



## **Anti-Corruption Policy**

The way we do business  
worldwide

# Anti-Corruption Policy

According to the United Nations,  
"The cost of corruption exceeds by far the damage  
caused by any other single crime."

## The way we do business worldwide

At Apple, we believe in doing business ethically, honestly, and in full compliance with all laws and regulations. Our commitment to doing business the right way is part of what makes us Apple.

## Our position is clear

**Apple does not offer or accept bribes or kickbacks in any form, and we do not tolerate corruption in connection with any of our business dealings.**

Corruption is an abuse of power that involves acting dishonestly or improperly in return for money, personal gain, or anything of value. It can take many forms and is not limited to interactions with the government.

By wrongly benefiting a few individuals who abuse their power or position, corruption undermines respect for the rule of law, creates unfair competition, slows economic development, damages innovation, and contributes to governmental and social instability.

For Apple, involvement in bribery or corruption can result in lasting damage to our brand and our reputation, a breakdown in consumer and shareholder confidence, and inferior products. Legal violations can result in multi-million-dollar fines and penalties, plus jail time for participants.

## Compliance with this policy is mandatory

This policy provides guidelines for handling situations involving corruption. Its purpose is to ensure all Apple employees and all independent third parties who work on Apple's behalf globally (such as independent contractors, consultants, agents, suppliers, vendors, channel members and others who do business with Apple) understand and comply with applicable laws and Apple's policy against corruption.

Compliance with this policy and U.S. and international anti-corruption laws is *mandatory*. Failure to do so may result in disciplinary action up to termination of employment or termination of your business relationship with Apple.

## Speak up

If you have additional questions or are aware of a violation, contact [Apple Business Conduct and Global Compliance](#).

It is a violation of Apple policy to offer or receive bribes or kickbacks to or from any individual, whether that individual is a government official or a private party.

**I work in a country where bribery is commonplace. Don't we have to allow for some flexibility in this type of environment?**

No. Apple simply doesn't recognize a "that's how business is done here" excuse. As a company, we stand firm on our principles. Current and potential business partners and customers need to understand that if they want to do business with Apple, they must do business the right way. No exceptions.

**Who is a "government official"?**

A government official is any official or employee of a government or public organization (including departments or agencies thereof), or a person acting in an official governmental capacity. Also included are employees of state-run or state-owned entities, such as public utilities or schools.

**No "head-in-the sand" attitude**

Don't turn a blind eye to the actions of third parties. As a third party working on Apple's behalf, you and Apple can be legally liable if signs of bribery or corruption are ignored, even by subcontractors.

Example: You are a distributor working on Apple's behalf. You are informed that a customs official will delay the release of an important shipment unless given \$1,000 USD. Neither you nor Apple may provide the money. If the shipment is suddenly released, Apple has an obligation to make sure you didn't provide the money without Apple's knowledge. You and all third parties working on Apple's behalf have an obligation to ensure that subcontractors understand and comply with this policy and applicable anti-corruption laws.

Don't ignore these types of situations. Contact the [Apple Business Conduct and Global Compliance](#) immediately.

## Gifts, meals and entertainment

Under various worldwide anti-corruption laws, it is illegal to provide cash or anything else of value (like gifts, business meals or entertainment) to individuals to obtain or retain business, or to secure any improper advantage. These laws do not prohibit reasonable and customary business gifts, meals and entertainment. However, there are some important rules that you must follow:

- **No improper influence or special treatment:** Never give or receive anything of value to influence a decision or obtain special treatment
- **No cash:** Cash or cash equivalents (such as gift certificates, checks, or gift cards that are greater than nominal value) are never acceptable business gifts
- **Infrequent:** Frequent gifts to the same individual, even if inexpensive, are not appropriate
- **Transparency:** The gift must be given openly, at an appropriate time and circumstance—not secretly, or through a third party
- **Understand local laws:** Examine a country's local laws prior to giving or receiving any gift to ensure compliance
- **Special rules for government officials:** If you are an independent third party working on Apple's behalf, prior to giving a gift to a government official, contact your company's Legal or Compliance department to ensure compliance with the law. (See side bar for more information on who is considered a government official.)

## Dealing with third-party representatives

Apple does business globally with third parties, including resellers, suppliers, consultants, vendors and agents.

When interacting with third parties, Apple employees are expected to clearly communicate Apple's zero tolerance approach to corruption. Third parties are expected to understand and comply with this policy and applicable anti-corruption laws as well. Third parties also have an obligation to ensure that subcontractors understand and comply with this policy and applicable anti-corruption laws. Apple can be liable for the actions of third parties who offer or give something of value to benefit Apple's business. This can include the payment of commissions or fees to intermediaries who are engaged in promoting Apple's business around the world.

Be on the lookout for these red flags when dealing with third parties and subcontractors:

- Rumors of, or a reputation for, offering or accepting bribes
- Minimal detail on invoices or expense claims, or lump-sum requests (particularly for people who interact with the government)
- Requests for advanced or unreasonably large commissions or payments, or that payments be made through a third party or another country
- The third party has a family relationship with a government official or claims a "special relationship" with a particular official or ministry
- Insistence on using a specific consultant or one who provides little or no obvious added value

If you become aware of any of these red flags, please contact your company's Legal or Compliance department.

## Rules governing travel for government officials

If permitted under local law, Apple can pay reasonable travel expenses for government officials that are directly related to the promotion, demonstration or explanation of products and services. However, Apple follows these guidelines:

- Approval from Apple Government Affairs or regional Apple Legal counsel is obtained before offering travel to government officials
- All travel reimbursements are supported with appropriate receipts
- Arrangements are made directly with service providers—cash payments or per diems should not be given to government attendees
- Travel expenses of an official's family or friends should not be paid
- The primary focus of the trip is business, keeping entertainment or leisure activities to a minimum

Third parties working on Apple's behalf have an obligation to ensure that subcontractors understand and comply with applicable laws and Apple's policies. If you are paying travel expenses for a government official on Apple's behalf, check with [Apple Business Conduct and Global Compliance](#) prior to making the payment.

### Facilitation payments—health and safety exception

Exceptions to Apple's policy on facilitation payments may be made in circumstances that involve an imminent threat to health or safety. However, this situation must be reported to [Apple Business Conduct and Global Compliance](#) as soon as you are in a safe place.

## A word about "facilitation payments"

Expediting and facilitation payments are not permissible and strictly prohibited by Apple except in limited circumstances (e.g. imminent threat to health or safety).

If you have a question about whether a certain payment represents a facilitation payment, have been requested to pay a facilitation payment, or you suspect one has been made, please contact [Apple Business Conduct and Global Compliance](#).

## The importance of accurate records

Some anti-corruption laws create a separate offense for failing to keep accurate records of business transactions. Ensure that all relevant records—including invoices and expense reports—accurately reflect the associated business transactions. Never misstate facts, omit critical information or modify records or reports in any way to mislead others, and never assist others in doing so.

### What should I do if I am confronted with a demand to pay a bribe or am offered a kickback?

Refuse to pay the bribe or accept the kickback, and explain that those types of payments are illegal and against Apple policy. Immediately report the situation to [Apple Business Conduct and Global Compliance](#).

## Stay out of the grey areas

This policy is designed not merely to provide guidance on complying with the law, but also to help avoid even the appearance of questionable conduct in connection with Apple's operations. Here are some helpful tips for avoiding violations:

- When you have doubts or concerns, ask questions
- Don't let questionable behavior go unchallenged. Take compliance seriously and encourage others to do the same
- Be vigilant! Monitor third parties closely, especially if they interact with government officials on Apple's behalf or for Apple's benefit
- If you hear rumors of improper payments or other suspicious activities, never ignore them! Contact [Apple Business Conduct and Global Compliance](#) so that we can investigate the situation and take appropriate corrective actions