

This index has been prepared in reference to the [Global Reporting Initiative's \(GRI\) Standards](#) in order to report significant economic, environmental, and social topics within the business. All information below, unless noted otherwise is for the TDS Enterprise (TDS, TDS Telecom, UScellular, and OneNeck IT Solutions).

Inclusion of information in this index should not be construed as a characterization of the materiality or financial impact of that information. All data is for the year ended December 31, 2019. Please see our [Form 10-K](#) for the year ended 2019, and other information available on the TDS Sustainability website.

GRI 102: General Standards		
102-1	Name of organization	Telephone and Data Systems Inc.
102-2	Activities, brands, products, and services	<a href="#">10-K</a>
102-3	Location of headquarters	<a href="#">10-K</a>
102-4	Location of operations	<a href="#">10-K</a> <a href="#">Our Businesses</a>
102-5	Ownership and legal form	<a href="#">10-K</a>
102-6	Markets served	<a href="#">10-K</a> <a href="#">UScellular Coverage Map</a> <a href="#">TDS Telecom Company Profile</a> <a href="#">OneNeck IT Solutions</a>
102-7	Scale of the organization	<a href="#">10-K</a>
102-8	Information on employees and other workers	<a href="#">10-K</a> TDS had approximately 9,400 full-time and part-time employees as of December 31, 2019
102-9	Supply chain	<a href="#">Supplier Diversity at UScellular</a>
102-10	Significant changes to the organization and its supply chain	There have been no significant changes to the organization and supply chain in 2019.
102-11	Precautionary principle or approach	<a href="#">10-K</a> <a href="#">Proxy</a>
102-14	Statement from senior decision-maker	<i>"At TDS, we believe that being a good corporate citizen is fundamental to our long-term success. Truly caring about our customers, our employees and associates, striving to enhance the lives of those in our communities and serving as stewards of the environment will drive the performance of</i>

		<i>our business to benefit our shareholders and debtholders over time.” - LeRoy T. Carlson Jr., President and CEO - TDS</i>
102-15	Key impacts, risks, and opportunities	<a href="#">10-K</a>
102-16	Values, principles, standards, and norms of behavior	<a href="#">TDS Code of Conduct</a> <a href="#">UScellular Code of Conduct</a>
102-17	Mechanisms for advice and concerns about ethics	<a href="#">TDS Ethics Hotline</a> <a href="#">UScellular Ethics Hotline</a>
102-18	Governance structure	<a href="#">TDS Governance</a> <a href="#">TDS Proxy</a> <a href="#">ESG Steering Committee</a> <a href="#">TDS Governance Documents</a> <a href="#">UScellular Proxy</a> <a href="#">UScellular Governance Documents</a>
102-20	Executive-level responsibility for economic, environmental, and social topics	<a href="#">ESG Steering Committee</a> <a href="#">ESG Steering Committee Charter</a>
102-32	Highest governance body’s role in sustainability reporting	<a href="#">ESG Steering Committee</a> <a href="#">ESG Steering Committee Charter</a>
102-38	Annual total compensation ratio	<a href="#">Proxy</a>
102-40	List of stakeholder groups	<a href="#">TDS Sustainability</a>
102-45	Entities included in the consolidated financial statements	<a href="#">10-K</a>
102-49	Changes in reporting	There have been no significant changes in reporting in 2019.
102-50	Reporting period	Jan 1, 2019 – Dec 31, 2019
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Julie Mathews – Director, Investor Relations, <a href="mailto:julie.mathews@tdsinc.com">julie.mathews@tdsinc.com</a> Alex Shesterkin – Corporate Relations Specialist <a href="mailto:Alex.shesterkin@tdsinc.com">Alex.shesterkin@tdsinc.com</a>
102-54	Claims of reporting in accordance with the GRI standards	See top of index.

102-56	External assurance	We are in the process of evaluating whether we will engage third-party assurance. The information currently provided is validated and assured through a review by our internal audit and accounting functions, investor relations, as well as TDS' external legal firm.
GRI 201: Economic Performance		
201-1	Direct economic value generated and distributed	TDS directly distributes economic value to its shareholders through the payment of dividends and repurchases of its common stock.
201-2	Financial implications and other risks and opportunities due to climate change	TDS believes it has minimal direct business risk exposure to climate change. The financial risk to the company primarily relates to the frequency and severity of weather events where the company offers service.
201-3	Defined benefit plan obligations and other retirement plans	TDS sponsors a defined contribution pension plan along with a defined benefit post-retirement plan that provides medical benefits to certain retirees.
201-4	Financial assistance received from government	TDS Telecom receives Federal and State USF (Universal Service Fund) support, including support from the FCC's A-CAM program. UScellular also receives support from the FCC's USF programs that are designed so that Americans have more equal access to communication services, especially remote rural communities where it is more expensive to serve. <a href="#">A-CAM</a>
GRI 203: Indirect Economic Impacts		
203-1	Infrastructure investments and services supported	UScellular and TDS Telecom, in an effort to bridge the digital

		<p>divide, are both investing heavily and bringing advanced communication technologies to the communities they serve. Since its founding in 1969, TDS has focused on serving rural and suburban markets, which have tended to be underserved due to their rural locations. TDS Telecom is making significant investments in fiber inside and out of its footprint. Fiber promises faster speeds and better reliability.</p> <p>In addition, the A-CAM program is enabling TDS Telecom to improve internet speeds in some of the hardest to reach areas of TDS' serving area. Additionally, UScellular's network modernization program and deployment of 5G technology is expected to address customers' growing demand for data services as well as opportunities for new services requiring high speed, reliability and low latency. And importantly, UScellular expects to leverage the technology to better serve rural customers and connect them to education, healthcare and entertainment solutions.</p>
<p>GRI 204: Procurement Practices</p>		
<p>204-1</p>	<p>Proportion of spending on local suppliers</p>	<p>TDS selects suppliers based on price, quality and timeliness. Where appropriate, preference is given to suppliers located in the areas we conduct business. <a href="#">Code of Conduct</a></p> <p>UScellular selects suppliers based on price, quality and timeliness. Where appropriate, preference is given to suppliers located in the areas we conduct</p>

		business and to Telephone and Data Systems, Inc.'s business units that submit closely competitive bids. <a href="#">Code of Conduct</a>
GRI 205: Anti-corruption		
205-1	Operations assessed for risks related to corruption	We want our customers, suppliers and others to know the high standards with which we operate. Our Code of Business Conduct provides the guiding principles by which we conduct all business activities. Additionally, we have a robust anti-fraud program for the prevention/deterrence of fraud and timely detection to mitigate the impact of any fraud that occurs. <a href="#">Code of Conduct</a>
205-2	Communication and training about anti-corruption policies and procedures	The company maintains a Fraud Awareness & Ethics Resource Center on its intranet site for employees to continually promote fraud and ethics awareness throughout the Enterprise by providing valuable fraud and ethics resources. Additionally, there is mandatory fraud awareness training annually for all associates across the enterprise. The company also maintains an anonymous Ethics notification program that can be accessed by telephone or the internet.
GRI 207: Tax		
207-1	Approach to tax	Proactively deliver timely, accurate, ethical and business focused tax solutions and minimize the financial impact of taxes.
207-4	Country-by-country reporting	TDS' operations are domestic - only a U.S. taxpayer.

GRI 302: Energy		
302-1	Energy consumption within the organization	The TDS Enterprise (UScellular, TDS Telecom, TDS Corporate, OneNeck IT Solutions) consumed 1.9 GJ of energy consisting of electricity, natural gas, diesel and fuel oil. Gasoline consumption is not included in the calculation.
GRI 306: Waste		
306-4	Waste Diverted from disposal	<p>UScellular’s wireless devices are recovered through its stores, direct fulfillment, and through a Trade-In program.</p> <p>Devices recovered through Take Back:</p> <ul style="list-style-type: none"> <li>• Reused or Sold 99%</li> <li>• Recycled 1%</li> <li>• Land-filled 0%</li> </ul> <p>UScellular requires its device recycling and salvage vendors to be R2 certified. In addition, it requires buyers of its devices to have an ISO 14001 certified environmental management system.</p>
GRI 401: Employment		
401-1	New employee hires and employee turnover	<p>For the year 2019, The TDS Enterprise had</p> <p>2051 New Hires 2092 Terminations</p> <p>Turnover rate: 19% (end of year 12 month rolling average, includes voluntary and involuntary)</p>
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">TDS Careers</a> <a href="#">UScellular Benefits</a> <a href="#">TDS Telecom Benefits</a>
401-3	Parental leave	For UScellular, 104 women and 93 men took paid parental leave in 2019.
GRI 403: Occupational Health and Safety		

<p>403-1</p>	<p>Occupational health and safety management system</p>	<p>UScellular has a health and safety management system consisting of 28 programs based on recognized risks. UScellular Corporation Environmental Health &amp; Safety group is responsible for the company tracking and reporting for all OSHA and EPA codes compliance. They also guide the Company's efforts to address any identified risks and prevent injuries.</p> <p>TDS Telecom recognizes the importance of providing employees with a safe and healthy work environment, free from recognized hazards, and conducting business in the safest manner possible. TDS Telecom takes the matter of safety very seriously and expects each employee to actively promote safety and accident prevention daily, and integrate the tools and training provided into their job functions.</p>
<p>403-2</p>	<p>Hazard identification, risk assessment, and incident investigation</p>	<p>UScellular utilizes investigation processes to determine a root cause and corrective action for all incidents. The Environmental Health and Safety (EHS) team reviews and tracks all incidents to look for trends and systematic issues. Employees communicate with their safety committee about potential hazards, safety questions and inquiries, then the committees assess each situation and EHS proposes preventive measures.</p> <p>TDS Telecom's Environmental Health and Safety team has processes in place to identify and assess risks. These include</p>

		an accident reporting process, emergency action plans and emergency guides.
403-4	Worker participation, consultation, and communication on occupational health and safety	UScellular's EHS team is responsible for developing and maintaining the written Safety Committee Program, based on input from the safety committees. The purpose of our safety committee is to bring associates and leaders together in a non-adversarial cooperative effort to promote safety and health in each workplace.
403-5	A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations	<p>All UScellular's EHS administered training is included in our training matrix, including job specific training. This includes First Aid/CPR/AED training, respirator training, asbestos awareness, fire extinguisher, and spill prevention, containment &amp; countermeasure training among others.</p> <p>TDS Telecom's Safety Handbook includes 11 different sections, covering a wide range of training. This includes topics on personal safety, PPE, fall protection, confined space entry, vehicle safety, hazard communication, fire safety/suppression, electrical safety, tools, air &amp; machines, office safety, and accident management.</p>
<b>GRI 404: Training and Education</b>		
404-1	Average hours of training per year per employee	<p>At UScellular, each employee completes about 14 hours of training based on internal learning management system data. External development is not currently tracked.</p> <p>At TDS Telecom, 950 Employees spent 80,300 hours in various trainings that range from</p>



		unconscious bias to safety training.
404-3	Percentage of employees receiving regular performance and career development reviews	At UScellular, all employees receive regular performance and career development reviews.  At TDS Telecom, all full-time employees receive regular performance and career development reviews.
GRI 405: Diversity and Equal Opportunity		
405-1	Diversity of governance bodies and employees	For the TDS Enterprise (UScellular, TDS Telecom, TDS Corporate and OneNeck IT Solutions): Female – 38% POC/Minority – 22% Veteran – 5% Disabled – 4%  Diversity of governance bodies: <a href="#">TDS Governance</a>
GRI 413: Local Communities		
413-1	Operations with local community engagement, impact assessments, and development programs	<a href="#">TDS Communities</a> <a href="#">UScellular Community Outreach</a> <a href="#">TDS Telecom Community Involvement</a>
GRI 414: Supplier Social Assessment		
414-1	New suppliers that were screened using social criteria	UScellular includes questions regarding social criteria in our Request for Proposal (RFP) process. Our RFP template has a series of questions about the suppliers' sustainability management & environmental practices along with social responsibility and community efforts.  <a href="#">UScellular Suppliers</a>
GRI 418: Customer Privacy		

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>UScellular and TDS Telecom do not publicly disclose this information. However, both companies are in compliance with the FCC reporting requirements and other reporting agencies.</p> <p>The TDS information security program aligns with independent, industry standard cybersecurity frameworks. Formal risk assessments are conducted annually leveraging these standards. The assessment results are used to drive continuous improvement in the TDS cybersecurity control environment. The cybersecurity risk program is reported to the TDS Audit Committee and the TDS Board of Directors. TDS assesses the threat and vulnerability landscape using various commercial, government, vendor and publicly available information sources and tools. TDS manages these evolving risks through ongoing investments in the security program.</p> <p><a href="#">TDS Privacy Policy</a> <a href="#">TDS Telecom Privacy</a></p> <p><a href="#">UScellular Privacy Policy</a> <a href="#">UScellular Transparency Report</a></p>
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