



# Ethical Business Practices Brief

## Strategic Approach

Trust is foundational to our long-term growth. In a dynamic and highly competitive industry, T-Mobile is committed to acting with integrity in how we operate, innovate, and engage with our stakeholders. Guided by our core value, “Do it the right way, always,” we embed ethical decision-making and strong governance into our business practices to support responsible and strategic growth.

## Management Approach

T-Mobile maintains a robust Compliance & Ethics program designed to promote ethical conduct and compliance with applicable laws, regulations, and company policies. The program includes a comprehensive framework of tailored policies, processes, trainings, risk assessments, monitoring, and internal controls aligned to the company’s risk profile and global footprint. Together, they guide and reinforce our commitment to responsible business practices and the high level of integrity we expect from our officers, employees, and business partners.

Program effectiveness is assessed annually using a range of indicators, including employee surveys, training completion rates, misconduct reporting, and resolution trends. These insights inform continuous improvement and reinforce accountability across the organization.

Integrity at Work: T-Mobile’s Code of Business Conduct (Code) establishes clear expectations for ethical behavior and workplace conduct across our global operations. The Code provides robust guidance on key legal, ethical and policy requirements, and reflects the standards of integrity expected of employees and officers. The Code is regularly reviewed and refreshed to reflect evolving legal obligations, business practices, and emerging risks.

T-Mobile extends our commitment to integrity to third parties (vendors, suppliers, dealers) through our Supplier Code of Conduct. The Supplier Code sets clear expectations for ethical conduct in taking care of T-Mobile customers, demonstrating integrity, doing business the right way, respecting people and the environment, protecting company property and information, and reporting violations.

## Employee Training and Resources

T-Mobile employees and officers complete annual Code training, Integrity365 (i365), to reinforce their understanding of the content and their responsibilities. This award-winning, interactive training uses realistic scenarios to bring a range of Code topics to life and reinforces practical, ethical decision-making in their day-to-day work.

Topics covered in the training include, among others, acceptable use of company resources, anti-corruption and bribery, anti-discrimination and anti-harassment, antitrust and competitive intelligence, conflicts of interest, customer data privacy, cybersecurity, gifts and business entertainment, political activities and lobbying, securities trading, social media, and trade sanctions.

To support employees beyond training, employees have access to the Integrity Hub, a one-stop shop for information on topics covered in the Code. It includes resources for employees to better understand their responsibilities, tools available to them to meet those expectations, topic-specific FAQs, and key channels for reporting potential misconduct.



## Speak Up Culture and Reporting

T-Mobile is committed to fostering a culture in which individuals feel safe raising concerns and asking questions. Our Speak Up Policy encourages anyone, from employees and customers to vendors and suppliers, to report something that doesn't seem right, including illegal or unethical conduct and violations of our policies. The policy also prohibits retaliation against those who raise concerns in good faith.

We recognize that speaking up takes courage, and that's why we provide multiple reporting channels. They include our Integrity Line, which offers anonymous, online, and international toll-free options; our Compliance & Ethics team; and our Chief Compliance Officer. Any concerns relating to accounting, auditing, or financial reporting may be reported directly to the Chair of the Audit Committee. Employees can also report concerns or violations to their managers or through additional internal reporting channels, including Human Resources. The Integrity Line, operated by an independent third party, allows for anonymous reporting. Where a reporter chooses to identify themselves, any identifying information is managed through the third-party platform and provided to the Company only as necessary for the investigation, supporting the confidentiality and independence of the process.

Reported concerns are reviewed carefully through established investigation and remediation processes. When misconduct is identified, appropriate corrective actions may be taken and related controls and policies are enhanced, if necessary.

## Goals and Commitments

We strive to reach a 98%+ enterprise completion rate annually for our i365 Code of Business Conduct trainings.

## Oversight

T-Mobile's Chief Compliance Officer oversees our Compliance & Ethics program and reports quarterly to the Nominating, Corporate Governance, and Compliance Committee. These reports cover program activities, initiatives, and emerging compliance issues from new business activities or legal and regulatory developments. This direct reporting relationship reinforces the independence of the Compliance & Ethics function. The Chief Compliance Officer also meets with the executive-level Enterprise Risk and Compliance Committee to review compliance risk and mitigation efforts.

## Relevant Resources

- [Code of Business Conduct](#)
- [Human Rights Statement](#)
- [Integrity Line](#)
- [Legal Center](#)
- [Political Engagement Report](#)
- [Speak Up Policy](#)
- [Supplier Code of Conduct](#)