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A Message from Mike:

We’ve been delivering amazing results over the past several years, and we’re successfully changing the wireless industry for good.

We move fast, turn on a dime, and we play hard—but we always keep our values at the center of what we do. Winning is important, but how we get there matters!

It’s critical that we conduct business with uncompromised ethics. Our success relies on the trust of our customers, suppliers, business partners, and one another—each and every day. Our Code of Business Conduct provides clear expectations on how we “do it the right way” at T-Mobile. Take a few minutes, read it, and use it to help guide your everyday decisions and choices.

Regardless of your responsibilities at T-Mobile, conducting yourself with these standards is crucial to our success. It’s important we make an honest assessment about how we’re doing.

I want to remind everyone of our open-door culture—we all have a duty to speak up and report any violations to our policies, Code of Business Conduct, or any law and regulation. If you are unsure whether something is a violation, please don’t hesitate to ask! Concerns can be shared with those involved, our managers, HR Partners, or can be reported anonymously with the Integrity Line at 866-577-0575 or T-MobileIntegrityLine.com.

And we want you to know that we have your back! Retaliation against employees who make complaints in good faith will not be tolerated. Period.

Help us set the tone and promote a culture we all want to work in. Now, let’s keep disrupting the wireless industry, and let’s keep doing it the Un-carrier way—the right way!

Are You With Us?

Best,

~Mike

Mike Sievert
President | CEO
T-Mobile
@MikeSievert
WE DO IT THE RIGHT WAY. ALWAYS.

We do the right thing.

For our customers, our shareholders, and each other.

EVERY TIME.
WE DO IT THE RIGHT WAY. ALWAYS.

We’re changing the wireless industry! And we’re doing it the RIGHT way—always—by following high standards. You’ll find those standards in this Code of Business Conduct.

The Code is a snapshot of the legal and policy requirements we follow here at T-Mobile as part of our commitment to ethical business practices. Keep in mind it’s a guide. If something comes up in any of the areas covered in the Code and you need more detail, take a look at our company policies. Or ask your manager, HR Partner, or Legal Affairs partner for guidance.

All of us at T-Mobile and its subsidiaries—employees, officers, and board members—are expected to uphold the law and this Code.

We take this expectation seriously.
- No one can ask you to break the law or the Code.
- You can’t direct someone to break the law or the Code.
- Breaking the law or violating the Code cannot be justified by saying that it helped T-Mobile.
- T-Mobile does not expect to grant waivers of the Code’s provisions. Any waivers of a Code requirement for a T-Mobile employee or board member can be made only by the T-Mobile Audit Committee, and will be promptly disclosed as may be required to shareholders.
- Code and legal violations can land you in a world of trouble. You could face discipline (including getting fired), as well as criminal and civil penalties.

Ask Questions

Look, the Code can’t cover everything. Life is complicated, and sometimes throws surprises at you.

When you’re faced with a difficult decision, and the Code isn’t helpful, do the smart thing: Stop. Think. Ask.

OK, let’s break this down:

Stop: Don’t make a snap decision. When in doubt, step back and think about things.

Think: Before you act, ask yourself these questions. Act only if the answer to ALL of them is “yes”:

- Is my action legal?
- Is it consistent with our Code and T-Mobile policies?
- Is it the right thing to do for customers, employees, shareholders, suppliers, and other business partners?
- Would I feel OK about my action if I read about it on someone’s Facebook page? Or if my mom knew about it??

Ask: Not sure if the answer to each question is “yes”? Ask for help. And keep asking until you’re satisfied that you’ll do something that will make Team Magenta proud.

Got a question? We’re here for you.

- Your manager or next-level manager
- HR Partner or Legal Affairs partner
- T-Mobile Compliance & Ethics
- Our 24/7 Integrity Line at 866-577-0575 or T-MobileIntegrityLine.com (Anonymous questions are OK)
- Or, you can connect with “Additional Resources” found at the end of the Code that are available to help.
Speak Up

If you see something that violates the law, the Code or company policies, say something. Follow your gut. Something doesn’t seem quite right to you? Then it probably isn’t. Call it out so it can be dealt with and everyone can get back to doing things the right way.

What’s the best way to report a concern? You can always start by talking with your manager, next-level manager or HR Partner. If you’re not comfortable using these resources, or don’t feel they resolved your concern, contact T-Mobile Compliance & Ethics. This team is available to all T-Mobile employees, customers, suppliers, shareholders, and other business partners who want to raise concerns.

T-Mobile provides several other ways to report a concern:

- Our Integrity Line: This 24/7 resource is managed by a leading third-party reporting service. You have the option to remain anonymous. If you’re located outside the U.S., we’ll let you know what confidentiality, data retention, and other related privacy rules apply to your report.
  - By phone: 866-577-0575
  - By web: T-MobileIntegrityLine.com
- Our Chief Compliance Officer

Leaders Set the Tone

We expect our managers to lead by example and encourage everyone to do things the right way.

What do we mean by that? We mean that T-Mobile leaders follow the law and uphold the Code every day and expect the people who work for them to do the same. We want our leaders to take it to the competition, but in a way that meets our high ethical standards. Upholding the Code may require more than compliance with laws and regulations, and our leaders get that.

No one should ever be asked to bend the rules to meet a company goal. And leaders must be particularly careful with their words and actions so they don’t put—or appear to put—pressure on employees that could lead them to violate the law or the Code.

Upholding the Code also means that our leaders talk about the Code with their teams and ensure that training is completed in a timely way. They call out and recognize do-it-the-right-way behavior. And they take care of problems before they become bigger problems. If an employee has questions or sees something that worries them, our leaders listen to that employee and let them know that speaking up is the right thing to do.

Finally, upholding the Code means that we expect our leaders to forward reports of legal or Code violations for review by the appropriate investigations group. And leaders demonstrate zero tolerance for retaliation. No one gets punished for raising a good faith ethical concern or possible legal, Code or company policy violation.

FAQ

No Retaliation

We don’t tolerate retaliation—ever. Anyone who reports a possible violation of the law, this Code or any company policy in good faith is protected from retaliation. Any employee (including officers) who is found to have retaliated may be disciplined and could lose their job.

We hope you’ll use these resources. But keep in mind, nothing in this Code or in any company policy or agreement prevents you from making a good faith report to outside government or regulatory authorities.

No matter how you choose to report, we’ll handle your report with care. Our intake processes and procedures are designed to review concerns and take the right action in a timely manner. And we’ll let you know when we’re done.

Because we’re committed to doing things the right way, violations of the legal or policy requirements in this Code could result in discipline, including job termination.

Questions and concerns about accounting, internal accounting controls, or auditing issues can be submitted (including anonymously) to:

T-Mobile Audit Committee Chair
c/o Chief Compliance Officer
T-Mobile US, Inc. 12920 S.E. 38th St.
Bellevue, WA 98006

We do it the right way. Always.
WE TAKE CARE OF OUR CUSTOMERS

We earn the trust of our customers by putting them first every day.
WE TAKE CARE OF OUR CUSTOMERS

Treat Customers Honestly and Fairly

Why do customers love T-Mobile? Because we listen to them, then go all out to meet their needs. That doesn’t mean over-selling. It means giving customers honest and complete information about our great products and services. It means delivering what we promise. And we never charge customers for things they haven't authorized.

Guard Customers’ Private Communications

Customers expect us to protect their private communications. And we do! We'll comply with government and other legal requests for customer communications, but only to the extent the law requires. Be sure to refer all government, law enforcement and other legal requests for customer communications to the Legal & Emergency Response Group.

Protect the Confidentiality of Customer Information

Customers entrust a lot of sensitive information to us—credit card numbers, Social Security numbers, addresses, all sorts of things. We hold other customer information as well, like call detail records and location data. Here’s the thing: We protect the confidentiality of our customers' information. We collect, use, and store this sensitive information only so far as is permitted by law, T-Mobile Terms & Conditions, and company Privacy policies.

When it comes to customer information, we're also careful about access and disclosure. We access this information only when we need to when doing our job—and only to the extent our job duties allow. And we access customer information only for the legal and business reasons listed in our Terms and Conditions and Privacy policies, or when we have received advance authorization from the customer or our manager. We share customer information only if the customer says we can or we're allowed to by the law, our Terms and Conditions, or Privacy policies. Even then, we follow security practices so only those who need to know this information can review it.

The European Union, the United Kingdom, and other countries have specific laws on how to handle customer personal information or the transfer of personal information. Contact T-Mobile Privacy for information on how these privacy and data protection laws apply to T-Mobile.

If the police, the government, or an attorney is asking for customer information, notify the Legal & Emergency Response Group.

Honor Rules That Apply to Government Customers

Working with government customers takes particular care. They have special bidding, pricing, disclosure, contracting, and certification requirements for companies with which they do business, like us. They also have specific rules about gifts and entertainment, political donations, reporting, and who can contact government employees to market goods and services during active government procurement opportunities or under an existing government contract.

We completely get what it means to work with the government, and go to the extra lengths that government rules require. And when we have questions, we go to Public Sector Compliance.

FAQ

T-Mobile Privacy Center

Political Activities and Lobbying Policy
Avoiding Conflicts of Interest Policy
Gifts and Business Entertainment Policy
Anti-Corruption Policy

Additional Resources
WE RESPECT EACH OTHER AND OUR ENVIRONMENT

We succeed by doing RIGHT by each other AND our environment.
WE RESPECT EACH OTHER AND OUR ENVIRONMENT

Do Not Tolerate Discrimination or Harassment

We love our diverse workforce, and our culture of inclusion. All the great ideas and different viewpoints our co-workers bring to work are what make T-Mobile such a great place.

Help keep our awesome work environment awesome. Don’t discriminate and don’t engage in unlawful harassment of any kind, including sexual harassment. We follow laws against discrimination and harassment everywhere we do business.

Put Health and Safety First

We want everyone to be safe on the job. So we work hard to prevent accidents and injuries by reducing workplace hazards and by complying with all safety laws and regulations.

What’s more, we follow T-Mobile’s health and safety program, complete required training, and follow the safe work practices that apply to our jobs. We also look out for each other by reporting and investigating workplace injuries and by being prepared to respond to potential emergencies.

If you see something that could pose a hazard, correct it. If you can’t, tell your supervisor, site safety contact, or local facility manager immediately, so they can address it. If you have safety questions or concerns, legacy T-Mobile employees should email Safety@T-Mobile.com, or call the T-Mobile Safety Hotline at 1-877-604-SAFE (7233). Legacy Sprint employees should call the EHS Helpline at 877-347-4457.

Minimize Our Impact on the Environment

We know our customers try to go green, and we do the same. We strive to make business decisions that preserve the environment. And we work to minimize waste and maximize natural resources through product reuse and recycling, cutting energy use, sustainable product packaging, waste reduction initiatives and ride sharing. Every sustainable contribution helps and we're committed to doing our part!

And that includes following laws protecting the environment everywhere we do business.

Protect Confidential Information

Our customers expect their privacy, and so do our co-workers and business partners. So we respect it. We don’t access or take employee information from company systems unless required for authorized legal or business reasons. And only people who need to know can access or take this information. We also protect the business information of vendors, prospective customers and other third parties. In certain countries, the law protects a company's business information much like an individual's personal information.
WE DEMONSTRATE INTEGRITY 24/7

We’re transparent.

We do the right thing even when nobody is watching.

Our business decisions are based on business factors, NOT PERSONAL INTERESTS.

Period.
WE DEMONSTRATE INTEGRITY 24/7

Don’t Steal or Deceive
Theft and fraud hurt our reputation, our brands, and every one of us. So we don’t embezzle, steal, or take money, property, or services that don’t belong to us.

Maintain Accurate Records and Reports
Each of us must be sure that the records and reports we produce are accurate, timely, understandable, and complete. Our financial and accounting records must be correct and include all transactions and assets. And we don’t mislead, record things that didn’t happen, or leave out important information. That goes for financial reports, documents and communications as well, including those we file with the Securities and Exchange Commission and provide to investors.

In addition, we don’t hide cash or company assets or use them for unauthorized purposes or to break the law. Lastly, any report or statement filed with or given to the government or the public must be accurate, complete, and timely.

Avoid Conflicts of Interest
Lots of us have interests outside of work. It’s important that those activities are legal (of course!), and that they don’t get in the way of doing what’s best for T-Mobile when we’re doing our jobs. If they do, that’s called a conflict of interest.

A conflict of interest is hard to define because it can take many forms. Put simply, it’s when your personal interest, relationship, or activity influences—or can be seen by others as influencing—your ability as a T-Mobile employee to do what’s best for the company. A conflict may exist even if T-Mobile is benefiting from the situation in some way.

Here are some examples: You have a family member who needs a job, so you hire them to work for T-Mobile. Conflict! Or you start dating someone you supervise. REALLY a conflict. Let’s say you take a job working part-time in a competitor’s wireless store. Big conflict. Or you participate in the selection of a vendor that your spouse works for or a friend owns. Yep, conflict. What about serving on the board of directors or an advisory committee of a company or organization? Could be a conflict!

Sometimes conflicts seem innocent. After all, maybe you’re just trying to help a friend or relative. Or you’re confident the conflict won’t affect your work for T-Mobile. But to make sure you’re doing the right thing and not risking your own job, talk the situation over with your manager.

Be aware that the activities of OTHERS can create a potential conflict of interest for YOU. Like if your brother hires on with a T-Mobile supplier. Or your wife starts working for a competitor. You haven’t done anything, but now you have a potential conflict.

Another kind of conflict is when you use your T-Mobile position to benefit yourself. Like scoring game tickets from a vendor by hinting you can give them some T-Mobile work. Or taking for yourself business opportunities you learn about at work that T-Mobile would be interested in pursuing. Always avoid these conflicts. Lastly, NEVER compete with T-Mobile. (But really, why would you want to?)

The best way to prevent conflicts is to avoid those things that could be seen as influencing you on the job. But this isn't always reasonable or necessary. That's why you must tell T-Mobile Compliance & Ethics about your personal interests, relationships, and activities that could conflict with your job. They'll review the situation and advise you what to do. It's easy to disclose—just complete the form on T-Mobile Conflicts Manager.
Exchange Only Reasonable Business Gifts and Entertainment

It’s a normal part of doing business—you want to take a potential business partner to dinner, or a vendor wants to show their gratitude to you with some kind of gift.

These things are generally OK, so long as these gift and entertainment conditions are met:

- They’re legal and serve a legitimate business purpose.
- They’re not an effort to influence a business decision or gain special treatment, and are not likely to be seen as one.
- Gifts from a single giver don’t exceed $100 in value in a calendar year.
- The gift is not cash (or a cash equivalent).
- The entertainment is not frequent or routine.
- They wouldn’t embarrass T-Mobile if word got out.
- You have received advance written approval from your senior vice president or above manager before accepting lodging or other travel courtesies.
- The gifts or entertainment you give are accurately reflected in accounting records and expense reports.

In situations involving government officials or employees, including employees at a government-owned or -operated business, offering or providing a gift or entertainment (including meals) is OK only with prior written approval by T-Mobile Compliance & Ethics.

During contract negotiations with customers and suppliers, you should decline all gifts, business entertainment and offers to pay for or reimburse travel expenses.

Sometimes vendors may give us products or services to evaluate. And sometimes T-Mobile may give phones or accessories to another company or an organization for business reasons. That’s generally fine, as long as everyone knows what’s going on, it’s legal, and it aligns with T-Mobile’s business interests.

It’s fine if you attend a social function hosted by a vendor or supplier. Just talk with your manager first and make sure the event meets the conditions we just mentioned.

As to corporate charitable donations to a nonprofit organization, make sure that they are not provided in exchange for T-Mobile business advantages.

If a gift exceeds what’s allowed in the Code, return it and explain that T-Mobile’s standards don’t permit you to accept it. If you’re unable to return the gift, ask your manager or T-Mobile Compliance & Ethics for guidance.

Finally, never ask our vendors, suppliers or other business partners for gifts or entertainment.
Don’t Buy or Sell Stock When You Have Material Non-Public Information

As a T-Mobile employee, you probably know lots of stuff that outsiders don’t about the company, our customers, suppliers and other companies that we do business with. That may include information that isn’t yet public which, if it became public, could affect someone’s decision to buy or sell stock. This is what is called “material non-public information” and it can include sales figures, proposed acquisitions, earnings or forecast changes in senior management and new service or product offerings. When that’s the case, you cannot buy or sell T-Mobile stock or other securities that could be affected by that material non-public information. This is known as “insider trading.”

The same rule applies when you’ve become aware of information about a third party on the job (including a T-Mobile supplier or vendor), that isn’t yet public and could affect its stock price—don’t buy or sell the stock. It’s also against our policy (and illegal) to give friends and relatives tips on whether to buy or sell securities when you have material non-public information that could affect its price.

Finally, don’t use material non-public information that you are given as a tip from others to trade any companies’ securities—including T-Mobile stock. The rules of insider trading are complicated, so if you’re not sure how they may apply to you, ask the T-Mobile Securities Compliance Officer.
WE DO BUSINESS RIGHT

We play hard and we play fair.

It’s how we roll.
Uphold T-Mobile’s Anti-Corruption Commitment

It goes without saying that corruption and bribery are bad for business and they’re bad for society. We must follow the U.S. Foreign Corrupt Practices Act (FCPA) and applicable foreign anti-bribery laws. That means that no T-Mobile employee or anyone acting on behalf of T-Mobile may directly or indirectly offer anything of value to ANY government official, political party or candidate, to influence an action or gain a business advantage.

T-Mobile must also comply with laws that prohibit kickbacks and bribery with private parties (also known as commercial bribery). We don’t offer or take bribes or kickbacks from anyone—whether a government official or private person. And we don’t allow anyone else to offer or take bribes on behalf of T-Mobile. In other words, never allow, offer or take anything of value to improperly influence a business or government decision, or to create a return obligation or expectation of favorable treatment.

Deal in Good Faith

We achieve amazing results—the right way. We follow all laws and regulations that apply to our business, even those not specifically mentioned in this Code. More than that, we’re fair and honest in our business dealings. We don’t try to gain unfair advantage over competitors, suppliers or customers by tricking anyone, taking advantage of confidential information, or fudging the facts.

Compete Fairly

We take care of our customers by fixing pain points. We’ve ignited a new level of competition in wireless and we’re changing the industry for good! And we won’t stop. When we amp up competition, customers win, so we compete hard. That means we follow antitrust and anti-competition laws that apply to T-Mobile, compete fairly, and don’t conspire with our competitors to rig prices, fix bids, divvy up sales territory, or boycott particular suppliers, customers, or countries not otherwise subject to U.S.-approved sanctions. Because it’s smart to avoid even the appearance of not following antitrust laws, we won’t even TALK to our competitors about these things.

Respect Others’ Trade Secrets and Confidential Business Information

We have trade secrets; our competitors have trade secrets. Just like we wouldn’t appreciate it if they tried to do something sneaky to learn what our next big move will be, we respect the fact that they too have confidential information. So we don’t use illegal or unethical methods to gather confidential business information that belongs to other people or businesses. That includes any sensitive information—business plans, technical info, marketing strategies, and so on.

We also don’t hire people to glean the business secrets of the company where they last worked. And if you DID work for one of our competitors, please keep confidential information about them to yourself.

Finally, if you somehow come across trade secrets or other confidential business information belonging to another person or business, don’t take advantage of it. Immediately secure the information without using or sharing it and tell your manager. Your manager should contact your Legal Affairs partner or T-Mobile Compliance & Ethics right away for guidance.
Engage Ethical Suppliers

We look for suppliers who share our values—ethical, hard-working, and customer-focused. And we want them to share our commitment to diversity, human rights, and business practices that are fair and considerate of their workers and the environment. Before selecting or retaining suppliers, we consider their business integrity and let them know about our ethical expectations.

In addition, we stand fully behind U.S. and international efforts to stop slavery and human trafficking. We have a zero-tolerance policy against trafficking and activities related to trafficking in our supply chain, and any violation will result in disciplinary action, including potential job termination.

Follow Rules on Campaign Contributions, Lobbying and Gifts to Government Officials

T-Mobile wants to inform and guide government decisions that impact our business, customers, and employees, so we actively participate in the political process. We engage the right way—by following all campaign contribution and lobbying laws and the ethical standards that apply to dealing with public officials and government employees.

Don’t use corporate money or other resources to support a political candidate or cause, except as permitted by law and specifically allowed in company policy.

Keep in mind that only authorized employees of T-Mobile are allowed to lobby government officials and employees on behalf of T-Mobile.

Don’t offer gifts, meals or anything else of value to government officials and employees without the prior approval from the T-Mobile Compliance & Ethics team.

Lastly, do your personal political work with your own resources and on your own time—not T-Mobile’s.

Comply with Trade Sanctions and Exports Controls

The United States, along with many other countries, imposes sanctions on certain countries, individuals, groups and organizations. T-Mobile follows applicable laws and regulations governing sanctions. We perform due diligence on potential suppliers and other third parties to avoid transacting with sanctioned parties. Sanctions differ depending on the target party and the nature of the transaction; they also change frequently. Contact the Sanctions Compliance team with questions on how sanctions laws may affect your T-Mobile business relationships or transactions. See Additional Resources.

In the United States and around the world there are also laws that restrict T-Mobile from sending or sharing certain products and technologies with particular countries or persons, especially products with encryption capabilities. These restrictions can cover telecommunications-related devices and technologies and can apply to foreign persons located in the United States who receive or access covered products or technologies.

If your business processes or role involves the exchange of information about technical equipment or technologies, contact Export/Trade Compliance for guidance about export controls that may apply. See Additional Resources.

FAQ

- Anti-Corruption Policy
- T-Mobile Supplier Code of Conduct
- T-Mobile Human Rights Statement
- Political Activities and Lobbying Policy
- Avoiding Conflicts of Interest Policy
- Gifts and Business Entertainment Policy
WE PROTECT T-MOBILE INFORMATION AND ASSETS

We keep our competitive advantage and protect T-Mobile by using company resources wisely.
Safeguard T-Mobile Information

We're in a fiercely competitive industry. Our “secret sauce” to doing well is our ability to use our business information and technical know-how to introduce leading-edge products and services that our customers love.

We keep this valuable commercial information confidential. We don't disclose it to anyone outside the company unless we get advanced approval from our manager. That goes for any confidential company information, trade secrets, inventions, details about our network—all that stuff. Releasing confidential information can hurt T-Mobile and lead to serious legal trouble. Sometimes we'll tell a vendor or partner some of this information, but only after they sign a nondisclosure agreement or agree to confidentiality terms and conditions in a contract. Be careful with your co-workers too and share certain information only if they really need to know, and if you've cleared it with your manager.

Do your part to protect T-Mobile's secret sauce and property from loss, damage, theft and misuse. If you have questions about protecting T-Mobile competitive information or intellectual property, contact your Legal Affairs partner.

If a government or law enforcement agency or an attorney asks for T-Mobile information, ask Legal Affairs for advice before you respond.

Use Company Assets Responsibly

Let's all take care of T-Mobile. Use such things as company funds, property, vehicles, equipment, and office supplies first and foremost for company business. Try not to lose or waste them. And take common sense steps to protect them from theft.

During your daily work, use email, web browsing, social media and other digital resources provided by T-Mobile in a way that meets our business needs, our Social Media Policy and other policies governing the use of company assets.

When you use the company's digital resources, remember that we have no expectation of privacy. When necessary and authorized by law, T-Mobile can monitor and use any content that's shared or stored on company property.
Sometimes the Code and our company policies don’t have the answers to all your questions. Don’t worry, we’ve got you covered! In almost all cases, you can start with our go-to resources.

- Your manager or next-level manager
- HR Partner or Legal Affairs partner
- T-Mobile Compliance & Ethics
- Our 24/7 Integrity Line at 866-577-0575 or T-MobileIntegrityLine.com (Remember, your Integrity Line reports or questions can be anonymous.)

If they can’t answer your question or address your concern, contact the additional resources below.

- Antitrust or competition: Antitrust Compliance Officer
- Export controls: Export/Trade Compliance
- Gifts and business entertainment: T-Mobile Compliance & Ethics
- Gifts and meals to government officials: T-Mobile Compliance & Ethics
- Government sales or contracts compliance: Public Sector Compliance
- Political activities or lobbying: Government Affairs or T-Mobile Compliance & Ethics
- Privacy and security of company and customer information: T-Mobile Privacy
- Requests for release of Customer Information: Legal & Emergency Response Group
- Requests for T-Mobile business information: Legal Affairs
- Trade sanctions: Sanctions Compliance
- Securities trading compliance: Securities Compliance Officer
- Workplace safety: Safety@T-Mobile.com or 877-604-SAFE (7233) or Sprint EHS Helpline 877-347-4457