



PURPOSE

This policy pertains to the disclosure of inside information regarding ADT Inc. (“ADT”), its subsidiaries or another company and to trading in securities while in possession of such inside information. It is intended to ensure that all officers, directors and employees of ADT and its subsidiaries comply with the applicable laws and regulations concerning securities trading, commonly known as “insider trading”. Insider trading and stock tipping, as discussed below, are criminal offenses subject to severe criminal and civil consequences. Any violation of this policy could subject ADT Personnel (as defined below) to disciplinary action, up to and including termination. Appropriate judgment should be exercised in connection with all securities trading. Specific questions regarding this policy or applicable law should be directed to the General Counsel’s Office.

SCOPE

This policy applies to ADT and its subsidiaries, their officers, directors and employees (collectively, “ADT Personnel”), and household and immediate family members of ADT Personnel.

RESPONSIBILITY FOR IMPLEMENTATION

All ADT employees are responsible for implementation of this policy. The General Counsel’s Office is specifically responsible for implementing the Trading Window provisions of this policy.

APPLICATION

ADT requires all ADT Personnel to comply with applicable securities laws. ADT Personnel must never:

1. Buy, sell or engage in transactions in ADT securities at any time while aware of *material non-public information* about ADT.
2. Buy or sell securities of other companies at any time while aware of *material non-public information* about those companies that ADT Personnel become aware of as a result of business dealings between ADT and such other companies.
3. Disclose *material non-public information* to any unauthorized persons outside ADT (including family members), commonly known as “tipping.” ADT personnel are prohibited from “tipping” other persons about material non-public information

ISSUED BY ADT Law Department	EFFECTIVE DATE April 5, 2021	SUPERSEDES January 18, 2018	PAGE 1 of 5
---------------------------------	---------------------------------	--------------------------------	----------------



or otherwise making unauthorized disclosures or use of such information, regardless of whether the person profits or intends to profit by such tipping, disclosure or use. You must take steps to prevent the inadvertent disclosure of material non-public information to unauthorized persons outside ADT. If you believe that the disclosure of material non-public information is necessary or appropriate for business reasons, you must consult with the General Counsel’s Office to ensure that they concur that such disclosure is necessary, and to ensure that any such disclosure will comply with all applicable laws.

Non-public information is sometimes referred to as confidential information and means information about the Company that is not known to the public-at-large. All information is considered non-public until the second trading day after the information has been widely released through a press release, news wire or a report filed with the U.S. Securities and Exchange Commission.

Information is considered *material* if a reasonable investor would consider it important in making an investment decision. If you are motivated to buy or sell a stock because of information you possess, the information will be considered material. Material information may be positive or negative. Examples of *material* information include expected earnings or revenues for a calendar period, as well as company projections as to future earnings or revenues; proposals, plans or agreements, even if preliminary in nature, involving mergers, acquisitions, dispositions or joint ventures; purchases or sales of substantial assets; significant write-downs in assets or increases in reserves; a planned offering of additional new classes of securities; changes in dividend policy or declaration of a stock split; changes in credit ratings; a significant product development; gain or loss of a major customer; or a substantial contract award or termination.

While in possession of material non-public information, ADT Personnel and their families are prohibited from trading in any ADT securities as to which ADT Personnel and their families have a “beneficial” or financial interest, or over which a person exercises investment control, including, but not limited to, transfers to or from the ADT Stock Fund in the company’s 401(k) plan, and sales of securities held in an employee account under any ADT Employee Stock Purchase Plan, or changes in the employee contribution amount or investment allocation under any such Plan.

Specific Prohibition Regarding Puts, Calls, Options, Etc.

ADT Personnel and their household and immediate family members are prohibited from engaging in transactions regarding puts, calls, warrants, cashless collars, options or similar instruments involving ADT securities or sell such securities “short” (i.e., selling stock that is

<p>ISSUED BY ADT Law Department</p>	<p>EFFECTIVE DATE April 5, 2021</p>	<p>SUPERSEDES January 18, 2018</p>	<p>PAGE 2 of 5</p>
---	---	--	------------------------



not owned and borrowing the shares to make delivery), other than the exercise of a Company-issued stock option. Such activities may put the personal gain of the ADT Personnel in conflict with the best interests of ADT and its security holders or otherwise give the appearance of impropriety.

Trading Window:

ADT imposes certain restrictions on specified senior officers, management and directors when trading in ADT securities. These restrictions govern even though the transactions may be permissible under law and apply to the following persons hereafter defined as the “Window Group”:

- All members of the board of directors of ADT
- All senior executives of ADT, meaning the Chief Executive Officer, the President, each of their direct reports and any other officer subject to Section 16 of the Securities Exchange Act of 1934
- Employees within ADT’s Financial Planning and Analysis department
- Employees with systems access to ADT financial information
- Any other employees designated as a member of the Window Group

ADT will conduct an evaluation each quarter to determine whether the scheduled trading window should be cancelled. ADT may close an open trading window early at any time, as deemed appropriate by senior management.

Notwithstanding transactions made subject to an approved 10b5-1 trading plan, members of the Window Group and their household and immediate family members may only enter into transactions in ADT securities (including option exercises and gifts) during an open trading window that commences two business days after the public release of ADT’s quarterly or annual financial results and ends at 4:00 p.m. EST on the 15th of the third month of each fiscal quarter; provided that if that day is not a trading day, then the trading window will close on the immediately prior trading day. After the close of the trading window, the Window Group and their household and immediate family members may not purchase, sell or otherwise dispose of any of ADT’s securities. The prohibition against trading while aware of, or tipping of, material non-public information applies even during an open trading window. For example, if during an open trading window you are aware that a material acquisition is pending, you may not trade in ADT’s securities. You should consult the General Counsel whenever you are in doubt.

Pre-clearance of Trades: During a trading window, all directors, Section 16 Officers (as defined below) and members of management who report directly to the CEO must pre-clear all transactions in ADT securities with the General Counsel’s Office. Pre-cleared transactions

<p>ISSUED BY ADT Law Department</p>	<p>EFFECTIVE DATE April 5, 2021</p>	<p>SUPERSEDES January 18, 2018</p>	<p>PAGE 3 of 5</p>
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may only be performed during the trading window in which approval was granted and within two business days from the date of approval. If the transaction does not occur during the two-day period, pre-clearance of the transaction must be re-requested.

Hardship Exemptions: In the event of exceptional personal hardship, a member of the Window Group may request a hardship exemption from the Chief Legal Officer for permission to trade outside the trading window, if the person does not possess any material non-public information and not otherwise prohibited from trading pursuant to this policy.

10b5-1 Trading Plans: A 10b5-1 trading plan is a binding, written contract between any individual and his or her broker that specifies the price, amount, and date of trades to be executed in the established broker account in the future, or provides a formula or mechanism that the broker will follow. In addition, a 10b5-1 trading plan must not permit the individual to exercise any subsequent influence over how, when or whether the purchases or sales are made. If an individual wishes to trade pursuant to a 10b5-1 trading plan, he or she must obtain the approval of the Chief Legal Officer prior to entering into the 10b5-1 trading plan. The Chief Legal Officer, or his or her designee, must review the 10b5-1 trading plan for compliance with this policy and, as appropriate, with the Company’s stock ownership and retention guidelines. ADT reserves the right to withhold pre-clearance of any 10b5-1 trading plan that ADT determines is not consistent with the rules regarding such plans. Notwithstanding any pre-approval of a 10b5-1 trading plan, ADT assumes no liability for the consequences of any transaction made pursuant to such plan. In addition, an individual may only enter into the 10b5-1 trading plan during an open trading window and while not in possession of any material non-public information. Any individual who enters into a 10b5-1 trading plan pursuant to the requirements set forth above must also notify the Chief Legal Officer promptly upon termination of such plan.

Notification of Window Group: In order to assist in compliance with this policy, the General Counsel’s Office will deliver an e-mail (or other communication) notifying the Window Group each quarter of the opening and closing of the trading window. Delivery or nondelivery of these e-mails (or other communication) does not relieve the Window Group of their obligation to comply with this policy.

Application after Termination: This policy continues to apply after ADT Personnel has terminated their employment or other affiliation with ADT for as long as the ADT Personnel is aware of *material non-public information* or until such time as the information is no longer *material*.

These restrictions apply to family members of the Window Group who lives in the same household or who are financially dependent on a member of the Window Group, as well as

<p>ISSUED BY ADT Law Department</p>	<p>EFFECTIVE DATE April 5, 2021</p>	<p>SUPERSEDES January 18, 2018</p>	<p>PAGE 4 of 5</p>
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POLICIES AND PROCEDURES

Insider Trading

corporations, partnerships or trusts that hold, purchase or sell ADT securities and that are controlled by members of the Window Group. Certain members of the Window Group are also subject to Section 16 of the Securities Exchange Act of 1934 ("Section 16 Officers") and Rule 144 of the Securities Act of 1933 applicable to affiliates of the Company.

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EFFECTIVE DATE

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PAGE

5 of 5