



Intel Code of Conduct

JANUARY 2015

From Intel's CEO

Intel has consistently been recognized as one of the world's leading corporate citizens and most ethical companies. I would like to thank you for your contribution in role modeling Intel values and maintaining our reputation as a company that is well respected, trusted, and admired.

As we embrace new challenges and increase our presence in rapidly changing markets, one thing that must never change is our unflagging commitment to our values and the highest ethical standards. These core values and standards are the foundation of the unique Intel culture that differentiates us, builds our brand, and inspires our customers and suppliers.

Our Code of Conduct is and will always be our steady compass. The Code sets the expectations for integrity and ethics that I expect all employees to follow. Read it, discuss it, and commit to upholding it. If you have any questions or concerns please contact your manager, your Business Group lawyer, the [Ethics Program Office](#) or any member of [Intel Ethics & Legal Compliance](#).

I look forward to your continued commitment to live our values in the workplace each and every day.

Brian Krzanich
Chief Executive Officer

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A Culture of Uncompromising Integrity

Since the company began, uncompromising integrity and professionalism have been the cornerstones of Intel's business. In all that we do, Intel supports and upholds a set of core values and principles. Our future growth depends on each of us understanding these values and principles and continuously demonstrating the uncompromising integrity that is the foundation of our company.

The Code of Conduct sets the standard for how we work together to develop and deliver product, how we protect the value of Intel and its subsidiaries (collectively known as 'Intel'), and how we work with customers, suppliers, distributors and others. All of us at Intel must abide by the Code, our Employment Guidelines, and other applicable policies when conducting Intel-related business.

Our Vision

If it is smart and connected, it is best with Intel.

Our Values

Customer Orientation

We Strive To:

- Listen and respond to our customers, suppliers and stakeholders
- Clearly communicate mutual intentions and expectations
- Deliver innovative and competitive products and services
- Make it easy to work with us
- Excel at customer satisfaction

Discipline

We Strive To:

- Conduct business with uncompromising integrity and professionalism
- Ensure a safe, clean and injury-free workplace
- Make and meet commitments
- Properly plan, fund and staff projects
- Pay attention to detail

Quality

We Strive To:

- Achieve the highest standards of excellence
- Do the right things right
- Continuously learn, develop and improve
- Take pride in our work

Risk Taking

We Strive To:

- Foster innovation and creative thinking
- Embrace change and challenge the status quo
- Listen to all ideas and viewpoints
- Learn from our successes and mistakes
- Encourage and reward informed risk taking

Great Place to Work

We Strive To:

- Be open and direct
- Promote a challenging work environment that develops our diverse workforce
- Work as a team with respect and trust for each other
- Win and have fun
- Recognize and reward accomplishments
- Manage performance fairly and firmly
- Be an asset to our communities worldwide

Results Orientation

We Strive To:

- Set challenging and competitive goals
 - Focus on output
 - Assume responsibility
 - Constructively confront and solve problems
 - Execute flawlessly
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Your Responsibility

Intel's Code of Conduct applies to all employees and sets expectations for Intel Corporation and its subsidiaries (referred to collectively as 'Intel') as well as our non-employee members of the Board of Directors regarding their Intel-related activities. The Code of Conduct also applies to independent contractors, consultants, suppliers and others who do business with Intel.

Specifics on seeking guidance and reporting ethical concerns, as well as other specifics, such as supplemental policies or guidelines related to this Code of Conduct, may differ by company and/or country and are subject to local laws.

Employees are encouraged to review the Code of Conduct Frequently Asked Questions and other related resources for further guidance. If you have questions on how the Code of Conduct may apply, please contact Legal.

Code Principles

The Code affirms Intel's five principles of conduct:

- **Conduct business with honesty and integrity.** Conduct business with uncompromising integrity and professionalism, demonstrating honesty and high ethical standards in all business dealings and treating customers, suppliers, distributors, and others with fairness, honesty and respect.
- **Follow the letter and spirit of the law.** Ensure that business decisions comply with all applicable laws and regulations of the many countries in which Intel does business.
- **Treat each other fairly.** Work as a team with respect and trust for each other.
- **Act in the best interests of Intel and avoid conflicts of interest.** Avoid situations where our personal or family interests interfere — or even appear to interfere—with our ability to make sound business decisions in the best interest of Intel.
- **Protect the company's assets and reputation.** Protect the value of Intel's assets, including physical assets, intellectual property, confidential and proprietary information, Intel brands, and its name and reputation as well as the confidentiality of information of our customers, suppliers and employees.

Asking Questions and Reporting Concerns

Each employee is responsible for reading, understanding, and following the Code. Employees who violate the Code are subject to discipline, up to and including termination of employment. Anyone who violates the law may also be subject to civil and criminal penalties.

To help our company conduct business with uncompromising integrity and professionalism, every employee has an obligation to report possible violations of the law, the Code, and other company guidelines.

Ways to Seek Guidance and Report Concerns

Because the Code cannot address every situation, you will need to seek guidance whenever unsure of the correct course of action. There are many ways to ask questions about the Code or raise issues.

All employees of Intel Corporation and Intel subsidiaries are encouraged to ask questions or raise concerns with their direct manager or internal groups who specialize in handling such questions or issues, including Human Resources, Internal Audit, Security and Legal as soon as possible after they arise. Employees can also report ethics and compliance issues on-line through the [Ethics Reporting Form](#) (requires Intel network access) or by calling the [Intel Ethics & Compliance Line](#). Both tools allow for anonymous reporting where allowed by law. Employees can also send an email to ethics.reporting@intel.com. For other work related concerns, contact your manager or any manager in your direct management chain, the confidential reporting e-mail account at harassment.concerns@intel.com, [Get HR Help](#), your Human Resources representative, or [HR Legal](#).

In accordance with the Open Door policy, employees of Intel Corporation are encouraged to raise issues about the Code with any manager, such as a department head, a division general manager, or another manager up to and including the Executive Office, or raise general Code of Conduct questions by contacting ask.ethics@intel.com. Employees of Intel subsidiaries may have additional reporting channels.

Managers and employees who learn of a possible violation of law, regulation, or corporate legal policy must immediately report that concern to Legal, HR Legal, or Internal Audit.

We take all reports seriously, look into the matter, and take appropriate action. All employees of Intel and its subsidiaries are required to cooperate fully with internal investigations and employees who fail to do so are subject to disciplinary action up to and including termination of employment, in accordance with applicable local laws. For investigations into alleged violations of the National Labor Relations Act, an employee's participation is voluntary. Employees are strongly encouraged to provide honest, truthful and complete information in any internal investigation.

Non-Retaliation Policy

We do not tolerate any retaliation against anyone who in good faith reports possible violations of law, the Code, or other company policies or procedures, or who asks questions about on-going or proposed conduct. Employees who attempt to retaliate will be disciplined.

Employees who believe they have experienced retaliation for reporting possible violations should contact a local representative in Human Resources or Legal.

Conduct Business with Honesty and Integrity

One of our core values is to conduct business with uncompromising integrity and professionalism. We put this value into practice by:

- Communicating clearly, respectfully, and professionally in business,
- Treating customers, suppliers, distributors, and others fairly,
- Acting as a responsible corporate citizen, respecting human rights, and managing the impact of our business on the world around us, and
- Keeping accurate financial and other books and records.

Communicating Clearly and Professionally in Business

We value clear, respectful and professional communication in all of our business interactions. Ambiguous and unprofessional communications – whether oral or written – can harm Intel. Even well-intentioned communications can be misinterpreted. Examples of communications include email, presentation materials, voicemails, text messages, and instant messaging, as well as content in social media and websites.

Conducting Business with Customers, Suppliers, Distributors and Others

Our success is based on strong relationships of mutual respect and trust with our customers, suppliers, distributors and others. To maintain these strong relationships, we treat everyone we deal with the way we would expect to be treated: with fairness, honesty, and respect.

In our marketing and in our interactions with customers and potential customers, we always represent Intel products and services fairly and accurately.

We expect our suppliers to comply with all applicable laws and regulations, Intel's Code of Conduct and the corporate responsibility principles consistent with the Electronic Industry Citizenship Coalition (EICC) Code of Conduct. We expect our suppliers to hold their direct supply chain accountable to these expectations.

Independent contractors, consultants, suppliers, distributors and others who conduct business with Intel risk termination of their relationship with Intel for violations of the Code.

Transactions with the U.S. Government may be regulated and be subject to special rules. When conducting business with the U.S. Government, Intel employees or others acting on Intel's behalf, must comply with requirements set out in our [Corporate Policy Statement: U.S. Government Business \(CPS\)](#).

Being a Responsible Corporate Citizen

Intel has a long-standing, global reputation as a responsible corporate citizen. For us, corporate responsibility means achieving business success in ways that demonstrate respect for people and the planet and uphold the values and high standards of ethics expressed in our Human Rights Principles and our Environmental, Health and Safety Policy. Intel is a leader in supporting education and enhancing the communities in which we live and work.

As reflected in our Corporate Social Responsibility Report, we demonstrate respect for people and the planet and ask all our employees to consider the short and long-term impacts to the environment and the community when they make business decisions. In all our activities, we need to uphold Intel's long-standing, global reputation as a role model for ethical and socially responsible behavior.

Preparing Accurate Financial and Other Records

Our financial and other business records shape the business decisions we make. We are responsible for ensuring that Intel's books and records are full, fair, accurate, timely, and understandable reflections of the company's operations and business activities.

Any records required by our jobs, such as contractual arrangements, time cards and expense reports must be accurate, complete and properly authorized. If questions arise, ask a direct or other manager for assistance. If you become aware of records that may be inaccurate, report the situation immediately to Finance or Legal. We do not support or condone preparing false records under any circumstances.

We employ auditors to ensure that the way we conduct business and keep records is consistent with relevant accounting standards. We must cooperate with auditors and ensure that anyone acting under our direction also cooperates with auditors.

Follow the Letter and Spirit of the Law

As a global company Intel must comply with the laws of the many countries in which it does business. We are each responsible for knowing and following all applicable laws or regulations.

We also must act in a manner that upholds the spirit and the intent of the law. Where the Code or company guidelines differ from local laws or regulations, we must always follow the higher standard. If you believe the requirements of the Code conflict with local law, consult Legal.

Violations of laws and regulations have serious consequences, both for the company and for the individuals involved. Therefore, when questions arise on these or other legal matters, you should always seek guidance from Legal.

Some of the legal topics we encounter include antitrust, anti-corruption, environment, import-export, insider trading, intellectual property, privacy, and public communications.

Antitrust

Antitrust laws, sometimes also called competition laws, govern the way that companies behave in the marketplace. Antitrust laws encourage competition by prohibiting unreasonable restraints on trade. The laws deal in general terms with the ways companies deal with their competitors, customers, and suppliers. Violating antitrust laws is a serious matter and could place both the company and the individual at risk of substantial criminal penalties.

In all regions and countries where we do business, we are committed to competing vigorously but fairly for suppliers and customers.

To adhere to antitrust laws, we must not:

- Communicate with any competitor relating to price, any term that affects pricing, or production levels,
- Divide or allocate markets or customers,
- Agree with a competitor to boycott another business, or
- Put inappropriate conditions on purchases or sales.

Our antitrust policy and standards are set out in Intel Corporation's Antitrust and Competition Law Worldwide Policy and Standards. When questions arise, contact Legal for guidance.

When dealing with distributors, we need to follow our company pricing and merchandising policies carefully. The executive responsible for distribution sales and marketing for a geographic area will have more particular information regarding local procedures to be followed in dealing with distributors in that area and can answer questions.

Bribery and Anti-Corruption

Many countries have bribery and other anti-corruption laws that are intended to prevent companies and individuals from gaining an unfair business advantage and from undermining the rule of law. Many laws also define facilitation payments as bribes and prohibit the payment of facilitation payments to government officials or employees. We do not make facilitation payments on behalf of Intel to any government official or employee or anyone else acting in an official capacity. We must never offer or accept bribes or kickbacks, and must not participate in or facilitate corrupt activities of any kind. Intel strictly prohibits all forms of bribery.

Prohibitions on offering or paying any form of bribes also apply to third parties acting on Intel's behalf, such as contractors, consultants or distributors. We must never engage a third party who we believe may attempt to offer a bribe to conduct company business. Our anti-corruption

expectations for third parties are set out in our [Supplier Anti-Corruption Policy](#) and [Third Party Gifts, Meals, Entertainment and Travel \(GMET\) Policy](#).

When doing business with governments, consult with Legal to be certain you are aware of any special rules or laws that apply. Obtain the required approvals in our third-party gifts, meals, entertainment, and travel policy before providing anything of value to a Government Official.

Environmental, Health and Safety Management and Compliance

A number of environmental laws, standards, requirements, and policies apply to our worldwide business operations, practices, and products. We have a responsibility to understand and follow these requirements, including:

- Conserving energy, water, raw materials and other natural resources,
- Managing materials and wastes properly, and
- Complying with environmental permits and health and safety requirements.

We support a precautionary approach to the materials used in our products and strive to reduce and minimize the use of hazardous materials and the environmental impact of our manufacturing technologies.

We expect our suppliers and others to comply with all applicable environmental, health and safety laws and standards in their operations.

Import and Export Compliance

In every country in which we do business, laws and regulations govern imports and exports. Many of these laws and regulations restrict or prohibit the physical shipment of our products or the transfer or electronic transmission of software and technology to certain destinations, entities, and foreign persons. In many cases, the law requires an export license or other appropriate government approvals before an item may be shipped or transferred.

We have a responsibility to comply with these laws and regulations. Therefore, we must clear all goods through customs and must not:

- Proceed with a transaction if we know that a violation has occurred or is about to occur,
- Transfer controlled software and technology unless appropriate authorizations are obtained; or
- Apply an inappropriate monetary value to goods and services

Violations, even inadvertent ones, could result in significant fines and penalties, denial of export licenses, loss of export privileges, and/or customs inspections and delays. Because these laws and regulations are complex and unique in each country, we provide guidelines and training.

Insider Trading

Many countries have insider trading laws that restrict securities trading and other activities by anyone who is aware of material, non-public information. Material, non-public information is any information not generally known to the public that a reasonable investor might find significant in executing transactions to buy or sell securities in a company.

Any employee who is aware of material, non-public information regarding Intel or any other company must not:

- Trade in or execute transactions regarding that company's stock or other securities,
- Disclose that information to others who may buy or sell securities because of the information, or
- Otherwise use the information for personal advantage or the personal advantage of others.

When you have regular access to material, non-public information concerning Intel or another company, you need to take special care in planning securities trades. Intel has guidelines and policies to help you plan transactions consistent with the requirements of the securities laws.

Directors, officers, and senior employees (Intel Corporation grade levels 10 and above or equivalent grades at Intel's subsidiaries) may not invest in (buy or otherwise receive or sell) derivatives of Intel securities, such as puts, calls, and forward contracts, or enter into any short sales or short positions (positions that allow the person to profit if the price of Intel securities goes down) with respect to Intel securities, with the limited exceptions noted in Intel's derivative securities guideline.

Intellectual Property

Intellectual property rights are crucial to protecting the investments that companies and individuals make in developing new products and ideas. We protect our intellectual property and respect the intellectual property rights of others.

We may not copy, reproduce, or transmit protected material, such as writing, artwork, music, video, photographs, movie clips and software unless we have authorization or license.

We must use the confidential information of Intel or others only for business purposes and disclose it only to those who are authorized and have a need to know. Even after we leave Intel employment, we must continue to protect confidential information (whether Intel's or another party's) and not use or disclose it without authorization.

Furthermore, we must not request or encourage anyone to use or disclose privileged, proprietary, or confidential information unless they are authorized to do so by the owner of that information.

Privacy

Many countries have privacy laws that govern the appropriate collection and use of personal information, which includes any information relating to an identifiable individual such as an email address, physical address, payment card information or government identification number.

We are committed to protecting the reasonable privacy expectations of everyone with whom we do business, including our customers, consumers and employees. We believe responsible stewardship of personal information helps maintain trust in Intel and in our products and services. We recognize the importance individuals place on the ability to control the collection and use of their personal information. We have adopted the Intel Privacy Principles and Intel Corporate Privacy Rules to define our commitment to privacy.

As Intel employees, we each have a responsibility to comply with our privacy and security requirements.

When questions, issues or concerns arise, consult your legal department or a member of your privacy compliance team.

Public Communications

As a publicly traded company, Intel must comply with a variety of regulations that govern public communications to investors and the public and promote transparency in financial markets. Intel has specific requirements for financial reports and documents that the company files with or submits to the U.S. Securities and Exchange Commission and in other public communications.

Therefore, if you are responsible for preparing such reports or contributing information for such reports, you need to ensure that the disclosures are accurate, reliable, and complete.

In addition, only authorized employees may make any public statements on behalf of Intel, whether to the media, investors, or in other external forums, including the Internet. This includes disclosing new or confidential information regarding Intel through social media applications and websites. If you are contacted by a reporter or the public on a topic on which you are not authorized to speak, refer the inquiry to the global communications group or Legal.

Treat Each Other Fairly

One of our core values is to work as a team with respect and trust for each other. We strive to uphold open and honest communication and to protect employees from discrimination, harassment, or unsafe practices.

Open and Honest Communication

We value the free flow of thoughts, ideas, questions, and concerns. We encourage employees to raise work-related issues or concerns through our established processes as soon as issues or concerns arise.

We do not tolerate any retaliation against employees for asking questions or making good faith reports of possible violations of law, the Code, or other guidelines.

Equal Employment Opportunities and Discrimination

We value diversity in our workforce, as well as in our customers, suppliers, and others. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the basis of race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance. We also make reasonable accommodations for disabled employees and applicants, as required by law.

We follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

Anti-Harassment

We are committed to providing a workplace free of harassment based on personal characteristics such as race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance. We strongly disapprove of and do not tolerate harassment of employees by managers or co-workers. We must treat co-workers, customers, and suppliers with dignity and respect.

Human Trafficking, Child and Forced Labor

We do not tolerate forced, debt bonded, indentured labor practices, or human trafficking. Intel does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We will not employ anyone under the age of 16 in any position, and workers under the age of 18 should not perform hazardous work. We expect our suppliers and others to meet these expectations.

Safety

Intel is committed to providing a safe workplace for employees, customers, vendors, contractors, and others on Intel property.

We comply with the safety laws, standards and guidelines that apply to our business. Sound safety practices are important in all of our workplaces.

To protect our employees, the public, and our communities, we conduct no activity without the proper safety precautions and produce no product without the proper safeguards.

We believe workplace injuries and illnesses are preventable. When we take care, employees and suppliers at our workplaces need to obey the safety requirements that apply to our job and workplace. We must not begin or continue any work activity contrary to safety requirements.

Workplace Violence

In keeping with our commitment to safety, Intel will not tolerate threats of any kind, whether explicit or implicit, threatening behavior, stalking or acts of violence. We take all reports of threatening behavior or violence seriously, look into the matter, and take appropriate action. For additional information, review Intel's [Workplace Threats and Violence guideline](#).

Act in the Best Interests of Intel and Avoid Conflicts of Interest

A conflict of interest may occur when an 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. We should not put ourselves in situations where we could be tempted to make Intel business decisions that put our personal needs ahead of Intel's interests.

Conflict of Interest Examples

Conflicts of interest typically arise in the following situations:

- Outside employment that involves working for a supplier, reseller, or a business that competes with Intel's interests while being employed at Intel
- Conducting any non-company business that interferes with the proper performance of our roles, such as conducting non-company business during working hours; utilizing confidential or proprietary information or processes gained as a company employee; or using company property or equipment for non-company uses (exceeding reasonable personal use)
- Using confidential or proprietary information or processes gained as a company employee for personal gain or to Intel's detriment, including consulting engagements with hedge funds and other investment professionals (any exceptions require the written permission of Intel's Chief Financial Officer)
- Offering or accepting a gift, meal, entertainment, travel expense, or other benefit that could be viewed as a bribe

- Accepting any personal benefit that is or could be interpreted as being given to us because of our role or seniority or because the donors believe we might be in a position to assist them in the future
- Participating in or influencing a company decision that may result in a personal gain, gain for an immediate family member, or gain for someone with whom we have a close personal relationship
- Making use of business opportunities discovered or learned through the use of company property, information, or our positions that may result in a personal gain, gain for an immediate family member, or gain for someone with whom we have a close personal relationship
- Serving on the board of directors or advisors of a competitor or a company that has or is seeking a business relationship with Intel, including sponsorships, or owning a significant interest in such an organization, where our ability to make decisions in Intel's best interest could be compromised
- Participating in or influencing a company decision to hire a family member, or supervising an immediate family member or someone with whom we have a close personal relationship

Handling Conflicts of Interest

We recognize that a conflict of interest may arise without any willful action on our part or that changes in circumstances may create a conflict or appearance of a conflict in situations where previously none existed.

Before engaging in outside business activities, including operating your own business or accepting outside employment, or if you become aware of any other possible actual or perceived conflict of interest, disclose it immediately to your manager, making a full report of all pertinent facts and circumstances. Your manager will determine, in consultation with Legal, HR or the Corporate Ethics Program, as necessary, whether a conflict of interest exists and how best to proceed.

Disclosure is mandatory; failing to disclose an actual or perceived conflict of interest is a violation of the Code.

Gifts, Meals, Entertainment, and Travel

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

- We comply with anti-corruption laws.
- The GMET must be for a legitimate purpose, such as to promote, demonstrate, or explain a company product, position, or service.

- The GMET must not place the recipient under any obligation. We do not offer, promise, or give anything of value with the intent to improperly influence any act or decision of the recipient in Intel's or your company's favor, or with the intent of compromising the recipient's objectivity in making business decisions.
- The GMET must be made openly and transparently, be reasonable, and appropriate to the business relationship and local customs, and not cause embarrassment by its disclosure.
- Accurately record all GMET provided on Intel's behalf.
- We give GMET to a Government Official (including employees of government agencies, public institutions and state-owned enterprises) only in limited circumstances and only with the proper approvals.

For more information, consult Intel's *Worldwide Business Gifts, Meals, Entertainment, and Travel Policy* ("GMET Policy"). For questions and additional guidance, consult Legal.

Protect the Company's Assets and Reputation

We spend considerable resources to develop and maintain assets used for the company's business. We each have a responsibility to comply with all procedures that protect the value of Intel's assets, including physical assets, information, Intel brands, and its name and reputation.

Protecting Physical Assets

Our physical assets include facilities, equipment, and computer and communications systems. We are to use these assets primarily for our business. As a narrow exception, we may use computer and communications systems for reasonable, personal use.

We need to follow applicable security and use procedures to protect the company's physical assets from theft, loss, damage, and misuse, including unauthorized access. Report the theft, loss, damage, or misuse of company physical assets to Human Resources as soon as possible.

While we respect employee privacy, we should not assume that our desk, cubicle, or use of compute devices or telephone equipment is private or confidential. Subject to local laws and under the guidance of Legal, Intel may search and review both incoming and outgoing communications and all device information, including any password-protected employee communications.

Maintaining Information Security

Proprietary information is another valuable company asset and includes internal and external communication; digital information stored on laptops, handhelds, wearables, desktops, servers, backups, and portable storage

devices; and hard copy documents, verbal discussions, and interactions via social media channels.

We need to take personal responsibility to safeguard both Intel owned and third-party owned proprietary and confidential information from unauthorized disclosure, changes, or loss.

We must comply with all company security policies and procedures for handling information assets and systems to ensure that we meet legal obligations, protect our reputation, and protect our investment in proprietary information.

Safeguarding Trademarks and Brands

Among our company's most valuable assets are its trademarks and brands. To protect the value and recognition of our trademarks, we have established guidelines that specify how and when they may be used.

We must follow these guidelines whenever we use the company's trademarks and brands, whether in internal and external communications or in materials prepared by third parties, such as marketing agencies, channel distributors, and Original Equipment Manufacturers.

Representing Intel

The value of our reputation and name must be upheld whenever we represent our company. On occasion, Intel may request individuals to act as an employee, officer, director, partner, consultant, representative, agent, or adviser of another entity. In those cases, an employee should discuss the situation with the direct manager. You may need to follow special rules to abide by the Code.

In other cases, such as when speaking on business or technology topics in a public setting or posting on the Internet – including through social media applications and websites – you must make it clear that you are expressing your own views and not those of our company, unless you are speaking as an authorized representative of the company.

You must carefully follow special rules of conduct if you participate in or take a leadership position with an industry trade association, to avoid antitrust violations.

Approvals and Waivers

The Code sets out expectations for our company's conduct. When certain situations require permission from management or another person before taking action, you need to raise the issue promptly to allow enough time for the necessary review and approval.

In a particular circumstance we may find it appropriate to waive a provision of the Code. To seek a waiver, speak with a manager, who will consider the request in consultation with others, such as Internal Audit, Legal or Human

Resources. Waivers of the Code of Conduct require the permission of Intel's Chief Financial Officer, General Counsel, or Senior Vice President, Director of Human Resources.

Directors and executive officers who seek a waiver should address the Board of Directors or a designated committee of the Board. We disclose such waivers for directors and executive officers to the extent and in the manner required by law, regulation, or stock exchange listing standard.

Reminders

The Code serves as our guide for conducting business with integrity. It is not an employment contract and confers no rights relating to employment.

The Code is not a complete list of company guidelines. You are expected to know and comply with all company guidelines related to your job. Violation of these other guidelines may also result in discipline, up to and including termination of employment.

Intel may amend the Code from time to time as it deems necessary or appropriate.

Code of Conduct Glossary Terms and Definitions

| Topic | Term | Definition |
|--|---------------------------------------|---|
| Conduct Business with Honesty/Integrity | | |
| Preparing Accurate Financial/Other Records | Auditors | Includes both external and internal auditors. |
| Preparing Accurate Financial/Other Records | Accounting Standards | Generally Accepted Accounting Principles (GAAP), International Accounting Standards (IAS), Securities & Exchange Commission (SEC) regulations |
| Follow the Letter and Spirit of the Law | | |
| Bribery and Anti-Corruption | Government official or representative | Government Officials: any officer, employee or person acting in an official capacity for any government department, agency or instrumentality, including state-owned or -controlled companies, and public international organizations, as well as a political party, political official, or candidate for political office. Some examples include: professors or researchers from public universities or research and design institutes; doctors from public hospitals and employees of state-owned telecommunication companies. For additional examples, please consult Intel's <i>Worldwide Business Gifts, Meals, Entertainment, and Travel Policy</i> ("GMET Policy"). |
| Bribery and Anti-Corruption | Bribe | Bribery, under Intel policy, means promising, offering, or giving anything of value with the corrupt intent of improperly influencing an act or decision of the recipient or obtaining an improper advantage in order to obtain or retain business. |
| Bribery and Anti-Corruption | Facilitation payment | A small payment made to obtain a routine government action that involves non-discretionary acts, such as processing government papers, or supplying phone or water service. Paying an official to perform such routine work is regarded a bribe under many country laws. <i>Expediting Fees:</i> published government rates or fees that a government agency or entity charges for the purpose of expediting a service are permissible payments. Such payments are made to a government agency and a receipt for the expedited service must be obtained as proof of payment. |
| Environmental Management and Compliance | Precautionary approach | An approach where the health or environmental risks from using a material and striving to find cleaner and safer alternatives are carefully considered. |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
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| Import and Export Compliance | Import | An import is any item coming into a country or crossing a border. Imports may be subject to customs duty, quota restrictions, bans, or licensing requirements, depending on the country of origin and the item. |
| Import and Export Compliance | Export | The transfer of a physical item or technology, the disclosure (oral or visual) of technology or act of providing a service that is subject to an export regulation. |
| Import and Export Compliance | Export authorization | Intel export compliance organization approval to transfer or disclose any information, technology, product, software or service that is subject to export regulations. |
| Import and Export Compliance | Non-U.S. person | A non-U.S. person is anyone who is working and/or residing in the United States and is not a U.S. citizen or permanent U.S. resident. Depending on what country the non-U.S. person is from and what type of work he/she will be doing for Intel, an export license may need to be obtained on his/her behalf. |
| Import and Export Compliance | Export controlled technology (or software) | Technology that requires Export Authorization prior to transfer. At Intel, this term, specifically, Controlled Technology (CT) has been used (historically) to identify specific microprocessor technology for which U.S. government authorization is required for export; however, as Intel's business expands into new business segments, technology previously not identified as controlled technology can become controlled depending on the activity or end user. |
| Insider Trading | Tip or tipping | Tipping occurs when someone gives material, non-public information about a company to someone else in circumstances where it is likely that the recipient of the information will trade on that information. |
| Intellectual Property | Privileged (attorney-client privilege) | The attorney-client privilege is a legal concept that protects communications between a client and his/her attorney in which the communication involves seeking or providing legal advice. <i>Please note: the privilege varies per jurisdiction. If you have questions about whether a communication is privileged or not, you should consult Legal.</i> |
| Intellectual Property | Intellectual property rights | Intellectual property rights include patents/patent applications, trademarks, copyrights, trade secrets, know how, and mask work rights. |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
|---|----------------------|---|
| Privacy | Privacy | <ul style="list-style-type: none"> • An individual’s right to keep aspects of his or her personal life secret and to expect appropriate collection, use and disclosure of their personal information • An organization’s responsibility to respect an individual’s rights and to manage personal information appropriately <p>Note: An individual’s right to privacy is not limited to personal information only, but also includes other areas, such as behavioral privacy (an individual’s right to choose what they do and to keep certain behaviors from being shared with others) and communications privacy (the right to communicate without undue surveillance, monitoring, or censorship).</p> |
| Privacy | Personal information | <p>Any information relating to an identifiable individual.</p> <p>Note: Personal Information is also known as Personal Data or Personally Identifiable Information.</p> <p>Examples of personal information include: Address, Biometric Information, e-Mail Address, Fax Number, Financial Information (such as Bank Account or Payment Card Information), Government Identification Number, Health/Medical information, Name, Personal Profiles, Photographs, Social Security Number, Telephone Number, etc.</p> |
| Treat Each Other Fairly | | |
| Anti-Harassment | Harassment | <p>Intel considers the following conduct to be harassment under our Code of Conduct: verbal, physical and visual conduct that creates an intimidating, offensive, or hostile environment in the workplace that interferes with work performance, even if it is not unlawful. Harassment may be based on race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance.</p> |
| Human Trafficking, Child and Forced Labor | Debt bonded | <p>Debt bonded labor arises from a pledge of personal services or a family member’s services by a debtor as security for a debt. At the outset, the individual typically understands that the pledge of labor is security for a debt and that the rendering of services will, in time, extinguish the debt; however, the debt is open-ended and a rolling tab continues to accrue making the debt and work arrangement self-perpetuating.</p> |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
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| Human Trafficking, Child and Forced Labor | Human trafficking | Human Trafficking is defined as (1) the act of recruiting, harboring, transporting, providing, or obtaining a person for labor services or commercial sex acts (2) by means of force, fraud, or coercion (3) for the purpose of exploitation, involuntary servitude, peonage, debt bondage, slavery, or any commercial sex act involving a minor. |
| Human Trafficking, Child and Forced Labor | Corporal punishment | Corporal punishment refers to physical punishment. For example, caning and flogging are examples of corporal punishment. |
| Avoid Conflicts of Interest | | |
| Handling Conflicts of Interest | Bribe | Bribery, under Intel policy, means promising, offering, or giving anything of value with the corrupt intent of improperly influencing an act or decision of the recipient or obtaining an improper advantage in order to obtain or retain business. |
| Handling Conflicts of Interest | Significant interest | An interest in something outside of an employee's job at Intel is significant when this influences an employee's ability to make fair and impartial decisions in the best interest of Intel. |
| Handling Conflicts of Interest | Routine promotional | Under corporate policies and practice, this refers to items of nominal or small value that are routinely given away for marketing purposes. These items must include a logo or trademark of the supplier, vendor, or contractor who is giving them away. |
| Protect the Company's Assets/Reputation | | |
| Maintaining Information Security | Proprietary and confidential information | Specific data types that are regulated by laws, contractual agreements, national and international regulations, and company policies. Failure to provide proper access restrictions on the distribution, display, transportation, use, or storage of this information may put the company at risk and may also put the individuals involved at risk. Examples: Conflict of Interest, Insider Trading and Tipping, Personnel Privacy, Health Information Privacy, Customer Privacy, Customer Transaction Information, Trade Secrets, Future Marketing Information, Controlled Technology, Sensitive Business Processes, Security Information, Legal and Information Export regulations. |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
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| Maintaining Information Security | Wearables | A Wearable is "something you wear", including devices that attach to the body or clothing and devices incorporated in some other functional item (glasses, hearing aid, clothing), which perform one or more functions of a computer such as internet access or data recording. |
| Safeguarding Trademarks and Brands | Trademark | A trademark is anything that identifies the source of one's goods or services and distinguishes them from those of another, including a word , a name , a design , a color , a phrase , a sound , or even a scent . It is a word (Tide*), name (Howard Johnson*), symbol (McDonald's Golden Arches*), device (Pillsbury Doughboy*), phrase (The Ultimate Driving Machine*) or sound (Intel Bong/Sonic) that is used in trade with goods to indicate the source of the goods and to distinguish them from the goods of others. A trademark is a valuable asset worth millions of dollars and signifies the standards of excellence and consistent quality associated with the Intel products and services. This gives the consumer an assurance of quality when making future purchasing decisions in the marketplace. Thus, a trademark is inherently bound up with the "good will," and reputation, that is developed by the owner of the mark. |
| Safeguarding Trademarks and Brands | Brands | <ol style="list-style-type: none"> 1. A brand is a collection of images and ideas representing an economic producer; more specifically, it refers to the concrete symbols such as a name, logo, slogan, and design scheme. 2. Is often used interchangeably with "trademark". 3. A brand is a sign identified by a distinctive word, phrase, sign, package or label. It is a representation of a company's name, trademarks, products, designs and symbols. |
| Safeguarding Trademarks and Brands | Channel distributors | Re-sells company products to smaller accounts or end users |
| Representing Intel | Authorized representative | This refers to an employee who has been designated as a representative of Intel for external purposes or has been delegated the authority by his or her organization to commit Intel to agreements. Examples of this would be a manager sitting on another company's Board of Directors, or signing a deal with a customer, or attending an external conference as the official Intel representative. This would also include the limits of signing authority of certain employees. |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
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| Representing Intel | Antitrust violations | There are provisions of the antitrust laws in the United States and worldwide that must be strictly complied with in order to prevent Intel and you from being accused of and found liable for violating these laws. |