Political Contributions and Expenditures Policy

The success of Apple Inc. (the "Corporation") depends on sound and consistent public policies that encourage a healthy business environment. The Corporation is subject to legislation and regulation that significantly affects how the Corporation conducts its business affairs and creates value for its shareholders. The legal and regulatory landscape includes, without limitation, laws relating to intellectual property, trade, corporate taxation and the environment. Participating in the political process is part of the Corporation's strategy to protect and enhance the Corporation's interests.

The Corporation's strategy is to engage in the political process with a view to the long-term interests of the Corporation and its shareholders. It is the role of the senior management team not simply to respond to the political process, but also actively to promote the Corporation's interests and forecast policy trends that can affect the Corporation in the future. The Corporation makes all of its political contributions and expenditures in accordance with this policy. The Corporation's Government Affairs group, with the approval of the Chief Executive Officer of the Corporation, makes all political contributions and expenditures on behalf of the Corporation, and management reports these political contributions and expenditures to the Board on an annual basis.

The Corporation does not make political contributions to individual candidates. Any other political contribution the Corporation makes is promptly reported publicly on the Corporation's website.

The Corporation complies with all applicable laws and regulations governing political contributions and expenditures and discloses all political contributions and expenditures as required by law. The Corporation does not have a political action committee.

The Corporation engages with government officials at all levels on issues that impact the Corporation and its operations. The Corporation also belongs to various trade organizations that focus on matters concerning the Corporation's interests. These organizations, which operate on a multi-national, national and/or state and local level, principally comprise technology companies and/or geographically linked companies. Some of the major trade associations that the Corporation currently belongs to include TechAmerica, the Business Software Alliance (BSA), the Consumer Electronics Association (CEA), and Information Technology Industry Council (ITI). The purpose of these associations is to advance the common goals and interests of the member companies and their customers, including addressing such issues as combating piracy, opening access to foreign markets, ensuring consistent product standards, and promoting strong intellectual property protection. These organizations also engage in advocacy activities on behalf of their members. The Corporation does not allow trade association dues to be used to make political contributions. Management reports the Corporation's membership and participation in these organizations to the Board annually when it reports on its other political activities.