

ADTRAN HOLDINGS, INC.

AMENDMENTS AND WAIVERS TO THE CODE OF BUSINESS CONDUCT AND ETHICS

Amendments

None since the Board of Directors of ADTRAN Holdings, Inc. (the “Company”) amended the Code of Business Conduct and Ethics (the “Code”) on October 28, 2025. Changes from the prior version of the Code included, among other items:

- Updated references to persons covered by the Code;
- A refined values statement in Section A, *Ethical Principals*, emphasizing the promotion of community and belonging;
- Updated compliance provisions in the following areas: insider trading, anti-corruption, prevention of money laundering, antitrust, intellectual property, and data privacy;
- New guidance on the appropriate use of artificial intelligence tools;
- Updated reporting and review procedures in the event of actual or potential violations of the Code;
- Enhanced provisions relating to Section 406 of the Sarbanes-Oxley Act, applicable to the Company’s chief executive officer and senior financial officers, which have been moved to a separate appendix; and
- Various clarifying, stylistic, and non-substantive changes.

The foregoing description is qualified in its entirety by reference to the text of the Code, as amended as of October 28, 2025, a copy of which is posted on the Investor Relations page of Company’s website at www.adtran.com (under “Governance”).

Waivers

None.