractually or legally obligated not to share the information. If a Supplier receives DIRECTV's or any other third party's confidential information in error, the Supplier should immediately notify its contact at the Company and not share the information with anyone.

INSIDER TRADING

Suppliers should not trade in securities, or encourage others to do so, based on confidential information received in the course of providing services to or acting on behalf of DIRECTV.

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 in their possession or control, 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 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

DIRECTV

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 applicable DIRECTV policy, purchase orders, and agreements.

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. Suppliers should also inform DIRECTV if they see a DIRECTV employee or another Supplier engaging in questionable behavior or violating Our Code, by contacting our Speak Up Helpline at 888.DTV.HELP or <http://speakup.directv.com>.

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