

Third Party Code of Conduct

Our Principles

At Apple, we believe in doing business ethically, transparently, and in full compliance with all applicable laws and regulations. Apple requires all businesses and persons that associate themselves with our brand to uphold these same high standards. To that end, Apple requires certain third parties working with Apple or on behalf of Apple worldwide to comply with this Third Party Code of Conduct (Code).

Who

This Code applies to certain third parties that work with or on behalf of Apple. This includes, but is not limited to, channel members (distributors, resellers, service providers, and carriers) and any other third party not covered by Apple's Supplier Code of Conduct (collectively, "third parties"). Your employees, independent and sub-contractors, consultants, or anyone that you work with or contract with as part of your relationship with Apple should understand and comply with all provisions of this Code.

Our Expectations

Third parties must be committed to high standards of ethical conduct in all business dealings and must comply with all applicable legal requirements. Third parties must demonstrate integrity in every business interaction and avoid engaging in any activity that involves the appearance of impropriety.

Your Responsibilities

Where applicable or required by law, third parties must establish policies, procedures, and monitoring practices so their employees, independent contractors, consultants, and all others who do business for or on their behalf (in relation to Apple's business) understand and comply with all provisions of this Code and other applicable Apple policies. This includes conducting due diligence on its own third parties who are performing work in relation to Apple's business.

Third parties must treat customers, business partners, employees, and others with respect and courtesy. Third parties should have a process in place to ensure complaints, questions, and allegations can be reported in a safe, confidential, and anonymous (where allowed by law) manner. Retaliation is not tolerated in relation to reporting good-faith violations of this Code.

What You Should Know

Apple conducts due diligence and monitoring on all third parties to ensure compliance with this Code. As a condition of doing business with Apple, you consent to such due diligence and monitoring.

Apple will assess a third party's compliance with this Code, and any violations of this Code may jeopardize the third party's relationship with Apple up to and including termination.

Human Rights and Labor

Apple is deeply committed to respecting human rights as stated in Apple's [Human Rights Policy](#). We expect our third parties to ensure the workplace is fair and ethical and that all workers are treated with the utmost respect and dignity.

Human Rights. Third parties must uphold internationally recognized human rights and treat workers with dignity and respect. Please refer to Apple's Human Rights Policy for detailed information and additional expectations.

Anti-Discrimination. Third parties may not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination, and retirement. In addition, third parties may not require workers or potential workers to undergo medical tests that could be used in a discriminatory way, except where required by applicable law or regulation or prudent for workplace safety.

Anti-Harassment and Abuse. Third parties must be committed to a workplace free of harassment. Third parties may not threaten or subject workers to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.

Prevention of Involuntary Labor and Human Trafficking. Third parties must ensure that all work is voluntary. Third parties may not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes recruiting, transporting, harboring, or receiving a person by the use of force, coercion, deception, fraud, abduction, abuse of power or vulnerability, or by the provision of payments or other benefits.

Third parties may not withhold workers' original government-issued identification and travel documents. Third parties must ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers.

Third parties may not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

Workers are not required to pay employers' or their agents' recruitment fees or other similar fees to obtain employment. If such fees are found to have been paid by a worker, those fees will be repaid to that worker.

The requirements of this section, and any other applicable sections of this Code, apply to any recruiting agencies used by Apple's third parties.

Prevention of Underage Labor. Third parties shall only employ workers who: are at least 15 years of age, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. Third parties may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138.

Juvenile Work Protections. Third parties may employ juveniles who are older than the applicable legal minimum age, but are younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138. Third parties must not require juvenile workers to work overtime or perform nighttime work.

Student Worker Protections. Third parties must ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Third parties will provide appropriate support and training to all student workers.

Working Hours. Third parties must follow all applicable laws and regulations with respect to working hours and days of rest, and any overtime must be voluntary.

Wages and Benefits. Third parties must provide any benefits as required by law and/or contract. Third parties must meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and wage deductions must not be used as a disciplinary measure. All use of temporary and outsourced labor shall be within the limits of the local laws.

Environment, Health, and Safety

At Apple, climate change and other environmental considerations are an integral part of our business practices. We expect our third parties to demonstrate the same commitment by reducing or eliminating waste and implementing

conservation measures as appropriate. Detailed information about Apple's practices can be found at <https://www.apple.com/environment/>.

Worker health, safety, and well-being is also important to Apple. We expect our third parties to provide and maintain a safe work environment and integrate effective health and safety management practices into their businesses. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Health and Safety Permits. Third parties must obtain, keep current, and comply with all required health and safety permits. Health, safety, and any other related permits must be obtained in accordance with [Apple's Anti-Corruption Policy](#).

Occupational Health and Safety Management. Third parties must establish a process to identify and document foreseeable occupational health and safety hazards in the work environment and make all efforts to manage the risks associated with those hazards. Foreseeable hazards are categorized as physical, chemical, biological, ergonomic, and mechanical, and examples may include noise, illumination, indoor air quality, and emergency preparedness.

Emergency Preparedness and Response. Third parties must identify and evaluate the likelihood of different types of emergencies based on their activities and local geographic, geologic, and meteorological conditions. Emergency scenarios may include a fire, explosion, flood, power outage, violence, and/or natural disaster.

Emergency preparedness and response includes, but is not limited to, having an emergency response plan, emergency response team, and evacuation drills with knowledge or maps of the locations of emergency exits, signs, and equipment. This Emergency Preparedness and Response related information shall be shared with Apple personnel prior to visiting or working at any third party's site.

Infectious Disease Preparedness and Response. Third parties must develop and implement a program to take reasonable steps to prepare for, prevent, and respond to a potential emergency or outbreak of an infectious disease among their employees.

Incident Management. Third parties must have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Third parties shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

Working and Living Conditions. Third parties must provide workers with reasonably accessible and clean toilet facilities, as well as potable water. All

dining, food preparation, and storage facilities provided to employees must be sanitary.

Health and Safety Communication. Third parties must provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facilities.

Law and Ethics

Apple expects the highest standards of ethical conduct in all of our endeavors. We expect our third parties to comply with all applicable laws and and be ethical in every aspect of their business.

Corruption. Third parties may not engage in corruption, extortion, embezzlement, or bribery. A bribe is defined as offering or receiving anything of value to any person for the purpose of obtaining or retaining business, or securing an improper advantage. Kickbacks are a type of bribery and occur when a person is offered money or something of value in exchange for providing something to a third party. All bribes are strictly prohibited. Anything of value includes cash, cash equivalents, gifts, entertainment, internships, employment, or even a promise.

Apple also does not allow for facilitating payments in relation to any Apple related business. Facilitating payments are typically demanded by low-level officials in exchange for providing a service that is ordinarily and commonly performed by the official. Third parties are required to report anytime they are confronted with a request to pay a bribe. Contact globalcompliance@apple.com or Apple's [external helpline](#). For additional details please refer to Apple's Anti-Corruption Policy.

Responsible Sourcing and Due Diligence. Third parties must exercise due diligence in their own business operations, including development of due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate such risks.

Interactions with Public Officials. A public official is any person who is paid with government funds or serves in a public function. This includes individuals who work for a local, state/provincial, or national government, a public international organization, as well as employees of public (government-owned or operated) schools, hospitals, and state-owned enterprises. Employees at such organizations are considered public officials regardless of title or position.

Apple expects any third party working with a public official to adhere to additional rules and obligations, including meal, gift, and travel limits.

Gifts. Please check with your Apple contact before providing any gift.

Third parties should not offer any gifts, regardless of value, to Apple employees or anyone working on behalf of Apple that are meant to influence a decision or are otherwise in violation of Apple's gifting policies.

Conflicts of Interest. Third parties must conduct business openly and transparently. Third parties should avoid and disclose to Apple any conflicts of interests like significant relationships. Significant personal relationships include, but are not limited to, spouses, dating or physical relationships, and close friends.

Money Laundering. Third parties may not engage or assist others in concealing illicit funds or other suspicious activities. The following are examples of potential money laundering that merit further investigation:

- 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, non-business account

Tax Evasion. Tax liabilities must be paid. Third parties may not assist or otherwise facilitate the nonpayment of true tax liabilities of its third parties, or related entities.

Trade Restrictions, Export Controls, and Customs. All transactions must comply with United States export and customs laws and additional export and customs laws in the countries where business is being conducted. Third parties whose business activities involve the sale or shipment of Apple products, technologies, or services across international borders must understand and ensure compliance with all applicable laws or restrictions that apply in connection with those activities.

Third parties conducting business on behalf of Apple must take additional steps to ensure that they are not interacting, contracting, or otherwise engaging with a sanctioned person or entity. This may include screening or other procedures that ensure that the third party is not conducting business with a sanctioned entity.

Competition and Sales Practices. Third parties must uphold fair business standards in advertising, sales, and competition.

Laws regulating competition and trade practices vary around the world, but certain activities, such as price fixing or agreeing with a competitor to allocate customers, are almost always illegal. Third parties must understand and ensure compliance with all competition and trade practices laws or restrictions that apply in connection with their business activities.

Apple does not dictate prices to resellers and cannot get resellers to raise, lower, or stabilize their retail prices. Resellers are free to determine their own prices and should follow local laws to ensure fair and accurate pricing.

Accuracy of Records and Reports. Third parties must ensure that all records and reports provided to Apple or to any government or regulatory body are comprehensive, accurate, timely, and compliant with applicable legal and financial standards. Third parties must never misstate facts, omit critical information, or modify records or reports in any way to mislead or assist others in doing so.

Privacy. Apple is committed to ensuring the privacy of the end-user customers of Apple products and services. Third parties are required to comply with all privacy laws and regulations. Third parties must take appropriate precautions — including administrative, technical, and physical measures — to safeguard customers' personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. Failure to protect customer private information may damage Apple's relations with its customers and may result in legal liability for third parties. For additional information, see Apple's Privacy Policy at <https://www.apple.com/privacy/>.

Confidentiality of Apple Information. Third parties will protect the confidentiality of Apple information that they have access to. Third parties must strictly abide by all Non-Disclosure Agreements and other agreements regarding the confidentiality of information. Third parties must not comment or provide information on Apple business matters, including any programs, policies, or contract terms.

Protection of Intellectual Property. Third parties must respect the intellectual property rights of Apple and other third parties and may not knowingly use the intellectual property of any third party without permission or legal right.

Insider Trading. Third parties who become aware of material nonpublic information regarding Apple or another company— such as an Apple business partner, channel member, vendor, or customer— in connection with their work at Apple, should not buy or sell securities of Apple or such other company. Third parties must also not disclose material nonpublic information to other persons, including family members, or make any recommendation about whether to buy or sell Apple securities or securities of such other companies. Determining whether information is "material" requires consideration of all relevant facts and circumstances. In general, information is material if it would likely be considered important by an investor who is deciding whether to buy or sell a security, or if the information is likely to have a significant effect on the market price of the security. Both positive and negative information may be material. "Nonpublic" information means information that has not been previously disclosed to the general public and is otherwise not available to the general public. Information

should be considered nonpublic for at least 24 hours after it has been distributed to the general public through a press release, filing with the Securities and Exchange Commission, or similar means. Trading on material nonpublic information is a crime. Penalties for insider trading can include significant fines, monetary damages, and prison time. In the United States, the Securities and Exchange Commission and the Department of Justice prioritize these types of cases.

Ensuring Compliance with This Code

Process to Receive and Investigate Reports of Violations

Third parties must have a process whereby their employees and others who do business for or on behalf of third parties can safely, confidentially, and anonymously (where allowed by law) report violations of this Code to the third parties' management. Third parties must promptly investigate any observed or reported violations of this Code.

Whistleblower Protection

Third parties must ensure whistleblower confidentiality and to prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of this Code.

Corrective Action Process

Third parties must have a process for timely correction of any deficiencies or violations of this Code identified by internal or external audit, assessment, inspection, investigation, or review.

Questions and Additional Resources

Please contact globalcompliance@apple.com to report any violations of this Code, allegations, or if you have questions about any provision of this Code. Information for Suppliers and Apple's Supplier Code of Conduct can be found at <https://www.apple.com/supplier-responsibility/>.