

Summary of changes to Business Conduct Policy

July 2010

- **Your Responsibilities (p.2)** – Added two clarifications to the existing requirement that employees with knowledge of possible violations must report the issue to management: (1) failure to report an issue in these circumstances may result in disciplinary action, and (2) you cannot fulfill your obligation by reporting the issue to your manager if your manager is involved in the wrongdoing.
- **Business Conduct Principles (p.2)** – Updated section to focus on four core principles of Honesty, Respect, Confidentiality and Compliance.
- **Retaliation is Not Tolerated (new section, p.2)** – Apple’s policy against retaliation is now more prominently featured in the Business Conduct Policy. Apple will not retaliate and will not tolerate retaliation against any individual for filing a good-faith complaint with management, Human Resources, Legal, Internal Audit, Finance or the Business Conduct Helpline, or for participating in the investigation of a complaint.
- **Giving and Receiving Business Gifts (p.5)** – Clarified that cash is never an acceptable gift. Added a note that some departments (e.g., Operations and Retail) have more restrictive gifting policies that may prohibit giving or receiving business gifts altogether, and that employees in those departments must follow the stricter policies.
- **Competition and Trade Practices (p.6)** – Added a prohibition against making disparaging remarks to customers about Apple resellers or service providers. Also, added a statement that employees cannot provide information to benefit one vendor over another.
- **No Bribery or Corruption (new section, p.7)** – Added an explicit statement that “Apple personnel shall not offer or accept bribes or use other inappropriate means to obtain an undue or improper advantage, or otherwise violate U.S. or international anticorruption laws and regulations (e.g., the U.S. Foreign Corrupt Practices Act).”
- **Charitable Donations (new section, p.8)** – Apple employees are encouraged to support causes of their choice, as long as the support is done without the use of Apple assets. Donation of Apple assets requires CEO/CFO approval.
- **Hiring Government Employees (p.8)** – Broadened this existing section to make it less U.S.-focused. Clarified that employees must check with Government Affairs before hiring a current or recent government employee.
- **Environment, Health, and Safety (p.8)** – Added a statement that Apple does not tolerate workplace violence.
- **Activities Related to Technical Standards (new section, p.10)** – Employees must receive management and Legal approval before engaging in activities related to technical standards, such as joining a standards organization or working group, contributing technology to a standard, or using a standard in the development of an Apple product. Included a link to Apple’s Standards Legal Policy.
- **Outside Employment and Inventions (p.12)** – Added a reference to Apple’s policy prohibiting employees from having any involvement in the development of outside iPhone/iPad Apps.
- **Workplace Relationships (new section, p.13)** – New section regarding personal relationships in the workplace that present an actual or perceived conflict of interest. Individuals who become involved in such a relationship must notify HR, and employees should not allow their relationships to disrupt the workplace or interfere with their work or judgment.
- **Public Speaking and Press Inquires (new section, p.14)** – Combined the “Public Communications” and “Honoraria and Public Speaking” sections from prior versions into a single section. Clarified that all public speaking engagements that relate to Apple’s business or products must be pre-approved by your manager and Corporate Communications.
- **Your Obligation to Take Action (p.15)** – In addition to incorporating the concepts added in the “Your Responsibilities” section above, clarified that employees must cooperate fully in any Apple investigation and keep their knowledge and participation confidential to help safeguard the integrity of the investigation.