Overview

1. What Intel Expects of Intel Employees
   - Intel's Code of Conduct
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2. What Intel Expects of Suppliers
   - Supplier Expectations
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   - Anti-corruption and Bribery
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Section 1:
Intel Ethics as Business Principles
Ethics Principles

Intel is proud to be recognized worldwide as an ethical company. Having a high ethical standard helps Intel to:

- Gain and keep customers
- Attract and retain high-quality employees
- Ensure fairness, transparency, and improvement in our supply chain

As a key part of our corporate values, Intel continuously seeks to maintain the highest ethical standards worldwide.

- Intel’s Code of Conduct and ethical expectations may be more stringent than the requirements of applicable laws, or may differ with prevailing common practices or social customs of a region.
- All Intel employees are expected to comply with the Intel Code of Conduct regardless of local business practices or social customs.

Achieving excellence in ethics is good business. Intel strives to be beyond reproach worldwide.
Intel Code of Conduct

Intel conducts business with uncompromising integrity and professionalism.

- Intel complies with all applicable laws and regulations
- Intel respects competition
- Intel supports and upholds a set of core values and principles

Intel employees are held to our Code of Conduct which guides:

- How we work together to develop and deliver product
- How we define, implement, and uphold Intel values
- How we work with customers, suppliers, and others

Continuing our commitment to the highest standard of ethical performance is good business.
# Intel Code of Conduct: What We Expect of Ourselves

## Conduct Business with Honesty and Integrity
- Treat Customers and Suppliers Fairly
- Be a Responsible Corporate Citizen
- Respect Human Rights
- Prepare Accurate Financial and Other Records
- Communicate Clearly and Professionally in Business

## Follow the Letter and Spirit of the Law
- Antitrust
- Privacy
- Bribery and Anti-corruption
- Environmental, Health, and Safety
- Product Safety
- Import and Export Compliance
- Insider Trading
- Intellectual Property
- Public Communications

## Treat Each Other Fairly
- Open and Honest Communication
- Equal Employment Opportunities and Discrimination
- Anti-harassment
- Stop Human Trafficking, Child, and Forced Labor
- Safety
- Prevent Workplace Violence

## Act in Best Interests of Intel and Avoid Conflicts of Interest
- Avoid Conflicts of Interest
- Gifts and Entertainment Guidelines
- Be Aware of Perception Issues
- Disclose Known Conflicts of Interest

## Protect Intel's Assets and Reputation
- Protect Physical Assets
- Protect Confidential Information
- Safeguard Trademarks and Brands
- Represent Intel Carefully

## Ask Questions and Report Concerns
- Raise Issues Promptly
- Provide Safe Ways to Seek Guidance and Report Concerns
- Protect Against Retaliation
- Ensure Thorough and Fair Investigation
- Approvals and Waivers

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**Find detailed information on the Web:**
Intel Code of Conduct
Section 2: What Intel Expects of Suppliers

1. Supplier Expectations
2. EICC Code of Conduct
3. Supplier Sustainability
4. Anti-corruption and Bribery
5. Gifts, Meals, Entertainment, and Travel
6. Conflicts of Interest
7. Supplier Publicity and Confidentiality
8. Protecting Intel’s Assets and Classified Information
9. Privacy
10. IT Information Security and Cybersecurity
11. Accurate Records
12. PO Guidance (New)
1. Supplier Expectations

All Intel suppliers and their employees are expected to comply with Intel's supplier expectations regardless of prevailing local business practices or social customs.

Intel expects all suppliers to comply with the EICC Code of Conduct. This includes the “zero fees for workers“ expectation and EICC Definition of Fees.

Suppliers are expected to report concerns regarding ethical issues or violations of Intel’s Code of Conduct, Third-Party Gifts, Meals, and Entertainment Policy, or Anti-corruption Policy.

Reporting Hotline: Ethicspoint.com
For any potential issues or concerns
2. Elements of the EICC Code of Conduct

**Workers Treated with Respect and Dignity**
- Freely Chosen Employment
- Young Workers
- Working Hours
- Wages and Benefits
- Humane Treatment
- Non-discrimination
- Freedom of Association

**Evaluate and Control Exposure to Hazards**
- Occupational Safety
- Emergency Preparedness
- Occupational Injury and illnes
- Industrial Hygiene
- Physically Demanding Work
- Machine Safeguarding
- Sanitation, Food, and Housing
- Health and Safety Communication

**Global Environmental Stewardship**
- Environmental Permits and Reporting
- Pollution Prevention and Resource Reduction
- Hazardous Substances
- Wastewater and Solid Waste
- Air Emissions
- Materials Restrictions
- Storm Water Management
- Energy Consumption and Greenhouse Gas Emissions

**Uphold the Highest Standards**
- Business Integrity
- No Improper Advantage
- Disclosure of Information
- Intellectual Property
- Fair Business, Advertising, and Competition
- Protection of Identity and Non-retaliation
- Responsible Sourcing of Minerals
- Privacy

Intel focus areas ensuring supply chains are free from forced labor practices, environmental responsibility in your global and local operations and upholding the spirit and letter of the law.
3. Supplier Sustainability

Intel's Program to Accelerate Supplier Sustainability (PASS) focuses on improving supplier sustainability programs by establishing a minimum expectation of conformance and compliance, requiring greater sustainability transparency, and increasing supplier emphasis on environmental footprint.

Intel expects suppliers to comply with:
- Intel Code of Conduct and EICC Code of Conduct
- Completion of Supplier Ethics and Expectations annual training
- Support Intel's Corporate Priorities, including its 2020 goals and its Conflict-Free sourcing initiatives
- Regulatory reporting for areas such as Conflict Minerals and Product Ecology as required by law

Intel is committed to collaborating with our suppliers to achieve higher levels of transparency and to solve complex challenges such as conflict minerals.
4. Anti-Corruption and Bribery

Intel strictly prohibits all forms of bribery or kickbacks.

As an Intel supplier, we expect that you will:

- Comply with anti-corruption laws
- Observe Intel anti-corruption policies and contractual provisions
- Maintain accurate financial records
- Train your employees and third parties
- Report to Intel any issues or concerns

Intel expects the same high level of integrity, standards of conduct, and professionalism from our suppliers as we do from our employees.

- Intel expects our Suppliers to comply with all anti-corruption laws and to accurately document all transactions conducted on behalf of Intel.
- As part of Intel’s anti-corruption program, Intel conducts risk-based anti-corruption due diligence on its third parties.
- Train your current and new employees on Intel’s Third Party Anti-Corruption and Third Party Gifts, Meals, Entertainment, and Travel policy expectations. Ensure your employees comply with these expectations.

If an Intel employee asks your company to pay a bribe or asks for a bribe, a kickback or anything of value, report this immediately at Ethicspoint.com, (a non-Intel site).
5. Gifts, Meals, Entertainment and Travel (GMET)

The exchange or provision of gifts, meals, entertainment or travel ("GMET") may create a real or perceived conflict of interest or a situation where those types of expenses could be viewed as a bribe under applicable laws and international standards. Intel expects its Third Parties to comply with the following principles when giving or receiving GMET:

- Compliance with applicable law
- Business purpose
- No improper influence
- Made openly
- Reasonable in value
- Appropriate
- Accurately recorded
- Government GMET
- Intel suppliers are discouraged from giving gifts to Intel employees
- Report Ethics and Legal Concerns

If a gift would create, or appear to create, an improper or unfair obligation, it could be viewed as a bribe or create a conflict of interest.
6. Avoid Conflict of Interest

All Intel employees and supplier employees are expected to disclose and remove conflicts of interest that would interfere or appear to interfere with ability to make sound business decisions in the best interest of their respective employer.

Examples of potential conflict of interest situations:

- Offering or accepting gifts especially when in position to influence business with the supplier
- Using Intel information, assets, or position for personal gain (or gain by relatives or friends)
- Hiring, supervising, or evaluating friends or relatives
- Intel employee or family member having an ownership interest in a supplier business
- Service as director or advisor to a supplier outside of official Intel position

Intel employees must avoid any activity which may interfere or appear to interfere with the proper performance of their duties.

We ask our Suppliers to disclose any conflicts of interest at Ethicspoint.com
7. Supplier Publicity and Confidentiality

Use of Intel's brand, logo or name

Intel Corporate Purchase Agreements, Purchase Orders, and General Contractor Agreement specify that suppliers may **not:**

- Use any Intel logos without a written license
- Use the Intel name to advertise your products, goods, or services
  - *Rare exceptions may be granted with prior written approval by Intel Senior Management*
- Disclose Intel as a customer or release information about relationships with Intel, by name or by an indirect or descriptive reference
- Represent themselves as acting on Intel’s behalf unless specifically authorized in writing by Intel Senior Management
- Make donations, gifts, etc. on Intel’s behalf

*Use of Intel Name, Logo is restricted. Do not use Intel's name or logos.*
8. Protect Intel Assets and Classified Info

Intel's assets include but are not limited to:

- **Intel funds**
- **Trade Secrets, Classified Information, and other Intel Intellectual Property (IP)**
  - Suppliers with access to classified information must sign a non-disclosure agreement (NDA) which provides that they not disclose Intel classified information to a third party and vice versa.
  - Appropriate privacy and security measures must be in place to address data handling, access requirements, data protection, storage, and transmission.
  - Contingent Workers (CWs) may not attend Intel-sponsored meetings and events unless specifically invited by the Intel business group and approved by the Intel CW Policy Team. CWs may attend Intel business meetings only where needed for specific project- or task-related reasons; then must be excused.
- **Materials, equipment, or buildings**
  - **NOTE:** Some areas of Intel facilities are “off limits” to contractors and suppliers

Suppliers are expected to protect Intel financial, intellectual, and physical assets. Intel assets must not be sold, loaned, given away, or modified without Intel's direction.
9. Privacy Policies

Intel is committed to protecting privacy expectations of its employees, customers, and suppliers. The Intel Privacy Notice and Intel Corporate Privacy Rules define our commitment.

In addition to compliance to country-specific privacy laws, Intel expects suppliers to adhere to the following privacy principles in governing the collection, processing, and use of personal info.

1. **NOTICE and PURPOSE**
   - Inform individuals of the personal data being collected and how it will be used.

2. **MINIMIZATION**
   - Only collect what is needed and do not re-purpose.

3. **CHOICE**
   - Do not pre-select the “opt-in” choice as the default, give individuals a choice.

4. **TRANSFER**
   - Do not share information beyond originally defined limits without further consent.

5. **ACCESS and ACCURACY**
   - Provide individuals with reasonable access to their personal data to view/remove.

6. **SECURITY**
   - Use industry security methods to protect personal information from loss and misuse.

7. **RETENTION**
   - When you don’t need it, delete it!

8. **HANDLING COMPLAINTS**
   - Provide user-friendly methods for owners of data to update or correct inaccurate data.
10. IT Information Security Policies and Cybersecurity

Suppliers must have an Information Security Policy in place which meets applicable industry standards and which is subject to review by Intel under a Non-Disclosure Agreement (NDA)

Supplier Information Security policy must:
- Comply with the laws, regulations, operational procedures and systems security configurations implemented
- Reviewed on a regular basis by the Supplier
- Provide governance for all platforms deployed including mobile computing and Small Form Factor (SFF) devices that require access to Intel data or Intel operated systems

Cybersecurity

Consider improving critical infrastructure cybersecurity when establishing systems for managing the security of Intel’s information

NIST Framework for Improving Critical Infrastructure Cybersecurity >
Intel Supplier Guidelines and Cybersecurity Framework >
11. Keep Accurate Business Records

Intel requires keeping accurate financial and other books and records

- Both Intel and Suppliers must keep accurate business records during the course of their relationship.

- Contractual and Legal requirements also require retention of such records for a period of time beyond termination of the relationship.

- Intel does not permit or otherwise allow or condone falsification of documents.

Immediately report to Intel Management any attempt to falsify information in Intel's records—or the appearance of doing so.
12. Purchase Order Guidance

Scope of Work:
- Execute activity according to the agreed upon scope of work. If changes happen, work with program owner to get a new PO.
- Suppliers are accountable for any third party suppliers that you manage as required for the scope of work.

PO Amount:
- Amount should agree with the scope of work definition in quotation.
- There should be one PO per quotation
- Do not apply any balance of the PO amount to other activities outside of PO line item amount and description should align with contracted/agreed-on rate.

Proper timing:
- No PO, No Work: Insist on receiving a PO before you start work.
- Submit any pre-agreed proof of performance before submitting the invoice
- Payment timing for staggered payments must be reflected in scope of work
- Invoice only the work that has been completed
Section 3: Reporting Responsibility
Suppliers Expected to Report Issues

Intel expects our suppliers to report issues!

- We do not tolerate any retaliation against anyone who in good faith reports possible violations of law, the Code, Anti-corruption Policy or other company guidelines, or who asks questions about on-going or proposed conduct. Employees who attempt to retaliate will be disciplined.
- Intel investigates each allegation thoroughly to determine the facts and the parties involved.

Suppliers should report to Intel Management any potential ethical issues or violations of Intel's Code of Conduct or Anti-corruption Policy:

- By Intel employees or supplier employees or supplier third parties
- Dangerous or exploitative working conditions
- Ethical issues in the procurement process
- Any other issue which could alter the Intel-Supplier relationship (example: government investigations)

Report issues at Ethicspoint.com or Ethics.reporting@intel.com
Reports Lead to Investigations

When Intel receives a report alleging ethical wrong-doing:

- An independent and objective Intel team investigates
- A prompt and confidential review of the case can be expected

If the facts support the allegation, Intel takes appropriate action:

- Potential consequences to all parties involved (e.g., Intel employees, suppliers, other third parties)
- May require reporting to governmental authorities for further investigation and/or prosecution

Intel takes all reports of ethical wrong-doing seriously. Investigations are independent and confidential.
How to Report

**Notify Intel Management any way you wish:**
- Phone call, e-mail, fax, letter
- Signed or anonymous (*where allowed by law*)
- Anonymous reports may limit Intel’s ability to follow up on an allegation
- Sometimes we need clarification or more information in order to verify the allegation
- English or local language

**Multiple contact points for raising issues**
- Local Intel representatives
- Intel Internal Audit
- Intel Security
- [Ethics.reporting@intel.com](mailto:Ethics.reporting@intel.com) (monitored by Internal Audit)
- Ethics phone line available 24x7 in 200+ different languages. The number can be found at: [http://Ethicspoint.com](http://Ethicspoint.com)

Also see the Ethics info on [supplier.intel.com](http://supplier.intel.com) web site for phone numbers, email and contacts for reporting issues.
Section 4: Consequences of Wrongdoing
Violations Lead to Consequences

Violation of the Code of Conduct, Anti-corruption Policy, or Intel's ethical expectations may result in disciplinary action

- Intel employees: up to and including termination of employment.
- Suppliers: up to and including termination of supplier agreements with Intel and banning future contracts with that supplier.
- Supplier employees (including contingent workers at Intel): denial of access to Intel or removal from Intel's premises.

Intel may take legal action and seek damages or restitution (as appropriate).
SUMMARY
Summary of Expectations

Intel conducts business with uncompromising integrity and professionalism:
Striving to be Beyond Reproach, Worldwide.

Ethics violations are unacceptable to Intel
- We investigate and take such action as is appropriate to the facts.
- Suppliers need to report all such issues (actual or suspected), so Intel can investigate and act.

Help Intel maintain the highest level of integrity in all business dealings
- Establish an ethical business culture.
- Train your employees on Intel’s ethics requirements and expectations as established by the Intel Code of Conduct, EICC Code of Conduct and Anti-corruption Policy.
- Create an environment where employees and our suppliers can raise concerns without fear of retaliation.
- Support and implement fair supplier selection and management processes.

We value your support and participation in meeting this key goal!