

# T-MOBILE US, INC.

## SPEAK UP POLICY

(Last amended, effective as of October 19, 2018)

**Purpose:** To help T-Mobile maintain the highest standards of ethical business conduct by encouraging employees, officers, directors, business partners, and other third parties to speak up without fear of retaliation when they see or suspect something (including illegal or unethical conduct) that could harm the company, our employees, customers, or shareholders, or the communities we serve.

**Scope:** This policy applies to the employees and officers of T-Mobile US, Inc. and its subsidiaries (referred to collectively in this policy as T-Mobile), the members of the T-Mobile Board of Directors, business partners, (including agents, contractors, vendors, and suppliers) and other third parties.

### *Definitions*

**Business Conduct Concern:** A Business Conduct Concern refers to a concern or a complaint relating to:

- Accounting, internal accounting controls, or auditing matters, including:
  - Fraud or other financial crime;
  - Deliberate error in financial reporting or record-keeping;
  - Deviation from full and fair reporting of T-Mobile's financial condition or financial results;
  - Misrepresentations or false statements by employees and officers of T-Mobile in regards to a matter contained in T-Mobile's financial records, financial reports, or audit reports, including such statements made to T-Mobile's external counsel and auditors; and
  - Deficiencies in or non-conformance with T-Mobile's internal accounting controls.
- Actual or potential violations of the [Code of Business Conduct](#) or other company policy, and activities which may otherwise be illegal or unethical.

**Retaliation:** Retaliation refers to discharging, demoting, suspending, or in any manner threatening, harassing, or otherwise discriminating against an employee in the terms and conditions of employment, or taking an action harmful to any person (including whistleblowers), because that person has or is believed to have reported or otherwise provided information relating to, or assisted or participated in an investigation of, a Business Conduct Concern.

### *Policy*

**Overview:** T-Mobile employees and third parties will be protected from Retaliation for reporting a Business Conduct Concern in good faith, and through the Reporting Process established in this policy and/or to an appropriate governmental or regulatory agency.

### ***Speak Up Protections:***

- ***Non-retaliation.*** T-Mobile will not tolerate Retaliation against any person who in good faith reports or otherwise provides information or assists in an investigation of Business Conduct Concern. Any T-Mobile officer or employee who is found to have engaged in Retaliation will be subject to discipline, including potential job termination. Suspected Retaliation should be reported immediately through the Reporting Process established in this policy.
- ***Independence.*** The Audit Committee of the Board of Directors is responsible for monitoring the implementation of this policy. T-Mobile's Chief Compliance Officer is responsible for administering this policy on behalf of the Audit Committee.
- ***Confidentiality.*** A reporter's identity will be kept confidential to the fullest extent reasonably possible within the requirements of law and taking into account the legitimate needs of any review and ensuing investigation.
- ***Anonymous Reports.*** A Business Conduct Concern may be reported anonymously to the T-Mobile Integrity Line, which is managed independently of T-Mobile by a third party. In addition, any suspected fraud, potential misrepresentation in financial record-keeping, reporting, accounting or auditing, or deviations from accounting controls may also be reported confidentially and anonymously by T-Mobile employees to the Chair of the Audit Committee, as provided in the Reporting Process described below.
- ***Bad Faith Reports.*** Reporting a Business Conduct Concern that is determined to be knowingly false or otherwise misleading will subject the reporter to discipline, including potential job termination.
- ***Immunity for Confidential Disclosures of Trade Secrets.*** The Defend Trade Secrets Act of 2016 grants employees, contractors and consultants immunity from criminal and civil liability arising from their disclosure of a trade secret in these circumstances:
  - The disclosure is made in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law;
  - The disclosure is made in a complaint or other document filed in a lawsuit or other proceeding if such filing is under seal; or
  - If the employee, contractor or consultant files a lawsuit for Retaliation by their employer for reporting a suspected violation of law, they may disclose the trade secret to their attorney and use the trade secret information in the court proceeding, so long as they file any document containing the trade secret under seal and do not disclose the trade secret, except pursuant to court order.

### ***Reporting Process:***

T-Mobile provides several options for reporting Business Conduct Concerns and is committed to handling all reports with care.

- *Where to Report.* T-Mobile employees may report a Business Conduct Concern to a supervisor or next-level manager, a Human Resources Employee Success Partner, T-Mobile Compliance & Ethics ([T-MobileCompliance@T-Mobile.com](mailto:T-MobileCompliance@T-Mobile.com)), the T-Mobile Integrity Line (at 1-866-577-0575, or online via T-MobileIntegrityLine.com), or the Chief Compliance Officer.

T-Mobile employees may report financial concerns directly to the Chair of the Audit Committee at the following address: Audit Committee Chair, c/o Chief Compliance Officer, T-Mobile US, Inc., 12920 S.E. 38th Street, Bellevue, WA 98006.

T-Mobile business partners and other third parties may report via the T-Mobile Integrity Line (at 1-866-577-0575 or online via T-MobileIntegrityLine.com).

While use of the internal Reporting Process is encouraged, this process is not intended to prohibit reporting of a Business Conduct Concern to proper governmental or regulatory authorities.

- *Information to Include in a Report.* A report should focus on factual rather than speculative information and should contain as much specific and detailed information (including any relevant documents) as possible, including the “who”, “what”, “when”, and “where” of the alleged Business Conduct Concern.
- *Communications with the Reporter.* T-Mobile is committed to reviewing all reported Business Concerns with care and providing periodic updates on the status of our review when possible. Questions regarding the status of a report should be directed to the resource where the Business Conduct Concern was reported. Reporters may also contact T-Mobile Compliance & Ethics ([T-MobileCompliance@T-Mobile.com](mailto:T-MobileCompliance@T-Mobile.com)), the T-Mobile Integrity Line (at 1-866-577-0575, or online via T-MobileIntegrityLine.com).

**Records Retention:** The Chief Compliance Officer (or designee) shall maintain a log of all Business Conduct Concerns that are forwarded to or received directly by T-Mobile Compliance & Ethics through the Reporting Process established in this policy, tracking their receipt, investigation, and resolution, and shall prepare a periodic summary report for the Audit Committee. All documentation of reported concerns, including the log, any investigation reports and recommendations, will be maintained in accordance with T-Mobile’s Records Management Policy.

#### ***Additional Resources***

[T-Mobile Code of Business Conduct](#)

[T-Mobile Supplier Code of Conduct](#)

[T-Mobile US Employee Handbook](#)