

*Sprint Nextel*  
**Code of Conduct**  
*for Consultants, Contractors  
and Suppliers*



## **TO OUR VALUED CONSULTANTS, CONTRACTORS AND SUPPLIERS:**

Sprint Nextel's reputation for service, quality and fair dealing attracts capable and diverse employees, loyal customers, respectful regulators and other stakeholders who are vested in our success. This reputation can be easily lost by one inappropriate action by an employee, consultant, contractor or supplier. In an effort to ensure that everyone involved in the success of Sprint Nextel understands the expectations and standards to which they will be held, Sprint Nextel is providing this Code of Conduct to all consultants, contractors and suppliers.

Please take the time to review this Code of Conduct carefully, become familiar with its content and draw guidance from it. If a situation arises that you believe may violate the law or this Code of Conduct, you are obligated to report it immediately by contacting Sprint Nextel's Ethics Helpline and identifying yourself as a consultant, contractor or supplier.

This Code of Conduct is in addition to and does not alter or reduce any obligations that may be set forth in a written agreement between Sprint Nextel and any consultant, contractor or supplier. This Code of Conduct is not a contract or an offer to contract between you and Sprint Nextel.

## **BUILDING MUTUAL TRUST**

Sprint Nextel is committed to leading with integrity and conducting all of our business relationships with the highest ethical standards. Consultants, contractors and suppliers are an integral part of our success and we expect you to comply with the letter and spirit of this Code of Conduct. At Sprint Nextel, we strive to be competitive in all our markets by conducting all of our business dealings in an ethical manner and we expect our consultants, contractors and suppliers to do the same.

## **SPRINT NEXTEL MISSION and VALUES**

Sprint Nextel's mission is to be #1 in providing a simple, instant, enriching and seamless customer experience by offering convergent voice, data, video and multimedia solutions. There should be no doubt about Sprint Nextel's commitment to conduct business and to treat one another, including consultants, contractors, and suppliers with the utmost integrity. Sprint Nextel's commitment is evident in the six core values that define our culture.

## **WE DEMONSTRATE INTEGRITY**

We are fair and respectful. We keep our word. We protect the company's reputation. We are intolerant of unethical behavior.

## **WE ARE PASSIONATE ABOUT OUR CUSTOMERS**

We are easy to do business with. We listen and respond to their needs. We anticipate their needs. We are innovative and creative. We WOW our customers.

## **WE DELIVER RESULTS**

We compete aggressively. We are decisive and action-oriented. We execute our plans. We meet high expectations. We take ownership. We continuously improve.

## **WE WORK AND WIN AS A TEAM**

We build productive relationships. We communicate openly, honestly and often. We actively support our communities. We are good business partners. We have fun!

## **WE CARE ABOUT EACH OTHER**

We support the development of all employees. We create an inclusive environment in which a wide variety of thoughts, opinions, backgrounds and perspectives are valued and respected. We foster an environment where it's safe to make mistakes, learn from them and move on. We strive to give all employees challenging, meaningful work opportunities. We celebrate success.

## **WE LEAD BY EXAMPLE**

We take ownership of our roles. We understand that every person makes a difference and that excellence inspires excellence. We look for the best ways to work, the best ways to get the job done and the best ways to serve our customers. We stay abreast of the industry and market developments and view the business from the customer's point of view.

## **ACCURATE ACCOUNTS & RECORD KEEPING**

Sprint Nextel relies on accurate information and reliable records to make responsible business decisions. Sprint Nextel requires honest and accurate recording, reporting and retention of information. This includes all business records, such as quality, safety or personnel, as well as financial records.

All financial books, records and accounts must accurately reflect transactions and events, and must conform to Generally Accepted Accounting Principles (GAAP) and, as applicable, to Sprint Nextel's system of internal controls.

Here are additional guidelines to keep in mind:

- ▶ Do not make false, artificial or misleading entries or omissions in any system, book or record for any reason in connection with your business with Sprint Nextel.
- ▶ Keep systems, books, records and accounts in reasonable detail so that they accurately reflect transactions and events.
- ▶ Complete expense reports and time reporting accurately and completely.
- ▶ Do not create or maintain secrets or unrecorded funds, assets or accounts for any purpose.
- ▶ Never intentionally make a payment or approve an invoice, expense report or other document that is incorrect, misleading or inaccurate.

## **CONFLICTS OF INTEREST**

A hallmark of our professionalism is the ability to consistently act in the best interests of Sprint Nextel, its customers and other business partners, and to avoid improper influence, or even the reasonable appearance of improper influence, motivated by non-business considerations. Consultants, contractors and suppliers are naturally involved in business relationships with companies in addition to Sprint Nextel. These relationships must not reasonably appear to compromise your responsibilities or ability to make sound, impartial and objective business decisions in connection with your engagement with Sprint Nextel. Any situation that creates or could reasonably appear to create a conflict of interest should be avoided and disclosed to your supervisor and the appropriate Sprint Nextel representative.

## **DIVERSITY**

Sprint Nextel recognizes that diverse consultants, contractors and suppliers are essential to our success and we are committed to providing procurement opportunities to women, minorities, veterans, service disabled veterans and small businesses. In turn, Sprint Nextel expects its consultants, contractors and suppliers to be inclusive in their daily business decisions when selecting subcontractors.

## **DRUG-FREE WORKPLACE**

Sprint Nextel prohibits consultants, contractors and suppliers from performing work activities for or on behalf of Sprint Nextel while under the influence of any substance, including drugs or alcohol, which prevents them from conducting their work safely and effectively.

## **ENVIRONMENT**

Sprint Nextel operations are subject to federal, state and local environmental laws. Beyond our environmental compliance obligations, Sprint Nextel is committed to minimizing any adverse impact on the environment. As a consultant, contractor or supplier, your awareness and cooperation is essential in carrying out our commitment.

There are many ways in which you can help Sprint Nextel carry out this commitment such as recycling when possible and by advising Sprint Nextel if you become aware of any improperly handled hazardous materials. Consultants, contractors and suppliers are required to advise the appropriate Sprint Nextel representative or the Ethics Helpline if aware of any significant environmental issues.

## **GIFTS, ENTERTAINMENT AND TRAVEL**

Gifts, business entertainment and travel are often an integral part of building and maintaining business relationships and advancing the interests of Sprint Nextel. To avoid even the appearance of a conflict, Sprint Nextel requires its employees to only accept nominal gifts and reasonable business entertainment to further business relationships.

Consultants, contractors and suppliers should not offer a gift or business entertainment if it appears to influence or compromise judgment, could reasonably appear to influence or compromise judgment or if it appears to be an attempt to obligate or influence the recipient. As consultants, contractors or suppliers Sprint Nextel is asking for you to respect our commitment and respect Sprint Nextel's Gift, Entertainment and Travel policy which provides, in part:

- ▶ Sprint Nextel employees may accept gifts of nominal value (retail value of \$150 or less), given in the normal course of business, but not on a regular or multiple basis.
- ▶ Promotional items (t-shirts, mugs, baseball caps) given in the normal course of business may be accepted by Sprint Nextel employees but not on a regular or multiple basis.
- ▶ Consultants, contractors and suppliers should not offer gifts, business entertainment or travel to a Sprint Nextel employee who is a decision maker, or who plays a role in the decision during a Request for Proposal or Request for Information.
- ▶ Gifts, business entertainment and travel may not be extended by consultants, contractors and suppliers to Sprint Nextel employees during or in connection with contract negotiations.
- ▶ Sprint Nextel employees are required to obtain supervisor approval prior to accepting any business entertainment (such as an occasional lunch or dinner, cultural or athletic event beyond a nominal value) from a consultant, contractor or supplier.
- ▶ Employee travel and accommodations should generally be at Sprint Nextel's expense. Consultants, contractors and suppliers should not pay for Sprint Nextel employee travel and accommodations related to business or entertainment events.
- ▶ Gifts of money or cash equivalents such as vouchers, gift certificates and gift cards are always unacceptable and may not be offered to any Sprint Nextel employee.
- ▶ Consultants, contractors and suppliers may not offer bribes, kickbacks, payoffs or other unusual or improper payments to Sprint Nextel employees in order to obtain or keep business.
- ▶ In the case of the government or foreign entities, special rules and laws such as the Foreign Corrupt Practices Act (FCPA) may apply to the offer or acceptance of a gift, business entertainment, or travel, regardless of actual or perceived value. Please contact the appropriate Sprint Nextel representative or the Ethics Helpline before engaging in any activity that may involve such parties.

For additional guidelines, contact your Sprint Nextel representative or the Ethics Helpline.

## **HARASSMENT AND RELATED ISSUES**

Sprint Nextel is committed to maintaining an environment in which every employee has a right to a work environment free from harassment regardless if the harasser is a co-worker, supervisor, manager, customer, consultant, contractor or supplier. Unlawful harassment may include, but is not limited to, harassment of a sexual nature or gender-based harassment. Harassment of any type will not be tolerated. Therefore, when conducting

business on behalf of Sprint Nextel, we expect you to treat everyone you interact with appropriately. If you believe that you are not being treated with equal respect, we want to know about it, and you should contact your Sprint Nextel representative or the Ethics Helpline.

## **NON-DISCRIMINATION & EQUAL OPPORTUNITY**

Sprint Nextel is committed to establishing and maintaining workplace environments and business relationships that are free from discrimination, where each party or individual has equal opportunity to develop their abilities and demonstrate potential. Sprint Nextel policies as well as federal, state and local laws prohibit unlawful discrimination. Therefore, we expect every individual to interact in a non-discriminatory manner. If you feel that you are being treated in a discriminatory manner by anyone at Sprint Nextel, report it to the appropriate Sprint Nextel representative or the Ethics Helpline.

## **EXPORT CONTROL**

Several U.S. laws restrict trade with certain countries, and with persons and entities from those countries. These laws restrict export of certain technologies, especially in the areas of encryption and advanced computing devices. Sprint Nextel operations worldwide must comply with U.S. export restrictions. Consultants, contractors and suppliers who are uncertain of the legal trade status of any country or technology for export must contact the appropriate Sprint Nextel representative or the Ethics Helpline.

## **FOREIGN CORRUPT PRACTICES ACT**

The Foreign Corrupt Practices Act (FCPA) prohibits Sprint Nextel and its consultants, contractors and suppliers from directly or indirectly offering anything of value (such as gifts, money or promises) to foreign government officials, political parties or candidates to influence or induce action or to secure an improper advantage. Simply stated, the FCPA prohibits bribery of foreign officials. The FCPA also has strict accounting requirements that govern international transactions and payments (even hospitalities). Consult with the appropriate Sprint Nextel representative or the Ethics Helpline before making or authorizing any payment of this type.

## **ANTI-BOYCOTT**

Consultants, contractors, and suppliers must not cooperate with foreign boycotts that are not approved by the U.S. government. Any request for information or action that seems to be related to a foreign boycott, or any other illegal boycott, should be immediately forwarded to the appropriate Sprint Nextel representative or the Ethics Helpline.

## **PROTECTING SPRINT NEXTEL ASSETS & COMPETITIVE INFORMATION**

Information about Sprint Nextel, its employees, competitors, customers, prospective customers and suppliers is a valuable asset in the highly competitive communications

market. Customer records are extremely confidential and must be secured and used only for legitimate business purposes and within the scope to which the information was provided. Sprint Nextel is committed to protecting its information and the privacy rights of its employees, customer and prospective customers. As such, all information related to Sprint Nextel's business is proprietary and confidential. The confidentiality obligations of all Sprint Nextel consultants, contractors, and suppliers are governed by the applicable agreement containing confidentiality and privacy provisions.

## **ETHICS HELPLINE**

The information in this booklet does not address every situation or circumstance. It is not a comprehensive, full, or complete explanation of all the policies, laws and regulations that may apply to consultants, contractors or suppliers. If you have questions or concerns about a potential ethical issue, you should discuss it with the appropriate Sprint Nextel representative or call the Ethics Helpline.

### **Ethics Helpline available 24 hours a day, 7 days a week:**

**By phone:** 1-800-788-7844 or 913-794-1666 (if you are calling from outside the U.S.)

**By fax:** 913-523-9779

**By mail:** Ethics and Compliance Program  
6200 Sprint Parkway  
Mailstop: KSOPHF0202-2B507  
Overland Park, KS 66251

**By e-mail:** [Ethicshelpline@sprint.com](mailto:Ethicshelpline@sprint.com)

