

T-Mobile

Code of Business Conduct

The Right Results, The Right Way



Contents

General	5	Conducting Business	13
Why a Code?	5	Complying with Laws and Ethical Conduct	13
Who Needs to Follow the Code?	5	Commitment to Integrity	13
What about a Waiver of the Code?	5	Criminal Convictions	14
Do Leaders Have Special Obligations?	5	Conflicts of Interest	14
Is the Code All I Need to Follow?	5	Outside Employment or Work	15
Your Duty to Speak Up	5	Gifts, Gratuities, and Business Entertainment	15
Whom Should I Contact for Help?	6	Accessing Customer Accounts	16
What Happens after I Raise an Issue?	6	Competitor and Third Party Information	17
What about Retaliation?	7	Antitrust	17
Interpretation	7	The Government as Our Customer	18
		Money Laundering and Contraband	18
How We Play	8	Bribes and Kickbacks	18
Frontline first, because customers are first	8	Accurate and Complete Books, Records and Accounting	18
Results matter. Count on me to deliver	8	Whistleblower Protection	19
Be bold. Think big. Make a difference	8	Cooperation with Agencies and Law Enforcement	20
Play to WIN and have fun	8	Open Door Policy	20
Do it the right way	8	Sustainability	20
		Company Resources	21
Our Work Environment	9	Protecting Company Assets	21
Equal Employment Opportunity	9	Corporate Opportunities	21
Discrimination and Harassment-Free Environment	9	Insider Trading	21
Harassment	9		
Sexual Harassment	10	Confidentiality and Information Security	22
Complaint Procedure – Discrimination, Harassment, or Retaliation	11	Dealing with Contractors, Vendors, Suppliers	24
Health and Safety	11	Your Commitment	25
		Contact Information	26
Protecting Customer Information	12		
Confidentiality of Each Other’s Information	12		

Foreword

For all employees:

At T-Mobile, how we get results is as important as the results we deliver. We respect one another. We delight our customers. And we act with honesty and integrity in all business dealings. It's what we do, because it's who we are. This is how we earn the trust and respect of our customers, our suppliers and business partners, and one another.

Our continued success relies on earning that trust each day. We do this by taking personal responsibility for conducting business with uncompromised ethics. You can expect that of me, and I expect it of you.

The Code of Business Conduct provides clear expectations on how to “Do it the right way” at T-Mobile. I ask you to learn the Code, take it to heart, and follow it. Because, whatever your responsibilities at T-Mobile may be, you're responsible for conducting yourself according to these high standards.

Behaviors, as well as results, matter at T-Mobile. Thank you for your personal commitment to getting the right results, the right way.



Sincerely,

John Legere

A handwritten signature in black ink that reads "John Legere". The signature is stylized and cursive.

President and Chief
Executive Officer
T-Mobile US, Inc.

General

Why a Code?

At T-Mobile, respect and integrity guide our behavior. We demonstrate this by doing the right thing by our customers, our co-workers and third parties, such as vendors. However, sometimes it may not be clear what this right thing is. The Code of Business Conduct (Code) will help to clarify what's expected of us.

Our Code sets out the basic expectations of work conduct. Following this Code will help ensure we act with integrity, treat each other with respect and take the appropriate actions to preserve T-Mobile's reputation. The Code does not change the at-will status of T-Mobile employees and does not create a contract.

Who Needs to Follow the Code?

Our Code applies to all employees and officers of T-Mobile and its subsidiaries as well as the members of the Board of Directors. From our front-line employees to our chief executive officer, to the chair of T-Mobile's board of directors, it's an essential part of everyone's job to follow it. Failure to follow the Code can result in disciplinary action, up to and including termination.

What about a Waiver of the Code?

No waiver of this Code may be made for a member of the board of directors or an executive officer (as that term is defined for purposes of Section 303A of the New York Stock Exchange

(NYSE) Listed Company Manual) of T-Mobile unless properly authorized by the T-Mobile board of directors or a committee of the board. Any waiver granted to a director or executive officer will be publicly disclosed on a timely basis, in the manner and to the extent required under applicable rules of the NYSE.

Do Leaders Have Special Obligations?

We expect leaders to cast a shadow of integrity by exhibiting awareness, understanding and compliance with the Code and by setting the right example of ethical behavior and leadership. Supervisors have an obligation both to make sure their teams understand the Code and to create an environment in which issues can be raised without fear of retaliation.

Is the Code All I Need to Follow?

Think of the Code as the umbrella under which all our policies and values exist. The Code sets out basic principles of work conduct but it is meant to be followed in conjunction with our other important policies. For example, the Code doesn't replace the Employee Handbook, the Corporate Governance Guidelines, or other Company policies which absolutely continue to apply.

Your Duty to Speak Up

Each of us has a duty to speak up and raise concerns if we become aware of unethical, illegal or questionable activities or actions which may violate the Code or any other policy.

Q: I am aware of a possible violation of the Code of Business Conduct or unethical behavior, but it doesn't affect me. Why should I bother reporting it?

A: Because respect and integrity guide our behavior, we all have an obligation to uphold T-Mobile's ethical standards. Even if you feel it doesn't affect you directly, every employee has a duty to speak up and report any known or suspected violation of T-Mobile's Code of Business Conduct. If you observe behavior that may represent misconduct or appears to be unethical, you should raise the issue promptly. This will allow T-Mobile an opportunity to investigate the issue and correct it.

Whom Should I Contact for Help?

There are several options available to you for help, some depending on the nature of the issue. If the issue concerns alleged discrimination or harassment, you must report it to Human Resources (please refer to page 11 regarding discrimination or harassment complaints). For other concerns, your supervisor is a good place to start. If you believe your concern is not addressed to your satisfaction by your supervisor, you may seek advice from your department head, local Human Resources representative or the Legal Department. You may also contact the Compliance & Ethics Office for guidance.

Wrongdoing or questionable practices may be reported by calling the Integrity Line at 1 866-577-0575, or online at [T-MobileIntegrityLine.com](https://www.t-mobile.com/integrityline).

Reports to the Integrity Line may be made anonymously. The Integrity Line is managed by a third party to protect confidentiality.

Employees may report any questionable accounting, accounting controls or auditing matters to the Audit Committee using any of the processes described in the **Whistleblower Policy** available on OneVoice. Any such report may be made anonymously.

What Happens after I Raise an Issue?

As appropriate, T-Mobile will investigate complaints of harassment, discrimination, retaliation in the workplace, fraud, non-compliance with policies or legal requirements, employee misconduct, threats of violence or unsafe conduct, and allegations of other improper activity. Employees must fully cooperate in internal investigations, including providing complete, truthful and accurate information, and written statements upon request. An employee's refusal to cooperate in any investigation may result in disciplinary action, up to and including termination of employment. To help ensure the integrity of investigations, employees must maintain the confidentiality of the names of the employees involved in the investigations, whether as subjects or witnesses, to the extent permitted by law.



Conduct that interferes with, undermines, impedes or is otherwise detrimental to any internal investigation is prohibited and may result in disciplinary action, up to and including termination of employment.

What about Retaliation?

The Company will not retaliate against any employee who makes a good faith report of an alleged illegal act, Code or policy violation, questionable activity, discrimination, or harassment, or who is involved in the investigation of such a report. Nor will it permit any supervisor, manager, or other employee to do so. Retaliation violates Company policy and should be reported immediately to a supervisor, manager, or Human Resources representative. Any person found to have retaliated against an employee for making any report or providing information during an investigation will be subject to strict disciplinary action, up to and including termination of employment.

Interpretation

If you have a question regarding application or interpretation of the Code, contact the Compliance & Ethics Office. Further, our certificate of incorporation contains certain provisions governing the duties of members of our board of directors and takes precedence over any provisions in this Code that may conflict with the certificate of incorporation.

How We Play



Frontline first, because customers are first.

--We value our frontline teams because they take care of our customers.



Play to WIN and have fun.

--We are here to win and have some fun along the way.



Results matter. Count on me to deliver.

--We are wired to perform. We take ownership for doing our part.



Do it the right way.

--We earn the trust of our teammates, customers and shareholders every day.



Be bold. Think big. Make a difference.

--We have a fearless mindset. We are here to change the industry. We take the right risks.

Our Work Environment

Equal Employment Opportunity

T-Mobile is an equal opportunity employer. All decisions concerning the employment relationship will be made without regard to age, race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, marital status, veteran status, the presence of any physical or mental disability, or any other status or characteristic protected by federal, state, or local law. Discrimination or harassment based upon any of these factors is wholly inconsistent with our values and will not be tolerated. Furthermore, such discrimination or harassment may violate federal, state, and local law.

Discrimination and Harassment-Free Environment

T-Mobile employees have the right to work in an environment that is free of unlawful discrimination and harassment. The Company prohibits discrimination and harassment based upon any individual's age, race, color, religion, creed, sex, national origin, marital status, veteran status, sexual orientation, gender identity or expression, mental or physical disability, or any other status or characteristic protected by federal, state, or local law. Discrimination and harassment not only violate T-Mobile's Code of Business Conduct, but may also violate federal, state, and local law.

Harassment

T-Mobile does not tolerate harassment. Harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her legally-protected status or characteristic (e.g., race, gender, etc.), and that has the purpose or effect of unreasonably interfering with that individual's work performance or creating an intimidating, hostile, or offensive work environment. Examples of prohibited conduct include:

- Demeaning or hostile written, graphic, or verbal communications, including off-hand comments, epithets, jokes, slurs, or negative stereotyping directed at any individual because of or regarding that individual's age, race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, marital status, veteran status, mental or physical disability, or any other status or characteristic protected by federal, state, or local law
- Hostile, intimidating, or threatening conduct directed at an individual because of that individual's age, race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, marital status, veteran status, mental or physical disability, or any other status or characteristic protected by federal, state, or local law



Sexual Harassment

We do not tolerate sexual harassment. Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment includes many forms of offensive behavior and can include sex-based harassment of a person of the same sex as the harasser. Prohibited conduct includes, but is not limited to:

- Unwanted sexual advances
- Visual conduct: leering, sexual gestures, displaying sexually suggestive objects, pictures, cartoons, or posters
- Verbal conduct: derogatory comments, epithets, slurs, or jokes
- Verbal sexual advances or propositions
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, or sexually degrading words used to describe an individual

- Making or threatening reprisals after a negative response to sexual advances
- Suggestive or obscene e-mail, letters, notes, or invitations
- Physical conduct: touching, assaulting, impeding or blocking movements
- Using the Internet or e-mail system to search for, view, create, forward, or otherwise disseminate sexually explicit audio, visual, or textual material

Q: A co-worker told an inappropriate joke at a team meeting and I found it offensive. Should I approach my co-worker with my concern or am I just being too sensitive?

A: Each of us has an obligation to help maintain a respectful environment. If you feel uncomfortable speaking to your co-worker directly, contact your manager or your Human Resources representative.



Complaint Procedure – Discrimination, Harassment, or Retaliation

Employees who feel they have witnessed or experienced discrimination, including harassment, by a co-worker, supervisor, client, customer, vendor, contractor, or anyone else during the course of their T-Mobile employment because of their age, race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, marital status, veteran status, mental or physical disability, or any other status or characteristic protected by federal, state, or local law, should immediately speak with a supervisor, manager, or Human Resources representative.

Likewise, employees who feel they have witnessed or experienced retaliation should immediately speak with a supervisor, manager, or Human Resources representative. Supervisors and managers must promptly refer all reports of discrimination, harassment, and retaliation to a Human Resources representative. All reports of possible discrimination, harassment, and retaliation will be treated seriously and promptly, and thoroughly investigated. The investigation will be as confidential as possible consistent with the need to conduct a full investigation. If the Company determines that prohibited discrimination, harassment, or retaliation has occurred, it will take effective remedial action commensurate with the circumstances.

Health & Safety

T-Mobile complies with all federal, state, and local health and safety rules and regulations. The Company strives to maintain a safe workplace by preventing or eliminating health and safety hazards, and providing employees with appropriate safety training.

Every employee is responsible for helping to maintain workplace health and safety and for adhering to our health and safety program. For the protection of all employees, any hazardous workplace condition must be immediately reported to a supervisor or safety manager. T-Mobile encourages employee suggestions regarding workplace health and safety issues. Employees should present such suggestions to a supervisor or the Safety Department. A Company Safety Manual is available for employee review on the Company's intranet (OneVoice or MINT).

Employee safety concerns may be presented to a supervisor or manager or a Human Resources representative by calling the toll-free Safety Hotline at 877-604-SAFE (7233), or by e-mailing the Safety Hotline at Safety@T-Mobile.com. Additional information regarding reporting safety concerns is on OneVoice and MINT.



Confidentiality of Each Other's Information

T-Mobile acquires and retains the personal information of its employees in the normal course of business; for example, for the provision of employee benefits. Personal information about employees, including for example, home addresses, must not be disclosed or used by employees except in the proper performance of their duties.

We take seriously the privacy of our customers' information and we have a duty to protect the confidentiality of our customers' personal information. We disclose customer personal information when authorized to do so by the customer, in response to legal process or when otherwise legally permitted. We have policies and procedures regarding use and disclosure of customer information, which can be found on the Company's intranet (OneVoice or MINT). If you have any questions, you should contact the Company's Chief Privacy Officer via Privacy@T-Mobile.com.

Q: I don't work directly with our customers. How do I know if the information I have access to should be kept confidential?

A: No matter which area of T-Mobile you work in, you have a duty to protect the information about our customers, employees and the Company. You're entrusted to help ensure that only the appropriate people have access to the information you create, share and store.

Unauthorized disclosure of confidential information, or even accessing customer information without the authority to do so, may subject you to legal liability and disciplinary action.

When in doubt, contact your manager, Human Resources, the Chief Privacy Officer or the Privacy Mailbox.

Conducting Business

Complying with Laws and Ethical Conduct

We comply with all applicable federal, state and local laws and regulations. We do not engage in any activities which would in any way violate Company policies, including but not limited to the non-discrimination, non-harassment, and non-retaliation policies. We do not misrepresent any Company policies, prices, or procedures, or offer unauthorized deals or discounts to customers, or misrepresent our role or authority to enter into an agreement on behalf of the Company.

Above all, we are committed to dealing fairly with our customers, suppliers, competitors, and employees alike. We will not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair-dealing practice.

Commitment to Integrity

At T-Mobile, we expect all employees, officers and directors to exercise integrity, common sense, good judgment, and to act in a professional manner. We do not tolerate inconsistent conduct. While we cannot anticipate every situation that might arise or list all possible violations, the acts listed below are unacceptable.

- Violating the law, Code, Employee Handbook or any Company policy
- Removal of Company property from the premises without permission
- Willfully or neglectfully destroying, damaging or defacing Company property

- Unauthorized use or operation of Company equipment or vehicles
- Dishonesty, misrepresentation, fraud or theft
- Exhibiting a poor attitude or discourtesy in the presence of or toward any customer, or providing poor customer service
- Making slanderous or detrimental comments about the Company, its customers, the Company's products or services, or Company employees
- Failure to comply with Company performance standards or job expectations
- Falsification or unauthorized alteration of time records, expense reports or other Company records
- Sleeping during work hours
- Refusal to accept job assignments, or failure to comply with supervisory direction
- Inappropriate dress during work hours or while representing the Company to customers, clients, or vendors
- Failure to follow proper record keeping procedures
- Arguing or fighting with co-workers, subordinates or supervisors; failing to treat others with respect; or failing to demonstrate appropriate teamwork
- Criminal conduct relating to or affecting job performance
- Favoritism unrelated to the Company's business needs
- Improper payment for Company merchandise and/or services

This list is not all-inclusive.



Criminal Convictions

Employees are required to notify Human Resources within one day of any conviction of a crime during their T-Mobile employment that may affect T-Mobile's business interests or corporate image, the performance of their job duties, their ability to positively represent T-Mobile, or the welfare of other employees. The Company will determine whether any employment action is warranted. A conviction will not necessarily result in termination of employment. However, we will consider any failure to make a required disclosure a serious breach of our ethical standards.

Conflicts of Interest

T-Mobile is committed to conducting all aspects of business in the highest ethical and professional manner. Employees, officers and directors must refrain from any action and avoid any situation that might create a conflict, or the appearance of a conflict, between the personal interests of the employee or a third party, and the Company's interests. In their work-related conduct, employees must act at all times in a manner that will best promote the Company's interests. Thus, employees must refrain from, among other things:

- Violating any Company policy
- Receiving improper personal benefits as a result of their position with the Company
- Hiring family members
- Supervising family members

- Pursuing any outside business interest or activity that might conflict, or appear to conflict, with T-Mobile's business interests, or that might detrimentally affect the employee's work at T-Mobile. This includes, without limitation, compensated and non-compensated consulting work or employment with another business whose interests may be directly or indirectly competitive with T-Mobile's interests

For more information on this topic, including the Company's prior-approval requirement for employees, see the **Avoiding Conflicts of Interest Policy** on OneVoice, and the "Outside Employment or Work" section on the following page.

Employees should err on the side of caution, and are encouraged to consult a manager, a Human Resources representative or the Compliance & Ethics Office with any questions. Any actual or potential conflict of interest should be promptly reported to Human Resources when the issue first becomes known.

Q: My spouse works for one of T-Mobile's competitors. Is this considered a conflict of interest?

A: Possibly. It depends on the nature of your spouse's job duties and your duties, and the amount of overlap between the two. You should disclose the relationship to your manager and HR to evaluate. In no event should you disclose T-Mobile confidential information to your spouse or vice versa.



Outside Employment or Work

At its sole discretion, the Company may allow employees to engage in outside employment or work. However, since conflicts of interest may arise from such activities, before accepting or engaging in any outside employment or work, employees must submit to a Human Resources representative a written request for approval of outside employment, and obtain written approval of outside employment from their immediate supervisor before engaging in outside employment, including any consulting work or self-employment. Regardless of whether the Company approves any outside employment, employees are expected to meet the same standards of performance and the same scheduling demands as the Company would otherwise expect. Company time and resources may not be used in furtherance of outside employment. Approval to engage in outside employment may be revoked at any time with or without notice or reason. Employees on any type of leave of absence, whether paid or unpaid, may not under any circumstances engage in outside employment or work unless otherwise permitted by law.

Gifts, Gratuities, and Business Entertainment

Many suppliers in our industry make it a common practice to provide gifts, favors, and entertainment to employees of the companies with whom they do business or seek to do business. Although it is important to maintain good relationships with suppliers, we must ensure that even the appearance of favoritism or special benefits is avoided. The **Gifts and Business Entertainment Policy** provides specific guidance and direction for employees regarding the exchange of gifts and business entertainment.

Any gifts exchanged must be customary, reasonable, legal, and of modest value. Gifts must never be solicited or intended to influence a business decision.

Meals or other forms of modest entertainment from vendors, contractors, or suppliers may be accepted if they are extended during the normal course of business, are not offered to affect business decisions, and are not offered on a routine basis. Entertainment must be in a venue that is appropriate for all employees and consistent with our values. All employees are also accountable for the highest standards of behavior before, during, and after events attended on behalf of the Company.



When in doubt, you should err on the side of caution and decline gifts, entertainment, trips or sponsorships. You are encouraged to raise any questions about specific situations with your supervisor, a Human Resources representative or the Compliance & Ethics Office.

Employees may only accept overnight or other travel expenses offered by a supplier or business partner if related to T-Mobile business and approved in advance by the recipient's Senior Vice President or above manager.

Caution: Special laws and regulations govern the giving of gifts, meals, trips, and entertainment to and from U.S. or foreign government officials and employees. The above guidance may be inappropriate or even illegal when dealing with foreign, federal, state, and local government entities. No gift, entertainment, trip, or meals may be offered to or accepted from government officials or employees without prior written approval of the Compliance & Ethics Office.

Q. A vendor has offered me tickets to a baseball game. Can I accept them?

A. Possibly.

If the vendor is inviting you to attend the game with him or her, this may be considered **business entertainment** and must be:

- During the normal course of business
- Infrequent and not lavish
- Without intent of affecting business decisions
- Consistent with our values

If the vendor is not attending, then the tickets would be considered a **gift** and must comply with the Gifts and Business Entertainment Policy.

Accessing Customer Accounts

Unless specifically authorized to do so as part of your job responsibilities, you may not access any subscribers' T-Mobile account information in any Company system.



Competitor and Third Party Information

T-Mobile complies with all trade secret laws. Except in furtherance of a business transaction pursuant to a nondisclosure agreement, the confidential information of other persons or businesses, including T-Mobile competitors, may not be solicited, used, or disclosed by T-Mobile employees. Confidential information includes proprietary business, technical, or trade secret information (including but not limited to pricing, marketing strategies, and business proposals). While it is entirely appropriate to obtain competitive information from newspapers, discussions with customers, trade shows, public filings, industry surveys, consultants, and by “shopping the competition,” you should not seek or use competitors’ information that is marked “Confidential” or that common sense suggests is confidential. Management may not hire employees to obtain confidential information and should remind employees who have worked for competitors not to use or disclose confidential information acquired during their prior employment. Additional information regarding the use of competitive information is available on OneVoice and MINT.

If you acquire the confidential information of another person or business, whether through intentional or inadvertent disclosure, the information must be handled in strict confidence and is not to be discussed with outsiders or with other employees. You must take the following actions:

- Inform your supervisor that you have received confidential information of an outside business or person but do not otherwise copy or forward it to anyone other than the General Counsel
- Do not retain confidential information. Forward it to the corporate Legal Department to the attention of the General Counsel
- Do not use the confidential information for any purpose whatsoever
- Do not disclose the confidential information to anyone (including other employees, vendors, customers, dealers, contractors, etc.) other than your supervisor and the General Counsel

Antitrust

Antitrust laws promote free and fair competition and prohibit agreements which unreasonably limit competition. These laws limit discussions with competitors regarding prices, other terms of sale or purchase, terms affecting price, market allocation, and boycotting sellers.

We comply with the spirit and letter of the antitrust laws by not discussing or agreeing with our competitors to fix prices or other terms, allocate territories, or allocate customers. We don’t make any agreements with our competitors on whether we will or will not bid on contracts. As discussed more fully later in this Code, we do not share confidential information with competitors. Refer to the Antitrust Guidance on OneVoice and MINT for additional information on meeting antitrust requirements.



Q: I have friendships with a couple of account executives at one of our competitors. At trade shows we often catch up on industry trends, customer deals, and supplier challenges. Is this appropriate?

A: Use extreme caution in these situations and do not ever discuss customers, suppliers, pricing or other business terms with competitors. In fact, do not discuss any confidential or non-public business information with friends, including pricing and marketing strategies. If inappropriate topics come up, refuse to discuss them and end the conversation immediately.

The Government as Our Customer

Our customers include the federal government, as well as state and local governments. Special rules and requirements apply to conducting business with the government. In particular, it is important to refrain from offering gifts, gratuities or entertainment, to government officials or employees, or discussing employment opportunities with them. Violations carry criminal and civil penalties and may result in exclusion from bidding opportunities. If you have any questions about doing business with the government, contact the Legal Department.

Money Laundering and Contraband

Trading in products in violation of customs laws (“smuggling”) or using a process to conceal illicit funds (“money laundering”) is illegal and we will not condone, support or facilitate such activities.

Bribes and Kickbacks

A bribe or kickback is the giving or acceptance of money, gifts or other things of value in return for favorable treatment. No employee, officer or director shall ask for or take any form of a bribe or a kickback. For additional information regarding T-Mobile’s anti-bribery position, consult the **Anti-Corruption Policy**, available on OneVoice.

Accurate and Complete Books, Records and Accounting

T-Mobile is required to keep books, records and accounts that accurately reflect transactions. To maintain the integrity of accounting records, all entries must be accurate and supported by appropriate documentation. All employees have a duty to ensure that their work in this regard is accurate. False or misleading entries must never be made by an employee.



Whistleblower Protection

As specified in this Code, employees, officers, and directors are expected to report suspected misconduct, including any questionable accounting, accounting controls or auditing matters. Neither the Company nor any officer, employee, contractor, subcontractor, or agent of the Company, may discharge, demote, suspend, threaten, harass, or in any other manner discriminate against an employee in the terms and conditions of employment because of any lawful act done by the employee:

- To provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of this Code or any provision of federal law relating to fraud against T-Mobile shareholders, when the information or assistance is provided to or the investigation is conducted by (1) a federal regulatory or law enforcement agency; (2) any member of Congress or any committee of Congress; or (3) a person with supervisory authority over the employee (or such person working for the employer who has the authority to investigate, discover, or terminate misconduct)

- To file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed (with the knowledge of the employer) relating to an alleged violation of any rule or regulation of the SEC, or any federal law relating to fraud against T-Mobile shareholders

Any individual who retaliates against or takes any action harmful to a whistleblower is subject to civil liability as well as criminal penalties, including imprisonment.

Q: I have an ethics-related concern, but I'm unsure I want to make a report. Does it really make a difference?

A: Yes. When doing the right thing means reporting an incident or concern, know that you're doing your part to uphold T-Mobile's reputation, protect your fellow employees and preserve a good working environment for everyone.

If you choose to make a report by contacting the Integrity Line, you can do so anonymously.



All complaints of possible retaliation will be treated seriously and promptly investigated. The investigation will be as confidential as possible, consistent with the need to conduct a thorough review. If the Company determines that prohibited retaliation has occurred, it will take appropriate corrective action to end the retaliation and to prevent it from recurring.

For additional information regarding T-Mobile's non-retaliation position, consult the **Whistleblower Policy**, available on OneVoice.

Cooperation with Agencies and Law Enforcement

T-Mobile cooperates with law enforcement officials pursuant to applicable law. All law enforcement inquiries for information (e.g., customer information) must be referred to the Law Enforcement Relations Group. Contact information is located on OneVoice.

Open Door Policy

T-Mobile has adopted an **Open Door Policy**, available on OneVoice, to facilitate open, timely and direct communication and resolution of workplace issues free from retaliation. Direct communication with your manager is usually the best way to address work-related issues. Should you choose not to take such an issue to your manager, (for example if your manager is involved in the situation), the following additional resources are available to you:

- Your direct manager's manager
- Your Human Resources Business Partner or any member of Human Resources
- If you are not comfortable using any of the resources above, you may anonymously report concerns or suspected misconduct through the Integrity Line at T-MobileIntegrityLine.com or 1-866-577-0575

In certain cases it may be appropriate for the Workplace Relations Department to review a complaint. T-Mobile will not retaliate against any employee for making a good faith report under this policy or permit any supervisor, manager or other employee to do so.

Sustainability

We strive to make business decisions which take into consideration social, ethical and environmental issues. We give back to the community through various community outreach programs. We work to minimize waste and maximize resources by supporting environmental programs including recycling of our products, energy conservation, sustainable product packaging, waste-reduction initiatives, and ride-sharing. Our Code demonstrates our commitment to ethical business behavior.

Company Resources

Protecting Company Assets

T-Mobile's assets should be used only for legitimate business purposes. All employees, officers, and directors will protect the Company's assets from theft, carelessness and waste, and help ensure their efficient use. Company resources may not be used for loans to T-Mobile's officers or board members.

It is your duty to report incidents of fraud, theft, and misuse promptly to your manager, local Human Resources representative, or the Integrity Line at 1-866-577-0575, or at T-MobileIntegrityLine.com. Fraud will be investigated and appropriate action taken. The Legal Department will advise whether criminal prosecution should be pursued. No one may initiate a criminal complaint on behalf of T-Mobile without the prior written approval of the Legal Department.

Corporate Opportunities

Employees, officers, and directors are prohibited from using their position in the Company for personal gain, such as:

- Taking for themselves business opportunities that they learn about as a result of their employment or position
- Using the Company's property or information for personal gain
- Competing with the Company

Employees, officers, and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

Insider Trading

Securities laws prohibit the use of material, non-public information when trading in corporate securities. Employees, officers, and directors are prohibited from trading T-Mobile securities or any other company's securities while in possession of material non-public information about that company. For additional information regarding restrictions on transactions involving T-Mobile and other companies' securities, consult the **Policy on Securities Trading**, available on OneVoice.

Confidentiality and Information Security

We must ensure that the operations, activities, and business affairs of the Company and our customers are kept confidential to the greatest possible extent. Because of your work for us, you may have access to confidential information that belongs to the Company or to its customers. Confidential information includes private or proprietary business, technical, or trade secret information. It also includes certain employee and customer information, such as social security numbers, addresses and telephone numbers, and credit and bank account information.

The policy against disclosure of confidential information is a broad one, and includes intentional and inadvertent disclosure. It also prohibits making unauthorized public statements or disclosures that are based on, or rely on, Company confidential information, regardless of the venue in which the statements are made (e.g., to a friend, in a chat room, on a website, or on a blog). Employees, officers, and directors may not access or review any confidential employee or customer information, including account and contact information, without a business need to do so and without prior authorization from the employee, customer, or a manager.

If you acquire confidential information about T-Mobile, its business, its employees, or its customers, the information must be handled in strict confidence and is not to be discussed with anyone without a business need to know it.

Employees are responsible for the internal security of such information.

The responsibility to protect confidential information includes, without limitation, the following:

- Do not use or reveal any confidential information that belongs to the Company or any of its customers, employees, vendors, or contractors except as required in the course of T-Mobile's business and only to the extent your job duties require that you do so.
- Have a signed nondisclosure agreement approved by the Legal Department in place before revealing any confidential information to any vendor, contractor, or person not employed by T-Mobile or one of its subsidiaries. Do not reveal any confidential information to anyone (including other Company employees) who does not have a valid T-Mobile business need to know the information. This includes revealing confidential information about the Company's future plans to people who might use that information for their own personal profit or benefit.
- Comply with the confidentiality agreement that you signed at the time of your hire and any subsequent confidentiality agreements.
- Do not use or reveal any confidential information from a former employer in your work for T-Mobile.



- Apart from customer calls that are recorded for quality purposes, do not tape or otherwise make sound recordings of work-related or workplace discussions without the permission of all participants and Human Resources or the approval of the Legal Department. Failure to request and receive such permission violates Company policy and may violate the law.
- Protect Customer Proprietary Network Information (CPNI) from unauthorized access or disclosure. Only use CPNI as permitted by law and Company policies.

When your T-Mobile employment or service terminates, you may not take, use, or reveal any confidential information that belongs to the Company or to one of its customers, employees, vendors, or contractors. If you have any questions about whether certain information is confidential, or whether it would violate this policy or the confidentiality agreement you signed at the outset of employment to use or reveal certain information, you should consult your supervisor or a Human Resources representative.

If there is any doubt about whether certain information should be considered confidential, you should treat it as confidential and you should not use or reveal it unless your job duties require you to do so. Violation of this policy or an employee's confidentiality agreement will result in disciplinary action, up to and including termination of employment.

Q: Outside of the office I sometimes make work-related calls while I am at restaurants or airports. Is this acceptable?

A: Always be careful when discussing T-Mobile information in public places like restaurants, airports, elevators, and sports events. When making calls in public places, be aware of your surroundings and take appropriate steps to protect T-Mobile non-public information.

Dealing with Contractors, Vendors, Suppliers

Our contractors, vendors, and suppliers are valued business partners. We are fair and reasonable in contract negotiations while at the same time we strive to obtain the highest quality product or service at a favorable price. We select our contractors, vendors, and suppliers who best meet the needs of T-Mobile.

Q: I know that the T-Mobile Code of Business Conduct is important, but how do these apply to our vendors and suppliers?

A: Our commitment to doing business ethically and legally means that we expect the same commitment from our vendors and suppliers. Our vendors and suppliers are expected to follow the [Supplier Code of Conduct](#) which is available at T-Mobile.com and on OneVoice.

Your Commitment



T-Mobile is committed to the highest standards of ethical and honest business conduct. To achieve these standards, each of us is expected to follow the principles in this Code. This is your commitment to T-Mobile.

When the right thing to do is not obvious, ask yourself:

- Would taking this action violate the letter or spirit of any T-Mobile policy or any law or regulation?
- Would this action create a conflict between my personal interests and the interests of T-Mobile?
- Would this action cause me or T-Mobile to fail to meet any of our business commitments?
- Would I be uncomfortable telling my family, a jury, or a newspaper about this action?

If you answer “yes” to any of these questions, the action is probably unethical and may even be illegal.

If you are unsure, please reach out to your manager, Human Resources representative, or the Compliance & Ethics Office for guidance.

Contact Information

T-Mobile US, Inc.

Compliance & Ethics Office
Legal Department
12920 SE 38th Street
Bellevue, WA 98006

onevoice.t-mobile.com

To report a Code of Business Conduct or ethics-related concern:

Integrity Line
(866) 577-0575
T-MobileIntegrityLine.com

To ask questions regarding the Code of Business Conduct or other compliance or ethics matters:

Compliance & Ethics Office
T-MobileComplianceHelp.com

To request guidance on protecting confidential information:

Privacy Mailbox
Privacy@T-Mobile.com

Investigations Mailbox
Investigations@T-Mobile.com

(Updated May 2013)



