

# SUPPLIER CODE OF CONDUCT

**T Mobile**<sup>™</sup>

THE UN-CARRIER

## Do It the Right Way. ALWAYS.

T-Mobile is changing the wireless industry. And we're doing it the RIGHT way – through ethical conduct and socially and environmentally responsible business practices. As a T-Mobile supplier, you are an important part of our business, and we expect you, your employees, agents, and subcontractors (Suppliers) to share our commitment to doing it the right way while you conduct business with or on behalf of T-Mobile.

We require our Suppliers to operate in full compliance with the laws, rules, regulations, and ethical standards of the country in which you operate or where you provide products, people, or services to or for T-Mobile. You are responsible for knowing and complying with all applicable laws in connection with the services you are providing T-Mobile. In addition, you must follow this Supplier Code.

This Supplier Code outlines T-Mobile's expectations for your 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. We expect you to promptly report any concerns or potential violations of this Supplier Code to the [T-Mobile Integrity Line](#).

This Code does not create new or additional rights in favor of a supplier or any third parties and is intended to supplement, but not supersede, the written agreement between you and T-Mobile. Suppliers must have a fully executed written agreement or valid purchase order before performing work for T-Mobile and may not subcontract any T-Mobile agreement obligation without T-Mobile's [express written consent](#).

**Take Care of T-Mobile Customers.** Help us protect the privacy and security of our customers' personal and confidential information:

- ▶ Comply with all applicable privacy, data protection, and information security laws, and with applicable [T-Mobile Supplier privacy and security policies](#).
- ▶ Collect T-Mobile customer personal information lawfully and responsibly, and provide transparent notice and appropriate choices regarding your use of that information. Only collect and use such information as authorized by law and your agreement with T-Mobile.
- ▶ Disclose such information only to personnel on a need-to-know basis in the performance of their work for T-Mobile.
- ▶ Adopt and maintain effective and secure measures to protect all personally identifiable information. Comply with T-Mobile's Supplier Cyber Risk Assessment, Third Party Management Assessment, and Privacy Impact Assessment processes when required by your written agreement with T-Mobile.

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Requests for consent to subcontract a T-Mobile agreement obligation should be submitted via [subcontractorrequest@t-mobile.com](mailto:subcontractorrequest@t-mobile.com).

To access T-Mobile's Supplier Policies and information on our Supplier Diversity Program, go to: <http://www.t-mobile.com/company/working/bidding.html> 2

**Protect T-Mobile Information and Property.** Safeguard T-Mobile information and use our resources responsibly:

- ▶ Protect T-Mobile’s confidential and proprietary information concerning our business activities, strategies, plans, technology, customers, finances and performance, and information systems. Only use and disclose T-Mobile information as authorized by law and your agreement with T-Mobile.
- ▶ Use and protect T-Mobile’s physical assets, including property, equipment, systems, and supplies with care and only for legitimate T-Mobile-related business purposes. Promptly report misuse, theft, vulnerability, improper exploitation, or sabotage of T-Mobile company property to the [T-Mobile Integrity Line](#).
- ▶ Adhere strictly to all T-Mobile security requirements, including national security requirements. T-Mobile requires that its Suppliers follow all applicable policies and instructions from T-Mobile related to compliance with security requirements including, when applicable, restricting or conditioning access to T-Mobile’s data, network, and customer information.

**Demonstrate Integrity.** Be transparent and do the right thing at all times:

- ▶ Ensure that you don’t engage in any form of unlawful conduct, including theft, fraud, misrepresentation, extortion, and bribery. Any such conduct must immediately be reported to the [T-Mobile Integrity Line](#).
- ▶ Records prepared for T-Mobile (including records of work time and expenses) must be timely, accurate, truthful and complete. Keep accurate financial and business records as required by law and generally accepted accounting practices. Create and maintain business records in compliance with legal and regulatory requirements and

your agreement with T-Mobile.

- ▶ Respect T-Mobile’s customers and other business partners. Any relationships with other companies, including competitors of T-Mobile, should never compromise or reasonably appear to compromise, your responsibilities or ability to make sound, impartial and objective business decisions in connection with your engagement with T-Mobile. Any situation that creates or could reasonably appear to create a conflict of interest should be avoided and reported to the [T-Mobile Integrity Line](#).
- ▶ Avoid relationships with any T-Mobile employee that affect or might appear to affect the objectivity of the employee’s judgment or that creates or appears to create a conflict of interest for that employee. Disclose any such relationships to the [T-Mobile Integrity Line](#) for review as soon as you become aware of the situation. Suppliers must not deal directly with any T-Mobile employee whose spouse, domestic partner or other family member or relative holds a significant financial interest in the Supplier (other than publicly traded securities). In the course of negotiating a Supplier agreement or performing your obligations to T-Mobile, dealing directly with a Supplier’s spouse, domestic partner or other family member or relative employed by T-Mobile is also prohibited.
- ▶ Gifts (something of value provided for personal use or benefit for which the recipient does not pay fair market value) exchanged with T-Mobile employees must be legal and not exceed \$100 in value in a calendar year. Business entertainment must serve a legitimate business purpose and not occur on a frequent or routine basis. All gifts and entertainment should be reasonable and customary. Ensure that gifts and business entertainment are not offered in close proximity to a major business decision or in

an attempt to gain special treatment. Offering cash or cash-equivalent gratuities or tips to any T-Mobile employee is not allowed regardless of value. T-Mobile Suppliers are strictly prohibited from offering or providing gifts, entertainment or hospitality to a T-Mobile employee involved in a Request for Proposal, Request for Information, or contract negotiation that involve that Supplier.

- ▶ If a T-Mobile employee asks you for a gift, entertainment or gratuity, or if you have questions about T-Mobile's expectations about business gifts and entertainment, contact the [T-Mobile Integrity Line](#).
- ▶ As a T-Mobile Supplier, you may be given access to non-public information about T-Mobile or third parties. Conduct business in full compliance with securities laws. Avoid insider trading by not buying or selling T-Mobile's or another company's stock when in possession of information that is not available to the investing public and that could influence an investor's decision to buy, sell or hold the stock. And don't convey non-public information about T-Mobile or third parties to another person, including when that information could influence an investor's decision to buy, sell or hold stock.

**Do Business Right.** Engage in fair and honest business practices:

- ▶ Ensure that you do not participate in bribes or kickbacks of any kind to advance any interest associated with T-Mobile. You are prohibited from giving or offering money or anything else of value to a government official, employee, or other government-related party for the purpose of influencing them to assist T-Mobile or yourself in obtaining or retaining business or securing an improper advantage.
- ▶ Conduct business in full compliance with antitrust and fair competition laws. Avoid any business practices aimed at

limiting or impairing full and open competition for the products or services you provide to T-Mobile.

- ▶ Respect the intellectual property rights and confidential business information of T-Mobile and other third parties. Do not use or disclose any confidential or proprietary business information that belongs to a third party.
- ▶ Ensure that you don't do business with entities or persons that have had sanctions imposed by the U.S. Government. Suppliers that import or export goods, software or technology must comply with all legal requirements, including those that require you to obtain import and export licenses when shipping controlled items.

**Respect People.** Support our commitment to human rights, equal opportunity and fair labor standards, and a safe and healthy workplace.

### Human Rights

T-Mobile believes that businesses should respect human rights, in particular those that could be impacted by the way we engage our Suppliers. To meet this responsibility, T-Mobile has implemented policies and practices appropriate to our business. We expect our Suppliers to implement their own policies and practices appropriate to their operations, and at a minimum to:

- ▶ Treat all employees with respect and dignity and never use unlawful harassment, corporal punishment, threats of violence, physical abuse or other forms of improper coercion or intimidation.
- ▶ Ensure use of only voluntary labor. Any form of forced labor, including bonded, indentured, or involuntary prison labor is prohibited. Human trafficking and trafficking-related activities are also prohibited, including using misleading or

fraudulent recruitment practices, charging recruitment fees, denying employee access to their identity documents, failing to provide return transportation costs or an employment agreement (if required) in the employee's native language.

- ▶ Prohibit the use of child labor. Comply with all local and national minimum working age laws or regulations and ensure that there isn't any work inconsistent with a child's safety. Hazardous work should not be performed by anyone under age 18.
- ▶ Exercise due diligence into their supply chains regarding the source and chain of custody of conflict minerals contained in any materials or products supplied to T-Mobile, in accordance with [T-Mobile's Responsible Sourcing Policy](#). As a purchaser of electronic products, T-Mobile is committed to the responsible sourcing of minerals. For additional information about T-Mobile's commitment to human rights check out [T-Mobile's Human Rights Statement](#)

## Equal Opportunity and Fair Labor Standards

- ▶ Ensure your employment practices comply with applicable laws and regulations, including anti-discrimination and anti-harassment laws. T-Mobile is an equal opportunity and affirmative action employer. As a T-Mobile Supplier, you may be required to follow similar equal employment and affirmative action regulations.
- ▶ Support T-Mobile's commitment to driving positive economic impact in the communities we serve by building an inclusive supply chain. Our supplier diversity and inclusion program is designed to help provide opportunities to certified minority, women, veteran, disabled, and LGBTQIA+ owned businesses. For more information about supplier diversity, please visit our [Supplier Diversity Program site](#).

- ▶ Comply with wage laws that apply, including those relating to minimum wages, overtime hours and legally mandated benefits. Abide by the maximum legally allowed number of working hours and offer rest days as required.
- ▶ Follow applicable laws and regulations that govern the rights of employees to join or not to join worker organizations, including trade or labor unions.

## Accessibility

- ▶ Ensure products and services are accessible for use by people with disabilities. Suppliers who provide products and services must comply with the following, when applicable:
  - ◆ The most recent version of the Web Content Accessibility Guidelines (WCAG), and all applicable rules, regulations, standards and U.S. federal and state laws that require accessibility.
  - ◆ All applicable T-Mobile accessibility requirements, standards, and policies, including but not limited to [T-Mobile Supplier Policies](#).

## Safe and Healthy Workplace

- ▶ Provide a safe and healthy work environment for all employees and fully comply with all legal requirements, including those that address occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, sanitation, food and housing. Take reasonable steps to minimize workplace hazards.
- ▶ The use, possession, distribution, or sale of illegal drugs on T-Mobile-owned or -leased property is prohibited. Ensure that you don't perform work activities for or on T-Mobile's behalf while under the influence of any substance, including drugs or alcohol, which may impair your ability to work safely and effectively.

**Respect the Environment.** Operate in a manner that protects the environment:

- ▶ Comply with all applicable domestic and foreign environmental laws and standards. This includes those relating to air emissions, water discharges, environmental permitting and reporting, management and disposal of hazardous materials, product labeling and warning requirements, the recycling of materials, and environmental claims.
- ▶ Follow [T-Mobile's Responsible Sourcing Policy](#).
- ▶ Continually seek opportunities to reduce the environmental impact of your products and services, including by:
  - ◆ Reducing your carbon footprint
  - ◆ Minimizing wasteful practices
  - ◆ Maximizing use of recycled materials and implementing end-of- life recycling alternatives
  - ◆ Increasing energy efficiency and reducing water use
  - ◆ Reducing use of paper and pulp
  - ◆ Responsibly sourcing product materials, especially minerals and virgin wood, pulp and fiber
  - ◆ Developing and using more efficient and sustainable packaging

**Monitor Compliance & Report Violations.** T-Mobile expects our Suppliers to have controls and processes in place that are designed to facilitate compliance with the law and this Supplier Code:

- ▶ We encourage you to provide an anonymous complaint mechanism for your employees, agents and subcontractors to report violations of this Code. You must protect any individual who reports violations in good faith from retaliation.

- ▶ Promptly report any identified or suspected violations of the law or this Code to T-Mobile. Reports may be made through the T-Mobile Integrity Line. As stated in our [Speak Up Policy](#), T-Mobile will not tolerate retaliation against any individual who reports violations in good faith. You must provide reasonable assistance to any investigation by T-Mobile of an actual or suspected violation of this Code and encourage the reporting of suspected misconduct without fear of retaliation in accordance with T-Mobile's [Speak Up Policy](#).
- ▶ We expect our Suppliers to self-monitor and demonstrate compliance with this Code, and we may audit you to confirm compliance. Identified deficiencies must be timely corrected. We take this Code seriously and any violations may jeopardize your business relationship with T-Mobile, up to and including termination of that relationship.

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**T-Mobile Integrity  
Line**

- ◆ Dedicated telephone line: **1-866-577-0575**
- ◆ Secure online reporting site: [T-MobileIntegrityLine.com](https://T-MobileIntegrityLine.com)

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