



Intel Ethical Expectations for Suppliers and their Employees

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OVERVIEW

Ethics Business Principles

- Intel's Code of Conduct
- Intel's Anti-Corruption Policy
- Supplier Ethics Expectations
- Electronic Industry Citizenship Coalition (EICC)

Ethics Expectations and Key Policies

- Bribes, Kickbacks and Commissions
- Gifts and Gratuities
- Conflicts of Interest
- Use of Intel's Name
- Protecting Intel's Assets
- Accurate Records

Reporting Responsibility

Consequences of Wrongdoing

Summary



Intel Ethics as Business Principles



Intel Code of Conduct

Intel conducts business with uncompromising integrity and professionalism.

- Intel complies with all applicable laws & 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

All Intel employees must abide by the Code of Conduct when conducting Intel-related business.

Intel Code of Conduct vs. Local Practices

- **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 conflict 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.**

The GOAL: Be Beyond Reproach Worldwide

Principles - Intel Code of Conduct

Conduct Business with Honesty & Integrity

Communicating Clearly & Professionally in Business

Conducting Business with Customers, Suppliers, & Others

Being a Responsible Corporate Citizen

Preparing Accurate Financial and Other Records

Follow the Letter & Spirit of the Law

Antitrust

Bribery & Anti-corruption

Environmental Management & Compliance

Import & Export Compliance

Insider Trading

Intellectual Property

Privacy

Public Communications

Treat Each Other Fairly

Open & Honest Communication

Equal Employment Opportunities and Discrimination

Anti-Harassment

Safety

Act in Best Interests of Intel & Avoid Conflicts of Interest

Conflict of Interest Examples

Handling Conflicts of Interest

Gifts & Entertainment

Protect Intel's Assets and Reputation

Protecting Physical Assets

Maintaining Information Security

Safeguarding Trademarks & Brands

Representing Intel

Ask Questions & Report Concerns

Raising Issues

Ways to Seek Guidance and Report Concerns

What to Expect After Raising an Issue

Approvals and Waivers

Find detailed information on the Web:

[Intel Code of Conduct](#)

Intel Anti-Corruption Policy

- **Intel strictly prohibits all forms of bribery**
- **We must never offer, promise or accept bribes or kickbacks** and must not participate in or facilitate corrupt activities of any kind
- **Intel expects all suppliers to comply** with Intel's Anti-Corruption Policy and Code of Conduct
- **Intel further expects its Suppliers and their employees to prohibit bribery and corruption in any form** and to communicate these expectations to their third parties as well.

EXPECTATIONS & GOAL:
Be Beyond Reproach Worldwide

Supplier Ethics Expectations

- All Intel suppliers and their employees are expected to **comply with Intel's ethical expectations** regardless of prevailing local business practices or social customs.
- Suppliers are expected to **report concerns** regarding ethical issues or violations of Intel's Code of Conduct or Anti-Corruption Policy.
- Intel expects its suppliers to **comply with all applicable antitrust laws.**

Public Ethics & Compliance Hotline for reporting at
<http://Ethicsline.intel.com>

Elements of the EICC Code of Conduct

All Intel employees and supplier employees must follow the proper safety precautions and safeguards that apply to our job and workplace.



EICC Code of Conduct

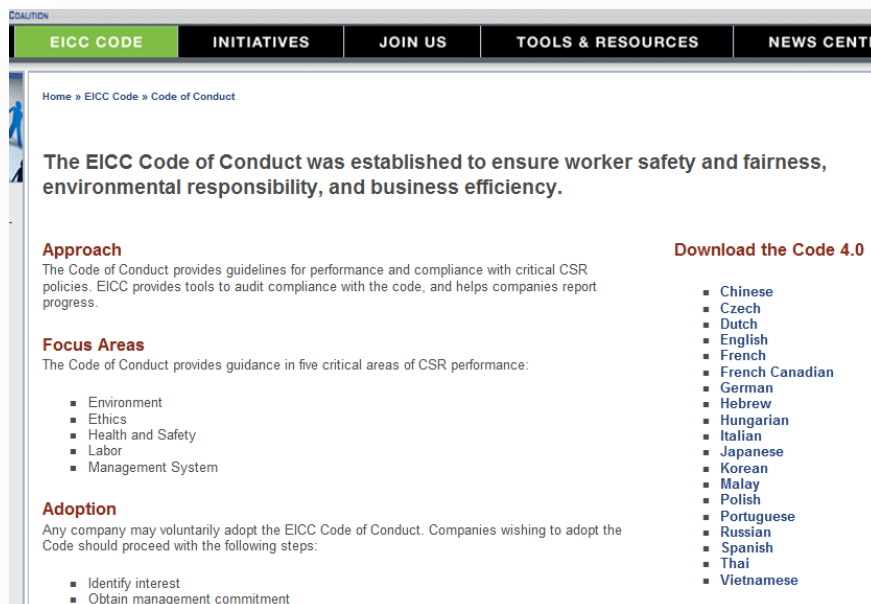
We ask you, as a Supplier to Intel, to review the EICC Code of Conduct in detail.

You will find this online at <http://www.eicc.info/>

- In top menu, mouse over EICC CODE, and click on Code of Conduct.
- On that next page, you will find on right "Download the Code 4.0" section.
- Download the language version most appropriate for you and your company; the EICC Code is available in 19 languages.

Intel has been a member of the Electronic Industry Citizenship Coalition ("EICC") since 2004.
Our suppliers must comply with the EICC.

For more info, please see
<http://supplier.intel.com/ehs/materials.htm>



Ethics Principles

- **Intel is proud to be recognized worldwide as an ethical company.**
- **We expect uncompromising integrity and professionalism in our business relationships.**
 - Helps to assure fairness in our supplier selection and management processes.
 - Protects our corporate reputation and enables expanded business with our customers.

Continuing our commitment to the highest standard of ethical performance is good business.

ethical performance is good business.

Ethical Expectations and Key Policies



Bribes and Kickbacks

CORRUPTION

Your NO counts



Anti-Corruption Laws & Regulations

- Most countries have bribery and other anti-corruption laws that **prohibit bribery of government officials by companies and individuals** and laws that **prohibit commercial bribery**.
- Regulatory agencies around the world, including the U.S. Dept. of Justice, Securities Exchange Commission and the U.K. Serious Fraud Office, are **aggressively enforcing anti-corruption laws**, including matters related to:
 - Bribery
 - Inadequately documented transactions, books and records or internal controls
 - Potential corrupt activities of third parties or intermediaries who act on behalf of companies

Train your current and new employees on Intel's ethical and legal compliance expectations

Ensure that your employees comply with Intel's ethical and legal compliance expectations

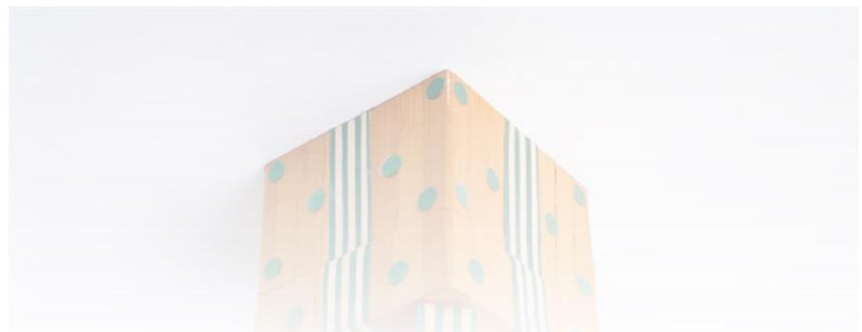
Prohibit Bribery and Corruption

- **Intel's Code of Conduct and Anti-Corruption Policy prohibits all forms of bribery and corruption.** This means:
 - Compliance with all anti-corruption laws, regulations and all national and local laws.
 - Accurate documentation for all transactions
- **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 is conducting risk based anti-corruption due diligence on its third parties.
 - Intel expects its Suppliers and their employees to prohibit bribery and corruption in any form and to communicate these expectations to their third parties as well.

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 to Intel at
<http://Ethicsline.intel.com>

<http://Ethicsline.intel.com>

Gifts and Gratuities



Intel Gifts & Gratuities Policy

- **Intel values our business relationship with suppliers based on their performance.**
 - Future business from Intel is based on the supplier's ability to deliver on cost, performance, and quality of the goods and services we buy.
- **The Intel Code of Conduct:**
 - Forbids our employees from soliciting gifts, entertainment or favors.
 - Strictly limits our employees' ability to accept gifts.
 - Prohibits cash gifts of any kind to or from employees.
- **Intel prefers that suppliers do not give gifts to our employees and appreciates your support on this request.**

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.

Conflict of Interest



Avoid Conflict of Interest

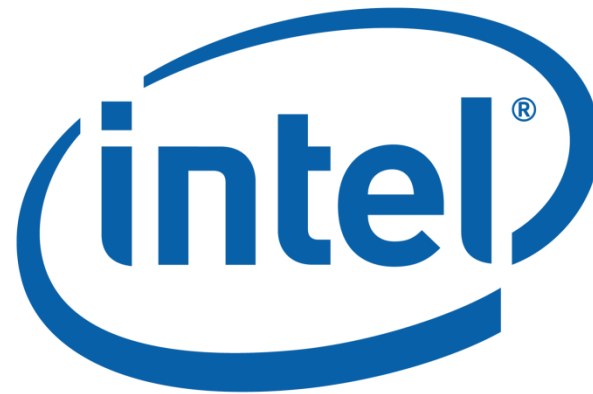
- A conflict of interest occurs when an Intel employee's personal or family interests interfere—or even appear to interfere—with the employee's ability to make sound business decisions in the best interest of Intel.
- **Examples of potential conflict of interest situations:**
 - Offering or accepting gifts
 - Using Intel information or position for personal gain (or gain by relatives or friends)
 - Hiring, supervising or evaluating friends or relatives
 - Intel employee having an ownership interest in a supplier business
- 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
<http://Ethicsline.intel.com>

Use of Intel Name by Suppliers

Intel
Corporation

Intel®



Use of Intel Name, Logo is Restricted

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.

Do not use Intel's name or logos

Misrepresentation and Use of Intel's Name

- **Suppliers may not represent themselves as acting on Intel's behalf -**
 - unless specifically authorized in writing by Intel Senior Management.
- **Suppliers may not**
 - Make donations, gifts, etc. on Intel's behalf.
 - Intel has our own charitable giving programs
 - Make improper payments, pay bribes or kickbacks, etc. on Intel's behalf.



Protecting Intel Assets and Classified Information



Protect Intel Assets and Classified Information

- **Equipment and buildings**

- ✓ **NOTE:** Some areas of Intel facilities are “off limits” to contractors and suppliers

- **Intel-sponsored meetings and events**

- 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.
 - ✓ **NOTE:** Supplier employees who connect to Intel’s network or have access to Intel’s classified information will be required to take additional Intel Information Security and Privacy training.

Intel expects our Suppliers to be Leaders and Role Models in protecting Intel assets and confidential information.

(CONTINUED)

Protect Intel Assets and Classified Information

These 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. Compliance with Intel's security and privacy requirements is expected.

- **Tangible Assets (i.e.. materials or equipment)**



Privacy Policies

Intel is committed to protecting reasonable privacy expectations of its employees, customers, and suppliers.

- The [Intel Privacy Notice](#) and [Intel Corporate Privacy Rules](#) define our commitment.

- Intel acknowledges country specific privacy laws which govern the appropriate collection and use of personal information of it's citizens.

- Personal information definition:

Any information relating to an identifiable individual



Privacy Principles
Notice
Purpose
Minimization
Choice
Transfer
Access and Accuracy
Security
Retention
Complaint Management

Privacy requirements for personal data collection and use:

- **NOTICE & PURPOSE** – Inform individuals of the personal data being collected and how it will be used.
- **MINIMIZATION** - Only collect what is needed and do not re-purpose.
- **RETENTION** – When you don't need it, delete it!
- **CHOICE** - Do not pre-select the "opt-in" choice as the default, give individuals a choice.
- **ACCESS** - Provide individuals with reasonable access to their personal data to view/remove.

Accurate Records



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.

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 an Intel employee or supplier employees or supplier third parties
- Ethical issues in the procurement process
- Any other issue which could alter the Intel-Supplier relationship (example: government investigations).

Report issues at <http://Ethicsline.intel.com> or Ethics.reporting@intel.com

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** (monitored by Internal Audit)
- **Ethics phone line available 24x7** in 200+ different languages. The number can be found at:
<http://Ethicsline.intel.com>



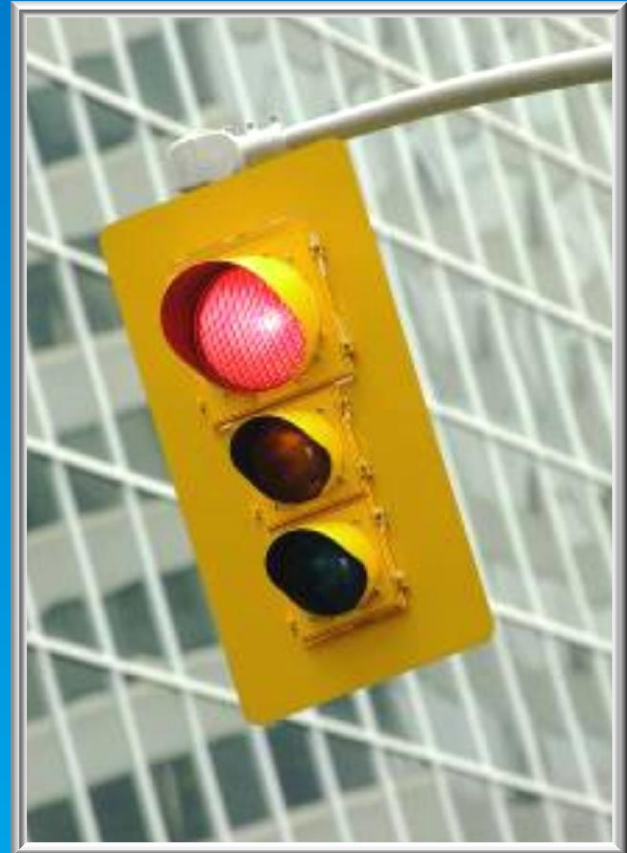
Also see the Ethics info on supplier.intel.com website for phone numbers, email and contacts for [reporting issues](#)

Reports Lead to Investigations

- **When Intel receives a report alleging ethical wrong-doing:**
 - Independent and objective Intel team investigates
 - Prompt and confidential review of the case
- **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



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 Ethical 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 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 & participation in meeting this key goal!

