



Mobileye Code of Conduct

NOVEMBER 2020

From Mobileye CEO, Prof. Amnon Shashua

In 2017, we embarked on an exciting new journey for Mobileye. We joined Intel Corporation, with the aim of accelerating our growth and leveraging the new skills and technology that a tech giant like Intel could offer us.

Prior to the acquisition, the Mobileye Code of Conduct was always the guide for how we operated with the highest ethical standards and with our core values in mind. With my full support, following the acquisition, the Mobileye Code of Conduct was updated to incorporate the Intel Code of Conduct and to reinforce the importance we placed on doing the right things right and operating legally and ethically in all that we do. We have now updated the Mobileye Code of Conduct once again.

These core values and standards are the foundation that differentiates us, builds our brand, and inspires our customers and suppliers. I expect and encourage everyone to read and follow the updated Code of Conduct.

If you have any questions or concerns please contact your manager, HR representative, the Legal Department, or the Intel Ethics and Compliance Reporting Portal (intel.ethicspoint.com). I look forward to your continued commitment to live our values in the workplace each and every day.

Prof. Amnon Shashua

Mobileye CEO & CTO | Intel Senior Vice President

November, 2020

What We Stand For

Integrity

We believe in doing the right things right everywhere we do business.

Ethical Leadership

Our values inform our business decisions, so that we deliver solutions that matter to our customers and stakeholders, we maintain the trust of our employees, business partners and communities, and we uphold Intel's reputation as an ethical, legal, and respected company.

Respect

We value human dignity, individual differences, diversity of thought, and the quality of ideas, innovation, and solutions that result.

Speaking Up

We have the courage to ask questions and [raise concerns](#) about any situation, condition, or action that appears inconsistent with our Code of Conduct, company policy, or applicable law, knowing that our voice will be heard without retaliation or reprisal.

Responsibility

We are responsible for meeting our commitments and are transparent in the manner in which we deliver results for our customers and stakeholders.

What We Prohibit

Dishonesty

We don't mislead our customers, suppliers, distributors, or each other. We do not falsify or misrepresent information in or about our books and records, or engage in unfair competition.

Illegal Activity

We do not violate the law and don't support others to violate the law either. This includes violating laws related to antitrust, bribery, corruption, environmental standards, product safety, human rights, privacy, insider trading, global trade, employment, and other laws that apply to our business.

Retaliation

We don't harass, bully, intimidate, engage in acts of violence toward others, or retaliate against anyone who speaks up in good faith or participates in an investigation.

Conflicts of Interest

We avoid situations that interfere or appear to interfere with our ability to act in the best interests of Intel.

Misuse of Assets

We don't misuse Intel assets or confidential information or those of our business partners, disclose confidential information entrusted to us without proper authorization, or put the security of our assets in jeopardy.

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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, Purpose, and Values

Our Vision

We are on a journey to be the trusted performance leader that unleashes the potential of data.

Our Purpose

We exist to create world-changing technology that enriches the lives of every person on earth.

Our Values

Customer Obsessed

- We listen, learn, and anticipate our customers' needs to deliver on their ambitions.
- Our customers' success is our success.

One Intel

- We appreciate, respect and trust each other.
- We commit to team over individual success. We are stronger together.
- Innovators at heart, we bring fun to work every day.

Fearless

- We are bold and innovative.
- We take risks, fail fast, and learn from mistakes to be better, faster, and smarter the next time.

Truth & Transparency

- We are committed to being open, honest, ethical, and timely with our information and feedback.
- We constructively challenge in the spirit of getting to the best possible result.
- We act with uncompromising integrity.

Inclusion

- We strive to build a culture of belonging.
- We create a space where everyone can contribute to their fullest potential and deliver their best work.
- We welcome differences, knowing it makes us better.

Quality

- We deliver quality and ensure a safe workplace.
- We have the discipline to deliver products and services that our customers and partners can always rely on.

Your Responsibility

Intel's Code of Conduct applies to all employees and sets expectations for Intel Corporation and its subsidiaries, including Mobileye B.V. and its subsidiaries ('Mobileye'), (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; those that do business with Intel can establish more restrictive policies, but cannot operate under less restrictive policies.

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.

If you have questions on how the Code of Conduct may apply, please contact Legal.

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.

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 confidential information.** Protect the value of Intel's assets, including physical assets, intellectual property, confidential 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

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.

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

Ways to Seek Guidance and Report Concerns

Because the Code cannot address every situation, you should seek guidance whenever you are unsure about the correct course of action. There are many ways to ask questions about the Code or report concerns:

- You can ask questions and report concerns about the Code with any manager, such as your direct manager, a department head, a division general manager, or another manager up to and including the Executive Office;
- You can ask questions or report concerns with internal groups who specialize in handling such issues, including Human Resources and Legal;
- You can report an ethics or compliance or safety concern online or by phone through the [Intel Ethics and Compliance Reporting Portal](#), which is hosted by a third party and allows anonymous reporting where permitted by law.

Employees of Mobileye have additional reporting channels for asking questions and reporting concerns that can be found in the [Mobileye Whistleblower Policy](#).

For other work related concerns, you are encouraged to contact the confidential reporting e-mail account at harassment.concerns@intel.com, to Human Resources, [Employment and Labor Legal](#) (ELL) or to Legal.

An employee does not need to be certain about a concern, have evidence of misconduct, or even know that a violation of the Code, policy or law has occurred to report. No matter how you choose to raise a concern, we take all reports seriously. An authorized team will promptly review the matter to determine what actions are appropriate based on the findings consistent with applicable law, Intel's Code of Conduct, and other applicable company guidelines.

All employees of Intel and its subsidiaries are required to cooperate fully with internal investigations, including providing honest, truthful and complete information (except where that would result in disclosure of the employee's participation in concerted activity under the U.S. National Labor Relations Act). 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 U.S. National Labor Relations Act, an employee's participation, while encouraged, is

voluntary.

Non-Retaliation Policy

Intel does not tolerate retaliation against anyone who in good faith reports possible violations of law, the Code, or other company policies or procedures, questions on-going or proposed conduct, or participates in an internal investigation. Retaliation can include, among other things, demoting, transferring, or terminating anyone for raising a question or speaking up in good faith about a possible violation of the Code, company policy, or law. Employees who retaliate or attempt to retaliate against anyone who reports a concern in good faith or participates in an internal investigation are subject to discipline up to and including termination.

Employees who believe they have experienced retaliation should contact [ELL](#) immediately.

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, accurate, 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 Responsible Business Alliance (RBA) 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.

When conducting business or engaging with the U.S. Government, Mobileye employees or others acting on Mobileye's behalf, must comply with Mobileye's applicable policies and procedures and applicable laws and regulations.

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 upholding 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 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 are responsible for fairly representing the information contained in Intel's books and records. This includes internal management reporting as well as external reporting, including our public statements, statutory filings and filings with the United States Securities and Exchange Commission.

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 encourage free competition by prohibiting certain agreements and conduct that make it more difficult for companies to compete. Intel complies with antitrust laws everywhere we do business. Violating an antitrust law is a serious matter and can result in prison time for employees and large financial penalties and reputational damage for Intel.

We compete vigorously and legally:

- We are truthful when communicating about our products and our competitors' products.
- We focus on what customers should do with Intel, not what they should not do with our competitors.
- We make design decisions that are based on improvements to our products.
- We do not agree with other companies to limit hiring or recruiting of each other's employees or to set employee compensation.
- We do not communicate with competitors about price, cost, terms of sale, production levels, allocation of markets or other competitively sensitive information.
- We do not agree with competitors not to sell to or buy from another company.

For more guidance, read Intel's Antitrust Policy. When questions arise, contact Intel Legal.

Bribery and Anti-Corruption

Intel strictly prohibits all forms of bribery. Intel's policy is to comply with all anti-corruption laws and to accurately reflect all transactions in Intel's books and records. We must never offer or accept bribes or kickbacks and must not participate in or facilitate corrupt activity of any kind. Many countries' laws define facilitation payments made to government officials as bribes. We do not make facilitation payments on behalf of Intel to any government official.

Intel's prohibition against offering, promising or paying bribes also applies to third parties who provide services or act on Intel's behalf, such as suppliers, agents, contractors, consultants and distributors. We must never engage a third party whom we believe may attempt to offer a bribe in connection with company business. Our anti-corruption expectations for third parties are set out in our [Third Party Anti-Corruption Policy](#) and [Gifts, Meals, Entertainment and Travel \("GMET"\) Policy for Third Parties](#).

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 before providing anything of value to a Government Official.

Environmental, Health and Safety

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.

Product Safety & Regulatory

We protect people, property, and the environment through world-class product regulatory practices. Intel is committed to the safety of its employees, customers, and anyone who encounters our products. Our product design teams incorporate regulatory and safety compliance into the product regulatory lifecycle to ensure that we deliver the highest quality products to our customers and consumers. All safety and regulatory concerns and incidents are handled by Intel's Product Safety and Regulatory Council.

Trade 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. Economic sanctions laws restrict with whom we can engage or may set certain parameters regarding how we engage. Customs laws, amongst other things, require accurate product information and payment of duties, if applicable. Export laws may require an export license or other appropriate government approval 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, civil and criminal penalties, denial of export licenses, loss of export privileges, mandatory audits, 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 would 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. You can find more information in our [Insider Trading Compliance](#) page.

Intel's directors and all employees may not:

- buy or sell Intel call options, Intel put options, or other Intel stock derivatives;
- 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; or
- buy, sell, or participate in instruments such as prepaid variable forwards, equity swaps, collars, and exchange funds if they involve Intel securities.

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 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, the Intel Corporate Privacy Rules, and Intel's Philosophy on Protecting Personal Information to demonstrate and 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 spokespersons may make public statements on behalf of Intel to the media or investors.

If you are contacted by a reporter, blogger, analyst or the public requesting comments on behalf of Mobileye on a topic for which you are not authorized to speak on behalf of the company, do not respond. Immediately refer the inquiry to Marketing 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 Diversity

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, religious creed, sex, national origin, ancestry, age, physical or mental 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, and for the religious beliefs and practices of 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, religious creed, sex, national origin, ancestry, age, physical or mental 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 everyone we interact with while performing work with dignity and respect.

Respect for Human Rights

Human rights are the fundamental rights, freedoms and standards of treatment to which all people are entitled. Respect for human rights is rooted in our values and applies wherever we do business. Our [Global Human Rights Principles](#) formalizes Intel's commitment to respect human rights.

We are committed to respecting human rights in our operations, our supply chain, our business partnerships, and our products. While we do not always know nor can we control what products our customers create or the applications end users may develop, Intel does not support or tolerate our products being used to violate human rights. We expect our suppliers and business partners to make the same commitment to respect human rights.

We also believe human trafficking, forced, debt bonded, indentured, and slave labor are unacceptable. Intel's Code and policies prohibit harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. Our policies prohibit the employment of anyone under the age of 16 in any position, and workers under the age of 18 are not to perform hazardous work. We also expect our suppliers 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. We communicate our expectations and safety protocols to employees and suppliers and explain the potential health and safety risks and implications of not following these requirements. 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.

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

We seek to avoid any activity that is or has the appearance of a conflict of interest with Intel. We do not engage in activities that compete with Intel or interfere with the proper performance of our duties or responsibilities to Intel. We do not use confidential company information, company assets or our role or position at Intel for personal gain. We avoid situations where our personal, outside business, or family interests could impair our ability to make sound business decisions in the best interest of Intel.

Handling Conflicts of Interest

All employees must disclose to their managers in writing any conflict or appearance of a conflict of interest with Intel; directors and executive officers may choose instead to disclose the issue to the General Counsel, Chief Compliance Officer or the Board of Directors. Managers or other permitted persons to whom disclosures are made will determine, in consultation with Legal, [ELL](#) Legal, Internal Audit, or the Board, as necessary, if a conflict, or a perception of a conflict, exists, and if so, how to resolve it. The employee is responsible for memorializing the resolution in writing. In addition to these requirements, when conducting outside business activities, Mobileye employees must also follow the applicable Mobileye policies, which requires informed written consent of Legal. Disclosure is mandatory; failing to disclose a conflict or a perceived conflict 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 questions and additional guidance, consult Legal.

Protect the Company's Assets and Confidential Information

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, and to protect confidential information customers and others have entrusted to us.

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 your manager or to the [Intel Ethics and Compliance Reporting Portal](#) 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.

Protecting Confidential Information

Confidential information is valuable to Intel. It gives Intel a competitive advantage, helps maintain the trust of our customers, and sustains the solid reputation on which Intel was built. Confidential information includes information about unreleased products, product roadmaps, manufacturing dates and more. It also includes confidential information transmitted orally or by tweets, posts, blogs and other forms of social media.

Each of us has a responsibility to protect and not to leak Intel confidential information or the confidential information of our customers and business partners, and we must not disclose or use this information without clear authorization. Physical assets and documents must be handled in compliance with information security policies. Improper disclosure of Intel or third party confidential information is a terminable offence, subject to applicable local law.

If you become aware of unauthorized disclosure or loss of confidential information, contact

Information Security or Legal.

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 employees to act as representatives of other entities (for example, as an officer, director, adviser, agent or similar role). 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 spokesperson 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 Chief People Officer.

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 and 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	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.
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 an official receipt issued by the government agency for the expedited service must be obtained as proof of payment.

Topic	Term	Definition
Environmental, Health and Safety	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.
Trade 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.
Trade 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.
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.
Privacy	Privacy	Privacy is defined as an individual's right to keep aspects of his or her personal life secret. This includes an organization's responsibility to respect an individual's privacy rights and to manage personal information appropriately, including collection, use, storage, or disclosure of an individual's personal information. 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).

Topic	Term	Definition
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>Harassment under our Code of Conduct includes: 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>
Respect for Human Rights	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>
Respect for Human Rights	Human trafficking	<p>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.</p>

Topic	Term	Definition
Respect for Human Rights	Corporal punishment	Corporal punishment refers to physical punishment. For example, caning and flogging are examples of corporal punishment.
Protect the Company's Assets and Confidential Information		
Maintaining Information Security	Confidential information	Confidential Information includes, without limitation: technical information (e.g. roadmaps, schematics, source code, specifications), business information (e.g. product information, marketing strategies, markets, sales, customers, customer lists or phone books), personnel information (e.g. organizational charts, employee lists, skill sets, employee health information, names, phone numbers, email addresses, personnel files, employee compensation except where the disclosure of such personnel information is permissible under local labor law such as the right of employees to discuss compensation and working conditions under the US National Labor Relations Act), and other non-public Intel data and information of a similar nature.
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 scents . 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.

Topic	Term	Definition
Safeguarding Trademarks and Brands	Brands	<p>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.</p> <p>2. Is often used interchangeably with "trademark".</p> <p>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.</p>
Safeguarding Trademarks and Brands	Channel distributors	Re-sells company products to smaller accounts or end users
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.