

Doing It The Right Way: Integrity 365

Joe Pulichino, Ed.D.

Ivan H. Lee

Brant Duckett

Swapnil Nair

T Mobile™

Agenda

Reimagining Compliance & Ethics Training

Integrity 365 Design

Leaders Set the Tone: Completions & Conversations

Results

2021: Season 2



What's wrong with Compliance & Ethics Training?



It's about Compliance & Ethics



Off-the-shelf training libraries



Anti-learning laws and regulations



Same old same old
year in year out

The Consequences



No one size fits all

No engagement just a mindless content click through

No relevance to the employees' day-to-day live-in reality

No emotional connection to the learning – motivation and empathy

No personal stake in the learning

No behavior change or workplace transfer

No learning process – no refresh, reinforcement, remediation

Do It The Right Way Culture

It's how we work

It's how we play

It's how we behave

It's how we decide

It's who we are



Focus Training on the Culture & Integrity

- Naturalizes and harmonizes compliance and ethics
- Promotes compliance
- Mitigates risk
- Aligns behavior with our Code
- Is employee-driven
- Makes it easier to Do It the Right Way



T-Mobile Solution



Two Big Insights

- New and Tenured Employees have different training needs.

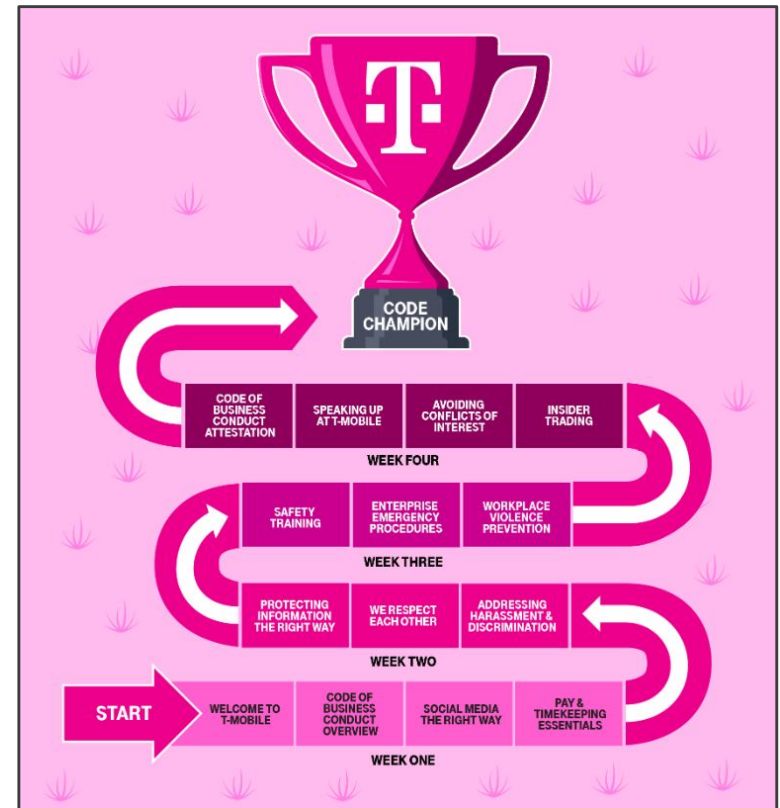


- Dilemmas and decisions do not take place in a vacuum.



NEO – New Employee On-boarding

- Launched Jan 1, 2020
- Code of Business Conduct learning path for “newbies”
- Covers all Code related topics
- Includes new courses:
 - Welcome to T-Mobile
 - Speaking Up at T-Mobile
- Transforms new employees to Code Champions in four weeks

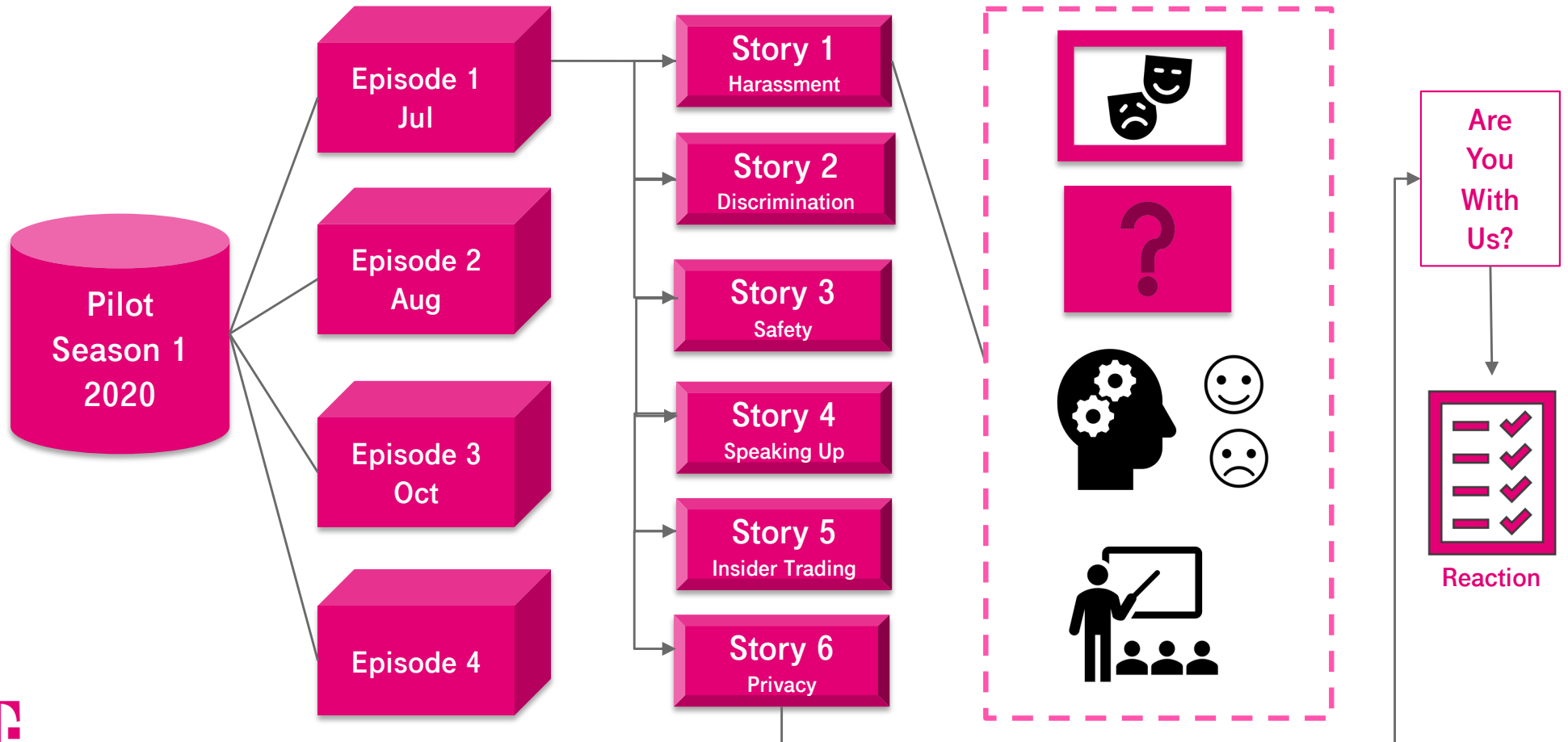


A New Learning Experience for Tenured Employees

Introducing
INTEGRITY
365



i365 – Program Architecture



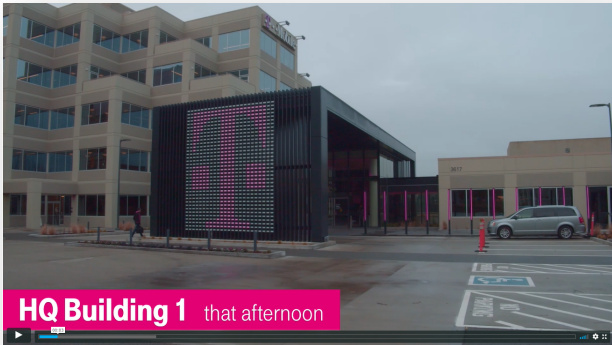
i365 Design



Video Story

1. Setting
2. Situation: dilemma / decision
3. Engage the learner: “What should I do now?”
4. Learner response
5. Feedback
6. The Lesson





HQ Building 1 that afternoon

1. Setting



2. Situation




3. Engage learner




THE MANAGER STRIKES BACK

1 2 3 4 5 6 7 8

What should I do now?
Select the best response.



Do nothing—it might only make matters worse for you.



Report the perceived retaliation to your Employee Success Partner or Compliance & Ethics through the Integrity Line.

Submit

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4. Learner response

THE MANAGER STRIKES BACK

1 2 3 4 5 6 7 8


What should I do now?
Select the best response.

That's right!

I'm worried that Jenna is getting back at me for reporting the number-fudging incident, so I reported that for further investigation.

At T-Mobile, we don't tolerate retaliation. Stay tuned for the resolution of the investigation in a future Integrity 365 episode.

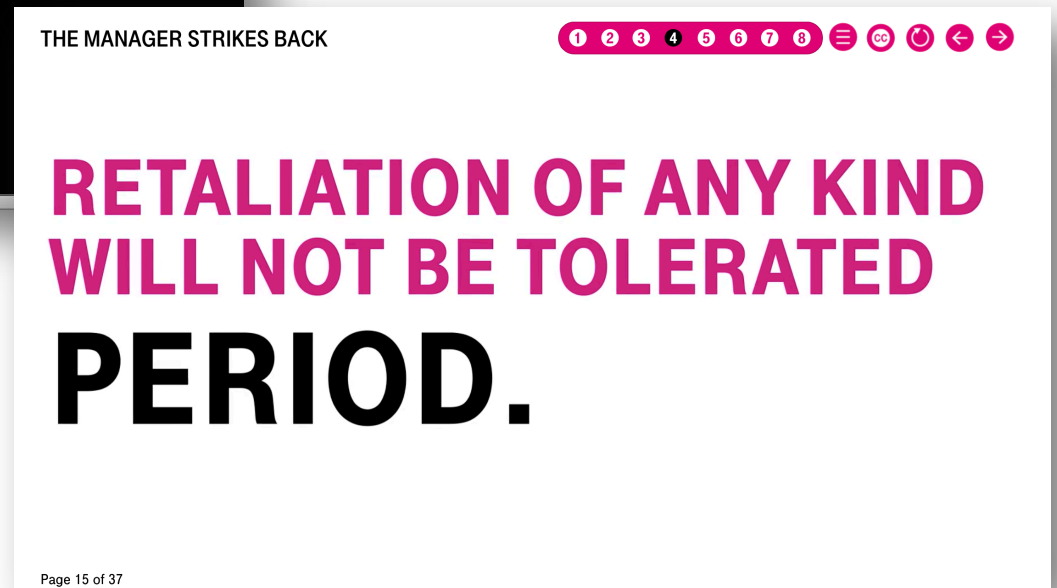
Continue



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5. Feedback





6. The Lesson



LIVE DEMO



Learner Rating (4.8 Stars) & Comments

- *“I never leave reviews for these trainings, but this was amazing, very engaging and I learned something. I want more of these trainings.”*
- *“This is the best ethics training I have ever taken. It was presented so well, and it is easier to understand. Well done!!”*
- *“Wow - about time we had UnCarrier Code of Conduct training that made the importance of following the code clear and relatable.”*



On-Time Completions = IMPORTANT!

- Required: >98%
- Results – Reported quarterly to Board of Directors
- Covers multi-state Anti-Harassment Training Laws
- Episode sequence matters
- Leaders Set the Tone: Responsibility of the Manager





i365's Manager Program: Engaging People Leaders in Ethical Leadership

T-Mobile™

Leaders Set the Tone: Code of Business Conduct

HOW WE PLAY

Speak Up

If you see something that violates the law, the Code or company policies, say something. Follow your gut. Something doesn't seem quite right to you? Then it probably isn't. Call it out so it can be dealt with and everyone can get back to doing things the right way.

What's the best way to report a concern? You can always start by talking with your manager, next-level manager or HR Employee Success Partner. If you're not comfortable using these resources, or don't feel they resolved your concern, contact [T-Mobile Compliance & Ethics](#). This team is available to all T-Mobile employees, customers, suppliers, shareholders, and other business partners who want to raise concerns.

T-Mobile provides several other ways to report a concern:

- Our Integrity Line: This 24/7 resource is managed by a leading third-party reporting service. You have the option to remain anonymous. If you're located outside the U.S., we'll let you know what confidentiality, data retention, and other related privacy rules apply to your report.
 - By phone: 866-577-0575
 - By web: [T-MobileIntegrityLine.com](https://www.t-mobile.com/integrityline)
- Our [Chief Compliance Officer](#)



Questions and concerns about accounting, internal accounting controls, or auditing issues can be submitted (including anonymously) to:

T-Mobile Audit Committee Chair
c/o Chief Compliance Officer
T-Mobile US, Inc. 12920 S.E. 38th St.
Bellevue, WA 98006

We hope you'll use these resources. But keep in mind, nothing in this Code or in any company policy or agreement prevents you from making a good faith report to outside government or regulatory authorities.

No matter how you choose to report, we'll handle your report with care. Our intake processes and procedures are designed to review concerns and take the right action in a timely manner. And we'll let you know when we're done.

Because we're committed to doing things the right way, violations of the legal or policy requirements in this Code could result in discipline, including job termination.



No Retaliation

We don't tolerate retaliation—ever. Anyone who reports a possible violation of the law, this Code or any company policy in good faith is protected from retaliation. Any employee (including officers) who is found to have retaliated may be disciplined and could lose their job.



Speak Up Policy



Leaders Set the Tone

We expect our managers to lead by example and encourage everyone to do things the right way.

What do we mean by that? We mean that T-Mobile leaders follow the law and uphold the Code every day and expect the people who work for them to do the same. We want our leaders to take it to the competition, but in a way that meets our high ethical standards. Upholding the Code may require more than compliance with laws and regulations, and our leaders get that.

No one should ever be asked to bend the rules to meet a company goal. And leaders must be particularly careful with their words and actions so they don't put - or appear to put - pressure on employees that could lead them to violate the law or the Code.

Upholding the Code also means that our leaders talk about the Code with their teams and ensure that training is completed in a timely way. They call out and recognize do it the right way behavior. And they take care of problems before they become bigger problems. If an employee has questions or sees something that worries them, our leaders listen to that employee and let them know that speaking up is the right thing to do.

Finally, upholding the Code means that we expect our leaders to forward reports of legal or Code violations for review by the appropriate investigations group. And leaders demonstrate zero tolerance for retaliation. No one gets punished for raising a good faith ethical concern or possible legal, Code or company policy violation.

“Upholding the Code also means that our leaders talk about the Code with their teams and ensure that training is completed in a timely way.”



CODE OF BUSINESS CONDUCT



[Additional Resources](#)

Two Challenges for Managers

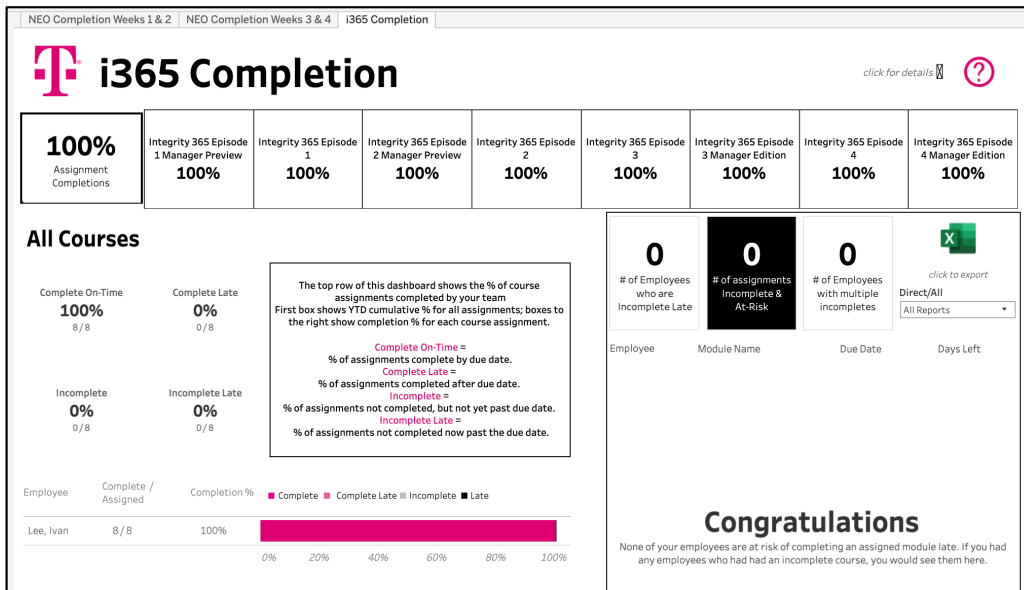


COMPLETIONS



CONVERSATIONS

Solution: Tools Leaders Can Use



T Mobile

INTEGRITY 365 EPISODE 3: MANAGER EDITION

Get started!

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Manager Guide

Integrity 365 Episode 4



Choose your Own Adventure!

T-Mobile's Code of Business Conduct outlines "Do it the Right Way" guidance that aligns to our company values and i365 reinforces behavior that reflect that guidance. And, the conversations you have with your team after the training is where the magic happens – they help build that strong Do It the Right Way culture. In this Manager Guide we're providing a list of activities to support those conversations, so pick a few to engage your team and get ready for some great discussions!



Tool #1: Conversation Guide

Set aside **10 minutes** in your regular 1:1s with your team members after you all have completed the Episode and use the questions below to guide your conversation with your team.

1. Which story stood out most to you and why?
2. Which story did you have questions about?
3. One Flew Over the Lovebird's Nest – Manager Shawn has been dating his direct report, Zoe. How could this be a conflict of interest? And what does the Code say about romantic relationships in the workplace?



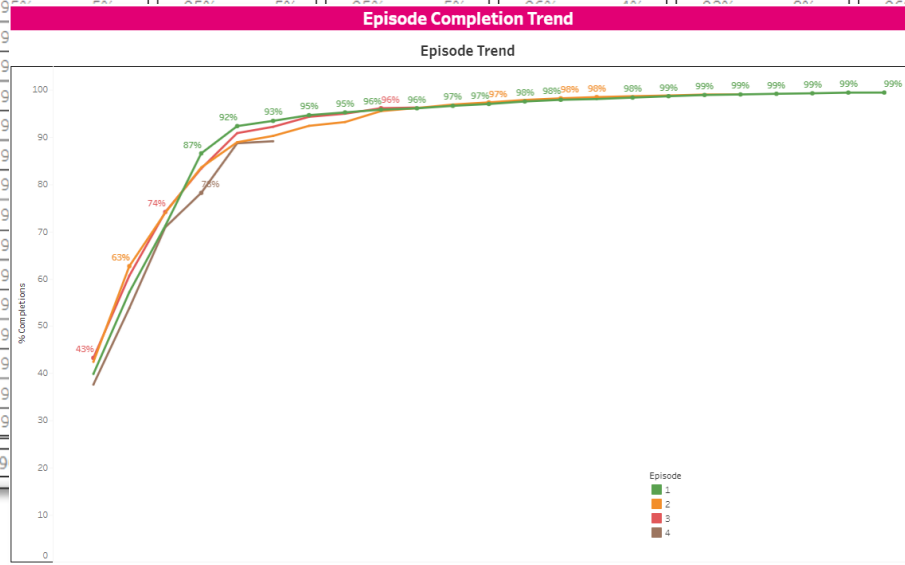
Manager Survey and Focus Groups: Findings

- 92% of managers would recommend our tools to other managers
 - *“The Manager Dashboard is a LIFE SAVER! This tool should be available to people managers for ALL T-Mobile training in the LMS. Best innovation for tracking team progress I’ve seen here.”*
 - *“The Manager Guide has been useful during staff meetings. I have used it to open conversations and solicit feedback from the team. It also helps to refresh our memory of the scenarios we viewed and the lessons we learned.”*



Reporting & Analyzing the Results

Total Assignments 46,402		Total Not Started 193		Total In Progress 80		Total Complete 46,129		Total Incomplete 273		%Completion 99%			
Click on Function name to view weekly completion trend by Line of Business		Click here to visit the Professional Standards Training Manager Dashboard		In the last month my leadership has communicated to me the importance of this training		My direct manager holds their employees accountable for working in a way that is consistent with the Code of Business Conduct		In my immediate working environment reports of unethical conduct are taken seriously		I am confident that I will be able to apply what I learned in this training			
				I know where to go if I have questions or need more information about the topics presented in this training		The videos in this training were engaging realistic and helped me learn do it the right way behaviors		This new Integrity 365 training format is an improvement over other compliance and ethics training I have taken at T Mobile					
Function	Episode Completions	Executive	Manager Preview Completions	Positive	Negative	Positive	Negative	Positive	Negative	Positive	Negative	Positive	Negative
[Redacted]	100%	[Redacted]	99%	92%	8%	99%	74%	99%	92%	99%	99%	99%	4%
	98%		89%	71%	29%	99%	74%	99%	92%	99%	99%	99%	7%
	100%		95%	79%	21%	99%	74%	99%	92%	99%	99%	99%	11%
	98%		81%	75%	25%	99%	74%	99%	92%	99%	99%	99%	8%
	99%		95%	83%	17%	99%	74%	99%	92%	99%	99%	99%	3%
	99%		94%	89%	11%	99%	74%	99%	92%	99%	99%	99%	6%
	100%		99%	80%	20%	99%	74%	99%	92%	99%	99%	99%	4%
	99%		98%	80%	20%	99%	74%	99%	92%	99%	99%	99%	6%
	99%		96%	81%	19%	99%	74%	99%	92%	99%	99%	99%	4%
	100%		91%	86%	14%	99%	74%	99%	92%	99%	99%	99%	4%
	99%		92%	74%	26%	99%	74%	99%	92%	99%	99%	99%	8%
	99%		92%	88%	12%	99%	74%	99%	92%	99%	99%	99%	4%
	100%		94%	88%	12%	99%	74%	99%	92%	99%	99%	99%	4%
	100%		99%	87%	13%	99%	74%	99%	92%	99%	99%	99%	5%
	97%		83%	87%	13%	99%	74%	99%	92%	99%	99%	99%	5%
T-Mobile Average	99%	Mike Sievert	96%	88%	12%	99%	74%	99%	92%	99%	99%	4%	



Dashboard Examples

← Explore / Compliance and Ethics / User Ratings & Reviews / PST User Reviews & Ratings ☆
Device Layouts Data Sources 🔍 📄 ? 🔔 👤

Undo → Redo ↶ Revert ↻ Refresh ⏸ Pause
Ask Data 📄 View: Original Alerts Metrics 📧 Subscribe ✎ Edit 🔄 Share 📄 Download 💬 Comments 🖨 Full Screen

PST User Reviews and Ratings

Last Updated 12/8/2020 6:57:49 AM T

PST group	Course Name	Line of Business	Is New Hire	Year	Quarter
(All)	(All)	(All)	(All)	(All)	(All)

Reviews and Ratings of only currently "Active" T-Mobile employees have been considered

Course Name	Avg.Rating	Reviews
Integrity 365 Episode 1	4.8	761
Integrity 365 Episode 1 Manager Preview	4.7	58
Integrity 365 Episode 2	4.7	603
Integrity 365 Episode 2 Manager Preview	4.5	62
Integrity 365 Episode 3	4.7	567
Integrity 365 Episode 3 Manager Edition	4.9	63
Integrity 365 Episode 4	4.7	451
Integrity 365 Episode 4 Manager Edition	4.8	49
Addressing Harassment & Discrimination	4.7	259
Avoiding Conflicts of Interest	4.6	191
Code of Business Conduct Attestation	4.6	821
Code of Business Conduct Overview	4.7	637
Enterprise Emergency Procedures	4.7	1,565
Insider Trading	4.7	515
Protecting Information the Right Way	4.7	818
Social Media the Right Way	4.9	480
Speaking Up at T-Mobile	4.9	80
T-Mobile Safety Training	4.7	2,077
We Respect Each Other	4.7	1,003
Welcome to T-Mobile	4.9	135
Workplace Violence Prevention for Employees	4.7	670

Integrity 365 Episode 3 Manager Edition

Full Name	Review	Rating																																								
<h2 style="text-align: center;">The Sentiment Story</h2> <p style="text-align: right; color: #ccc;">Last updated 12/8/2020 6:57:49 AM</p>																																										
<table border="1" style="width: 45%; border-collapse: collapse;"> <thead> <tr> <th>PST group</th> <th>Course Name</th> <th>Sentiment</th> <th>LOB</th> <th>Is New Hire</th> <th>Review Year</th> <th>Quarter</th> </tr> </thead> <tbody> <tr> <td>(All)</td> <td>(All)</td> <td>(All)</td> <td>(All)</td> <td>(All)</td> <td>(All)</td> <td>(All)</td> </tr> </tbody> </table> <div style="width: 50%; text-align: center;"> <p>Overall Sentiment</p> <p style="font-size: 1.2em; color: green;">Positive 80%</p> <p style="font-size: 1.2em; color: orange;">Neutral 17%</p> <p style="font-size: 1.2em; color: red;">Negative 3%</p> </div> <div style="width: 50%; font-size: 0.8em; color: #ccc;"> <p>Note: These sentiment classifications/categorizations are based on the amount of improvement and refinement work completed. There is a good chance that the sentiment may not reflect the actual sentiment associated with the course.</p> </div>			PST group	Course Name	Sentiment	LOB	Is New Hire	Review Year	Quarter	(All)	(All)	(All)	(All)	(All)	(All)	(All)																										
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What's Next?



Evaluation of Season 1

E1: July 6
E2: Aug 3
E3: Oct 5
E4: Nov 2



Season 2 Programming

8 Episodes
New Storylines
New Features



A photograph of three diverse women sitting at a dark table in what appears to be a cafe or office setting. They are all smiling warmly at the camera. The woman on the left is holding a white coffee cup. On the table in front of them are another coffee cup, a brown paper bag with pastries, and a smartphone. The background shows some office chairs and a window.

Let's talk

T-Mobile™

Joe Pulichino

Joseph.Pulichino1@T-Mobile.com

[linkedin.com/in/joepulichino](https://www.linkedin.com/in/joepulichino)

Ivan H. Lee

ivan.lee6@t-mobile.com

[linkedin.com/in/ivanhlee](https://www.linkedin.com/in/ivanhlee)

