



AT&T

AT&T Inc.

Modern Slavery Report 2025

This Modern Slavery Statement 2025 (“**Statement**”) is made on behalf of AT&T Inc. pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and the United Kingdom’s Modern Slavery Act of 2015. This report covers the following entities and demonstrates AT&T’s efforts to comply with and strengthen the anti-modern slavery policies adopted in its operations and supply chain:

- AT&T Global Services Canada Co. (Federal Business Number 89387 2523)
- AT&T Global Network Services (UK) B.V.
- AT&T Istel
- AMSUK Limited
- AT&T MVPD Europe Limited
- AT&T MVPD UK I Ltd
- AT&T MVPD UK IILtd

Where in this statement, we refer to “**AT&T**,” “**we**” or “**our**” is a reference to AT&T Inc. – a U.S. publicly-traded company and its AT&T Group of companies, of which the aforementioned companies are a part. AT&T Inc. exercises indirect control of the aforementioned entities, and they do not have any subsidiaries.

This Statement sets out the actions taken by AT&T to address modern slavery risks in our business operations and supply chain for AT&T’s financial year ended 31 December 2024 (“**Reporting Period**”).

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Introduction

AT&T is a leading provider of telecommunications and technology services globally. At AT&T, our purpose is to connect people to greater possibility – with expertise, simplicity, and inspiration.

AT&T has a longstanding commitment to human rights. In keeping with this commitment, we seek to operate with transparency, engage with stakeholders, and promote responsiveness and accountability. In complying with laws and regulations that relate to our business, we seek to honor the principles of internationally recognized human rights instruments.

Description of our Structure, Activities and Supply Chain

AT&T offers a wide range of innovative services, including local and wireless mobile telephony services, software driven network services, and fiber and wireless broadband internet. We provide wireless and wireline telecommunications and broadband services to consumers located in the U.S. and businesses globally. In Mexico, we provide wireless services and equipment. Our Business Wireline business unit offers advanced IP-based services, such as Virtual Private Networks (VPN), AT&T Dedicated Internet, and Ethernet as well as traditional data services, cloud solutions, outsourcing and managed professional services.

AT&T Global Services Canada Co. (“AT&T Canada”) is a wholly owned indirect subsidiary of AT&T Inc. AT&T Canada is headquartered in Thornhill, Ontario and offers telecommunications networks and information technology solutions and services to its enterprise customers and certain Internet of Things (“IoT”) services. AT&T Canada’s registered office is at 55 Commerce Valley Dr W, Suite 600, L3T 7V9. AT&T Canada’s workforce consists of approximately 75 full-time skilled, non-unionized employees. They perform a broad spectrum of roles related to Sales & Marketing, Project Management, Service Management, Network and Technology Solutions, Human Resources and Finance. AT&T Canada has offices in Vancouver and Montreal; its network assets are present in every major city across Canada, with many engagements in multiple industry verticals. AT&T Canada is registered as a Reseller, a Reseller of High-Speed Retail Internet Service, and it holds a Basic International Telecommunications Services license, providing telecom services to enterprise customers across Canada, including but not limited to, Business Network Services, Business Internet, and Cybersecurity.

AT&T operates in the United Kingdom through six legal entities (listed above). AT&T’s headquarters in the United Kingdom is located in London, and it has offices in Studley, Warwickshire and Portsmouth, Hampshire. The United Kingdom is the AT&T Center for Global Disaster Recovery Operations, and AT&T has three state-of-the-art Internet Data Centers in the United Kingdom. AT&T employs approximately 350 full-time skilled, non-unionized employees in the United Kingdom in roles related to Sales & Marketing, Project Management, Service Management, Network and Technology Solutions, Legal, Human Resources, and Finance. Enterprise clients across the UK can benefit from an industry-leading portfolio that includes Mobility, Network, Network Security, Cloud, Hosting, Voice, Unified Communications and Application services.

AT&T's supply chain categories are:

1. **Technology:** local and international telecom carriers for network services, data center and cloud services providers, original equipment manufacturers (OEM) of hardware, software companies, and professional services partners for project management.
2. **Construction:** engineering services, trenching and other services related to laying fiber optic cable, and other technical installation and maintenance services.
3. **Resellers and Distributors:** vendors of OEM hardware and software solutions.
4. **Real Estate and Utilities:** real estate management and service provider companies, real estate agents, property landlords, utility companies providing power, and water.
5. **Logistics:** logistics, shipping and freight forwarding companies.
6. **Consultancy and other Professional Services:** financial, banking, audit, legal, advertising and marketing, human resource staffing and augmentation, insurance services partners.

Risks of Modern Slavery in our Operations and Supply Chains

The risk that AT&T's operations have caused, contributed, or been linked to modern slavery is low given:

- the lower risk workforce profile as described earlier in this statement;
- our employment policies and procedures, which are designed to ensure that staff are remunerated fairly and are working of their own free will, with the right to work in the territory in which they are employed; and
- our processes for reporting and resolution of concerns, including those that may relate to modern slavery.

AT&T recognizes that, as with most large technology companies with complex supply chains, there are risks of modern slavery in our supply chains. The dominant spend for AT&T during the Reporting Period was on the procurement of information communications technology (ICT) hardware. Steps taken to mitigate these risks are outlined below.

Corporate Policies and Governance Framework

The most important commitment we can make to our customers, our shareholders and each other is living up to the high standards of honesty, integrity, and respect.

AT&T remains committed to operating with integrity and ethics – and with an emphasis on corporate responsibility.



AT&T’s Corporate Responsibility (**CR**) Governance Council is led by our Chief Sustainability Officer and comprises senior executives representing business areas linked to CR topics including human rights. Our commitment to CR is embedded in every company level, and oversight rests with the Governance and Policy Committee of the Board of Directors of AT&T Inc.

We seek suppliers that share our commitment to strict ethical and environmental standards. Our guidelines are conveyed through our [Principles of Conduct for Suppliers](#) (“Supplier Principles”), which align with international standards bodies such as the International Labour Organization (ILO) and cover topics such as freedom of association, collective bargaining, forced labor, child labor and discrimination.

We set expectations for adhering to the Supplier Principles through our Supplier Portal and contract agreements. We also expect suppliers to hold their subcontractors to the same principles and require that both comply with all applicable laws and regulations. Suppliers must verify alignment to our Supplier Principles through a self-attestation process every 18–24 months. To ensure compliance, we also survey a subset based on risk level. Supplier risk level (and subsequently survey frequency) is determined with a high-risk activities questionnaire completed by our sourcing managers in cooperation with the relevant AT&T departments.

As outlined in our [Human Rights Policy](#), AT&T is committed to addressing human rights throughout our value chain. Our Human Rights Policy is made available to all AT&T employees and suppliers and outlines our expectations for respecting and promoting human rights throughout our business. The policy is also referenced in our Principles of Conduct for Suppliers, along with other policies and materials that explain our approach to supplier responsibility.

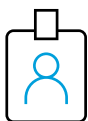
Finally, the [AT&T Code of Business Conduct](#) (“**Code**”) puts our values into action and details our commitment to ethics, inclusion, privacy, the environment, and our communities. The Code provides that we strive to do business with ethical suppliers. That includes seeking suppliers who share our commitments to ethical and sustainable business practices and human rights (including labor rights).

The Code defines the standard of ethical behavior that employees are expected to follow. Encouraging honest and ethical conduct, the Code covers a wide range of topics related to ethics and compliance, including non-discrimination, conflicts of interest, customer, and employee data privacy and our commitment to the environment. The Code is a key resource and practical tool, providing guidance to each employee about the attitudes to adopt in relationships within, and outside, the company.

The Code is available on external websites and company intranets and is accessible on many employees' mobile devices. Employees also have access to the Code in more than 20 languages. We also update the Code regularly as part of our ongoing effort to maintain its effectiveness and provide clear direction and resources on relevant topics.

AT&T has core values in respect of corporate governance. They are as follows:

Labor Practices



Our Supplier Principles state that we do not permit suppliers to use involuntary labor, like child labor, prison labor, debt bondage or indentured or forced labor. No person employed by a supplier may be below the minimum legal age for employment. Contractually, suppliers are required to comply with all applicable labor, wage and hour laws, and regulations, including, but not limited to, those relating to minimum wage, overtime, piece rates and other elements of compensation, and legally mandated benefits. Suppliers' employees should understand their employment conditions including payment terms and benefits.

Human Rights



AT&T expects suppliers to treat all employees with respect and dignity. The use of corporal punishment, threats of violence, physical abuse or other forms of physical coercion, harassment, or intimidation are not tolerated. Suppliers' employment, wage and benefits practices cannot be based on color, race, caste, religion, age, maturity, nationality, social or ethnic origin, status, sexual orientation, gender, marital status, pregnancy, political affiliation, union membership, or disability.

Our approach to human rights also includes the following:

Human Rights in the Supply Chain



AT&T is committed to upholding the highest standards of integrity and ethics, with a strong focus on corporate responsibility. Our suppliers play a crucial role in our operations and are essential to our commitment. We require our suppliers and their suppliers to comply with all applicable laws and regulations, both domestic and foreign.

We also require Suppliers to adhere to our [Principles of Conduct for Suppliers](#) and the [AT&T Human Rights Policy](#), or an equivalent set of principles. AT&T expects Suppliers to review these Principles at least once every three years to ensure ongoing adherence.

Conflict Minerals



AT&T is not a manufacturer, but we are concerned with the use of conflict minerals (which can be extracted at many different locations around the world, including the Democratic Republic of the Congo). Through our Supplier Principles, we set expectations that the products we sell will not contain conflict minerals that directly or indirectly finance or benefit armed groups. We ensure applicable contracts reference our expectation that suppliers do not use conflict minerals in the products they provide to AT&T. We also require that suppliers comply with applicable conflict mineral rules.

We reserve the right to audit for any known instances of noncompliance. Where noncompliance issues are identified, we work with suppliers to remedy them, suspending or terminating contracts with those that fail to demonstrate a commitment to this or any of our Supplier Principles.

Responsible Supply Chain

Our supply chain management strategy includes incorporating requirements for sustainable business practices into agreements and requests for proposal, training sourcing managers on sustainable principles and providing updates to sourcing managers on supplier sustainability performance. We strive for suppliers' conformance with Supplier Principles by using the following approaches, which are also published in our [Responsible Supply Chain](#) issue brief.

Supplier Sustainability Principles



We outline our expectations for suppliers on a variety of issues in our Supplier Principles. The Supplier Principles encompass all environmental, social and governance considerations, including the following:

- Environment, Health, and Safety
- Supplier Inclusivity
- Ethics
- Freedom of Association
- Conflict Minerals
- Labor Practices
- Human Rights
- Circular Economy
- Conflicts of Interest
- Company Property and Resources
- Confidential Information and Privacy

The Supplier Principles specifically prohibit involuntary labor, including child labor, and require compliance with minimum wage and hour laws, overtime, and other legally mandated employee benefits.

We also expect suppliers to hold their subcontractors to the Supplier Principles and we require our suppliers and their subcontractors to comply with all applicable laws and regulations, both domestic and foreign. If a supplier has questions about the Supplier Principles, senior sourcing managers may engage the AT&T Supply Chain Sustainability Office to consult with the supplier.

Risk Assessment, Mitigation and Due Diligence

Corporate Responsibility (CR) Audits & Assessments

Through our membership in the [Joint Alliance for CSR](#) (JAC), CR audits are conducted on select Tier 1, 2 and 3 suppliers by recognized, independent third-party auditors at suppliers' manufacturing facilities using a common audit framework. Member companies share audit results of suppliers, which promotes continuous improvement while reducing supplier audit fatigue.

In 2024, JAC audited 150 factory locations, including at 72 AT&T supplier facilities. AT&T led a combination of six audits and Mobile Worker Surveys of AT&T suppliers' factory locations. JAC identified 661 corrective actions of which, the following four areas made up 85% of all findings: 44% Health & Safety, 19% Working Hours, 11% Environment and 11% Wages and Compensation.

The JAC audit framework includes the following:

- Facility evaluation of production areas, office areas, storage facilities, distribution centers and dormitories.
- Management interviews of production, Environment, Health & Safety (EH&S), quality, human resources, and payroll manager(s).
- Confidential worker interviews of permanent, temporary, and subcontracted labor – including workers of both genders, new workers and workers from various departments and shifts.
- Review of relevant company documents necessary to understand whether the supplier is conforming to common CR principles and standards. This may include personnel records, proof-of-age documentation, timesheets, payroll records, environmental permits, emergency response plans, health and safety training documentation and certifications.

The 10 main areas of focus, all of which are addressed during the audits are:

1. Child labor
2. Forced/bonded labor
3. Health and safety
4. Freedom of association
5. Discrimination
6. Disciplinary practices
7. Working hours
8. Wages and compensation
9. Environment
10. Business ethics

If we become aware of suppliers at risk of non-compliance with social standards, we engage through JAC with on-site CR audits and corrective action plans, as well as other Supply Chain measures to ensure compliance with required standards. We also prioritize suppliers for audit based on the criticality of components provided or spend levels with suppliers to ensure AT&T can meet its business commitments, however, compliance with Modern Slavery requirements always remains a priority.

AT&T investigates and addresses human rights-related concerns from stakeholders, including customers, employees and suppliers. This commitment is referenced in our [Consumer Service Agreement](#), our [Privacy Notice](#) and our [Principles of Conduct for Suppliers](#). Grievances are promptly managed by the relevant business unit. Additionally, [AT&T's Hotline web reporting tool](#) is available to employees in the United States and provides a confidential and anonymous online process to report suspected or actual violations of AT&T's Code of Business Conduct, EEO policies and other Company policies. Employees outside the U.S. can report grievances through AT&T's web reporting tool.

Supply Chain Due Diligence



The AT&T supplier due diligence process focuses on vetting suppliers prior to contract execution and thereafter monitoring. This process involves the use of appropriate manual, online and subscription resources to assist in assessing and monitoring our suppliers for indications of financial, security, human rights, and other risks. During our engagement process, suppliers answer questions about their activities. Based on their responses and the presence of any risk indicators, risk mitigation methods, such as contract language and other controls, may be deployed. Business and risk-specific compliance monitoring is also performed, as appropriate.

To evolve our approach to assessing suppliers, we recently engaged EcoVadis to explore supplier performance across environment, labor and human rights, ethics and sustainable procurement. We have begun onboarding suppliers to this new process, which will help us gain an increasingly holistic insight into supplier sustainability performance.

Remediation and Training

The risk that AT&T's activities have caused, contributed, or been linked to modern slavery is low. In circumstances in which JAC audits have uncovered problematic practices in the factories surveyed, corrective action plans have been assigned and are managed with the relevant suppliers to ensure resolution is implemented. If a factory receives a result that raises particular concern, they may be reaudited after one year, otherwise facilities are eligible to be audited every two years. AT&T has not identified vulnerable families that have experienced loss of income because of steps that it has taken to eliminate forced labor or child labor risks, and as a result, it has not taken measures to remediate loss of income.

AT&T assigns training regarding the identification and prevention of human trafficking to select employees and makes the training available to all.

Finally, considering its risk profile, AT&T has not currently taken actions to assess the effectiveness in preventing and reducing risks of forced labor and child labor in our activities and supply chains.

Looking Forward

AT&T will continue to strengthen our supply chain lifecycle through company-wide efforts to address risks posed by modern slavery by following the five steps shown below, starting with supplier qualification.



Other Information



The We PROTECT Global Alliance is an international movement dedicated to national and global action to end the sexual exploitation of children online.



AT&T is a member of BSR’s Human Rights Working Group (HRWG). The HRWG was created to develop a safe space for a cross-sector group of companies to openly share best practices, challenges, questions, and experiences.



Since 2012, AT&T has participated in the Global Enabling Sustainability Initiative's (GeSI) Human Rights Working Group, which is pursuing a practical means of implementing the UN Guiding Principles on Business and Human Rights across the ICT sector, which includes internet providers, telecoms and manufacturers. The working group is also coordinating GeSI's involvement in the European Commission's project to develop human rights guidance for the ICT sector.



The Joint Alliance for Corporate Social Responsibility (JAC) is a not-for-profit association of telecom operators dedicated to developing Corporate Social Responsibility (CSR) across the Information and Communication Technology (ICT) supply chain. JAC verifies, assesses and implements CSR while sharing resources and best practice to develop long-term supply chain sustainability. JAC was established in 2010 and completes audits covering tens of thousands of workers globally each year. AT&T joined JAC in 2016 and has served on the Board of Directors since 2023.