

# **WIND RIVER**

## **Wind River Code of Conduct**

**JANUARY 2014**

## **Introduction**

The Code of Conduct applies to all employees (referred to collectively as 'employees') and sets expectations for Intel Corporation and its subsidiaries (referred to collectively as 'Intel'). The Code also applies to our non-employee members of the Board of Directors with regard to their Intel-related activities.

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

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

## **OUR VISION**

Wind River powers intelligent connected products that enrich the quality, safety and security of people's lives every day.

## **OUR MISSION**

Wind River delivers outstanding software and expertise that enables the rapid innovation and deployment of the most safe, secure and reliable intelligent devices.

## **OUR GUIDING PRINCIPLES**

### **We Are Business-Focused and Customer-Driven**

- Focus on meeting the company's business objectives
- Drive to make our customers successful
- Actively listen to our customers' needs
- Build solutions that meet our customers' needs while ensuring they are in line with our business strategy

### **We Are Urgent, Agile and Accountable**

- Accelerate our business with a sense of urgency around our key priorities
- Change quickly in response to customer needs, industry trends, and market shifts
- Always focus on improving the customer experience and our business
- Hold ourselves accountable to the company strategy, our customers, and each other

### **We Are Collaborative**

- Collaborate with openness and honesty
- Work cross-functionally on key issues
- Clearly communicate decisions and plans to all stakeholders
- We treat each other with respect

### **We Are Optimistic, Upbeat and Passionate**

- Support each other in whatever way possible to achieve success and customer satisfaction
- Focus on finding solutions and achieving results
- Vigilantly address obstacles that get in the way of success
- Constantly add value and look for ways to improve the company

### **We Are Innovative**

- Design and develop innovative products
- Develop innovative solutions to solve customer needs
- Innovate internally and learn constantly to improve processes, efficiencies and results
- Lead the embedded software industry with new technologies

## **From Wind River's President**

At Wind River, a commitment to high ethical standards is an important part of our history and culture. Preserving these values has never been more important than in today's competitive and rapidly changing business climate. As we continue to grow our business, the Code of Conduct sets forth the ethical principles that guide our standard business conduct.

Our business accomplishments stem from our ability to build partnerships – with each other, clients, business partners, and our communities. We need to ensure our approach to business remains consistent and is widely understood. Our Code of Conduct provides the universal framework for each of us to make the right decisions and our obligation to do the right thing.

The Code of Conduct represents Wind River's pledge to abide by the highest ethical and legal standards.

Commitment to the Code – Get to know it. Understand it. Adhere to both the intent and spirit of what it represents.

Resources can be found on Wind River's intranet site to help you apply the Code to your everyday work life.

Compliance with our Code of Conduct helps us remain above reproach and allows us to continuously conduct business in a manner that builds trust and integrity.

  
Barry Mainz  
President

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## **Code of Conduct**

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 and others. All of us at Intel must abide by the Code when conducting Intel-related business.

The Code affirms our five principles of conduct:

- Conduct Business with Honesty and Integrity
- Follow the Letter and Spirit of the Law
- Treat Each Other Fairly
- Act in the Best Interests of Intel and Avoid Conflicts of Interest
- Protect the Company's Assets and Reputation

## **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, and others fairly,
- Acting as a responsible corporate citizen, respecting human rights, and managing the impact of our business on the world around us, and
- Keeping accurate financial and other books and records.

### *Communicating Clearly and Professionally in Business*

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

### *Conducting Business with Customers, Suppliers, and Others*

Our success is based on strong relationships of mutual respect and trust with our customers, suppliers, 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.

### *Being a Responsible Corporate Citizen*

Intel has a long-standing, global reputation as a responsible corporate citizen. For us, corporate responsibility means achieving business success in ways that demonstrate respect for people and the planet and uphold the values and high standards of ethics expressed in our Human Rights Principles and our environmental health and safety policies.

Intel intends to be a leader in encouraging education and enhancing the communities in which we do business. We do this by challenging ourselves and others to continuously improve, inspire, and strengthen our communities, as well as enabling technologies that improve the lives of people around the world.

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

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

### **Follow the Letter and Spirit of the Law**

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

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

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

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

### *Antitrust*

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

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

To adhere to antitrust laws, we must not:

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

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

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

### *Bribery and Anti-Corruption*

Many countries have bribery and other anti-corruption laws that are intended to prevent companies and individuals from gaining an unfair advantage and from undermining the rule of law. We must never offer or accept bribes or kickbacks, and must not participate in or facilitate corrupt activities of any kind.



This prohibition on offering or paying bribes also applies to third parties acting on Intel's behalf, such as contractors or consultants. We must never engage a third party who we believe may attempt to offer a bribe to conduct company business.

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

### *Environmental Management and Compliance*

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

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

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

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

### *Import and Export Compliance*

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

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

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

Violations, even inadvertent ones, could result in significant fines and penalties, denied export licenses, loss of export privileges, or customs

scrutiny and delays. Because these laws and regulations are complex and unique in each country, we provide guidelines and training.

### *Insider Trading*

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

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

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

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

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

### *Intellectual Property*

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

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

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

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

### *Privacy*

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

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

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

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

### *Public Communications*

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

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

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

### **Treat Each Other Fairly**

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

### *Open and Honest Communication*

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

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

### *Equal Employment Opportunities and Discrimination*

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

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

### *Anti-Harassment*

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

We prohibit threats or acts of violence against co-workers, vendors, customers, or others. If you become aware of a threat or act of violent behavior in or near the Intel workplace, notify management of the details of the act or threat immediately. Managers who receive such information should immediately notify Security or Human Resources as applicable.

### *Safety*

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

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

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

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

A conflict of interest may occur when an employee's personal or family interests interfere—or even appear to interfere—with the employee's ability to make sound business decisions in the best interest of Intel. We should not put ourselves in situations where we could be tempted to make Intel business decisions that put our personal needs ahead of Intel's interests.

### *Conflict of Interest Examples*

Conflicts of interest typically arise in the following situations:

- Conducting any non-company business that interferes with the proper performance of our roles, such as conducting non-company business during working hours; utilizing confidential or proprietary information or processes gained as a company employee; or using company property or equipment for non-company uses (exceeding reasonable personal use)
- Using confidential or proprietary information or processes gained as a company employee for personal gain or to Intel's detriment, including consulting engagements with hedge funds and other investment professionals (any exceptions require the written permission of Intel's Chief Financial Officer)
- Offering or accepting a gift, entertainment, or other payment that could be viewed as a bribe
- Accepting any personal benefit that is or could be interpreted as being given to us because of our role or seniority or because the donors believe we might be in a position to assist them in the future
- Participating in or influencing a company decision that may result in a personal gain, gain for an immediate family member, or gain for someone with whom we have a close personal relationship
- Making use of business opportunities discovered or learned through the use of company property, information, or our positions that may result in a personal gain, gain for an immediate family member, or gain for someone with whom we have a close personal relationship
- Serving on the board of directors or advisors of a competitor or a company that has or is seeking a business relationship with Intel, or owning a significant interest in such an organization, where our ability to make decisions in Intel's best interest could be compromised

- Participating in or influencing a company decision to hire a family member, or supervising an immediate family member or someone with whom we have a close personal relationship

### *Handling Conflicts of Interest*

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

If you become aware of a possible conflict of interest, disclose it immediately to your manager, making a full report of all pertinent facts and circumstances. The manager will determine, in consultation with Legal as necessary, whether a conflict of interest exists, what needs to be done to resolve the conflict, or whether you may proceed.

Disclosure is mandatory; failing to disclose a conflict of interest is a violation of the Code.

### *Gifts and Entertainment*

We recognize that exchanging business courtesies such as meals, entertainment, routine promotional gifts, and other items can be a part of building strong business relationships. At other times, such business courtesies are not appropriate.

We provide guidelines to help determine when accepting or offering such courtesies may be appropriate and when to seek advice. As customs vary throughout the world, these guidelines may differ by country.

However, there are some principles that are fixed and apply worldwide:

- We do not offer or accept a bribe, that is, anything designed to obligate a person to act improperly with regard to our business
- We do not offer or accept cash or cash equivalent gifts
- We never participate in any business entertainment activity that would violate the law or embarrass us by its public disclosure
- We follow our company's policies when providing anything of value to Government Officials (which includes employees of government agencies and state owned enterprises) as gifts, meals, entertainment and travel are strictly regulated and often forbidden entirely.
- We do not seek favors directly or indirectly, such as gifts, entertainment, sponsorships, or contributions from organizations doing business or seeking to do business with Intel

If you have questions, consult Legal.

## **Protect the Company's Assets and Reputation**

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

### *Protecting Physical Assets*

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

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

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

### *Maintaining Information Security*

Proprietary information is another valuable company asset and includes internal and external communication; digital information stored on laptops, handhelds, desktops, servers, backups, and portable storage devices; and hard copy documents, verbal discussions, and interactions via social media channels.

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

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

### *Safeguarding Trademarks and Brands*

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

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

### *Representing Intel*

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

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

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

### **Asking Questions and Reporting Concerns**

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

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

### *Ways to Seek Guidance and Report Concerns*

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

All employees of Intel Corporation and Intel subsidiaries are encouraged to ask questions or raise concerns with their direct manager or internal groups who specialize in handling such questions or issues, including Human Resources, Internal Audit, Security and Legal as soon as possible after they arise. Within Wind River, you can also raise issues by calling 1-877-483-7163 or going to the Silent Whistle intranet site. Intel employees can report ethics and compliance issues on-line through the Ethics Reporting Form (requires Intel network access) or by calling the Intel Ethics & Compliance Line. Both tools allow for anonymous reporting where allowed by law. Intel employees can also send an email to [ethics.reporting@intel.com](mailto:ethics.reporting@intel.com).

In accordance with the Open Door policy, employees of Intel Corporation can raise issues about the Code with any manager, such as a department head, a division general manager, or another manager up to and including the Executive Office and can ask general Code of Conduct questions by



contacting [ask.ethics@intel.com](mailto:ask.ethics@intel.com). Employees of Intel subsidiaries may have additional reporting channels.

Whether you are an employee of Intel Corporation or an Intel subsidiary, you have an obligation to report any potential or actual violations of the law, the Code, or other guidelines. We take all reports seriously, look into the matter, and take appropriate action.

### *Non-Retaliation Policy*

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

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

## **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.

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.

## Code of Conduct Glossary Terms and Definitions

Topic	Term	Definition
<b>Conduct Business with Honesty/Integrity</b>		
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
<b>Follow the Letter and Spirit of the Law</b>		
Bribery and Anti-Corruption	Government official or representative	Any individual acting on behalf of a government, government department, government agency or government-owned company. Enforcement agencies interpret "government official" very broadly to include individuals who would not traditionally have been treated as a government "official". For example, under the current enforcement practice, even an employee of a partially government-owned entity can be treated as a government "official". Consultants who have been retained by the government or who are acting on behalf of the government clearly fall within the current definition.
Bribery and Anti-Corruption	Bribe	Giving, offering, promising or authorizing to give someone anything of value to improperly influence that person's activities or performance of their function or to improperly reward that person for past conduct.
Environmental Management and Compliance	Precautionary approach	An approach where the health or environmental risks from using a material and striving to find cleaner and safer alternatives are carefully considered.
Import and Export Compliance	Import	An import is any item coming into a country or crossing a border. Imports may be subject to customs duty, quota restrictions, bans, or licensing requirements, depending on the country of origin and the item.
Import and Export Compliance	Export	An Export is often seen as merely a physical shipment of goods, but this is a common misconception. An export can also take the form of an e-mail message, a conversation, or even a foreign national catching a glimpse of technology or a process that originated in the U.S.

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Topic	Term	Definition
Import and Export Compliance	Foreign Persons	A Foreign Person is anyone who is not a U.S. citizen or permanent U.S. resident who is working and residing in the United States. Depending on what country the Foreign Person is from and what type of work he/she will be doing for Intel, an export license may need to be obtained prior to employment.
Import and Export Compliance	Controlled software and technology	Intel produces products, software and technologies that are considered controlled by the U.S. government. There is also manufacturing equipment at Intel that may be considered controlled by the U.S. government. Such regulation and controls also exist in other countries.
Insider Trading	Tip or Tipping	Tipping occurs when someone gives material inside information about a company to someone else in circumstances where it is likely that the recipient of the information will trade on that information.
Intellectual Property	Privileged (attorney-client privilege)	The attorney-client privilege is a legal concept that protects communications between a client and his/her attorney in which the communication involves seeking or providing legal advice. <i>Please note: the privilege varies per jurisdiction. If you have questions about whether a communication is privileged or not, you should consult Legal.</i>
Intellectual Property	Intellectual property rights	Intellectual property rights include patents/patent applications, trademarks, copyrights, trade secrets, know how, and mask work rights.
Privacy	Privacy	<ul style="list-style-type: none"> <li>• An individual's right to keep aspects of his or her personal life secret and to expect appropriate collection, use and disclosure of their personal information</li> <li>- An organization's responsibility to respect an individual's rights and to manage personal information appropriately</li> </ul> <p>Note: An individual's right to privacy is not limited to personal information only, but also includes other areas, such as behavioral privacy (an individual's right to choose what they do and to keep certain behaviors from being shared with others) and communications privacy (the right to communicate without undue surveillance, monitoring, or censorship).</p>

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Topic	Term	Definition
Privacy	Personal Information	<p>Any information relating to an identifiable individual.</p> <p><b>Note:</b> Personal Information is also known as Personal Data or Personally Identifiable Information.</p> <p><b>Examples of personal information include:</b> 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 Preferences, Personal Profiles, Photographs, Social Security Number, Telephone Number, etc.</p>
<b>Treat Each Other Fairly</b>		
Anti-Harassment	Harassment	<p>Intel considers the following conduct to be harassment under our Code of Conduct: verbal, physical and visual conduct that creates an intimidating, offensive, or hostile environment in the workplace that interferes with work performance, even if it is not unlawful. Harassment may be based on race, color, religion, sex, national origin, ancestry, age, disability, veteran status, sexual orientation, marital status, pregnancy, gender identity or other characteristic protected by federal, state or local law, regulation or ordinance.</p>
<b>Avoid Conflicts of Interest</b>		
Handling Conflicts of Interest	Bribe	<p>Giving, offering, promising or authorizing to give someone anything of value to improperly influence that person's activities or performance of their function or to improperly reward that person for past conduct.</p>
Handling Conflicts of Interest	Significant Interest	<p>An interest in something outside of an employee's job at Intel is significant when this influences an employee's ability to make fair and impartial decisions in the best interest of Intel.</p>
Handling Conflicts of Interest	Business courtesies	<p>These refer to the usually acceptable practices between representatives of two or more companies that are considering doing business or are actually doing business together. These practices would include invitations to events or meals and the giving of gifts of appreciation.</p>
Handling Conflicts of Interest	Routine promotional	<p>Under corporate policies and practice, this refers to items of nominal or small value that are routinely given away for marketing purposes. These items must include a logo or trademark of the supplier, vendor, or contractor who is giving them away.</p>

INTEL CODE OF CONDUCT

Topic	Term	Definition
<b>Protect the Company's Assets/Reputation</b>		
Maintaining Information Security	Proprietary and confidential Information	Specific data types that are regulated by laws, contractual agreements, national and international regulations, and company policies. Failure to provide proper access restrictions on the distribution, display, transportation, use, or storage of this information may put the company at risk and may also put the individuals involved at risk. Examples: Conflict of Interest, Insider Trading and Tipping, Personnel Privacy, Health Information Privacy, Customer Privacy, Customer Transaction Information, Trade Secrets, Future Marketing Information, Controlled Technology, Sensitive Business Processes, Security Information, Legal and Information Export regulations.
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 <b>word</b> , a <b>name</b> , a <b>design</b> , a <b>color</b> , a <b>phrase</b> , a <b>sound</b> , or even a <b>scent</b> . It is a <b>word</b> (Tide*), <b>name</b> (Howard Johnson*), <b>symbol</b> (McDonald's Golden Arches*), <b>device</b> (Pillsbury Doughboy*), <b>phrase</b> (The Ultimate Driving Machine*) or <b>sound</b> (Intel Bong/Sonic) that is used in trade with goods to indicate the source of the goods and to distinguish them from the goods of others. A trademark is a valuable asset worth millions of dollars and signifies the standards of excellence and consistent quality associated with the Intel products and services. This gives the consumer an assurance of quality when making future purchasing decisions in the marketplace. Thus, a trademark is inherently bound up with the "good will," and reputation, that is developed by the owner of the mark.
Safeguarding Trademarks and Brands	Brands	<ol style="list-style-type: none"> <li>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.</li> <li>2. Is often used interchangeably with "trademark".</li> <li>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.</li> </ol>
Safeguarding Trademarks and Brands	Channel Distributors	Re-sells company products to smaller accounts or end users

INTEL CODE OF CONDUCT

<b>Topic</b>	<b>Term</b>	<b>Definition</b>
Representing Intel	Authorized Representative	This refers to an employee who has been designated as a representative of Intel for external purposes or has been delegated the authority by his or her organization to commit Intel to agreements. Examples of this would be a manager sitting on another company's Board of Directors, or signing a deal with a customer, or attending an external conference as the official Intel representative. This would also include the limits of signing authority of certain employees.
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.