

WIND RIVER CODE OF CONDUCT

# WIND RIVER

## **Wind River Code of Conduct**

AUGUST 2010

## **Introduction**

The Code of Conduct sets expectations for Intel and its subsidiaries (referred to collectively as 'Intel').

Specifics on seeking guidance and reporting concerns as well as other specifics, such as supplemental policies or guidelines related to this Code of Conduct, may differ from company to company.

If you have questions on how the Code of Conduct may apply, please contact Corporate Legal.

## **OUR MISSION**

Wind River enables companies to develop and run device software faster, better, at lower cost and more reliably.

## **OUR GUIDING PRINCIPLES**

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### **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 ensuring they are in line with our business strategy

### **We Are Urgent and Agile**

- 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.

### **We Debate, Commit, Communicate, and Deliver**

- Debate critical issues with openness and honesty
- Commit to and support decisions made
- Clearly communicate decisions and plans to all stakeholders
- Deliver projects on time and within budget

### **We Are Fiercely Competitive**

- Work diligently to fiercely compete in our key markets
- Constantly evaluate our competitors' strengths and weaknesses
- Create strategies that demonstrate our technical capabilities and advantages

### **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

## **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 a universal framework for each of us to make the right decisions and do the right thing.

This Code of Conduct represents Wind River's expectations 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 says.

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.

Ken Klein  
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:

- 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.

### *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 a direct or other manager. 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 Corporate 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 Corporate Legal.

Some of the more common 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 Corporate 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 has 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 Corporate Legal to be certain you are aware of any special rules that apply, and obtain approval

from Corporate Legal 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 in possession of material, non-public information. Material, non-public information is any information not generally

known to the public that people might find important in making their decisions to buy or sell stock in a company.

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

- Trade in or make investment decisions 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 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 implemented, or are planning to implement, privacy laws that set requirements for the appropriate handling of personal data (any information that can be used to identify, contact, or locate an individual).

We are committed to protecting the reasonable privacy expectations of everyone we do business with, including our customers, consumers and employees. We believe individuals have the right to decide when their personal data is collected, used, or disclosed. We also believe that responsible stewardship of personal data is a critical component in maintaining trust in the our brand and ensuring that individuals feel confident that we respect their right to privacy.

Therefore we each have a responsibility to comply with our privacy and information security requirements when personal data is collected, stored, processed, transmitted, and shared.

When questions, issues, or concerns arise, consult Corporate Legal or a member of the privacy team, if applicable.

### *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. 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.

## **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 unlawfully discriminate on the basis of race, color, religion, sex, national origin, ancestry, age, disability, veteran status, sexual orientation, gender identity, or genetic information. We also make reasonable accommodations for disabled employees.

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, gender identity, or sexual orientation. 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 a manager of the details of the act or threat immediately. Managers who receive such information should immediately notify Security.

### *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, not just the fabrication or assembly/test factories.

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 all 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 occurs 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 information, specialized skills or knowledge gained as a company employee; or using company property or equipment for non-company uses
- 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
- Owning a significant interest in any business that does or is seeking to do business with Intel or is in competition with Intel, when the ownership might dilute our loyalty to Intel
- 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 Corporate 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 equivalents without approval
- We never participate in any business entertainment activity that would violate the law or embarrass Intel by its public disclosure
- We consult our Legal representative before offering anything of value to government or political party officials, as such gifts and entertainment 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 Corporate 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 Security 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, 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 and verbal discussions.

When we work with proprietary and confidential information, we need to take personal responsibility to safeguard it 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, 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. We offer many ways to get information and ask questions about the Code.

Address ethics and legal questions and concerns with the internal groups who specialize in handling such issues, including Internal Audit, Security, Corporate Legal, and Human Resources.

You have an obligation to report any potential or actual violations of the law, the Code, or other guidelines, so they may be investigated. 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 Corporate 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 Corporate Legal or Internal Audit.

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.

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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>		
Conducting Business with Customers, Suppliers, and Others	Company guidelines	Additional documentation to clarify key topics such as Supplier Publicity and Confidentiality Policy (SPCP), if applicable.
Preparing Accurate Financial/Other Records	Financial record	Any record that flows into Intel's financial statements.
Preparing Accurate Financial/Other Records	Other business records	Any other document, including PowerPoint presentations, that is not financial in nature, e.g. white papers, statements of work, etc.
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)
<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	Third party	Someone other than the parties directly involved in the action or transaction.
Bribery and Anti-Corruption	Bribe	Giving of something of value, money, a favor, something in kind which may include a promise or excusing a debt or obligation is offered or give to a person in position of trust in order to influence his/her judgment or conduct.

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<b>Topic</b>	<b>Term</b>	<b>Definition</b>
Environmental Management and Compliance	Precautionary approach	Carefully considering the health or environmental risks from using a material and striving to find cleaner and safer alternatives.
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.
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.
Insider Trading	Calls or Call Options	Give the holder the right to buy stock at a specified price during a specified period of time.
Insider Trading	Derivatives	Transactions where the underlying value is derived from another indicator, such as a stock price, an index price, an interest rate, etc. Examples include call options which give the holder the right to buy stock at a specified price, or put options which give the holder the right to sell stock at a specified price, during a specified period of time.
Insider Trading	Puts or Put Options	Give the holder the right to sell stock at a specified price during a specified period of time.
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	Information or subjects discussed with an Intel attorney

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<b>Topic</b>	<b>Term</b>	<b>Definition</b>
Intellectual Property	Intellectual property rights	Include patents, trademarks, copyrights, trade secrets, know how, and mask work rights
Privacy	Personal data	Personal data includes any information that can be used to identify, contact or locate someone. This includes any information which is linked to personal data, or from which other personal data can easily be derived. Examples include someone's name, address, telephone number, fax number, e-mail address, Social Security Number or other national government identifier, etc.
<b>Treat Each Other with Fairly</b>		
Anti-Harassment	Harassment	Harassment is a specific type of employment discrimination. It includes verbal, physical and visual conduct that creates an intimidating, offensive, or hostile environment in the workplace that interferes with work performance. Harassment may be based on gender, race, color, religion, national origin, ancestry, age, marital status, sexual orientation, disability, gender identity or veteran status.
Safety	Intel workplaces	Any place where Intel business is being conducted including owned or leased offices, labs, warehouses, factories, construction sites, outdoor spaces on Intel property, or offsite business meetings.
Safety	Safety requirements	Defined safety procedures and expectations for the purpose of controlling employee risk to recognized safety hazards.
<b>Avoid Conflicts of Interest</b>		
Handling Conflicts of Interest	Bribe	Giving of something of value, money, a favor, something in kind which may include a promise or excusing a debt or obligation is offered or give to a person in position of trust in order to influence his/her judgment or conduct.
Handling Conflicts of Interest	Personal gain	This refers to an employee taking advantage of a situation at the expense of the company and profits from the situation as a consequence of taking advantage. It does not matter whether or not the gain or profit was done with intent. Examples of these would be corporate credit-card fraud, expense fraud, theft of Intel products, theft of confidential information, and time-card fraud.
Handling Conflicts of Interest	Significant interest	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.

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<b>Topic</b>	<b>Term</b>	<b>Definition</b>
Handling Conflicts of Interest	Dilute	To reduce the strength, force, or efficiency
Handling Conflicts of Interest	Close personal relationship	This may or not refer to a blood relative; this also includes friendships or relations whose may be influential in another person's decision making or judgments.
Handling Conflicts of Interest	Willful action:	Action that is done deliberately or with intent
Handling Conflicts of Interest	Disclose	To make known; to reveal or uncover
Handling Conflicts of Interest	Business courtesies	These refer to the usually acceptable practices between representatives of 2 or more companies that are considering doing business or are actually doing business together. These practices would include invitations to events or meals, the giving of gifts of appreciation.
Handling Conflicts of Interest	Routine promotional	Under corporate policies and practice, this refers to items of nominal or small value that are routinely given away for marketing purposes and as such these must include a logo or trademark of the supplier, vendor, or contractor who is giving this away.
Gifts and Entertainment	Obligate	To feel morally or legally bound to do (or avoid doing) something for someone else. For example, a supplier or customer offers you entertainment within acceptable dollar guidelines. If you would feel obligated to provide some benefit to the supplier or customer in return, you should avoid the entertainment.
<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 Intel Policies. Failure to provide proper access restrictions on the distribution, display, transportation, use, or storage of this information may put Intel 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	Assets	1. An asset is something of value to its owner; is often referred to "property". Assets may come in the form

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Topic	Term	Definition
Brands		<p>of tangible and intangible property.</p> <p>2. An asset is any <u>economic</u> resource controlled by an entity as a result of <i>past</i> transactions or events and from which future economic benefits may be obtained. Examples include cash, equipment, buildings, and land.</p>
Safeguarding Trademarks and Brands	Trademark	<p>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.</p>
Safeguarding Trademarks and Brands	Brands	<p>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.</p> <p>2. Is often used interchangeably with "trademark".</p> <p>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.</p>
Safeguarding Trademarks and Brands	Original Equipment Manufacturers (OEM)	Direct Customers
Safeguarding Trademarks and Brands	Channel Distributors	Re-sells Intel products to smaller accounts or end users
Representing Intel	Special Rules	These rules would be the guidelines provided by Intel.
Representing Intel	Public Setting	This refers to external situations where you are attending as a speaker/participant. These include conferences, symposia, or face to face with 3 <sup>rd</sup> parties.
Representing Intel	Authorized Representative	This refers to an employee who has been designated as a representative of Intel for external purposes or

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Topic	Term	Definition
		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 that must be strictly complied with in order to prevent Intel and you from being accused of and found liable for violating these laws. An overview of the antitrust dos and don'ts may be found in the legal website.
<b>Asking Questions/Reporting Concerns</b>		
Non-Retaliation Policy	Retaliation	To seek revenge