

## Declaration of Compliance

ADTRAN Holdings, Inc. (“ADTRAN” or the “Company”) is an incorporation under Delaware law, United States of America. The German Corporate Governance Code (“GCGC”) does therefore not apply to incorporations and therefore the Company does not have to issue a Declaration of Conformity with the GCGC under section 161 of the German Stock Corporation Act (*Aktiengesetz*).

Solely for purposes of section 4.1.1.1 of the Guide to the DAX Equity Indices of STOXX Ltd., ADTRAN declares that it does not deviate from recommendations C.10 (with sole reference to its applicability to the Chair of the Audit Committee), D.8 and D.9 of the GCGC, in each case applied accordingly to an incorporation under Delaware law. ADTRAN’s Board of Directors or its audit committee arranges for the ADTRAN external auditors to inform it and note in the audit report if, during the performance of the audit, the external auditors identify any facts that indicate an inaccuracy in adhering to the recommendations in C.10, D.8 or D.9 of the GCGC in each case applied accordingly to an incorporation under Delaware law. ADTRAN additionally declares that it has appointed an Audit Committee that is to monitor the accounting process, the effectiveness of the internal control system, the risk management system, and the internal accounting control system as well as the auditing of financial statements, and in this regard particularly the selection and the independence of the auditor of the annual accounts and the services additionally provided by the auditor of the annual accounts pursuant to section 107 (3) of the German Stock Corporation Act (*Aktiengesetz*).

January 31, 2023  
Huntsville, Alabama