

# AT&T Inc. Political Engagement Policy

## Introduction

AT&T Inc. affiliates operate in a highly regulated environment, where public policy dictates how we serve our customers and how we deliver value to our shareholders. It is critical we have a voice in policy discussions that impact our business. The ability to make political contributions is an important part of the process.

## Policy Positions and Contribution Criteria

Every action we take is in strict compliance with applicable law. Political contribution and expenditure decisions are based on alignment with our [Core Values](#), our [Code of Business Conduct](#) and AT&T's corporate public policy positions. These decisions are made without regard for the personal political preferences of AT&T's officers and executives. These include issues such as: innovation, consumer protection, privacy, entertainment, media and spectrum. Information on many of AT&T's public policy positions can be found in the issue briefs located on the [Company's public policy main page](#), our [corporate responsibility website](#) and the [AT&T Forum](#).

## Contributions

We contribute prudently, where permitted by law, to:

- State Candidates
- State and Local Political Parties and Other Political Groups
- Political Action Committees (PACs)
- Ballot Measures
- Trade Associations
- Tax-Exempt Organizations

We do not make corporate political contributions to federal political parties or candidates for federal office. As a general practice, we do not make independent political expenditures or corporate political contributions to independent expenditure committees or to any non-candidate or non-political party political committee organized under Section 527 of the Internal Revenue Code (e.g., Super PACs); however, if we do, we disclose them via our [public website](#), updated twice yearly.

Contributions are made to candidates who support a strong private sector and show a free-enterprise philosophy. Other factors include:

- Whether they sit on a committee that addresses legislation affecting our businesses;
- Whether they represent a district or state with a major AT&T business operation;
- Their committee standing and ranking;
- Their elected leadership position; and
- Their voting record.

We also belong to various trade associations and contribute to tax-exempt advocacy organizations. These organizations principally are those that are part of the communications, information services and entertainment industries and are operated for the purpose of advancing the common goals and interests of the member companies and their customers. We review differing policy issues, and those are taken into consideration when determining annual membership. Our participation in these various industry, trade and business groups comes with the understanding that we might not always agree with all positions of the larger organization and/or other members, and that we are committed to voicing our concerns as appropriate through the AT&T leaders who interact with these organizations, many of whom serve on the boards and committees of these organizations.

## **Lobbying**

The AT&T External Affairs (EA) team is comprised of seasoned professionals who represent the interests of all AT&T businesses in the public policy arena. Members of the EA team come from diverse political, geographic and socio-economic backgrounds and work together to create value for AT&T businesses through lobbying and serving as the “faces” of AT&T with government officials.

AT&T complies with all federal and state laws and regulations for lobbying registrations and reporting. AT&T companies, employees, and external lobbyists and firms register as lobbyists as required by applicable law to represent our interests.

## **Disclosure**

In accordance with applicable law, campaign finance and disclosure rules, and our own internal policies, we publicly disclose twice yearly, via our [public website](#), our U.S. corporate political contributions and lobbying expenditures, contributions from our employee PACs, the lobbying expenditure portion of contributions of \$50,000 or more to trade associations, and the lobbying expenditure portion of contributions to other tax-exempt advocacy organizations. We make a reasonable effort to obtain from these organizations, or through other means, the portion of the Company’s contribution the organization allocates to lobbying and disclose that amount.

In addition, in all state and federal jurisdictions, recipient candidate campaigns and political committees are required to report contributions they receive. The AT&T Federal PAC publicly discloses its contributions with the Federal Election Commission. Many states also require AT&T to publicly report corporate contributions and PAC contributions made in those states.

## **Compliance**

AT&T has established strict internal policies, processes and compliance measures to ensure adherence to legal and regulatory requirements.

## **Oversight**

### *Board of Directors*

The AT&T Board of Directors' Public Policy and Corporate Reputation Committee (PPCRC), comprised entirely of outside directors, is responsible for oversight of AT&T's public policy activities and corporate political fund disbursements. As part of the PPCRC's oversight of AT&T's public policy activities, the PPCRC annually reviews the Company's policies and practices and expenditures related to political contributions, as well as contributions to trade associations and other tax-exempt and similar organizations that may engage in public policy initiatives.

Annually, both the PPCRC and full Board are provided with a complete list of all contributions for their review and guidance.

Additional information can be found at our [AT&T Political Engagement webpage](#) as well as past reports.

### *Executive Leadership*

AT&T's Senior Executive Vice President and General Counsel, who reports directly to AT&T Inc.'s Chairman and Chief Executive Officer, is responsible for overall management and participation in the political process.

## **Process**

AT&T applies a robust authorization process to political contributions and expenditures.

### *Corporate Political Contributions*

Each year, the AT&T Inc. Board of Directors authorizes a maximum aggregate limit for contributions that can be made by AT&T for the purpose of supporting or opposing any party, candidate, political committee, ballot measure, or any political purpose connected to a candidate. Contributions must be permitted by, and in strict compliance with, applicable law.

AT&T personnel consult with the AT&T Legal Department to ensure that contributions are lawful and consistent with applicable statutes, regulations, limits and guidelines. All political contributions are reviewed and approved as to lawfulness by the AT&T Legal organization prior to authorization.

All corporate political contributions must be approved by the Chief Executive Officer of the operating company making the request, or a delegate if the amount is \$2,500 or less. Similarly, the Chief Executive Officer of AT&T Inc., or a delegate if the amount is \$2,500 or less, must approve all corporate political contributions requested by AT&T Inc. A report of all political contributions, regardless of amount, is reviewed quarterly by AT&T Inc.'s Chairman and Chief Executive Officer and annually by the Board.

### *Trade Associations and Other Tax-Exempt Organizations*

AT&T has a rigorous approval process for contributions to trade associations and other tax-exempt advocacy organizations. Each proposed contribution must be in the best interests of the Company and our shareholders.

The contributions must be approved by the Senior Executive Vice President and General Counsel or other senior leaders. These contributions are shared with the PPCRC on an annual basis. Both the PPCRC and full Board are provided with the complete list of contributions for their review and guidance.

### *Employee PACs*

AT&T Employee Political Action Committees (PACs) are voluntary, non-partisan and provide AT&T management employees an opportunity to collectively support public policy positions that are important to AT&T. In all, there are 31 separate state employee PACs and a federal employee PAC. Each AT&T Employee PAC has a chairman, officers, a committee of employees that is engaged in PAC operations, and Articles of Operation outlining its operating procedures.

Each Employee PAC's Disbursement Committee, which determines the contributions that will be made, is comprised of management employees from various AT&T business units and management levels within the Company. Consideration of a contribution to a candidate is guided by our [Core Values](#) and based on the candidate's position on issues of importance to AT&T's business and the technology, media and telecommunications industry.