



## **Business Conduct**

The way we do business  
worldwide

# Business Conduct

## The way we do business worldwide

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

## Apple's Principles of Business Conduct

Apple's success is based on creating innovative, high-quality products and services and on demonstrating integrity in every business interaction. Apple's principles of business conduct define the way we do business worldwide. These principles are:

- **Honesty.** Demonstrate honesty and high ethical standards in all business dealings.
- **Respect.** Treat customers, suppliers, employees, and others with respect and courtesy.
- **Confidentiality.** Protect the confidentiality of Apple's information and the information of our customers, suppliers, and employees.
- **Compliance.** Ensure that business decisions comply with all applicable laws and regulations.

## Your Responsibilities

Apple's Business Conduct Policy and principles apply to employees, independent contractors, consultants, and others who do business with Apple. You are expected to:

- **Follow the policy.** Comply with Apple's Business Conduct Policy, principles, and all applicable legal requirements.
- **Speak up.** If you have knowledge of a possible violation of Apple's Business Conduct Policy or principles, other Apple policies, or legal or regulatory requirements, you must notify either your manager (provided your manager is not involved in the violation), Human Resources, Legal, Internal Audit, Finance, or the [Business Conduct Helpline](#).
- **Use good judgment.** Apply Apple's principles of business conduct, review our policies, review legal requirements, and then decide what to do.
- **Ask questions.** When in doubt about how to proceed, discuss it with your manager, your Human Resources representative, or the Business Conduct Group. If you need more support, contact the [Business Conduct Helpline](#).

Failure to comply with the Apple's Business Conduct Policy, or failure to report a violation, may result in disciplinary action up to and including termination of employment or the end of your working relationship with Apple.

## Retaliation Is Not Tolerated

Apple will not retaliate—and will not tolerate retaliation—against any individual for filing a good-faith complaint with management, HR, Legal, Internal Audit, Finance, or the [Business Conduct Helpline](#), or for participating in the investigation of any such complaint.

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## Individual Conduct

### Can you give an example of conflicts of interest or potential divided loyalty?

Your niece needs a summer internship and you decide to hire her into your organization, or, your brother-in-law owns a business that is being considered as a vendor for Apple, and you are one of the decision makers.

### Am I allowed to develop outside iPhone or iPad apps on my own time?

No. Employees are not permitted to have any involvement in the development of outside iPhone or iPad apps, either alone or jointly with others.

### May I occasionally use my Apple email address for my outside business?

No. Although limited personal use of your Apple email is permitted for personal activities, you may never use your Apple email for an outside business.

### Can my outside music, videos or books be offered through iTunes or the iBookstore?

Generally, yes, as long as the content isn't related to Apple's business or products. Do not use your position at Apple to get favored treatment for your content.

### May I serve on the board of directors of an outside enterprise or organization?

If you plan to serve on a board, you must obtain approval from your manager and the senior vice president for your organization. In addition, vice presidents and executive team members must obtain the approval of their manager and the CEO before they can accept a position on the board of directors of a private or publicly traded company (other than nonprofit entities).

## Conflicts of Interest

A conflict of interest is any activity that is inconsistent with or opposed to Apple's best interests, or that gives the appearance of impropriety or divided loyalty. Avoid any situation that creates a real or perceived conflict of interest. Use good judgment, and if you are unsure about a potential conflict, talk to your manager, contact Human Resources, or contact the [Business Conduct Helpline](#).

Do not conduct Apple business with family members or others with whom you have a significant personal relationship. In rare cases where exceptions may be appropriate, written approval from the senior vice president of your organization is required.

You shouldn't use your position at Apple to obtain favored treatment for yourself, family members, or others with whom you have a significant relationship. This applies to product purchases or sales, investment opportunities, hiring, promoting, selecting contractors or suppliers, and any other business matter. This does not apply to special purchase plans offered by Apple like the employee discount. If you believe you have a potential conflict involving a family member or other individual, disclose it to your manager.

## Outside Employment and Inventions

Full-time Apple employees must notify their manager before taking any other employment. In addition, any employee (full-time or part-time) who obtains additional outside employment, has an outside business, or is working on an invention must comply with the following rules.

Do not:

- Use any time at work or any Apple assets for your other job, outside business, or invention. This includes using Apple workspace, phones, computers, Internet access, copy machines, and any other Apple assets or services.
- Use your position at Apple to solicit work for your outside business or other employer, to obtain favored treatment, or to pressure others to assist you in working on your invention.
- Participate in an outside employment activity that could have an adverse effect on your ability to perform your duties at Apple.
- Use confidential Apple information to benefit your other employer, outside business, or invention.

Before participating in inventions or businesses that are in the same area as your work for Apple or that compete with or relate to Apple's present or reasonably anticipated business, products, or services, you must have written permission from your manager, an Apple product law attorney, and the senior vice president of your organization.

## Individual Conduct

### Personal Investments

Many Apple employees have investments in publicly traded stock or privately held businesses. In general, these are fine, but investments may give rise to a conflict of interest if you are involved in or attempt to influence transactions between Apple and a business in which you are invested. If a real or apparent conflict arises, disclose the conflict to your manager. Your manager will help determine whether a conflict exists and, if appropriate, the best approach to eliminate the conflict. If you still need help, contact the Business Conduct Group.

### Workplace Relationships

Personal relationships in the workplace may present an actual or perceived conflict of interest when one individual in the relationship is in a position to make or influence employment decisions regarding the other. If you find yourself in such a relationship, you must notify Human Resources so they may assist you in resolving any potential conflicts. Employees should not allow their relationships to disrupt the workplace or interfere with their work or judgment. For additional information, see Apple's policy on Personal Relationships.

#### **I have stock in companies that do business with Apple. Is this a problem?**

Probably not. However, it could be a concern if (1) you're influencing a transaction between Apple and the company, or (2) the transaction is significant enough to potentially affect the value of your investment.

#### **How do I know whether information is material?**

Determining what constitutes material information is a matter of judgment. In general, information is material if it would likely be considered important by an investor buying or selling the particular stock.

#### **Does Apple's policy apply to buying or selling stock in other companies?**

Yes. For example, say you learn about a customer's nonpublic expansion plans through discussions about hardware purchases. If you purchase stock in the customer's company or advise others to do so, it could be viewed as insider trading.

#### **What is harassment?**

Harassment can be verbal, visual, or physical in nature. Specific examples of prohibited harassing conduct include, but are not limited to, slurs, jokes, statements, notes, letters, electronic communication, pictures, drawings, posters, cartoons, gestures, and unwelcome physical contact that are based on an individual's protected class.

#### **Need more information?**

In the U.S., refer to Apple's [Harassment](#) policy. Outside the U.S., contact Human Resources.

### Buying and Selling Stock

Never buy or sell stock while you are in possession of information obtained through your employment at Apple that has not been publicly announced and could have a material effect on the value of the stock. This applies to decisions to buy or sell Apple securities and to investments in other companies. It is also against Apple policy and may be illegal to give others, such as friends and family, tips on when to buy or sell stock while you are in possession of material, nonpublic information concerning that stock.

In addition, employees are prohibited from investing in derivatives of Apple securities. This includes, but is not limited to, trading in put or call options related to securities of the company.

Members of Apple's board of directors, executive officers, and certain other individuals are subject to blackout periods during which they are prohibited from trading in Apple stock. If you are subject to these restrictions, you will be notified by the legal department. Even if you are not subject to blackout periods, you may never buy or sell stock while you are in possession of material, nonpublic information.

Review Apple's Insider Trading policy. Specific questions on buying and selling stock should be referred to the legal department.

### Harassment and Discrimination

Apple encourages a creative, culturally diverse, and supportive work environment. Apple does not tolerate harassment or discrimination based on factors such as race, color, sex, sexual orientation, gender identity characteristics or expression, religion, national origin, age, marital status, disability, medical condition, veteran status, or pregnancy. Additional restrictions may apply based on regional laws and regulations.

These requirements apply to interactions with employees, customers, suppliers, and applicants for employment and any other interactions where you represent Apple.

If you feel that you have been harassed or discriminated against or have witnessed such behavior, report the situation to a manager or Human Resources. You may also contact the [Business Conduct Helpline](#).

## Individual Conduct

### Where can I learn more about policies on confidential employee information?

View the [Safe Harbor Privacy Policy](#).

### Is personal information on my computer system private?

No. Limited personal use of Apple equipment and systems is allowed. However Apple may monitor equipment and systems. You should not have any expectation about the privacy of content or personal information.

### If I make a presentation on my own time, may I accept a payment?

That depends. If you are representing Apple, you may not accept payment. If you are on your own time and are not representing Apple, you may be allowed to accept payment. Before accepting this type of opportunity, check with your manager, Human Resources, or the [Business Conduct Helpline](#).

### What if I have a substance abuse issue?

Help yourself and Apple by taking action. Talk to your Human Resources representative or, in the U.S., view information on the [Employee Assistance Program](#).

## Confidential Employee Information

As part of your job, you may have access to personal information regarding other Apple employees or applicants, including information regarding their employment history, personal contact information, compensation, health information, or performance and disciplinary matters. This information is confidential and should be shared only with those who have a business need to know. It should not be shared outside Apple unless there is a legal or business reason to share the information and you have approval from your manager.

## Personal Information

Subject to rules or regulations affecting an employee's rights, Apple may monitor or search its work environments, including equipment, networks, mail, and electronic systems, without notice. Apple monitors facilities and equipment to promote safety, prevent unlawful activity, investigate misconduct, manage information systems, comply with legal guidelines, and for other business purposes.

## Public Speaking and Press Inquiries

All public speaking engagements that relate to Apple's business or products must be pre-approved by your manager and Corporate Communications. If you receive approval to make a public presentation at a business meeting or conference, you may not request or accept any form of personal compensation from the organization that requested the presentation. This does not prohibit accepting reimbursement for expenses, if approved by your manager.

All inquiries from the press or the financial analyst community must be referred to Corporate Communications or Investor Relations.

## Publishing Articles

If you author an article or other publication, do not identify yourself in the publication as an Apple employee without prior approval from Corporate Communications. In addition, all publications that relate to your job, or to Apple's present or reasonably anticipated future products, business, or services, must be pre-approved by Corporate Communications.

## Substance Abuse

Employees are prohibited from manufacturing, distributing, dispensing, possessing, using, or being under the influence of illegal drugs in the workplace. Use of alcohol or medications on the job or before work can cause safety issues, damage customer relations, and hurt productivity and innovation. Use good judgment and keep in mind that you are expected to perform to your full ability when working for Apple. View Apple's policy on [Drugs in the Workplace](#).

## Responsibilities to Apple

### What are assets?

Assets include Apple's proprietary information (such as intellectual property, confidential business plans, unannounced product plans, sales and marketing strategies, and other trade secrets), as well as physical assets like cash, equipment, supplies, and product inventory.

### Can I give an Apple-owned iPhone to my family member for use?

No. You are responsible for protecting Apple's assets at all times. You must follow all security procedures regarding Apple's property.

### If I believe that it is appropriate to disclose confidential proprietary information to a vendor or other third party, what should I do?

First, verify that there is a business need for the disclosure. Second, obtain your manager's approval for the disclosure. Third, be sure that a [nondisclosure agreement](#) is in place with the vendor or third party, and that you forward the original copy of the agreement to the legal department. If you are still unsure, check with the legal department before making the disclosure.

### How do I identify confidential Apple information in documents?

Mark these documents "Apple Confidential."

### What if I have a specific question on the use of the Apple name, names of products or services, or the Apple logo?

Please direct questions about the Apple corporate identity to [corpID@apple.com](mailto:corpID@apple.com).

### How can I find out more about patents?

Visit Apple's [Patent Information](#) site.

## Protecting Apple's Assets and Information

At Apple, we all have an obligation to protect Apple's property and to abide by the following guidelines:

- **Care for the company.** Apple remains an amazing company because of its people. Apple employees care deeply about the company. Protect our physical assets like equipment, supplies, cash, and charge cards. Be on the lookout for any instances you believe could lead to loss, misuse, waste, or theft of Apple property and tell someone about it. Speaking up shows you care.
- **Keep the mystery alive.** Apple is secretive because we know it adds to our customers' delight. Surprise is Apple's hallmark. Help keep it that way. Use extreme care to protect Apple's proprietary information from falling into the wrong hands, especially information about current and future products and services.
- **Be upstanding.** Follow our procurement procedures when acquiring goods or services, and use Apple's assets only for legal and ethical purposes.
- **Keep it clean.** Trash is inevitable. Waste is not. Before disposing of Apple assets, discuss your plans with your manager, get approval, and follow applicable policies.

## Confidential Apple Information

One of Apple's greatest assets is information about our products and services, including future product offerings. Never disclose confidential, operational, financial, trade secret, or other business information without verifying with your manager that such disclosure is appropriate. Typically, disclosure of this information is very limited, and the information may be shared with vendors, suppliers, or other third parties only after a nondisclosure agreement is in place. Even within Apple, confidential information should be shared only on a need-to-know basis. The Intellectual Property Agreement you signed when you joined Apple defines your duty to protect information.

## The Apple Identity and Trademarks

The Apple name, names of products (such as iPhone), names of services (such as AppleCare), taglines (such as "Don't steal music"), and logos (such as the familiar Apple logo) collectively create the Apple identity. Before publicly using the Apple name, product names, service names, taglines, or the Apple logo, review Apple's [corporate identity guidelines](#) on how names and logos can be used and presented (for example, the size of the Apple logo and the amount of white space surrounding it). Before using the product names, service names, taglines, or logos of third parties, check with the legal department.

## Apple Inventions, Patents, and Copyrights

Apple's practice is to consider for patenting the inventions of its employees, regardless of whether the inventions are implemented in actual products. If you are involved in product development, you should contact the legal department regarding the patentability of your work. Be alert to possible infringement of Apple's patents and bring any possible infringements directly to the legal department.

If you create original material for Apple that requires copyright protection, such as software, place Apple's copyright notice on the work and submit a copyright disclosure form to the legal department. For more information, visit the Apple [Copyright Information](#) site.

## Activities Related to Technical Standards

There are numerous organizations that develop or promote technical standards (such as W3C, OASIS, INCITS, IEEE, ETSI). Before engaging in activities related to technical standards, including, for example, joining a standards organization or working group, contributing technology to a standard, or using a standard in the development of an Apple product, employees must receive management and Legal approval. For additional information, see Apple's [Standards Legal Policy](#).

## Accuracy of Records and Reports

Accurate records are critical to meeting Apple's legal, financial, and management obligations. Ensure that all records and reports, including timecards, customer information, technical and product information, correspondence, and public communications, are full, fair, accurate, timely, and understandable.

Never misstate facts, omit critical information, or modify records or reports in any way to mislead others, and never assist others in doing so.

### How can I learn more about procedures for meals and travel?

See Apple's [Travel Policy](#) or talk to your manager.

## Business Expenses

All employees must observe policies and procedures regarding business expenses, such as meal and travel expenses, and submit accurate expense reimbursement requests. Guidelines on daily meal expenses vary worldwide.

## Establishing Bank Accounts

All Apple bank accounts must be approved and established by Apple's Treasury department. All payments must be made by recordable and traceable methods. For more information, contact the treasury department.

## Loans, Advances, and Guarantees

Other than through established corporate programs, such as programs for employee relocation and the cashless exercise of stock options, Apple does not provide loans or advances of corporate funds to its employees, officers, board members, or their families and does not guarantee their obligations.

### If I suspect money laundering, what should I do?

Advise your manager or contact the Apple legal department.

## Money Laundering

Money laundering is the process by which individuals or organizations try to conceal illicit funds or make these funds look legitimate. If you deal directly with customers or vendors, the following examples may be indications of potential money laundering:

- Attempts to make large payments in cash
- Payments by someone who is not a party to the contract
- Requests to pay more than provided for in the contract
- Payments made in currencies other than those specified in the contract
- Payments from an unusual, nonbusiness account

## Responsibilities to Apple

### Tell me more about legal holds.

In a litigation case or other legal matter, Apple may be required to produce documents. In these cases the legal department may put a legal hold on certain documents to prevent the documents from being destroyed, altered, or modified. If it is found that Apple has failed to retain or produce required documents, penalties or adverse rulings may result.

Adverse rulings in major litigation cases can cost Apple a significant amount of money. Failure of employees to retain and preserve documents placed on legal hold may result in discipline or discharge.

## Document Retention and Legal Hold

As an Apple employee, you have a responsibility to manage documents and make decisions on document retention. The definition of “document” is extremely broad. For example, every email or other electronic file, every customer record, and every transaction involves the creation of a document. Different documents have different retention periods. Check with your manager or contact [Records Management](#) to determine the appropriate retention period for documents in your area.

At times, Apple may need to retain documents beyond the period they would normally be retained. The most common reasons are litigation or other legal matters.

In these situations, retention and preservation of documents is critical. If you have documents that may be required for litigation or other legal matters, the legal department will place those documents on a legal hold, meaning the documents cannot be altered, destroyed, deleted, or modified in any manner. Legal will notify the individuals most closely identified with the documents about the legal hold and will provide instructions for retaining the documents. Recipients of a legal hold must ensure that these instructions are followed. A legal hold remains in effect until you are notified by the legal department in writing.

### **To what extent may I use an existing customer list to market other Apple products or services?**

Before using a customer list for marketing, sales, or other activities, talk to your manager or the legal department. Using an existing customer list may or may not be appropriate.

### **Where can I learn more about information protection and nondisclosure agreements?**

See [frequently asked questions](#) about nondisclosures and confidentiality agreements at Apple.

### **Where can I get a nondisclosure agreement?**

Apple provides [nondisclosure agreements](#) for the U.S. and other locations outside the US.

### **As long as the information helps Apple, why is the source of business intelligence an issue?**

Obtaining information illegally or unethically could damage Apple's reputation and in some cases could subject you and Apple to legal liability. For example, using illegally or unethically obtained information in a bid to the government could result in disqualification from future bidding and in criminal charges.

### **May I keep my personal music on my computer at work?**

If you are authorized to make copies of the music for personal use (for example, you purchased the music on iTunes), you may keep the music on your computer.

## Customer Focus

Every product we make and every service we provide is for our customers. Focus on providing innovative, high-quality products and services and demonstrating integrity in every business interaction. Always apply Apple's principles of business conduct.

## Customer and Third-Party Information

Customers, suppliers, and others disclose confidential information to Apple for business purposes. It is the responsibility of every Apple employee to protect and maintain the confidentiality of this information. Failure to protect customer and third-party information may damage relations with customers, suppliers, or others and may result in legal liability. See the [Apple Customer Privacy Policy](#).

## Nondisclosure Agreements

When dealing with a supplier, vendor, or other third party, never share confidential information without your manager's approval. Also, never share confidential information outside Apple (for example, with vendors, suppliers, or others) unless a nondisclosure agreement is in place. These agreements document the need to maintain the confidentiality of the information. Original copies of nondisclosure agreements must be forwarded to the legal department. Always limit the amount of confidential information shared to the minimum necessary to address the business need.

## Obtaining and Using Business Intelligence

Apple legitimately collects information on customers and markets in which we operate. Apple does not seek business intelligence by illegal or unethical means, and competitors may not be contacted for the purpose of obtaining business intelligence. Sometimes information is obtained accidentally or is provided to Apple by unknown sources. In such cases, it may be unethical to use the information, and you should immediately contact your manager, the legal department, or the [Business Conduct Helpline](#) to determine how to proceed.

## Third-Party Intellectual Property

It is Apple's policy not to knowingly use the intellectual property of any third party without permission or legal right. If you are told or suspect that Apple may be infringing an intellectual property right, including patents, copyrights, trademarks, or trade secrets owned by a third party, you should contact the legal department.

## Copyright-Protected Content

Never use or copy software, music, videos, publications, or other copyright-protected content at work or for business purposes unless you or Apple are legally permitted to use or make copies of the protected content. Never use Apple facilities or equipment to make or store unauthorized copies.

### Are business meals, travel, and entertainment considered gifts?

Yes. Anything of value is considered a gift.

### Can I avoid these rules if I pay for gifts to customers or business associates myself?

No. If the gift is given for business reasons and you are representing Apple, the gift rules apply.

## Giving and Receiving Business Gifts

Employees may not give or receive gifts or entertainment to or from current or potential vendors, suppliers, customers, or other business associates unless all of the following conditions are met:

- **Nominal value.** The value of the gift is less than US\$150. Exceptions must be approved by your vice president (for vice president–level employees, exceptions must be approved by your manager).
- **Customary.** The item is a customary business gift and would not embarrass Apple if publicly disclosed. Cash is never an acceptable gift. Giving or receiving cash is viewed as a bribe or kickback and is always against Apple policy.
- **No favored treatment.** The purpose of the gift is not to obtain special or favored treatment.
- **Legal.** Giving or accepting the gift is legal in the location and under the circumstances where given.
- **Recipient is not a government official.** Never provide a gift, including meals, entertainment, or other items of value, to a U.S. or foreign government official without checking with Government Affairs in advance. See page 13 for more information on gifts to government officials.

This policy does not preclude Apple as an organization from receiving and evaluating complimentary products or services. It is not intended to preclude Apple from giving equipment to a company or organization, provided the gift is openly given, consistent with legal requirements, and in Apple's business interests. The policy also does not preclude the attendance of Apple employees at business-related social functions, if attendance is approved by management and does not create a conflict of interest.

**Zero Gift Rule:** Certain departments, including Operations, Retail, AppleCare, Hardware, Industrial Design, Finance, Facilities, FileMaker, IS&T, and the Business Conduct Group have more restrictive gift policies that prohibit giving or receiving gifts altogether. Employees in these departments must adhere to the stricter policies. For additional information, see the Operations, Hardware Engineering and Industrial Design [Code of Conduct Policy](#) and the [Facilities, Filemaker, Finance, and IS&T No Gift Policy](#).

### What is an example of a side deal?

In a sales environment, a side deal may involve a guarantee to accept back unsold products or other special agreements to encourage certain customers to place larger orders. Such a side deal, whether written or oral, can have an impact on Apple's potential liability with respect to that transaction and may make it inappropriate for Apple to recognize revenue on the products sold, affecting the accuracy of Apple's books and records. Side deals or side letters made outside of Apple's formal contracting and approvals process are strictly prohibited.

## Side Deals or Side Letters

All the terms and conditions of agreements entered into by Apple must be formally documented. Contract terms and conditions define the key attributes of Apple's rights, obligations, and liabilities and can also dictate the accounting treatment given to a transaction. Making business commitments outside of the formal contracting process, through side deals, side letters, or otherwise, is unacceptable. You should not make any oral or written commitments that create a new agreement or modify an existing agreement without approval through the formal contracting process.

### What can I do if a reseller complains to me about low prices at another reseller?

Advise the reseller that you can't discuss or attempt to influence pricing of other parties, since this could violate antitrust laws.

### How should I handle customer inquiries about resellers and service providers?

Apple resellers and service providers are key members of the Apple family. They promote and sell Apple products, and they provide service and support to Apple customers.

Accordingly, you should never make disparaging remarks to customers about resellers or service providers.

### What is an example of an endorsement?

A friend writes a great book on software design and asks you to endorse the book by making a statement on the back cover. If you make such an endorsement, don't include your job title or affiliation with Apple.

## Competition and Trade Practices

Laws regulating competition and trade practices vary around the world, but certain activities, such as price fixing and agreeing with a competitor to allocate customers, are almost always illegal and are absolutely prohibited under Apple policy.

You should not:

- Agree with competitors or exchange information with competitors on prices, policies, contract terms, costs, inventories, marketing plans, or capacity plans.
- Agree with a competitor that the competitor will sell goods and services to Customer A (and you will not), and that you will sell goods and services to Customer B (and your competitor will not).
- Agree with resellers on the resale pricing of Apple products without legal department approval.
- Require vendors to purchase Apple products in order to sell products or services to Apple.
- Describe the products or services of competitors inaccurately to promote Apple products or services.
- Engage in any pricing or other practices that could defraud a supplier or others.
- Violate fair bidding practices, including bidding quiet periods, or provide information to benefit one vendor over other vendors.

## Endorsements

When representing Apple, never endorse a product or service of another business or an individual unless the endorsement has been approved by your manager and Corporate Communications. This does not apply to statements you may make in the normal course of business about third-party products that are sold by Apple.

## Open Source Software

Open source software is software for which the source code is available without charge under a free software or open source license. Before using, modifying, or distributing any open source software for Apple infrastructure or as part of an Apple product or service development effort, you must review Apple's [Open Source Software policy](#) and contact the legal department for approval using the forms referenced in that policy.

### **Tell me more about pricing products that are sold to governments.**

Governments shouldn't be charged more for our products or services than Apple charges other customers for the same products or services. There are laws that make it a crime to overcharge the U.S. government. Some other countries have similar laws.

### **Can I avoid a gift limitation by paying for a gift, such as lunch or golf, myself?**

No. If you are representing Apple, any gift to a government employee would be viewed as coming from Apple.

### **What is considered a gift to a U.S. or foreign official?**

In most cases, anything of value that is given is considered a gift. This includes items such as meals, golf, entertainment, and product samples. Cash is never an acceptable gift. Typically, giving cash is viewed as a bribe or kickback and is against Apple policy.

### **Who is a "foreign official"?**

A foreign official is any official or employee of a foreign government or public international organization (including departments or agencies of those governments or organizations), or any person acting in an official capacity. Also included are employees of a state-run or state-owned business, such as a public utility, and employees of a public/government-run school or university.

## Governments as Customers

Governments are unique customers for Apple. Governments often place special bidding, pricing, disclosure, and certification requirements on firms with which they do business. Discuss these requirements with Government Affairs or your local Apple Legal representative before bidding for government business.

## Gifts to U.S. Officials

It may be illegal to give a gift, even an inexpensive meal or a T-shirt, to a government employee. The rules vary depending on the location and job position of the government employee (for example, rules may vary by state, school district, and city, and there may be different rules for various elected and non-elected officials).

To prevent violations, review all gifts to government officials with [Government Affairs](#) before giving a gift.

## Gifts to Non-U.S. Officials

In many countries it is considered common courtesy to provide token/ceremonial gifts to government officials on certain occasions to help build relationships. Check local requirements and review any such gifts exceeding US\$25 in advance with the legal department. For meals, the US\$25 limit does not necessarily apply. Check [here](#) for value limits by country on meals to public officials and employees. Meals of any value should be avoided with officials from government agencies where Apple has a pending application, proposal, or other business.

## No Bribery or Corruption

At Apple, we do not offer or accept bribes or kickbacks in any form, and we do not tolerate corruption in connection with any of our business dealings. You may not offer or receive bribes or kickbacks to or from any individual, whether that individual is a government official or a private party. For additional information, see [Apple's Anti-Corruption Policy](#).

## Political Contributions

Apple does not make political contributions to individual candidates. All corporate political contributions, whether monetary or in-kind (such as the donation/lending of equipment or technical services to a campaign), must be approved in advance by Apple Government Affairs. Employees may not use Apple assets (including employee work time, or use Apple premises, equipment, or funds) to personally support candidates and campaigns. It is illegal for Apple to reimburse an employee for a contribution. For more information, see the [Apple Corporate Political Compliance Policy](#) and the [Political Contributions and Expenditures Policy](#).

**What should I do if I'm interested in hiring a current or recent government employee?**

Contact [Government Affairs](#) before beginning any negotiations to hire a current or recent government, military, or other public sector employee as an Apple employee or consultant.

## Hiring Government Employees

Laws often limit the duties and types of services that former government, military, or other public sector employees may perform as employees or consultants of Apple. Employment negotiations with government employees are prohibited while the employees are participating in a matter involving Apple's interests.

## Trade Restrictions and Export Controls

Many countries periodically impose restrictions on exports and other dealings with certain other countries, persons, or groups. Export laws may control trading of commodities or technologies that are considered to be strategically important because they have the potential to be used for military purposes. Laws may cover travel to or from a sanctioned country, imports or exports, new investments, and other related topics. Certain laws also prohibit support of boycott activities. See Apple's [Export Control](#) policy for more information.

If your work involves the sale or shipment of products, technologies, or services across international borders, check with the export department to ensure compliance with any laws or restrictions that apply.

**How do I get more information regarding Apple's environmental, health, and safety programs?**

Visit the [Environment+Safety](#) site.

## Environment, Health, and Safety (EHS)

Apple operates in a manner that conserves the environment and protects the safety and health of our employees. Conduct your job safely and consistently with applicable EHS requirements. Use good judgment and always put the environment, health, and safety first. Be proactive in anticipating and dealing with EHS risks.

In keeping with our commitment to the safety of our people, Apple will not tolerate workplace violence. For additional information, review Apple's [Workplace Violence](#) policy.

## Charitable Donations

Employees are encouraged to support charitable causes of their choice, as long as that support is provided without the use or furnishing of Apple assets (including employee work time, or use of Apple premises, equipment, or funds). Any charitable donations involving Apple assets require the approval of the Chief Executive Officer or Chief Financial Officer. For additional information, see [Finance Policy 1.10](#).

This policy does not preclude Apple employees from using the [Apple Matching Gifts Program](#) to contribute to the nonprofit organization of their choice.

**What if I want to get more involved in community activities?**

Contact [Community Affairs](#). This group promotes, supports, and facilitates employee involvement in community volunteer activities. Outside the U.S., check with your local Public Relations team or Human Resources.

## Community Activities and Public Positions

At Apple, we comply with all laws and regulations and operate in ways that benefit the communities in which we conduct business. Apple encourages you to uphold this commitment to the community in all your activities.

If you hold an elected or appointed public office while employed at Apple, advise Government Affairs. Excuse yourself from involvement in any decisions that might create or appear to create a conflict of interest.

## Your Obligation to Take Action

Always apply Apple's principles of business conduct, follow Apple policies, and comply with laws and regulations. When you are unsure, take the initiative to investigate the right course of action. Check with your manager, Human Resources, Legal, Internal Audit, or Finance, and review our policies on AppleWeb. If you would like to talk with someone outside your immediate area, consider contacting the [Business Conduct Helpline](#).

If you know of a possible violation of Apple's Business Conduct Policy or legal or regulatory requirements, you are required to notify your manager (provided your manager is not involved in the violation), Human Resources, Legal, Internal Audit, Finance, or the [Business Conduct Helpline](#). Failure to do so may result in disciplinary action.

Employees must cooperate fully in any Apple investigation and keep their knowledge and participation confidential to help safeguard the integrity of the investigation.

## Business Conduct Helpline

The Business Conduct Helpline is available 24/7 to all employees worldwide to help answer your questions on business conduct issues, policies, regulations, and compliance with legal requirements. It also allows you to advise Apple of situations that may require investigation or management attention.

The Business Conduct Helpline is committed to keeping your issues and identity confidential. If you would be more comfortable doing so, you may contact the Helpline anonymously. Your information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and correcting issues you raise. Note that if your information involves accounting, finance, or auditing, the law may require that necessary information be shared with the Audit and Finance Committee of the Apple Board of Directors.

Due to legal restrictions, anonymous use of the Business Conduct Helpline is not encouraged in certain countries (for example, France).

**Apple will not retaliate—and will not tolerate retaliation—against any individual for good-faith use of the [Business Conduct Helpline](#).**

Information on contacting the Business Conduct Helpline—including via email, toll-free telephone, and web access—is available on the [Business Conduct website](#).

## Policies and References

[Alcohol in the Workplace](#)

[Anti-Corruption Policy](#)

[Business Conduct Helpline](#)

[Buying and Selling Stock: Blackout Periods](#)

[Buying and Selling Stock: Insider Trading](#)

[Community Affairs](#)

[Copyright Information](#)

[Copyright Policy](#)

[Corporate Identity Guidelines](#)

[Customer Privacy Policy](#)

[Diversity](#)

[Drugs in the Workplace](#)

[Employee Assistance Program \(U.S. only\)](#)

[Environment+Safety](#)

[Equal Employment Opportunity](#)

[Export Control](#)

[Finance Policy 1.10](#)

[Government Affairs](#)

## Policies and References (continued)

[Harassment](#)

[Information Security](#)

[Intellectual Property](#)

[Legal Department Contacts](#)

[Mail and Electronic Communications](#)

[Matching Gifts Program](#)

[Name and Logo Use Questions: \[corpID@apple.com\]\(mailto:corpID@apple.com\)](#)

[Nondisclosure and Confidentiality Agreements](#)

[Open Communication](#)

[Open Source Software](#)

[Patent Information](#)

[Patent Policy](#)

[Personal Relationships](#)

[Political Compliance](#)

[Political Contributions and Expenditures](#)

[Procurement](#)

[Reasonable Accommodation](#)

[Records Management](#)

[Safe Harbor Privacy Policy](#)

[Standards Legal Policy](#)

[Trademarks](#)

[Travel Policy](#)

[Workplace Violence](#)