



AT&T

AT&T Global Services Canada Co.

Fighting Against Forced Labour and Child Labour in Supply Chains Act
Statement 2024

This Modern Slavery Statement 2024 (“Statement”) is made on behalf of AT&T Global Services Canada Co. (Federal Business Number: 89387 2523) (“AT&T Canada”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”) and demonstrates its efforts to comply with and strengthen the anti-modern slavery policies adopted in its operations and supply chain.

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 AT&T Canada is a part. AT&T Inc. exercises indirect control of AT&T Canada. AT&T Canada does not have any subsidiaries.

This Statement sets out the actions taken by AT&T Canada to address modern slavery risks in our business operations and supply chain for AT&T Canada’s financial year ended 31 December 2023 (“Reporting Period”). [Note: AT&T is also subject to the United Kingdom’s *Modern Slavery Act*, and its statements can be found online: <https://sustainability.att.com/governance/esg-policies>].

Approval and Attestation

This Statement is approved by the board of directors of AT&T Global Services Canada Co. and signed on the board of directors’ behalf by who attests as follows.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in this report for the entity described above, specifically, AT&T Global Services Canada Co. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Name: Michael Springham

Title: Director and Chief Financial Officer

Signature*:



*I have the authority to bind AT&T Global Services Canada Co.

Date:

30/4/24

Contents

INTRODUCTION

DESCRIPTION OF OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

RISKS OF MODERN SLAVERY IN OUR ACTIVITIES AND SUPPLY CHAINS

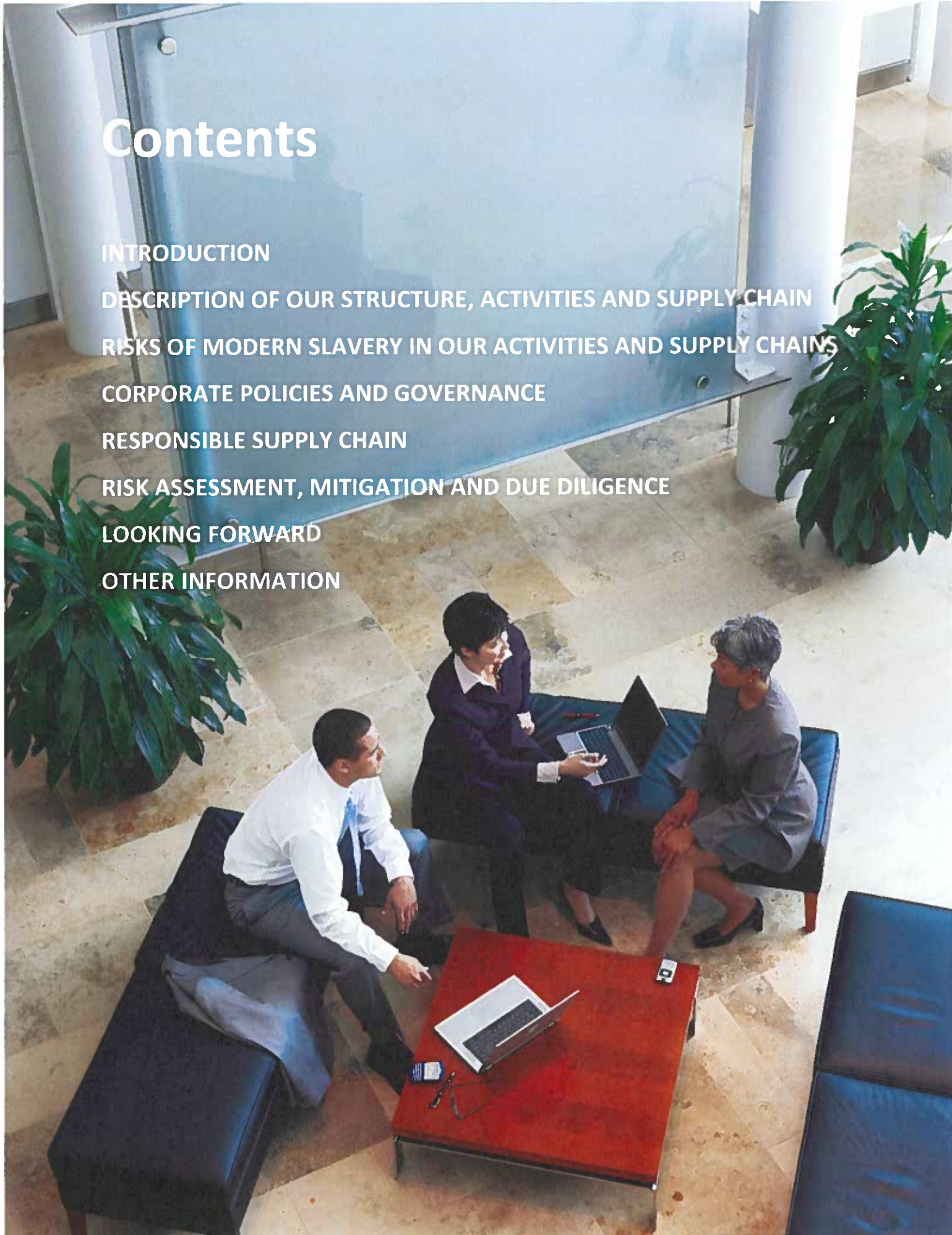
CORPORATE POLICIES AND GOVERNANCE

RESPONSIBLE SUPPLY CHAIN

RISK ASSESSMENT, MITIGATION AND DUE DILIGENCE

LOOKING FORWARD

OTHER INFORMATION



Introduction

AT&T is a leading provider of telecommunications and technology services globally. AT&T offers a wide range of innovative services, including local, long-distance, and wireless mobile telephony services, software driven network services, and fiber and wireless broadband internet.

At AT&T, our purpose is to create connections – with each other, with what people and businesses need to thrive every day and with the stories and experiences that matter.

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 honour the principles of internationally recognized human rights instruments.

Description of our Structure, Activities and Supply Chain

AT&T Canada is a wholly owned indirect subsidiary of AT&T Inc., a U.S. publicly traded company. 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 as described below. AT&T Canada’s registered office is at 55 Commerce Valley Dr W, Suite 600, L3T 7V9. As of the end of the Reporting Period, AT&T Canada’s workforce consists of 100+ 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 Canada also provides IoT “connected car” services to its some of its auto manufacturer enterprise customers, enabling those consumer customers to avail themselves of services including safety, security, and diagnostic IoT services, and the purchase of wireless data services.

AT&T Canada’s supply chain categories are:

1. **Technology:** local and international telecom carriers for network services and partnerships, data center and cloud services providers, original equipment manufacturers (OEM) of hardware, software companies, and professional services partners for project management and other technical installation and maintenance services.
2. **Resellers and Distributors:** vendors of OEM hardware and software solutions.
3. **Real Estate and Utilities:** real estate management and service provider companies, real estate agents, property landlords, utility companies providing power, water, and telecom services.
4. **Logistics:** logistics, shipping and freight forwarding companies.
5. **Hospitality:** local catering services through restaurants and cafés.

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 Canada’s operations have caused, contributed, or been linked to modern slavery is low given:

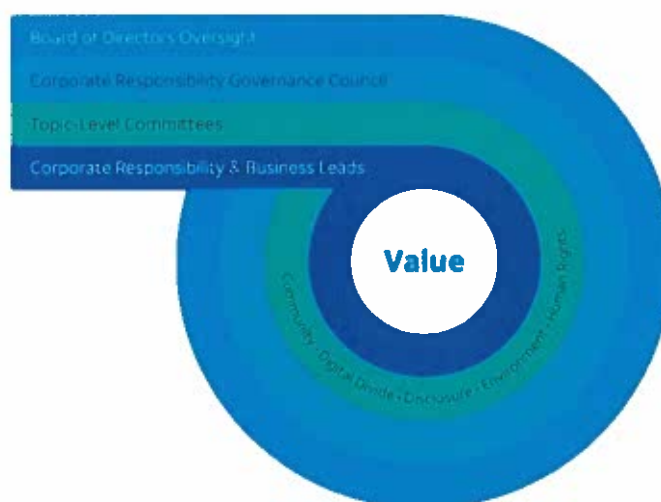
- the lower risk workforce profile as described earlier in this statement.
- our employment policies and procedures, which are designed to ensure that staff are remunerated fairly and are working of their own free will, with the right to work in the territory in which they are employed; and
- our processes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

AT&T Canada 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 Canada 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. Because the corporate policies and governance framework adopted by AT&T Inc. also apply to AT&T Canada, this report will focus on group-level governance, risk mitigation, and approaches to preventing modern slavery that are common to both entities.

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



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 deemed most material by our stakeholders, including human rights. Our commitment to CR is embedded in every company level, and oversight rests with the Public Policy and Corporate Reputation Committee of the Board of Directors of AT&T Inc.

Suppliers are a key part of our business and therefore must be a critical part of our approach to citizenship and sustainability. We believe it is important to understand more about the social, economic, and environmental performance of our suppliers, and expect our suppliers to share our commitment to citizenship and sustainability. We outline our expectations in our [Principles of Conduct for Suppliers](#), which cover topics including sustainable business practices, diversity, conflict minerals, ethics, and human and labor rights ("**Supplier Principles**").

We contractually require our suppliers ("**Suppliers**") to comply with all applicable laws and regulations, both domestic and foreign. We also require our Suppliers to impose similar requirements on their own suppliers. If our Supplier has a corporate citizenship, sustainability, and human rights ("**Citizenship & Sustainability**") program, we contractually require it to be no less stringent than the Principles of Conduct and the [AT&T Human Rights Policy](#) ("**AT&T Citizenship & Sustainability Policies**"). If our Supplier does not have a Citizenship & Sustainability program, or its program does not address all areas of AT&T Citizenship & Sustainability Policies, we contractually require our Supplier to conduct business in a manner consistent with those policies.

Finally, the [AT&T Code of Business Conduct](#) ("**Code**") puts our values into action and details our commitment to ethics, diversity, 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, human rights (including labor rights), and diversity.

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 diversity and 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:

Labour Practices



Our Supplier Principles state that we do not permit suppliers to use involuntary labour, like child labour, prison labour, debt bondage or indentured or forced labour. No person employed by a supplier may be below the minimum legal age for employment.

Contractually, suppliers are required to comply with all applicable labour, 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, gender identity or

expression, marital status, pregnancy, political affiliation, union membership, or disability. We also expect suppliers to work toward having a diverse work force.

Our approach to human rights also includes the following:

Human Rights in the Supply Chain



AT&T is committed to conducting business with integrity and ethics, with an emphasis on environmental, social, and corporate governance. As part of our business, suppliers are expected to follow the same environmental, social and governance standards we expect from our own employees. We have implemented sustainability-focused contract clauses that specifically highlight our relevant policies (such as our codes of conduct and the [AT&T](#)

[Human Rights Policy](#)) and obligate suppliers to adhere to programs in a manner consistent with these policies.

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). Our Supplier Principles confirm our expectations that the products that we purchase from suppliers and manufacturers and sell will not contain conflict minerals that directly or indirectly finance or benefit armed groups. We expect our

suppliers to share this objective and act to conform.

AT&T reserves the right to suspend or terminate suppliers who fail to commit to this expectation. For more information on human rights in the supply chain, please visit our [Responsible Supply Chain](#) issue brief.

Responsible Supply Chain

Our supply chain management strategy includes incorporating Citizenship and Sustainability as well as Supplier Diversity clauses into agreements and requests for proposal, training sourcing managers on the principles of sustainability and diversity and providing updates to sourcing managers on supplier sustainability and diversity 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:

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

The Supplier Principles specifically prohibit involuntary labour, including child labour, 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. We contractually bind suppliers to follow AT&T's Supplier Principles.

Risk Assessment, Mitigation and Due Diligence

Corporate Responsibility (CR) Audits & Assessments

Through our membership in the Joint Alliance for CSR (JAC) ([https://jac-initiative.com/.](https://jac-initiative.com/)) 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 **2023**: JAC audited 137 factory locations, including at 78 AT&T supplier facilities. AT&T led a combination of eight audits and Mobile Worker Surveys of AT&T suppliers' factory locations. JAC identified 890 corrective actions of which, the following four areas made up 84% of all findings: 45% Health & Safety, 18% Working Hours, 11% Environment and 10% 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 labour
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 remain a priority.

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.

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 labour or child labour risks, and as a result, it has not taken measures to remediate loss of income.

Similarly, due to the low risk of modern slavery posed by AT&T’s activities, we do not provide training that focuses on this subject. AT&T notes that some of its principal suppliers, including Cisco¹, Ericsson², and Apple³ conduct training to mitigate the risk of modern slavery in their operations and supply chains.

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



¹ See Cisco Statement on the Prevention of Slavery and Human Trafficking, available at https://www.cisco.com/c/dam/en_us/about/supply-chain/cisco-modern-slavery-statement.pdf.

² See Ericsson Modern Slavery and Human Trafficking Statement 2023, available at <https://www.ericsson.com/4931d8/assets/local/about-ericsson/sustainability-and-corporate-responsibility/documents/2023/modern-slavery-and-human-trafficking-statement.pdf>.

³ See Apple Statement on Efforts to Combat Modern Slavery in our Business and Supply Chains, available at <https://www.apple.com/supplier-responsibility/pdf/apple-combat-human-trafficking-and-slavery-in-supply-chain-2022.pdf>

Other Information



In 2019, AT&T became the first U.S. based telecommunications service provider to become a signatory of the United Nations Global Compact (UNGC) and commit to its voluntary framework of principles related to human rights and environmental sustainability. We publish an annual Communication on Progress, detailing our managerial approach to the UNGC focus areas.



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.