



Acting in Support of Our Values

Preventing Conflicts of Interest

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A Summary of Our Policies



About Our Code

Values

Uncompromising Integrity

We conduct our business affairs according to the highest ethical and legal standards.

Q. Where can I find a complete listing of Nextel's policies and procedures?

A. Policies relating to specific topics are referred to throughout the Code and can be read in their entirety by clicking on the related links. To see all our policy documents, visit our intranet Mundo Nextel.

Our Commitment

Nextel (NII Holdings, Inc. and each of its subsidiaries and controlled affiliates) is committed to maintaining the highest standards of business conduct and ethics. Our Code of Conduct and Business Ethics sets this standard and reinforces our Values.

- Uncompromising Integrity
- Spirited Collaboration
- Tenacious Drive
- Caring Spirit
- Simplicity

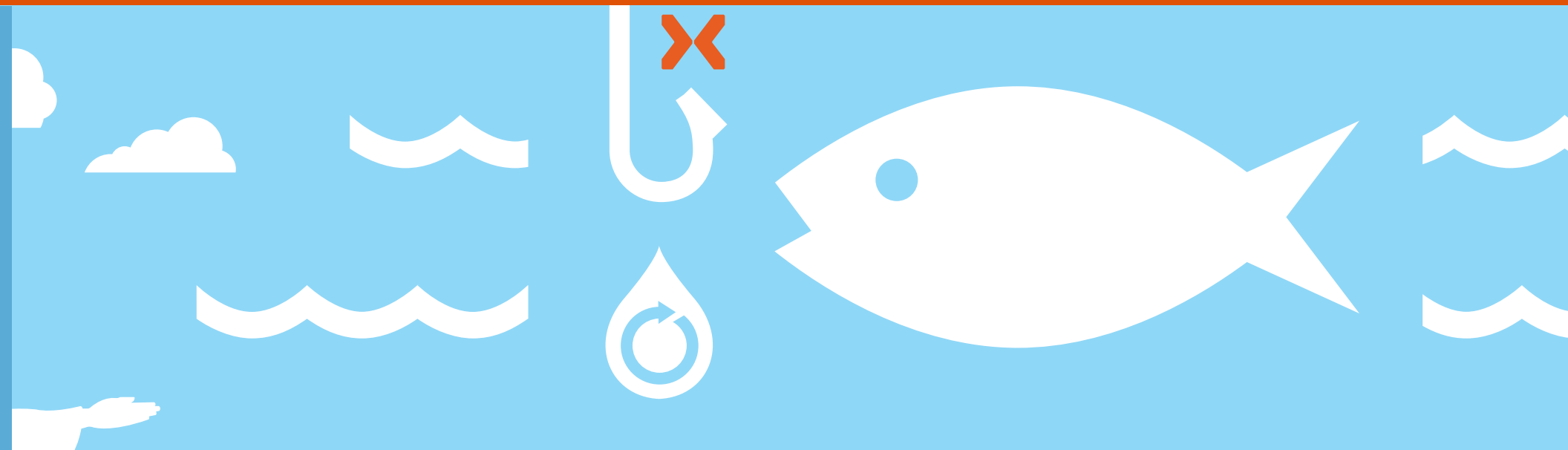
Our Code is intended to:

- Translate our Values into everyday behavior.
- Guide us when we are in doubt.
- Address conduct that could lead to criminal and civil liability for those involved.
- Keep us working toward a common goal: to behave ethically and in accordance with our Values, company policies and applicable laws.

By behaving in accordance with this Code and our Values, we will provide outstanding service to our customers, maintain our leadership position in our business, improve satisfaction for our employees and provide superior value to our shareholders.

Since our Code can't address every situation or summarize every law, rule and regulation, we rely on your good judgment. When faced with an ethical question, ask yourself:

- Am I compromising my own personal ethics in any way?
- Would I like to see my action become a general industry practice?
- How would I feel if my action were reported on the front page of the newspaper?
- Would Nextel lose customers or shareholders if they learned of my action?
- Would I be comfortable explaining my action to my fellow employees, spouse, parents, children or friends?
- Is my action consistent with the Value of Uncompromising Integrity?



Acting in Support of Our Values

Our Commitment

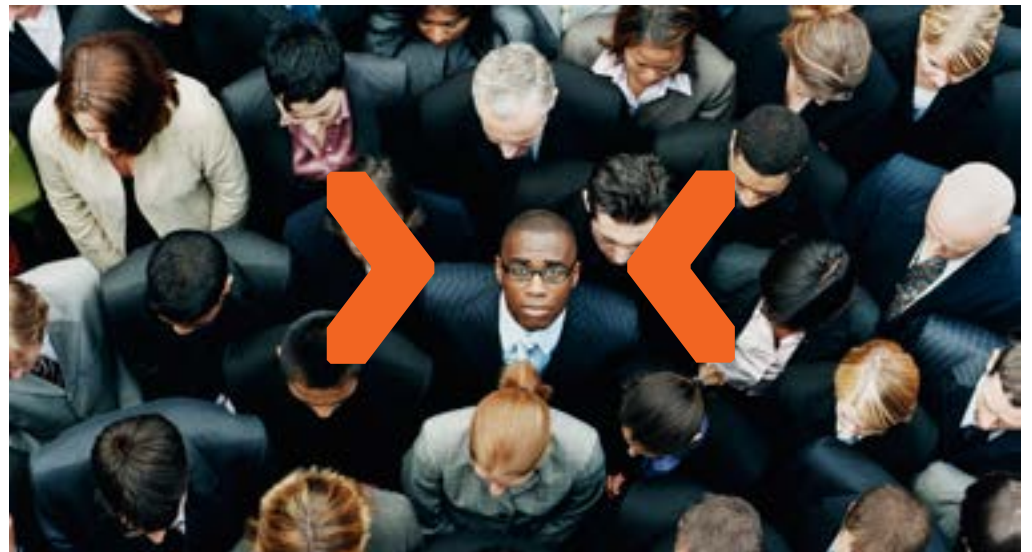
Nextel counts on you to uphold our reputation and high standards by always performing with Uncompromising Integrity.

- **Comply with all laws, rules and regulations** applicable to your company-related business activities and responsibilities, including the policies in this Code and any other related policy approved by Nextel, local laws in the countries in which we operate and laws that apply to operations globally such as U.S. competition and anti-corruption laws.
- **Understand the legal requirements** that are applicable to your employment duties.
- **Understand the regulatory environment** in which Nextel operates well enough to know when to seek advice.
- **Know when to raise concerns** about potential violations of law or policy.

Compliance: Whose Responsibility Is It?

Everyone required to follow these policies should have a copy of our Code so that they can become familiar with it, including:

- All directors, officers and employees of Nextel.
- Nextel's subsidiaries.
- Controlled affiliates.
- Entities in which Nextel owns more than 50 percent of the voting rights or has the right to control the entity.
- All third parties such as suppliers, consultants, agents, sales representatives/distributors and independent contractors.



Compliance: Whose Responsibility Is It? continued

Your Role

Participate in annual online training

Once every year, you will be required to participate in online training about our Code.

Certify your understanding

Upon hiring and each year thereafter, you will be asked to certify that you have read our Code, are aware of its provisions and are not aware of any violations of our Code—by you or any employee of Nextel.

Cooperate with internal investigation or audit

If you are asked to cooperate with any internal investigation or audit, make sure that you do so fully and honestly. If in connection with your employment with Nextel you receive a request for information or notice of an investigation from a government agency, notify your Compliance Coordinator and the Legal Department who will provide you with the information on how to proceed.

Raise concerns

You have an obligation and a responsibility to raise all integrity concerns and issues. If you believe someone may be violating a law or policy, notify your manager, Compliance Coordinator, Legal Department or other appropriate resource.

If you're a people manager, you have additional responsibilities:

- Help employees feel comfortable reporting violations and raising concerns without fear of retaliation.
- Encourage ethical conduct and compliance with the law by personally leading compliance efforts.
- Consider compliance efforts when evaluating and rewarding employees.
- Ensure employees understand that business results are never more important than ethical conduct, compliance with legal requirements and Nextel's policies.
- Work at prevention, awareness and response with regard to compliance issues.
- Identify business compliance risks and make sure the appropriate controls and adequate resources are in place to handle the risks.
- Raise employee awareness of compliance training and reporting channels.
- Promptly respond to observed or reported Code violations.



Raising Integrity Concerns

Nextel offers several ways that you can raise a concern, seek guidance or ask questions.

- 1. Talk to your manager.** Generally, your manager will be in the best position to resolve an integrity concern quickly.
- 2. Contact the next level of management.** If you're not comfortable going to your manager with a concern, you may contact your manager's manager.
- 3. Contact the Chief Compliance Officer at NII.**
- 4. Call the company 24/7 confidential compliance Ethics Hotline at 1-855-607-8703.**
- 6. Contact the NII Board of Directors at boardinquiries@nii.com.**



Q. What is an integrity concern?

A. An integrity concern is any concern that you may have about suspected, potential or actual violations of the spirit or letter of the Code, a Nextel policy or any law or regulation.

Q. When should I raise an integrity concern?

A. Raise all integrity concerns as early as possible. The longer you wait to address a concern, the worse it may become.

Q. May I remain anonymous when I raise a concern?

A. Yes, you may raise concerns anonymously. However, if you identify yourself, we can follow up with you and provide status updates.

Q. Will my concern and identity remain confidential?

A. Yes. This information will only be shared with those responsible for investigating and taking actions to resolve the concern on a "need-to-know" basis.

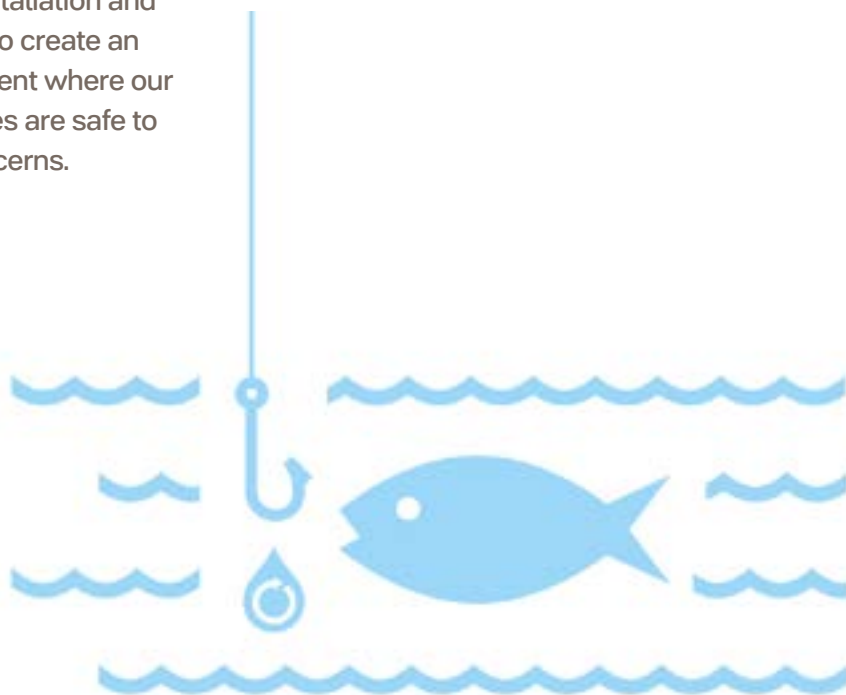
No Retaliation

Key Words

Retaliation

Any adverse action against someone in order to deter them from raising a concern or making a complaint is retaliation. Nextel strictly forbids any form of retaliation and we seek to create an environment where our employees are safe to raise concerns.

Any form of retaliation or adverse action against any employee for reporting in good faith an integrity concern or for assisting in an investigation of an integrity concern is strictly forbidden. If you believe you are being retaliated against, please immediately contact our Ethics Hotline.



Q. Will anything happen to me or will my employment be adversely affected after I raise a concern?

A. Nextel absolutely prohibits retaliation against anyone for raising or helping to investigate or address an integrity concern. Retaliation is not tolerated at Nextel and is grounds for disciplinary action up to and including termination of employment. As a Nextel employee, you are empowered to voice your concerns.

Q. What happens when an integrity concern or issue is raised?

A. Concerns will be fairly and thoroughly investigated. If necessary, people with the right knowledge and objectivity will be assigned to investigate and recommend corrective action as needed.



Preventing Conflicts of Interest

Our Commitment

While working at Nextel, avoid conflict between your personal interests and the interests of Nextel. A situation that could create a conflict of interest should be disclosed to your manager.

Disclosure

Key Words

Conflict of Interest

When your personal interests interfere with the interests of Nextel.

Q. Which relationships could cause a conflict of interest?

A. Relationships with prospective or existing:

- Suppliers
- Contractors
- Customers
- Competitors
- Regulators

Avoid conflicts of interest by disclosing relationships that could be misinterpreted. Talk to your manager to identify these situations and determine if action is necessary.

You should not:

- Compete with Nextel.
- Take advantage of corporate opportunity.
- Misuse confidential and proprietary information for personal gain.

We rely on your integrity and judgment to avoid situations that may interfere with your loyalty to Nextel.



To decide whether or not you have a conflict of interest, ask yourself:

Would this situation affect any decision I make for Nextel?

Yes

No

How would it look to my co-workers?

Bad

Good/Unsure

Would it affect how I do my job?

Yes

No

How would it look to someone outside Nextel, such as a customer or shareholder?

Bad

Good/Unsure

You probably don't have to worry, but if you're unsure discuss the situation with your manager.

Discuss the situation with your manager.

Relatives and Friends of Employees

Values

Uncompromising Integrity

We all have an obligation to do what's best for Nextel and our customers.

A conflict of interest could arise when doing business with organizations that employ or are owned by, close relatives or friends. What you are prohibited from doing should not be done through others.

If your relative or friend is an employee of a business seeking a business relationship with Nextel, you should not try to influence Nextel.

Disclose relationships to your manager when:

- You are involved in the **procurement process** relating to a relative or friend's organization or could be involved in the future.
- You have a personal relationship with an employee at Nextel who is or will be, in a **reporting relationship to you**. Employees should not supervise or be in a position to influence hiring, work assignments or assessments of close relatives or friends.

A "close relative" is:

- Spouse or partner.
- Parent, step-parent or grandparent.
- Child, step-child or grandchild.
- Sibling or step-sibling.
- Nephew or niece.
- Aunt or uncle.
- In-law.
- Anyone else you have a close personal relationship with.

Q. My son is thinking about applying for a job in my department. What should I do?

A. Even if your son won't be in a reporting relationship to you, it's always best to disclose the relationship to your manager to avoid a perceived conflict of interest.

Board Memberships

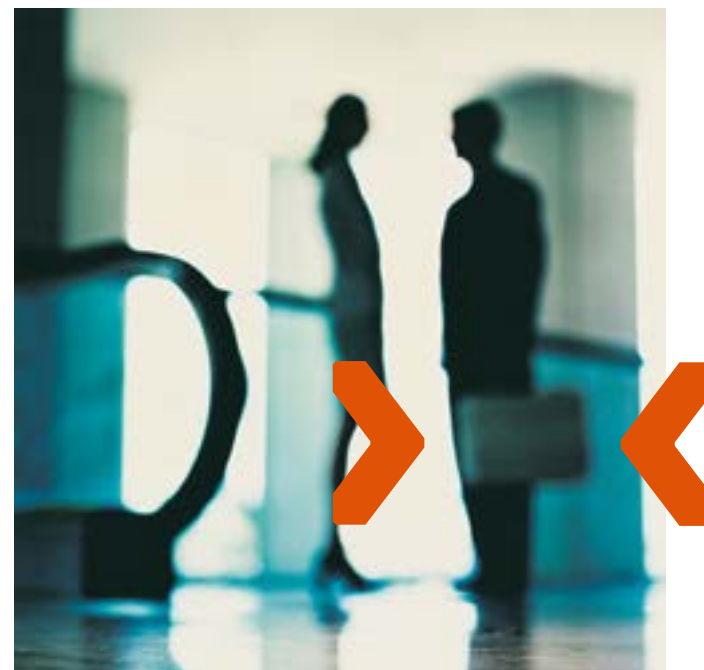
Requirements for employees: Serving on the board of a for-profit company or government agency requires approval of your manager and the Vice President in your line of reporting.

Requirements for the Senior Leadership Team (SLT): Approval from your manager and appropriate EVP, President, CEO or Chairman is required. Refer to the company's Corporate Governance Guidelines for additional approval requirements.

Employees may not serve on the board of directors of a competitor, supplier or customer.

Tip

Serving on boards of non-profit or community organizations is encouraged, does not require prior approval and should not interfere with your ability to do your job.



Acceptable Use of Nextel Assets

Tip

Take care when composing both personal and business messages online, whether in an email, blog, social computing site or any other form of user-generated media; they're a lasting and irrevocable written record and can easily be copied and forwarded worldwide without your knowledge or consent.

Nextel's assets should be safeguarded and used for Nextel business only, except for limited personal use that does not interfere with our business and is in compliance with Nextel policies. This includes protection of Nextel's physical assets, such as office facilities, furniture, equipment and supplies, information systems and other technology assets, intellectual property rights and confidential information.

Nextel's computer systems should not be used to:

- Advance personal or political views.
- Communicate inappropriate, sexually explicit or offensive statements.
- Send unauthorized solicitations.
- Conduct business for another organization.



Acceptable Use of Nextel Assets continued

Computer and Network System Usage

Computers and electronic information are essential tools to support our business. Use technology for appropriate business purposes only. Although limited personal use is not prohibited, it should be kept to a reasonable minimum and must not interfere with your job duties. Always exercise care when accessing information through the Internet or handling unsolicited emails since they may contain viruses.

Email, instant messages, text messages, blogs, chats and other texts of similar nature, including social media, must be composed with the same care you take in composing any other Nextel document. Anything said or written in public will remain documented and may someday be read by a client or colleague. You should carefully guard against making statements that might unintentionally reflect negatively upon Nextel or that might create the impression you are speaking for Nextel.

The use of profanity, derogatory remarks, discriminating or harrassing comments, innuendo and threatening or abusive language through Nextel's computer systems is prohibited.

Nextel reserves the right to block offensive, illegal and non-business-related sites and to monitor and intercept the content of any messages or files transmitted by or stored in our system, including information that has been deleted by users.

You should not expect privacy when using the communications resources that Nextel has provided. Nextel monitors workplace communications (including but not limited to Internet activity, email, social media or other electronic messages and computer storage) to ensure they are used responsibly and professionally. Any information and records produced by using these resources is subject to Nextel's review.



Acceptable Use of Nextel Assets continued

Intellectual Property

Nextel's intellectual property rights are valuable assets and employees are expected to protect them. We are highly respectful of all intellectual property rights of others.

You are required to understand and comply with all intellectual property laws that pertain to your business activities. Any use of Nextel systems in violation of intellectual property rights, such as unauthorized duplication or distribution of copyrighted materials, is strictly prohibited.

Through your work at Nextel, you may receive or develop information, practices, methods, inventions, written materials, programs, word algorithms, processes or other works. These creations belong to Nextel. Although such intellectual property may not be tangible like our buildings and equipment, it is a very valuable asset, which we are all expected to protect. When you leave Nextel, you must return all Nextel intellectual property in your possession including copies.

Intellectual property rights include:

- Patents.
- Trademarks/service marks.
- Taglines.
- Domain names.
- Copyrights (including copyrights in software).
- Design rights.
- Rights in know-how or other confidential information (sometimes called “trade secrets” or “proprietary information”).
- Rights under intellectual property agreements.



To find out more,
contact your
Compliance
Coordinator or Legal
Department.



Acceptable Use of Nextel Assets continued

Brand and reputation

We have become a leader in the telecommunications service business through constant focus on high-quality services and customer care. We must work diligently to meet our customers' expectations and maintain their hard-earned trust. We strive to protect both our quality reputation and our highly-respected brand.

Our logos and the "Nextel" name are examples of trademarks and service marks recognized throughout the markets in which we do business. Nextel has set out specific guidelines covering logos, color palette and the other components that make Nextel's brand identity instantly recognizable in the marketplace. These standards must be followed at all times on all Nextel materials.



To find out more,
contact your
Marketing
Department.



Acceptable Use of Nextel Assets continued

Confidential Information

It is your responsibility to protect all confidential information you have access to as an employee of Nextel. Nextel's confidential information may not be disclosed to anyone unless it is properly authorized.

You are not permitted to disclose Nextel information, confidential or not, outside of appropriate work channels. This would include, disclosure of Nextel information in online chat rooms, social media sites, on websites or in blogs. The unauthorized disclosure of Nextel information or public statements which reflect poorly on Nextel may result in disciplinary action.

Confidential information of third parties is usually disclosed to Nextel with nondisclosure agreements. These agreements restrict our use of the information. For all third party confidential information you are required to comply with these contractual provisions, in addition to our Code provisions. You may not disclose or have another employee disclose, any former employer's confidential information. For more information, please visit our Third Party Confidential Information Policy.

Q. What should I do with confidential information if I leave Nextel?

A. When your employment or position with Nextel ends, you must return all confidential information in your possession and remember that your obligation to keep Nextel's proprietary or competitive information confidential will continue.

Confidential information includes any non-public information concerning:

- Nextel.
- Its operations.
- Employees.
- Financial condition or performance.
- Prospects or information that may provide Nextel with a competitive advantage.
- Information provided to us by a third party with the expectation that such information will be kept confidential and used solely for the purpose for which it was shared.



For further details on privacy requirements, your Compliance Coordinator or Legal Department can help.

Making Private Use of Corporate Opportunity

If you are aware of an opportunity to make a purchase or an investment in which Nextel would be interested, notify your manager and allow Nextel to evaluate whether or not to pursue it. If Nextel decides not to pursue it, you may act privately on the opportunity.

Tip

Unsure about a particular situation?

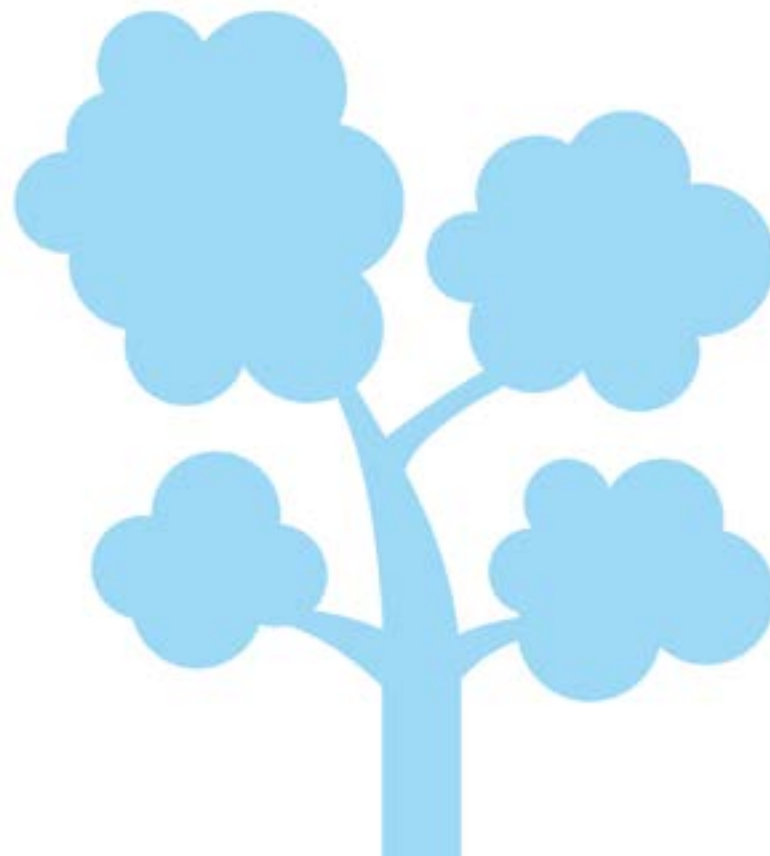
Discuss it with your manager, Compliance Coordinator, Legal Department or Human Resources contact.



Outside Employment Opportunities

You should not provide services to any business that competes with Nextel or allow extracurricular activities to interfere with your regular job and impair your ability to perform effectively. Ensure that any activity outside of your responsibilities at Nextel is strictly separate.

SLT members are expected to spend all of their working time on Nextel's business and should not have outside business activities.





Remember, you cannot offer, give or receive anything that would compromise your or the recipient's, ability to make fair and balanced business decisions.



For advice on whether business gifts and entertainment are appropriate, contact your manager or your Compliance Coordinator.

Exchanging Gifts and Entertainment

Business gifts and entertainment are courtesies designed to build and enhance working relationships with vendors, customers and suppliers. Giving and receiving gifts is not appropriate if it creates an obligation, biased situation or is done to influence a business decision.

Gifts and entertainment are permitted if they are:

- Reasonable in value.
- Infrequent and irregular.
- In good taste.
- Unsolicited.
- Not cash or cash equivalents.
- Appropriate for the situation.
- Something you or the recipient would freely discuss with coworkers.

The rules for gifts and entertainment apply year round and apply to spouses, partners and family members. If you regularly interact with government employees at any level, you should additionally familiarize yourself with their regulations and with our Foreign Corrupt Practices Act (FCPA) Policy.

Gifts include:

- Items of value.
- Travel.
- Lodging.
- Goods and services.
- Meals or entertainment when the host does not attend.

Entertainment includes:

- Meals together.
- Attending sporting or entertainment events.
- Outings where both the person offering and the person accepting attend.

Q. What should I do if I'm offered a gift that I think is inappropriate?

A. You should decline. If you are in a situation where refusing would embarrass or hurt the person offering it, you may accept the gift on behalf of Nextel and then report it to your manager.

Complying with Insider Trading Laws

Key Words

Material Information

Information that would be useful to a reasonable investor in deciding to buy or sell securities of the company in question. People who have access to such information are often referred to as “insiders.”



For more information, view our Insider Trading Policy.

You may have access to information about Nextel and the companies we do business with that is not available to people outside of Nextel, including our stockholders. Often, that non-public information or “inside information” is material.

Material, non-public information should only be shared with other employees on a “need to know” basis and should not be shared with anyone outside Nextel, including family, friends and others with whom we do business. Employees are expected to abide by all laws and regulations regarding the buying and selling of securities.

If you are in possession of material, non-public information, you may not trade, for yourself or for others, in securities of that company or Nextel. You should also not share such information with others (sometimes referred to as “tipping”). “Insider trading” and “tipping” are serious violations of law and can result in severe sanctions, including criminal penalties.

You and your family members may not conduct transactions involving Nextel’s stock during restricted periods. Restricted periods begin one week prior to the last day of each fiscal quarter or year-end.

The period ends 24 hours following the public release of Nextel’s results for that quarter. Trading in Nextel’s common stock may also be prohibited during a trading blackout. You should never conduct transactions in Nextel’s common stock while aware of material non-public information.

In addition to internal disciplinary action, the consequences of noncompliance with the Insider Trading Policy may include criminal prosecution or fines for both Nextel and the individual involved.



Complying with Insider Trading Laws continued

Examples of material, non-public information may include:

- Projections of future financial results or other guidance.
- Financial or operational results, especially quarterly and year-end results.
- Information regarding:
 - A pending or proposed merger, acquisition or tender offer or an acquisition or disposition of significant assets.
 - A change in Nextel's or another company's board of directors or executive management.
 - Significant events regarding Nextel's or another company's securities.
 - Declaration of a stock split.
 - Offering of additional debt or equity securities.
 - Plans to redeem or repurchase securities.
 - Changes in dividend policies.
 - Severe financial or liquidity problems.
- Actual or threatened major litigation or the resolution of such litigation.
- Significant changes in accounting practices.
- Significant developments or events concerning a company's products, services or strategic plans, including regulatory developments, significant pricing changes, etc.



Investments and Financial Opportunities

A financial investment that could compromise your judgment or work at Nextel is a conflict of interest.

Nextel's Insider Trading Policy prohibits:

- Short-sales.
- Publicly traded options or other derivative securities.
- Hedging or monetization transactions.

These transactions increase the legal risk and appearance of inappropriate conduct and create a conflict of interest with Nextel's long-term objectives.

Investments in competitors

We strongly discourage you from making financial investments in companies that compete with Nextel. Small, pre-existing financial investments in competitors in less than 1% of their equity should not be a problem as long as the investments are made through mutual funds or investment portfolios where investment decisions are made by the fund manager. If your pre-existing investment in a competitor is not small, discuss the situation with your manager.

Investments in other companies

You should not invest in current or prospective suppliers of Nextel, unless such investments are made through mutual funds or investment portfolios where investment decisions are made by the fund manager.

Discouraged financial investments are:

- Stock.
- Options to buy stock.
- Other ownership interests or debt securities in a company.

Allowed financial investments are:

- Mutual funds.
- Investment portfolios where investment decisions are made by the fund manager.

Initial Public Offerings or Preferential Allocations

Preferential allocations of stock or an offer to participate in an Initial Public Offering (IPO) from a company with which Nextel conducts or could conduct business should be discussed with your manager.



Our Workplace

Our Commitment

Nextel is committed to treating employees and job applicants with fairness and respect. To create and maintain a safe work environment where people are treated respectfully and fairly, we:

- Encourage a diverse workforce.
- Provide a workplace that is positive, creative and rewarding.
- Treat everyone with fairness, respect and dignity.
- Promote a harassment-free work environment.
- Protect the health and welfare of employees.

Fair Employment Practices and Diversity

Values

Spirited Collaboration

We encourage a workforce that is as diverse as the communities we operate in and the customers we serve. Diversity is a unique source of our energy, strength and excellence—and a competitive advantage for Nextel.

Fair employment practices do more than keep Nextel in compliance with applicable labor and employment laws. They contribute to a culture of respect. Nextel is committed to complying with all laws pertaining to fair employment practices.

To ensure that we are all able to perform, develop and advance, the Human Resources organization is available to address employee relations issues as they arise.

If you believe your rights have been violated or if you have any workplace concerns, you should consult your manager or call your Human Resources representative directly. If you do not receive a clear explanation or believe you may not receive an objective or adequate review of the issue, call the Ethics Hotline.



Equal Opportunity and Discrimination

Values

Caring Spirit

We provide a workplace that is positive, creative and rewarding, giving all employees the opportunity to reach their full potential and contribute to Nextel's success.

We are committed to equal opportunities for our employees and those seeking employment with Nextel. All employment decisions must be based on individual merit and business needs and be in compliance with labor and employment laws. Everyone at Nextel and everyone we come into contact with, is treated with fairness, respect and dignity and never unfairly discriminated against.

This commitment extends to all aspects of employment including recruitment, hiring, evaluation, promotion, compensation, training, development and termination.

We conduct our business without regard to and do not discriminate because of:

- Race
- Color
- Ethnic, cultural, community or national origin
- Religion
- Sexual orientation or identity
- Family or marital status
- Gender
- Disability
- Age



Harassment Free Workplace

Harassment in the workplace is unacceptable, will not be tolerated and must be reported. Harassment includes actions, conduct or behavior that any individual or group of individuals would find offensive, humiliating, intimidating or hostile. Such conduct could result in disciplinary action including possible termination.

Harassment can take many forms, such as:

- Verbal: derogatory statement, slurs, epithets, threats and innuendo.
- Visual: cartoons, drawings, postings and email
- Physical: assault and physical interference.

Examples of conduct that may constitute harassment:

- Making a statement concerning a person's race, color, ethnic or national origin, religion, sexual orientation or identity, gender, disability or age and is likely to make any individual or group of individuals feel unwelcome, offended or uncomfortable.
- Displaying or forwarding objects, pictures, magazines, cartoons, screen-savers, emails, posters, videos or other content that is likely to make any individual or group of individuals feel unwelcome, offended or uncomfortable.
- Making any inappropriate statement or engaging in any conduct of a sexually explicit nature.
- Making unwelcome sexual advances or requests for sexual favors in exchange for or as a condition to continued employment or advancement.
- Threatening or engaging in retaliation after an unwanted overture is rejected or in response to the reporting of such conduct.
- Engaging in threatening physical conduct.

Additional situations established by law in each of the markets where we do business may qualify as harassment.

Health and Safety

We want to maintain a safe, healthy environment for all employees. Therefore, we must follow safe working procedures and actively work to prevent accidents. If you become aware of any threat to the safety of an employee, customer, supplier, contractor, consultant or other business partner or site, report it to your manager.

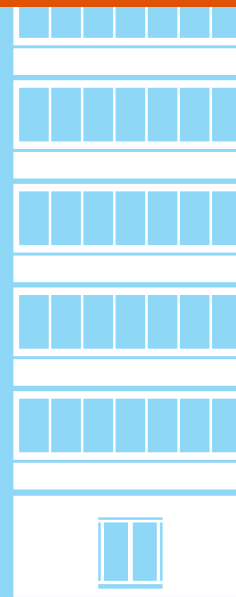
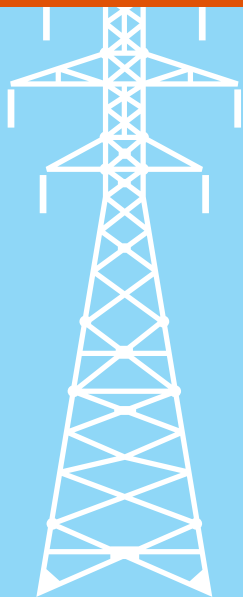
Workplace violence

Workplace violence or the threat of violence is unacceptable. Violent behavior or threats should be reported and will be investigated. Employees who engage in violence or threats of violence will be subject to disciplinary action, including termination of employment, recovery of damages and criminal prosecution in appropriate cases.

Drugs and alcohol

Because safety comes first, while at work we must remain free from the influence of drugs, alcohol or any other substance that may impair our ability to work safely and effectively. In addition, we must not possess, sell, use or purchase any drugs or drug paraphernalia on Nextel premises or sponsored events. Moderate alcohol consumption at Nextel sponsored events or in connection with business meals or entertainment is permissible if in compliance with all other Nextel policies.





The Marketplace

Our Commitment

Nextel will compete lawfully and ethically in the marketplace. We will act responsibly in our relationship with government officials (or third parties who interact with government officials), competitors, customers, individuals from specific sanctioned countries, auditors and the media. We will protect information belonging or relating to our customers, employees or third-party vendors.

Foreign Corrupt Practices Act and Other Anti-bribery Statutes

Key Words

Bribe

Anything that has “value” to the recipient such as offering entertainment or travel, directing business to a company owned by a government official or offering gifts to the family members of the recipient.

Anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), apply to all of our operations throughout all of our markets. When working with government officials or entities, you are strictly prohibited from offering, authorizing, giving or promising any form of a bribe or kickback. This applies to all employees worldwide, regardless of location. You are responsible for knowing and complying with this policy, as outlined in the Foreign Corrupt Practices Act (FCPA) Policy.

Hiring or using a third party that will offer or give a bribe while acting on our behalf or in our name is prohibited. Our suppliers, contractors, consultants and other business partners are held to the same rules that we are. We could be liable for bribery even if we did not know, but should have known, that the payment is going to a government official. We can also be liable if we only offered a bribe but did not pay.

If your job responsibilities require you to interact with government officials or hire third parties who interact with government officials, be sure to review the Foreign Corrupt Practices Act (FCPA) Policy carefully and attend any related training sessions.

When hiring a third party, ask yourself these questions:

- Who owns the company?
- Who are the officers?
- What are their qualifications and experience for the job?
- What is their understanding of and compliance with anti-bribery rules?
- Is their compensation reasonable under the circumstances?
- How long have they been in business?



Foreign Corrupt Practices Act and Other Anti-bribery Statutes continued

What is acceptable

Certain gifts, travel and entertainment for government officials and other entities are acceptable, but require approvals to assure compliance with the FCPA and anti-bribery laws. Our books and records must accurately reflect the transactions and Nextel must maintain control of internal accounting systems. In all of our operations, it is against policy and possibly illegal, for any employee to cause books and records to be inaccurate in any way. Examples include:

- Making records appear as though payments were made to one person when, in fact, they were made to another.
- Submitting false expense reports that do not accurately reflect the true nature of the expense.
- Creating any other records that do not accurately reflect the true nature of the transaction.

Consequences for violating the FCPA and other anti-bribery laws are severe, including heavy fines for both the individual making the payment and the company, jail time and irreparable brand and reputation damage.



If you have any questions, contact the Compliance Coordinator in your market.

—or—

View the full Foreign Corrupt Practices Act (FCPA) Policy.



Competition and Anti-Trust

Competition laws prohibit practices that restrain trade or restrict free and fair competition. We want to ensure that we compete fairly and in a manner that is consistent with our Values and our Code. In addition to the U.S. anti-trust laws, all countries in which we operate have enacted competition laws. These laws apply to us as both a buyer and seller of goods and services.

Violating competition laws can result in severe penalties, including criminal action against the company or any individual involved.

Although competition laws differ from country to country, some of the most commonly prohibited practices include:

- Agreements or understandings with a competitor to fix, raise, peg, stabilize or lower prices or to eliminate or reduce price competition. Even an informal understanding or mutual expectation that two competitors could achieve a common purpose might be found to constitute an illegal agreement.
- Agreements or understandings with a competitor to allocate or apportion customers, groups of customers, lines of business, products or geographic areas are unlawful. Here again, even an informal, tacit or unwritten understanding could be found to constitute an illegal agreement.
- Certain agreements or understandings with suppliers or customers that involve exclusivity or other restrictive arrangements may be unlawful.



To find out more,
contact your
Compliance
Coordinator or
Legal Department.



Laws Affecting International Trade and Transactions

Most countries have adopted laws regulating international business relationships. Some of these laws restrict the export of goods, technologies and software to specific users or locations. Exports are not limited to traditional shipping methods. An export can be made electronically, through discussions and by visual inspection.

Other laws prohibit business dealings with specific sanctioned countries, entities or individuals. You may be affected by these complex laws if you are involved with mergers, acquisitions or investments in companies and businesses and procurement of equipment, software or technologies (including imports, exports, re-exports and distribution of equipment, software or technologies).

If you are involved in any of these activities, you should seek guidance from your Compliance Coordinator or appropriate Legal Department member on how these laws affect your business activities.



To find out more,
contact your
Compliance
Coordinator or Legal
Department.

Protecting Data Privacy

While working at Nextel you may have access to information belonging or relating to our customers, employees or third-party vendors. We are committed to respecting the privacy of any personal data, which we collect and process.

Personal data is defined as all data that relates to any employee or customer, including:

- Names
- Addresses
- Birthdates
- Billing records
- Health care information
- Location data and other usage data



If you handle personal data as part of your responsibilities, you must be aware of and comply with all local laws and regulations and all Nextel policies. In general:

- Personal data may only be acquired and processed by lawful means and for lawful purposes and, where required, with the knowledge and consent of the data subject.
- Personal data may be used only for business purposes and only in accordance with applicable law and, where necessary, with appropriate consents.
- There are legal restrictions on transferring personal data to another party, including to other persons or entities within the NII Holdings, Inc. group of companies. There may be additional legal restrictions on transferring personal data outside its country of origin.

Personal data should be protected by security safeguards against such risks as loss, destruction, unauthorized access, unauthorized use, modification or disclosure. If you learn of a data security breach regarding personal data, contact your Compliance Coordinator and the Legal Department.

Accurate Accounts, Records and Disclosures

Nextel is subject to extensive accounting and reporting requirements. Our operations must comply with all accounting and financial reporting rules and regulations of the jurisdictions in which we operate.

All of our books, records, accounts and financial statements must be maintained in the proper level of detail, appropriately reflect Nextel's transactions, conform to legal requirements and our internal controls and overall be managed as it is provided in our Records Management Policy. Our internal controls are designed to maintain accurate, complete and lawful financial records. Filings with the U.S. Securities and Exchange Commission (SEC), as well as other public disclosures, must be timely, understandable, accurate, fair and complete in all material respects.

Accounting and financial reporting

Accounting and financial reporting practices must comply with accounting principles and other criteria, such as local statutory reporting and tax requirements.



Disclosure controls and procedures

No action may be taken to influence, coerce, manipulate or mislead Nextel's auditors in an improper manner or to influence the conduct of an audit of Nextel's financial statements.

Employees involved in Nextel's disclosure process must be familiar and comply with NII's disclosure controls and procedures.

Proper authorization and approvals

Ensuring that proper authorization is obtained for any transaction is an essential business practice. Authority to approve a transaction does not mean that you have authority to sign the related contract or document, which binds Nextel. It is your responsibility to ensure that appropriate approvals, signatories and execution procedures are followed and that you abide by your personal authorization limits. Find out more in our Global Accounting Guidelines – Authorization and Delegation of Authority chapter.

Communication with the Media

It is Nextel's policy to publicly disclose material information before discussing it with the media. Unsolicited inquiries from the media should be forwarded or directed to the Corporate Communications Department. Under no circumstances should you contact or attempt to respond to such inquiries, whether online (including social media), by phone or otherwise, without authorization.

Interviews granted to the media may only be given under the supervision and previous approval of the Corporate Communications Department.

The Corporate Communications Department coordinates all media releases and should receive prior notification of all country specific releases and must be copied on the final release.





The Community

Our Commitment

For many years, Nextel has contributed to the economic and social development of the communities in which it is located. In addition to the jobs created and the services provided, Nextel encourages its employees to be active in these communities.

Values**Caring Spirit**

Nextel contributes to the economic and social development of the communities in which it is located.

Personal Community Activities

You are encouraged to participate in community activities of your choice, but should always make it clear that your views and actions are your own and not those of Nextel. In addition, you should ensure that outside activities do not interfere with your job performance.

Employees should not pressure other employees to contribute to charitable organizations. If you wish to use Nextel time or property to support charitable, non-political efforts, you should work with the Social Responsibility Committee in your market to obtain all necessary approvals.



Political Activity and Lobbying

Unless permitted by law and authorized in advance, employees should not make any contribution on behalf of Nextel or use its name, funds, personnel, property or services for the support of political parties or candidates.

- Relationships with any government representative should not embarrass Nextel or the official if publicly disclosed.
- Activities with the potential to influence government officials are strictly regulated.
- Anyone representing Nextel should be extremely careful to avoid even the appearance of impropriety.
- Reasonable entertainment and courtesies should be extended only if not prohibited by law or our FCPA Policy and then only if it is customary and appropriate.

Any questions should be directed to your Compliance Coordinator, General Counsel or other appropriate Legal Department representative.



For more information,
view our
Foreign Corrupt
Practices Act
(FCPA) Policy.



Code of Conduct ►

Administration of our Code

The Board of Directors of NII has approved our Code. The Compliance Office (Legal Department of NII) is responsible for the administration of our Code and the Chief Compliance Officer oversees implementation and enforcement.

A Compliance Coordinator has been designated in each of our markets and is responsible for:

- Education and training of Nextel employees regarding the requirements of our Code.
- Conducting investigations of potential violations.
- Initiating periodic reviews.
- Monitoring of compliance systems to deter illegal or unethical conduct and maintaining procedures for employees to report actual or suspected violations of our Code.

It is our policy to employ a fair process by which to determine violations of our Code. If it is determined that evidence of a violation exists, the individual subject to investigation will be notified. The subject of an investigation will have an opportunity to respond to any allegations made against each person. Nextel will strive to enforce the Code in a prompt and consistent manner.

Amendment, modification and waiver

Nextel does not expect to grant waivers of provisions of our Code, but, in limited circumstances, may find it appropriate. All waivers require the written pre-approval of your immediate manager, your market Compliance Coordinator and the Chief Compliance Officer.

Only the NII Board of Directors may waive compliance with our Code for SLT members, employees above the SLT and members of the NII Board of Directors. If such a waiver is given, Nextel will disclose the waiver, as required by law or the rules of the U.S. Securities and Exchange Commission and NASDAQ.

Adherence to the standards contained in our Code is a condition of employment, but our Code is neither an employment contract nor any guarantee of continued employment. Our Code and Nextel's policies and guidelines are subject to change by Nextel at any time without notice.