AT&T Business Continuity Management Program Policy

Executive Summary – Non-Proprietary

Introduction

AT&T is committed to the effective support of its stakeholders and customers and requires a robust Business Continuity Management Program (BCM, BCM Program or Program) to help prevent or mitigate service disruptions and rapidly respond to any loss of essential business processes.

AT&T's BCM Program includes management disciplines, processes and techniques required to ensure that AT&T's essential business processes continue to support customer service and generate revenue in the event of a significant business disruption.

Operating Practice 999 is an enterprise-wide BCM standard that applies to all AT&T companies and affiliates. The Practice sets the standards and outlines the BCMS policy governing the processes that identify the Roles & Responsibilities relating to the WHO, WHAT, and HOW OFTEN activities that must be completed, and provides a framework for building resilience with the capability for an effective response that safeguards the interests of our key stakeholders and our reputation.

Effective Date & Governance

This Operating Practice is effective as of November 01, 2007.

The BCM Program may be reviewed by the AT&T Audit Services with the assistance and cooperation of the Corporate Business Continuity Planning Organization (C-BCP), and other supporting organizations.

At a minimum, this Operating Practice will be reviewed by C-BCP on a three-year cycle.

Mission Statement

The BCM Program mission and purpose is that it goes beyond Disaster Recovery to focus on loss prevention, risk mitigation, employee/human resources, and public relations, as well as rapid recovery of Business Unit (BU) operations and infrastructure. It is designed to maximize BU BCM Risk protection by prioritizing BU Planner time and effort (interaction) and to contribute to the recruitment and maintenance of AT&T Customers and external Interested Parties.

The Program is integrated for all Interested Parties, i.e. Employees, Customers, Government, or any person/organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity within the Program. Relationships with these Interested Parties are the responsibility of the specific Business Unit charged with the role & responsibility to interact with that Party.

Operating Practice Content

This Operating Practice is a collection of eleven different but related BCM topics organized into Sections. A summary of each Section is as follows.

Section 1 - Overview
The Program is designed to follow BCM-industry standard practices. The Operating Practice structure is aligned with a number of standards including ASIS BCP.1, and NFPA 1600 2016. It is aligned with the ten Disaster Recovery Institute International (DRII) Professional Practices. The Program's Incident Command System, Emergency Management Operations, also aligns to the National Incident Management System (NIMS) as suggested by the Department of Homeland Security (DHS).

The Program is certified to ISO 22301:2012 supporting AT&T's certification to the Department of Homeland Security's Voluntary Private Sector Preparedness Accreditation and Certification Program (PS-Prep). The Program is also certified by Cellular Telecommunications Industry Association (CTIA) as part of their Business Continuity/Disaster Recovery Program.

Section 2 - Program Initiation and Management
The BCM Program was created as a result of a directive from AT&T Leadership. That directive is executed under the guidance and sponsorship of senior leadership providing strategic oversight and tactical direction.

The BCM Program applies to all Business Units, executive structures, and leadership teams across AT&T, Inc. The Program, in its current form and structure, supersedes any previous Business Continuity, Disaster Recovery and/or Emergency Preparedness programs or policies within AT&T Inc., its affiliates, or its predecessors.

The Program may be reviewed by the AT&T Audit Services with the assistance and cooperation of the C-BCP Organization, and other supporting organizations.

Section 3 - Risk Assessment

Risk Assessment is part of the Risk Management Process, which encompasses the identification and minimization of Risk, both logical and physical, associated with Corporate Business Processes, Business Unit Operations, and Company properties.

Since not all Risks can be avoided, the Company must analyze and prepare for those Risks that could result in severe business disruptions or Events. AT&T's Risk Management Process is a component of the BCM Program; its objective is the preservation of company assets and shareowner value by minimizing the financial effects of business/accidental losses.

Section 4 - Business Impact Analysis

Business Impact Analysis (BIA) is an integral component of the Risk Management Process. Business risk and impact analysis are performed in a variety of circumstances/environments, such as project management, strategic planning, and business continuity planning. The Operating Practice addresses BIA only as it pertains to Business Continuity Management.

The intent of the BIA is to identify critical business activities, infrastructure and dependencies having a significant impact on continuity of business operations; ultimately those which must be given high priority for risk mitigation, recovery, and restoration. BIA findings support decision making regarding Business Continuity priorities, strategies, solutions, and recovery plans.

Section 5 – Recovery Strategies

Recovery Strategies are a pre-defined approach describing the accumulated and aggregated procedures for the recovery and restoration of the object of that strategy. The Strategy should support, in a cost-effective manner, the Organization's requirements, Recovery Time Objectives and Recovery Point Objectives.

Section 6 – Incident Response

The Emergency Management Organization is the Incident Command Structure which provides strategic & tactical direction, coordination, communication, and overall management of Emergency Operations. The Organization is comprised of individuals from multiple levels of the company which act in a consolidated and coordinated manner to prepare for, respond to, and recover from an Event.

Section 7 – Plan Development and Implementation

AT&T Business Units are responsible for development of a Plan(s) that meets their recovery and restoration requirements and adheres to the company BCM standard, both in format and in content. Plans are to be certified by the Business Unit and accredited by the reviewing Corporate SME Organization to demonstrate a level of compliance to Plan template standards.

Depending on the business segment to be addressed, one or more templates are available for the Business Unit to utilize to develop their Plans.

Section 8 – Awareness and Training Programs

The purpose of Awareness and Training Programs is to prepare communication mechanisms to create and maintain corporate awareness and offer training to enhance the skills required to develop and implement the Business Continuity Program and its supporting activities.

Section 9 – Business Continuity Plan Exercise, Assessment, & Maintenance

Business Continuity Management includes exercising, assessing, and maintaining each Business Continuity Plan.

The Plan Exercise component includes planning, coordination, execution, documentation of results, and execution evaluation. Exercises are conducted annually or more frequently as required.

Plan Assessment ensures plans follow the plan template for design, plans exercises accomplish the desired objectives, the plans are maintained to ensure pragmatic capability.

Plan Maintenance occurs following a continuous lifecycle development process where the results from a previous Plan execution or exercise act as the basis for future Plan development.

Section 10 - Crisis Communications

AT&T is impacted by various Events, ranging from relatively minor service disruptions to major emergencies. The objective of Crisis Communications is to deliver a consistent message whenever the Corporation communicates, regardless of the audience. Effective Crisis Communications to audiences including employees, customers, and interested parties is an essential part of the company's response, and crucial to help protect its reputation and image.

Corporate Communications is responsible for communications both internally and externally. AT&T's Corporate Communications Organization is responsible for all interactions with the media and coordinates closely with their regional leads and local field managers to handle communications in response to any Event.

Section 11 - Coordination with External Agencies

For the purpose of this document, External Agencies are defined as Federal, State, County, City, Township governments, emergency response agencies such as American Red Cross and Salvation Army, and other Utilities and Industry.

AT&T interfaces with these agencies for coordination during Events; for mitigation and restoration activities; to establish policies, plans, and guidelines; and to provide input to influence AT&T's position in venues.