



# **Business Conduct**

## **The way we do business**

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## The way we do business worldwide

At Apple, we are committed to demonstrating that business can and should be a force for good. Achieving that takes innovation, collaboration, and a focus on serving others.

It also means leading with our values—accessibility, education, environment, inclusion and diversity, privacy, racial equity and justice, and supplier responsibility. Our Business Conduct Policy is foundational to how we do business and how we put our values into practice each and every day.

Apple conducts business ethically, honestly, and in full compliance with applicable laws and regulations. This applies to every business decision in every area of the company worldwide.

The following principles guide Apple's business practices:

- **Honesty**—Demonstrate honesty and high ethical standards in all business dealings.
- **Respect**—Treat customers, partners, suppliers, employees, and others with respect and courtesy.
- **Confidentiality**—Protect Apple Confidential Information, including that of our customers, partners, and suppliers.
- **Compliance**—Ensure that business decisions comply with applicable laws and regulations.

Apple expects its suppliers, contractors, consultants, and other business partners to follow these principles when providing goods and services to Apple or acting on our behalf. Third parties involved in manufacturing, components, sourcing and raw materials related to Apple's products are also required to comply with the [Apple Supplier Code of Conduct](#). All other third parties doing business with Apple are required to comply with the [Apple Third Party Code of Conduct](#).

The Business Conduct Policy applies to all full and part-time employees of Apple and its subsidiaries, and provides a standard guide for what is required of everyone at Apple. Relevant sections also apply to members of Apple's Board of Directors. The Business Conduct Policy also provides information on additional resources available to employees, including the Business Conduct Helpline and the Business Conduct website, which contains guidance and frequently asked questions to assist employees in understanding Apple's approach to Business Conduct.

All employees are required to complete annual, online Business Conduct training, and review and certify their understanding of the Business Conduct Policy. Employees are also required to complete online Respect at Apple and Privacy trainings, and depending on job responsibilities and location, may be required to participate in additional mandatory online trainings on specific topics. Focused live training is also arranged periodically on Business Conduct and other relevant topics.

On rare occasions, local laws may impose requirements on Apple and its employees that differ from those set out in the Business Conduct Policy. Contact a local People Business Partner for more information on how these laws may apply to you.

Any waiver of this Policy for our directors, executive officers, or principal accounting officer may be made only by our Board of Directors, and will be disclosed as required by law or applicable listing rules.



## Your Responsibilities and Obligation to Take Action

Everything we do is a reflection of Apple. We expect you to:

- **Follow the Policy and exhibit appropriate workplace behavior.** Comply with the letter and spirit of Apple's Business Conduct Policy and all applicable legal requirements. Any failure to exhibit ethical or appropriate workplace behavior or to comply with Apple's Business Conduct Policy—or failure to report a policy, regulatory, or legal violation—may result in disciplinary action, up to and including termination of employment.
- **Speak up.** If you see or hear of any violation of Apple's Business Conduct Policy, other Apple policies, or legal or regulatory requirements, you must notify either your manager, People Team, Legal, or Business Conduct.
- **Use good judgment and ask questions.** Apply Apple's principles of business conduct, and review our policies and legal requirements. When in doubt about how to proceed, discuss it with your manager, your People Business Partner, Legal, or Business Conduct.

You are also required to fully cooperate in any Apple investigation and safeguard the integrity of the investigation.

## Reporting a Concern

To report a concern or ask a question about Apple's Business Conduct Policy, you can contact Business Conduct by phone, email, or web form. For contact details, visit the Business Conduct website or the Resources section at the end of this policy. Apple's external helpline ([apple.ethicspoint.com](https://apple.ethicspoint.com)) also allows employees and external parties to report concerns with the option of remaining anonymous, where permissible under applicable laws. The external helpline provides local, toll-free phone numbers that connect employees and external parties to a multilingual reporting service.

Your information will be shared only with those who have a need to know to help answer your questions or investigate concerns, ensure the prompt enforcement of this Policy, and, if appropriate, determine disciplinary action. If your information involves accounting, finance, or auditing, the law may require that necessary information be shared with the Audit and Finance Committee of the Board of Directors. Apple's Business Conduct Policy is administered by the Business Conduct organization, under the oversight of Apple's Chief Compliance Officer, who provides regular updates to the Audit and Finance Committee of the Board of Directors. The Business Conduct team is available to support all employees and answer questions on business conduct issues, policies, regulations, and compliance with legal requirements.

Apple's [Global Whistleblowing Policy](#) provides additional information about Apple's approach to protecting and supporting individuals who report potential misconduct, and rights of its employees to raise concerns externally as provided by applicable law.

## No Retaliation

Apple will not retaliate—and will not tolerate retaliation—against any individual for reporting a good-faith concern or complaint internally or externally or for participating in the investigation of a concern or complaint.

Retaliation under this policy occurs when Apple or one of its employees takes an action adversely affecting the career, pay, scope of role, or working conditions of an individual because the individual:

- Reported or participated in the investigation of a potential violation of our policies or the law; or
- Engaged in legally protected activity, including related to leaves of absence or job accommodations, or forming or joining (or refraining from joining) labor organizations of an employee's choice in a lawful manner.

In addition to violating this policy, some instances of retaliation may be unlawful.

Other behaviors that dissuade people from raising concerns or asking questions about complying with Apple's policies or legal obligations are also unacceptable under this policy and other Apple policies.

## Your Rights as an Employee

You are permitted to freely discuss or disclose wages, hours, employment terms, and working conditions at Apple, including information about harassment, discrimination, or any other conduct you have reason to believe is unlawful or inappropriate in the workplace. Nothing in this Policy, or any Apple policy or Apple agreement, should be interpreted as being restrictive of your right to do so.

Additional information about employee rights, including the right to engage in union and other protected, concerted activity, can be found on Apple's People site.

## Human Rights

Apple is committed to respecting internationally recognized human rights. Apple's approach to respecting human rights is based on the United Nations Guiding Principles on Business and Human Rights, the global standard on business and human rights. For more information, see the [Human Rights Policy](#).

# Workplace Behaviors

## Drugs and Alcohol

Apple cares about the health and safety of our employees. You are expected to comply with Apple's guidelines regarding alcohol, drugs, and smoking, whether it is in the workplace, at Apple-sponsored events, or while conducting Apple business. You are not permitted to be under the influence of any legal or illegal drug that impairs your ability to perform your job, and employees are prohibited from manufacturing, soliciting, distributing, possessing, or using any illegal drugs or substances in the workplace, or while working. Use good judgment and keep in mind that you are expected to perform to your full ability at work. For more information, see the Alcohol, Drugs and Smoke-Free Environment Policy.

## Environment, Health, and Safety (EH&S)

Apple is committed to protecting the environment, health, and safety of our employees, customers, and the global communities where we operate.

Apple's EH&S team provides guidance on how to conduct your job while meeting or exceeding all applicable environmental, health, and safety requirements. Use good judgment and always put the environment, health, and safety first. Work proactively with the EH&S team to anticipate and manage EH&S risks in a timely manner.

For more information on the EH&S team, policies, training, and programs, visit the EH&S website.

## Harassment and Discrimination

Apple is dedicated to maintaining a creative, diverse, inclusive, and supportive work environment, and does not tolerate discrimination or harassment of employees or non-employees with whom we have a business, service, or professional relationship. This applies to all interactions where you represent Apple, including interactions with employees, customers, suppliers, and applicants for employment. For more information, see the Equal Employment Opportunity Policy and People policies for your region.

If you believe you have been harassed or discriminated against, or have witnessed such behavior, visit Reporting a Concern. We encourage you to report the incident using any avenue with which you feel most comfortable, including your Apple manager, People Support, your People Business Partner, or Business Conduct.

We also do not tolerate workplace violence of any kind. For more information, see the Workplace Violence Policy.

## Respect

Respect is a foundational element of our culture. It is necessary for great collaboration, for great debate, and for our ideas, products, and services to be as great as they can be. We believe a safe, inclusive, and respectful environment is essential to ensure both the quality of our workplace and the success of our business, and that employees must be professional in their interactions with colleagues, customers and third parties. Respect is a shared responsibility, and should be demonstrated every day through actions, interactions, and decisions in the workplace.

Respect does not mean that we don't disagree or debate - it means that when we do so, we do it in a way that does not cause a coworker to feel offended, humiliated, or intimidated.

# Protecting Apple

## Protecting Apple's Assets and Confidential Information

You play a key role in helping us protect Apple. This includes both physical assets such as equipment, supplies and product information, as well as Apple Confidential Information. The Confidentiality and Intellectual Property Agreement that you signed when you joined Apple outlines your duty to protect Apple Confidential Information.

**Apple Confidential Information** means all Third Party Confidential Information and all non-public materials or information relating to past, existing or future Apple products or services, including but not limited to sales, pricing, operations, sources of material, financials and marketing plans. For the full definition and to learn more about Apple Confidential Information, visit the Business Conduct website.

**Third Party Confidential Information** is any confidential information disclosed to Apple by customers, partners, suppliers, and other third parties during the course of business. We are all responsible for protecting and maintaining the confidentiality of any information entrusted to us by our partners. Compromising that trust may damage relations with our partners and can also result in legal liability. For more information, see the [Apple Customer Privacy Policy](#).

We are very selective when disclosing Apple Confidential Information to vendors, suppliers, or other third parties, and only do so once a **Non-Disclosure Agreement (NDA)** is in place. You should verify with your manager whether there is a business need to share Apple Confidential Information with a supplier, vendor, or other third party, and never volunteer more than what is necessary to address the business at hand. Even within Apple, Apple Confidential Information should only be shared on a need-to-know basis. To learn more about NDAs and the NDA process, visit Legal's NDA website.

Remember to review the section on Your Rights as an Employee to understand your right to speak freely about wages, hours or working conditions and related topics, as well as the People site on this topic.

### Remember:

- **Watch what you say.** Being aware of where you are, who is around you, and what they might see or overhear is an important way we all protect Apple Confidential Information.
- **Protect our assets.** Keep track of the assets and information Apple has entrusted to you, and prevent loss, misuse, waste, or theft.
- **Set an example.** Model behavior that protects our assets and information at all times.

For information on best practices for protecting Apple's assets and Apple Confidential Information, visit the Global Security website.

## Accuracy of Business Records and Fraud

Accurate and honest business records are critical to meeting our legal, financial, and management obligations. You should ensure that all business records and reports, including expense reports, timecards, information related to employee benefits such as the Apple Matching Gifts Program and Employee Purchase Plan, customer information, and technical and product information that appear in any format, including correspondence and public communications, are comprehensive, fair, accurate, timely, and understandable.

Intentional manipulation of Apple business records is a form of fraud. This includes modifying business records or reports in any way, misstating business facts, or omitting critical business information to mislead others, or assisting others in doing so.

You are responsible for observing all policies and procedures regarding business expenses, including meal and travel

expenses, and for submitting accurate expense reimbursement reports. Guidelines on daily meal expenses vary worldwide. For more information, see the Travel and Expense Policy.

## Records Management

Apple owns all records and information that is created or received in the course of doing Apple's business. Employees are responsible for managing and protecting information and records in accordance with the Records Management Policy. A record is defined as information created, received, and maintained as evidence and as an asset by the Company in pursuit of legal obligations or in the transaction of business, and is identified in the Records Retention Schedule.

Records must be maintained in a manner that ensures their accuracy, integrity, and security. Privacy laws may dictate how long information can be retained. At times, Apple will need to retain records and information beyond the normal retention period for legal reasons or audits. If you have records and information that are categorized as under a "legal hold" you should not alter, destroy, or delete them in any way. Legal will notify you of any legal holds you may be subjected to and what is required.

For more information, see the Managing Your Records website or contact the Information Governance team.

## Side Deals or Side Letters

Apple formally documents all terms and conditions of the agreements into which it enters. Contractual terms and conditions define Apple's rights, obligations, liabilities, and accounting treatments. We do not accept business commitments outside of the formal contracting process managed by Legal. Side deals, side letters, or other informal documentation created by employees without Legal oversight are impermissible. You should not make any oral or written commitments that create a new agreement or modify an existing agreement without securing approval through the formal contracting process.

## The Apple Identity and Trademarks

The Apple name, names of products (such as iPhone), names of services (such as AppleCare), taglines (such as "Think Different"), and logos collectively create the Apple identity. Before publicly using any of these assets, review the [Trademark List, Trademark and Copyright Guidelines](#), and Corporate Identity Guidelines for how to properly do so. You should also check with Legal before using the product names, service names, taglines, or logos of any third parties.

## Third-Party Intellectual Property

Apple respects third-party intellectual property. Never use the intellectual property of any third party without permission or legal right. If you are told or suspect that Apple may be infringing on third-party intellectual property, including patents, copyrights, trademarks, or trade secrets, contact [Legal](#).

## Copyright-Protected Content

Never use or copy software, music, videos, publications, or other copyright-protected content at work or for business purposes unless you or Apple are legally permitted to use or make copies of the protected content. You should never use Apple facilities or equipment to make or store unauthorized copies. For more information about personal content on Apple-owned devices, see the Employee Use of Electronic Systems and Communications Policy.



## Apple Inventions, Patents, and Copyrights

Apple has a robust patent program that protects innovations related to our current or future products and services. You should submit your invention disclosure to the Apple Patent team via the Apple Patent System. It's best to submit your invention disclosure well before you share an invention outside of Apple, even if under an NDA, because doing so may compromise Apple's patent rights.

You may pursue, for your own personal ownership, inventions that (a) are not developed using Apple equipment, supplies, facilities, or Apple Confidential Information; (b) did not result from and were not suggested by work performed by you, Apple, or Apple Confidential Information; and (c) are not related to Apple's current or anticipated business, products, research or development.

Be alert to possible infringement of Apple's patents and notify Legal of any possible infringements. If you create original material for Apple that requires copyright protection, such as software, place Apple's copyright notice on the work and submit a copyright disclosure form to Legal. For more information, see the Copyright Policy.

## Activities Related to Technical Standards

You must secure management and Legal approval before participating in any activities related to technical standards. This includes joining a standards organization or working group, contributing technology or code to a standard, or using a standard in the development of an Apple product. For more information, see the Standards Legal Policy or contact the Standards Legal team.

## Activities Related to Open Source Software

Open source software is usually collectively developed software with its source code made available under an open source license. Before using, modifying, or distributing any open source software for Apple infrastructure, or as part of an Apple product or service development effort, you must receive management and Legal approval. For additional information on how to submit requests, visit Open Source at Apple. This website also includes information about personal contributions to Open Source and required approvals.

## Public Speaking and Press Inquiries

All public or outside speaking engagements that relate to Apple's products or services or reasonably anticipated products or services or public or outside speaking engagements where you could be construed as speaking on behalf of the company, must be pre-approved by your manager and Corporate Communications. If your request is approved, you may not request or accept any form of personal compensation from the organization that requested your participation, but you may accept directly related expenses. All inquiries from the media, industry, or financial analyst community in which you are asked to provide comments on behalf of Apple, or where your comments may reasonably be construed as being on behalf of Apple, must be referred to Corporate Communications or [Investor Relations](#).

Nothing in this provision restricts your right to speak freely about wages, hours, or working conditions, including information about harassment, discrimination, or any other conduct you have reason to believe is inappropriate in the workplace, and nothing in this policy, or any Apple agreement, should be interpreted as being restrictive of your right to do so, provided that you may not disclose Apple Confidential Information to third parties. For more information, see the section on Your Rights as an Employee and the People site.

## Publishing Articles

If you want to contribute an article or other type of submission to a publication or blog on a topic that relates to Apple's products or services, or reasonably anticipated products or services, or that could be seen as a conflict of interest, you must first request approval from Corporate Communications. If your contribution is technical or academic and relates to Apple's products or services, complete the Academic and Industry-Related Activities Questionnaire to obtain review from Legal and Business Conduct. If your contribution is determined to be a conflict of interest, you will need to get senior vice president approval. For additional information, see the Social Media and Online Communications guidelines.

Any employee who wants to publish a research paper in their capacity as an Apple employee should follow the guidelines on the Business Conduct website.

Review the section on Your Rights as an Employee and the People site to understand more about topics where the rules on Publishing Articles do not apply.

## Endorsements

You should never endorse a product or service of another business or individual in your role as Apple employee, unless the endorsement has been approved by your manager and Corporate Communications. This does not apply to statements made in the normal course of business about third-party products sold by Apple. If you want to provide a personal reference, review the Employment Reference Guidelines.

# Individual Accountability

## Avoiding Conflicts of Interest

A conflict of interest is any activity that may damage Apple's business, competitive, or financial interests, or gives the appearance of impropriety or divided loyalty. Avoid any situation that creates a real or perceived conflict of interest. If you are unsure about a potential conflict, talk to your manager, Business Conduct, or your People Business Partner.

Members of Apple's Board of Directors should follow the requirements and procedures described in the Guidelines Regarding Director Conflicts of Interest.

The following are common situations employees may encounter that could present a conflict of interest.

### Significant Personal Relationships

Personal relationships in the workplace can present a real or perceived conflict of interest when one individual in the relationship makes or influences employment decisions regarding the other, including performance or compensation.

Significant personal relationships include, but are not limited to, spouses, domestic partners, family members, dating or physical relationships, close friends, and business relationships outside of Apple. Apple business relationships include, but are not limited to, vendors, customers, suppliers, contractors, temporary agency workers, or similar relationships.

Do not conduct Apple business with family members or others with whom you have a significant personal relationship. Do not use your position at Apple to obtain favored treatment for yourself, family members, or others with whom you have a personal relationship. This applies to product purchases or sales, investment opportunities, hiring, promoting, selecting contractors or suppliers, and any other business matter.

If you believe that you have a potential conflict involving a family member or other individual, disclose it to your manager and your People Business Partner to review and work through any potential conflicts.

You should not allow any relationship to disrupt the workplace or interfere with your work or judgment.

In rare cases where exceptions may be appropriate, written approval from the senior vice president of your organization is required.

### Conflicts of Interest and Outside Activities

You may participate in outside activities, including secondary employment, businesses, inventions, and serving on boards, only if they do not present a conflict of interest and you adhere to the rules set out below.

Apple generally considers an outside activity to be a conflict of interest if it:

- Is for a business, company, or organization that makes or sells competing products or services to Apple, or that Apple is reasonably anticipated to create. This includes but is not limited to: Apple hardware products (e.g., computers, mobile devices, headphones), financial services, original content, health services, cloud services, any distribution of video, music or eBooks, and any software or app.
- Generates or exposes you to intellectual property that competes with or relates to Apple's present or reasonably anticipated business, products, or services.

- Would require you to disclose or use Apple Confidential Information.
- Arises from Apple's business relationship with the external organization.

In some circumstances, an outside activity that is the same as or similar to your role or work at Apple could also be considered a conflict of interest. Review the Business Conduct website for more information.

Work with your manager and Business Conduct to evaluate a potential conflict of interest. If an outside activity presents a conflict of interest, you must partner with a People Business Partner, and obtain written approval from your manager, Legal (if applicable), and the senior most person reporting to the CEO of both your and any relevant organizations. Contact Business Conduct to assist with Legal review.

Note that in some countries outside of the United States, employees are subject to restrictions on working hours, regardless of whether those working hours are with multiple employers. You should consider maximum working hours before taking on any paid outside activities. Please contact People Support if you need guidance.

Any employee, full or part-time, who is participating in an outside activity, must comply with the following rules.

**Do not:**

- Use any working time or any Apple assets for any outside activity. This includes Apple's workspace, phones, computers, Internet access, photocopiers, and any other Apple assets or services, other than incidental use.
- Use your position at Apple to solicit resources or any other benefit for your outside activity, obtain favored treatment, or pressure others to assist you.
- Participate in an activity that could have an adverse effect on your ability to perform your duties at Apple.
- Use Apple Confidential Information.

Nothing in this policy restricts your right to form, join or assist a union, or engage in other protected, concerted activity (or the right to refrain from any or all such activities). These activities are not considered to be conflicts of interests or outside activities within the meaning of this policy. Additional information about employee rights, including the right to engage in protected, concerted activity, can be found on Apple's People site.

## App Creation

You can only create apps for personal or educational purposes. You cannot join the Developer Program or share, sell, or distribute apps, stickers, or other media (for iOS, Android, or any other operating system), unless required for Apple business purposes. Some exceptions apply for employees who created apps before joining Apple or who are joining Apple for a short period of time. If this applies to you, contact Business Conduct to understand what is permitted.

## Board Positions

You may not serve as a director, trustee, officer, or advisory board member without prior approval from Apple. Apple has pre-approved positions in certain organizations like residential boards (i.e., HOAs) and local sports and arts organizations, provided their activities do not present a potential or actual conflict of interests. Contact Business Conduct if you have any questions or if you would like to seek approval from Apple for a position that is not in a pre-approved category. A board position that presents a potential or actual conflict of interest is unlikely to be approved.

The rule above relates to serving on a board in your individual capacity. If you have been asked to serve on a board as a representative of Apple, you should work with your manager, Legal, and any impacted business

teams to determine if Apple should participate, and whether you are the best person to represent Apple on that board. If the position is on a public sector advisory board, work with Business Conduct to assess whether your participation would impact Apple's ability to interact with that government agency. You should also consult with Corporate Communications, if applicable.

### **Rotations (Operations Only)**

Operations managers are responsible for ensuring that their employees who make or significantly influence sourcing, contractual, financial or capacity decisions with suppliers change position every three years so as to work with different suppliers. Exceptions are subject to VP review and approval each year. "Suppliers" include anyone who had, has, or might have any business connection (directly or indirectly) with Apple or Apple's supply chain.

### **Personal Investments**

You should avoid investing in companies that are Apple competitors or business partners when the investment presents a conflict of interest. One thing to consider when determining whether a personal investment creates a conflict of interest is whether you are in a position to influence transactions between Apple and a business in which you have invested.

If you have non-public information about a current or potential Apple business partner, you should not invest in that company, regardless of whether the company is publicly traded or the information could have a material effect on the value of the company. Note that an investment may present a conflict of interest and should be avoided even if it does not violate insider trading rules and Apple's Insider Trading Policy. If a real or apparent conflict arises, disclose the conflict to your manager, who can work with People and Business Conduct to help determine whether a conflict exists and, if appropriate, the best approach to eliminate the conflict. You can also reach out to Business Conduct for help.

## **Insider Trading**

Never buy or sell Apple securities, including Apple stock, if you are aware of information that has not been publicly announced and that could have a material effect on the value of the securities. It is illegal and against Apple policy to give anyone, including friends and family, tips on when to buy or sell securities when aware of material nonpublic information concerning that security. This applies to decisions to buy or sell Apple stock or the stock of an Apple supplier, manufacturer, vendor, or customer, such as cellular network carriers or other channel partners.

Information is material if it would likely be considered important by an investor who is deciding whether to buy or sell a security, or if the information is likely to have a significant effect on the market price of the security. Both positive and negative information may be considered material. Examples of potential material information include financial results, information about new products or significant features, timing of significant product announcements or new product introductions, news of a pending or proposed acquisition or other corporate transaction, significant changes in sources or availability of supplies, changes in dividend policy, significant product defects or modifications, and significant cybersecurity, or other data protection or privacy incidents.

Short sales, transactions that hedge or offset, or are designed to hedge or offset any decrease in the value of Apple securities and transactions in derivatives of Apple stock, are prohibited at all times, including transactions involving prepaid variable forward contracts, equity swaps, collars, options, warrants, puts, calls, or similar instruments related to shares of Apple stock.



For more information about restrictions on trading in securities as well as answers to FAQs, see the Insider Trading Policy or email Insider Trading.

## Charitable Donations

You are encouraged to support charitable causes of your choosing as long as you do not use or furnish Apple assets (including your work time or use of Apple premises, equipment, or funds). Any charitable donations involving Apple assets are managed by the Corporate Donations team and must be approved by the VP of Environment, Policy, & Social Initiatives. Any donation of 100K USD or more also requires the approval of the Chief Executive Officer or Chief Financial Officer. For additional information, see the Finance Policy on charitable donations. This policy does not prevent you from taking advantage of the Apple Matching Gifts Program to contribute to a nonprofit organization of your choice, or from participating in our Global Volunteer Program.

## Political Contributions

Apple does not make political contributions to individual candidates or political parties. All corporate political contributions, whether monetary or in-kind (including lending or donating equipment or technical services), must be approved in advance by Apple's CEO, and processed by Government Affairs and Political Compliance to ensure compliance with legal requirements and Apple policy. You may not use Apple resources, including employee work time, Apple premises, equipment, or funds, to personally support candidates and campaigns. It is also illegal for Apple to reimburse an employee for a political contribution. For more information, see the Corporate Political Compliance Policy and the [Apple Public Policy Advocacy website](#).

## Personal Political Activities

You are free to personally participate in political activities, including running for and serving in public positions, and supporting candidates and causes, as long as you comply with the points below:

- Do not represent or give the impression that you are representing Apple during any political activities or in campaign materials.
- Do not make public comments that could be misconstrued as being made on behalf of Apple, or give the impression that Apple is endorsing any particular legislation, position, or issue.
- Do not use Apple work time, equipment, or resources for political or campaign activities.
- If holding a public office, you may need to recuse yourself from any matters involving Apple.

## Gifts

Giving or accepting gifts can create a real or perceived conflict of interest and can lead to a perception of favoritism or an expectation of reciprocity that could compromise an employee's objectivity. This policy applies to giving or accepting gifts to or from current or potential vendors, suppliers, customers, or other business associates with whom you have a current or potential business relationship. Gifts between employees don't fall under this policy.

A gift is considered anything of value, including a meal, travel, entertainment (including tickets), Apple logo items, equipment (including loans), or discounts. Gifts must be legal, and gifts given with the purpose of influencing a decision are always prohibited. Gifts that are cash or cash equivalents, such as gift cards, are never allowed. Paying for a gift without getting reimbursement from Apple does not remove the requirement to comply with the gift policy.

**Apple employees are under either a zero gift rule or a \$150 gift rule**, depending on their organization. Refer to the Gifts page on the Business Conduct website to determine the rule that applies to you. Employees under a zero gift rule may not give or accept gifts of any value unless one of the key exceptions below applies. Employees under the \$150 gift rule may only give or accept gifts if the value is \$150 or less, unless one of the key exceptions below applies.

## Key Exceptions

Gifts that fall under one of the following exceptions are permissible for most employees, regardless of gift rule (additional approval requirements may be noted):

- **Business meals.** With the exception of Apple Store employees, employees may provide and accept reasonable and appropriate business-related meals, provided they are limited in frequency and expense. Any meals paid for by Apple must comply with Apple's Travel and Expense Reimbursement Finance Policy. Employees in Operations must obtain approval from their manager to accept business meals. Approval should occur beforehand when possible.
- **Low-value items.** With the exception of Operations and Apple Store employees, employees may accept low-value and infrequent promotional items or other nominal tokens of appreciation.
- **Business-related event attendance.** With the exception of Operations and Apple Store employees, free tickets for sporting events and other forms of entertainment where participation is directly related to an employee's job function and part of legitimate Apple business are not considered a gift under Apple's policy. If you are unsure if attendance at an event is directly related to your role, check with your manager. For high-value or high-profile events, you should review your attendance with your manager and your vice president. Employees should never use relationships built through Apple business for their personal advantage, such as obtaining tickets that are difficult to access, since that is preferential treatment and could be considered a conflict of interest.
- **Conferences.** With the exception of Operations and Apple Store employees, free tickets to conferences that are offered by a vendor, supplier or other third party are permissible if the tickets are free to all attendees, offered as part of a contract with Apple, or offered to all customers of a particular vendor. Tickets outside of those parameters do not fall under an exception, and require approval if the value is over your gift limit. Conference tickets purchased by Apple are not a gift.
- **Vendor-supplied local ground transportation.** Operations employees may accept reasonable local ground transportation provided by vendors to and from work locations.

Any other exceptions must be approved by your vice president. For vice president-level employees, exceptions must be approved by your manager.

## Refusing and Returning Gifts

Gifts outside the limits of your gift rule should be declined or returned whenever possible. If it is impossible or inappropriate to refuse or return a gift, you should notify your manager and People Business Partner immediately after accepting the gift, then contact Business Conduct for further guidance. Perishable, non-alcohol gifts may be placed in a common area for employees to share. For more information, see the Business Conduct website.

## Samples

Current and potential vendors and suppliers may provide product samples to Apple for business evaluation purposes. These samples are not gifts and may not be used for personal purposes. Receipt of samples should be documented according to any internal division policies, and where appropriate, returned to the vendor and supplier when the evaluation is complete.

## Gifts to Public Officials

Apple permits providing gifts to public officials only when permissible under applicable laws and policies. A public official is any person who is paid with government funds or performs a public function. This includes individuals who are elected or appointed to public office, as well as individuals who work for local, state/provincial or national government, public international organizations, public (government-owned or operated) schools, and state-owned or state-run enterprises. Employees at such organizations are considered public officials regardless of title or position.

### U.S. Public Officials

For U.S. public officials, anything other than refreshments of nominal value (\$10 or less) must be pre-approved by Political Compliance or comply with internal guidelines if available, including disclosure requirements

### Non-U.S. Public Officials

In many countries, it is considered customary to provide token ceremonial gifts to government officials on certain occasions. All gifts exceeding USD \$10 in value require pre-approval from Political Compliance or your regional Apple legal counsel. Meals that comply with posted guidance or a country are permissible and do not need pre-approval. Meals that are frequent and/or lavish could appear to influence a business decision and are inappropriate.

# Business Integrity

## Governments as Customers

Governments are unique customers for Apple. They often have unique bidding, pricing, disclosure, and certification requirements. When dealing with government customers, make sure to partner with Legal when bidding for business, and contact Business Conduct with questions relating to compliance requirements.

## Hiring Government Employees

Laws often limit the duties and types of services that former government, military, or other public sector employees may perform as employees or consultants of Apple, especially in regard to matters they were involved in while with the government. Employment negotiations with government employees may be subject to legal restrictions and disclosure requirements, particularly if the government employee is involved in a matter involving Apple's interests. Contact Political Compliance before entering such negotiations. You may never hire any individual in exchange for securing or retaining business, or securing an improper advantage. We also prohibit hiring preference being given to anyone in return for special treatment of any kind. For more information, see the [Anti-Corruption Recruiting Policy](#).

## Bribery and Corruption

At Apple, we do not tolerate corruption in connection with any of our business dealings. Corruption can take many forms, but most often it occurs through bribery. A bribe is offering or giving anything of value, including cash, cash equivalents such as gift cards, gifts, meals, travel and entertainment, to any person for the purpose of obtaining or retaining business, or securing an improper advantage. You cannot offer or receive bribes from any individual, regardless of whether that individual is a public official or a private party. Kickbacks are a type of bribery, and occur when a person is offered money or something of value in exchange for providing something, such as information, a discount or a favor, to a third party. Kickbacks are not permissible and are strictly prohibited by Apple.

Facilitating payments are a type of bribe generally used to facilitate or expedite the performance of routine, non-discretionary government action. These payments are not permissible and are strictly prohibited by Apple. Exceptions may be made in circumstances that involve an imminent threat to health or safety, and such situations must be immediately reported to Business Conduct.

Apple can be found responsible for bribes, kickbacks, and/or facilitating payments made by third parties in connection with Apple's business. Before engaging a third party that will be interacting with the government or public officials on Apple's behalf, contact Business Conduct to evaluate whether we need to conduct additional due diligence.

For more information, see the [Anti-Corruption Policy](#) and other resources available on the Business Conduct and Global Compliance website.

## Money Laundering

Money laundering occurs when individuals or organizations try to conceal illicit funds or make those funds look legitimate. Money laundering is illegal and strictly prohibited by Apple. In certain countries, we are required to report suspicious activity. If you deal directly with customers or vendors, the following examples may signal potential money laundering:

- Attempts to make large payments in cash
- Payments by someone who is not a party to the contract
- Requests to pay more than provided for in the contract
- Payments made in currencies other than those specified in the contract
- Payments from an unusual, nonbusiness account
- Transactions forming an unusual pattern such as bulk purchases of products or gift cards or repetitive cash payments

## Competition and Trade Practices

Competition and innovation are at the core of Apple's DNA. We vigorously compete to develop and create the very best products for our customers. Apple will never seek to eliminate or reduce competition through illegal agreements with competitors. Agreements with competitors are subject to rigorous scrutiny in all countries. Agreements with our resellers, distributors, and suppliers can also give rise to scrutiny, particularly if Apple has a leading position in the market.

You should never:

- Agree with or exchange information with competitors regarding price, policies, contract terms, costs, inventories, marketing plans, capacity plans, or other competitively significant data.
- Agree with competitors to divide or assign sales territories, products, or dedicate customers.
- Agree with resellers on the resale pricing of Apple products without legal approval. Resellers are free to determine their own resale pricing.
- Violate fair bidding practices, including bidding quiet periods, or provide information to benefit one vendor over other vendors.
- Remember: Always consult the Competition Law Team whenever you have a question. For more information, see the [Antitrust and Competition Law Policy](#).

## Obtaining and Using Business Intelligence

Gathering information about customers, competitors, and markets in which we operate is a common business practice, but you must always do so with integrity. You may generally obtain information from public sources, surveys, and competitive research. Personal information shall not be obtained from third parties without confirming with Privacy. We do not seek business intelligence by illegal or unethical means. It is never appropriate to engage in theft, espionage, or breach of a non-disclosure agreement. If you obtain confidential nonpublic information, accidentally or provided by unknown sources, that relates to a competitor, it may be unethical to use the information. If this happens to you, immediately contact your manager, Legal, or Business Conduct.

## Trade Restrictions and Import/Export Controls

Many countries periodically impose restrictions on imports, exports, and other dealings with certain countries, persons, or groups. These can include the trading of commodities or technologies, travel to or from a sanctioned country, and investments. Certain laws also prohibit support of boycott activities. If your work involves the sale or shipment of products, technologies, or services across international borders, always consult Global Export and Sanctions Compliance before moving goods. For more information, see the Export Control and Sanctions Policy.



## Private Employee Information

You should never share a coworker or prospective employee's personal identifying information, unless that person shares the information publicly themselves or gives you permission to share it. This includes information regarding their health information, national identity number, or performance and disciplinary matters. This does not apply to protected concerted activity. Any Legal or business need-to-know exceptions should be approved by your manager and Legal.

As an Apple employee, you should understand that subject to local laws and regulations and in accordance with Apple's review process, we may do one of the following when you access Apple's network or systems, or use any device, regardless of ownership, to conduct Apple business:

- Access, search, monitor, and archive all data and messages sent, accessed, viewed, or stored (including those from iCloud, Messages, or other personal accounts).
- Conduct physical, video, or electronic surveillance, search your workspace (e.g. file cabinets, desk drawers, and offices, even if locked), review phone records, or search any non-Apple property (e.g. backpacks, handbags) while on company premises.
- Disclose to law enforcement, without prior notice, any information discovered during a search that may indicate unlawful behavior.

While limited personal use of Apple equipment and systems is allowed, Apple may monitor equipment and systems. You should not have any expectation about the privacy of content or personal information on Apple systems or networks, including VPN. To learn more, read our Information Security Policies and guidance on Personal Information Privacy on the People site, which explain Apple's rights and your rights when conducting Apple business or using Apple-provided equipment. For more information, contact the Privacy team.

We will not exercise our rights of access to monitor union or other protected concerted activity. Additional information on employee rights, including on the right to engage in union or other protected, concerted activity, can be found on the People site.

## Human Trafficking

Apple is committed to treating everyone in our business and supply chain with dignity and respect, to upholding human rights across our global network of suppliers, and to protecting the planet we all share. Human trafficking and the use of involuntary labor are strictly prohibited in Apple's supply chain and our own business operations. If you become aware of human trafficking or behavior supporting human trafficking, you must report this activity to Business Conduct as soon as possible. Some Apple employees who interact with the U.S. government must abide by additional requirements set for government contractors. For more information, see the Anti-Human Trafficking Policy.

# Resources

[Apple Antitrust and Competition Law Policy Statement](#)

[Business Conduct Helpline](#)

(web form and telephone options)

[Anti-Corruption Policy](#)

[Apple Customer Privacy Policy](#)

[Apple Global Whistleblowing Policy](#)

[Apple Human Rights Policy](#)

[Apple Supplier Code of Conduct](#)

[Apple Third Party Code of Conduct](#)

[Apple Public Policy Advocacy Website](#)

[Intellectual Property](#)

[Investor Relations](#)

[Legal Department Contacts](#)

[Trademark and Copyright Information](#)

[Trademark List](#)