

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attachment.

Blank lines for listing Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ See attachment.

Blank lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attachment.

Blank lines for providing other necessary information.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here
Signature ▶  Date ▶ 05/13/2020
Print your name ▶ Larry J. Weians Title ▶ Vice President, Tax

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|-------------------------------|----------------------------|----------------------|------|---|--------------|
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | Firm's name ▶ | | | | Firm's EIN ▶ |
| | Firm's address ▶ | | | | Phone no. |

Sprint Corporation
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities

PLEASE CONSULT YOUR TAX ADVISOR

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Sprint and T-Mobile Merger. The information contained herein is not intended to be a complete analysis or description of all potential U.S. federal income tax consequences of the Sprint and T-Mobile Merger. In addition, this information does not address tax consequences which may vary depending on the individual circumstances of Sprint shareholders, or any non-income tax or any foreign, state or local tax consequences of the Sprint and T-Mobile Merger. Accordingly, Sprint shareholders are strongly urged to consult with their own tax advisor to determine the particular U.S. federal, state, local or foreign income or other tax consequences of the Sprint and T-Mobile Merger to them. Sprint shareholders should read the discussion contained in the Form S-4 Registration Statement under the head "MATERIAL U.S. FEDERAL INCOME TAX CONSEQUENCES OF THE MERGER".

14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action.

On April 1, 2020, pursuant to a Business Combination Agreement dated April 29, 2018 (as amended), Sprint Corporation and T-Mobile US, Inc., consummated a transaction (the "**Sprint and T-Mobile Merger**") wherein each outstanding share of common stock, \$0.01 par value, of Sprint Corporation ("**Sprint Common Stock**") held by public shareholders was converted into 0.10256 of a share of T-Mobile US, Inc. The transaction is more fully described in the Registration on Form S-4 that has been filed with the Securities and Exchange Commission.

Part I of Form 8937 contains information related to Sprint Corporation, the "reporting issuer" for shares of Sprint Common Stock. Comparable information for T-Mobile US, Inc. is as follows:

| | |
|-----------------------------|---|
| Issuer Name: | T-Mobile US, Inc. |
| Issuer EIN: | 20-0836269 |
| Classification/Description: | Common stock, par value \$0.00001 per share |
| CUSIP number: | 872590104 |

15. Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. shareholder as an adjustment per share or as a percentage of old basis.

As the nature of the Sprint and T-Mobile Merger is a nontaxable reorganization, a U.S. holder's aggregate tax basis in the surrendered Sprint Common Stock is transferred to the T-Mobile US, Inc. Common Stock received.

16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

The basis adjustment procedures described below should be applied separately to each “block” of Sprint Common Stock that a U.S. shareholder held at the time of the Sprint and T-Mobile Merger. A “block” of stock is shares of stock purchased at the same time and the same price in a single transaction.

U.S. shareholders will receive T-Mobile US, Inc. Common Stock in exchange for each separate block of Sprint Common Stock and generally will not recognize gain or loss in the Sprint and T-Mobile Merger, except in respect of cash received in lieu of a fractional share of T-Mobile US, Inc. (as discussed below).

The tax basis of T-Mobile US, Inc. Common Stock received (including a fractional share for which cash is received) by a U.S. shareholder will equal the tax basis of the shares of the Sprint Common Stock surrendered by the U.S. shareholder pursuant to the Sprint and T-Mobile Merger. This determination is performed separately for each block of Sprint Common Stock.

17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

For U.S. federal income tax purposes, it is expected, and the discussion contained herein assumes, that the exchanges of Sprint Common Stock for T-Mobile US, Inc. Common Stock that occur pursuant to the Sprint and T-Mobile Merger will be treated as a “reorganization” under Section 368 of the Code , and therefore, not taxable under Section 354 of the Code . The determination of basis is governed by Section 358(a) of the Code.

18. Can any resulting loss be recognized?

U.S. shareholders will generally not recognize loss in the Sprint and T-Mobile merger, except in the case of cash received in lieu of a fractional share of T-Mobile US, Inc. common stock. A U.S. holder who receives cash in lieu of a fractional share of T-Mobile US, Inc. common stock will generally be treated as having received such fractional share in the Sprint and T-Mobile Merger, and then as having redeemed such fractional share for cash in a transaction in which gain or loss may be recognized.

19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The tax effects of the Sprint and T-Mobile Merger should be reported by a U.S. shareholder in the tax year that includes April 1, 2020.

Other relevant considerations:

Holding Period

The holding period of the T-Mobile US, Inc. Common Stock received in the Sprint and T-Mobile Merger with respect to a block of Sprint Common Stock will include the holding period of the shares of that block of Sprint Common Stock surrendered.

Character of Recognized Gain or Loss

Any gain or loss with respect to the sale of a fractional share recognized by a U.S. shareholder holding Sprint Common Stock will generally be capital gain or loss, and will generally be long-term capital gain or loss if the U.S. shareholder held the Sprint Common Stock surrendered for more than one year as of April 1, 2020.

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The information in this document does not constitute tax advice and is not intended or written to be used, and cannot be used, for the purposes of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed herein.