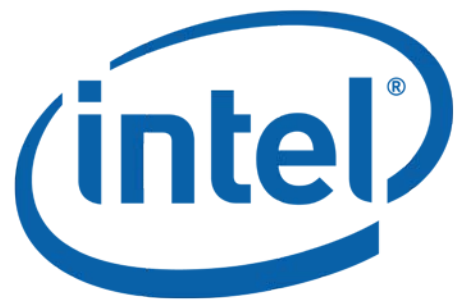


INTEL CODE OF CONDUCT



Intel Code of Conduct

NOVEMBER 2010

Our Mission

Delight our customers, employees, and shareholders by relentlessly delivering platform and technology advancements that become essential to the way we work and live.

Our Values

Customer Orientation

We Strive To:

- Listen and respond to our customers, suppliers and stakeholders
- Clearly communicate mutual intentions and expectations
- Deliver innovative and competitive products and services
- Make it easy to work with us
- Excel at customer satisfaction

Discipline

We Strive To:

- Conduct business with uncompromising integrity and professionalism
- Ensure a safe, clean and injury-free workplace
- Make and meet commitments
- Properly plan, fund and staff projects
- Pay attention to detail

Quality

We Strive To:

- Achieve the highest standards of excellence
- Do the right things right
- Continuously learn, develop and improve
- Take pride in our work

Risk Taking

We Strive To:

- Foster innovation and creative thinking
- Embrace change and challenge the status quo
- Listen to all ideas and viewpoints
- Learn from our successes and mistakes
- Encourage and reward informed risk taking

Great Place to Work

We Strive To:

- Be open and direct
- Promote a challenging work environment that develops our diverse workforce
- Work as a team with respect and trust for each other
- Win and have fun
- Recognize and reward accomplishments
- Manage performance fairly and firmly
- Be an asset to our communities worldwide

Results Orientation

We Strive To:

- Set challenging and competitive goals
 - Focus on output
 - Assume responsibility
 - Constructively confront and solve problems
 - Execute flawlessly
-

From Intel's President and CEO

Intel competes in fast changing markets. We conduct business in geographies around the world. In this environment of unprecedented change and opportunity, our path to continuing success is clear – uniting under a common vision, shared values and a consistent standard of conduct.

Our business success has always depended on our ability to build trusted relationships - with one another, customers, suppliers, governments and communities. But, trusted relationships don't happen overnight. They're built over time, on the integrity of every decision we make, every expectation we set and every action we take. Everything we do, big or small, can have big and lasting impact.

Sometimes, the right action isn't obvious. But we have our compass: a mission, a set of shared values, and our Intel Code of Conduct. This Code of Conduct represents Intel's expectations of what it means to act ethically and within the boundaries of the law. Understand the Code. Discuss it, follow it, use it. Find the resources on the Ethics and Compliance intranet site to help you apply the Code to your day-to-day work.

The Code is the standard of conduct that unites us, strengthens and allows us to continuously deliver value and build trust year after year. Integrity beyond reproach is our commitment, our foundation and our future.

Paul S. Otellini
President and CEO

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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 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 Intel's five principles of conduct:

- Intel Conducts Business with Honesty and Integrity
- Intel Follows the Letter and Spirit of the Law
- Intel Employees Treat Each Other Fairly
- Intel Employees Act in the Best Interests of Intel and Avoid Conflicts of Interest
- Intel Employees Protect the Company's Assets and Reputation

Intel Conducts Business with Honesty and Integrity

One of Intel's 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

Intel's 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 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 Intel-related 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

Intel's 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 at Intel, 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. Intel does not support or condone preparing false records under any circumstances.

Intel employs 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.

Intel Follows 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 Intel 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 Intel 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 Intel does business, Intel is 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.

Intel's antitrust policy and standards are set out in Intel Corporation's Antitrust and Competition Law Worldwide Policy and Standards. When questions arise, contact Intel Legal for guidance.

When dealing with distributors, we need to follow Intel's 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 Intel's business.

When doing business with governments, consult with Intel Legal to be certain you are aware of any special rules that apply, and obtain approval from Intel 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.

Intel expects 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 Intel does business, laws and regulations govern imports and exports. Many of these laws and regulations restrict or prohibit the physical shipment of Intel 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, Intel provides 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 Intel 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.

Intel directors, officers, and senior employees (Intel grade levels 10 and above) 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 the company'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 Intel brand and ensuring that individuals feel confident that Intel respects their right to privacy.

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

When questions, issues, or concerns arise, consult Intel Legal or a member of the Privacy Team.

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, general news disclosures of all types should be coordinated in advance with the Intel Global Communications Group, the organization responsible for disclosing information publicly about Intel. 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. This includes disclosing new or confidential information regarding Intel through social media applications and websites.

Intel Employees Treat Each Other Fairly

One of Intel's 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

Intel values the free flow of thoughts, ideas, questions, and concerns. Intel encourages employees to raise work-related issues or concerns with the direct manager as soon as possible after they arise. When necessary, the Open Door policy allows you to raise the issue with another manager, such as a department head, a division general manager, or another manager up to and including the Executive Office.

If you are not comfortable using the Open Door to get answers to your questions or concerns about the Code or other topics, contact ask.ethics@intel.com or a Human Resources representative, who will assess the issue or concern and determine next steps.

Intel does 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

Intel values diversity in its workforce, as well as in its customers, suppliers, and others. Intel provides equal employment opportunity for all applicants and employees. Intel does 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. Intel also makes 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

Intel is 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. Intel strongly disapproves of and does not tolerate harassment of employees by managers or co-workers. We must treat co-workers, customers, and suppliers with dignity and respect.

Intel prohibits 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 Intel Security.

Safety

Intel complies with the safety laws, standards, and Intel guidelines that apply to our business. Sound safety practices are important in all Intel workplaces, not just the fabrication or assembly/test factories.

To protect Intel 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 Intel 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.

Intel Employees 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-Intel business that interferes with the proper performance of our roles at Intel, such as conducting non-Intel business during working hours; utilizing Intel confidential information, specialized skills or knowledge gained as an Intel employee; or using Intel property or equipment for non-Intel 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 at Intel or because the donors believe we might be in a position to assist them in the future
- Participating in or influencing an Intel 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 Intel property, information, or our positions at Intel 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 an Intel 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

Intel recognizes 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 Intel 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

Intel recognizes 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.

Intel provides 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 Intel's 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 Intel 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 Intel Legal.

Intel Employees Protect the Company's Assets and Reputation

Intel spends 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

Intel's physical assets include facilities, equipment, and computer and communications systems. We are to use these assets primarily for Intel 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 Intel's physical assets to Intel Security as soon as possible.

While Intel respects 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, Intel 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 Intel security policies and procedures for handling information assets and systems to ensure that we meet legal obligations, protect Intel's reputation, and protect Intel's investment in proprietary information.

Safeguarding Trademarks and Brands

Among Intel's most valuable assets are its trademarks and brands. To protect the value and recognition of Intel's trademarks, Intel has 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 Intel's reputation and good name must be upheld whenever we represent Intel. 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 Intel, 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 Intel 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. Intel offers many ways to get information and ask questions about the Code.

Consistent with Intel's Open Door process, address the issue with your manager or with any other person in the management chain, including the Executive Office or any officer of the corporation.

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

Report concerns using the Ethics Reporting Form at <https://EthicsReporting.intel.com>, which allows for anonymous reporting. You have an obligation to report any potential or actual violations of the law, the Code, or other Intel guidelines, so they may be investigated. Intel takes all reports seriously, looks into the matter, and takes appropriate action.

Non-Retaliation Policy

Intel does 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 Intel Legal.

Approvals and Waivers

The Code sets out expectations for Intel'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 Intel 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 Intel 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. Intel discloses 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.

The Code is not a complete list of Intel guidelines. You are expected to know and comply with all Intel 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 |
|---|---------------------------------------|--|
| Conduct Business with Honesty/Integrity | | |
| Conducting Business with Customers, Suppliers, and Others | Company guidelines | Additional documentation to clarify key topics such as Supplier Publicity and Confidentiality Policy (SPCP) |
| 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) |
| Follow the Letter and Spirit of the Law | | |
| 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. |
| 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. |

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| Topic | Term | Definition |
|------------------------------|------------------------------------|---|
| 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 |
| 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 |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
|------------------------------------|-----------------------------|--|
| | | 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. |
| Treat Each Other Fairly | | |
| 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. |
| Avoid Conflicts of Interest | | |
| 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. |
| 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 |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
|--|--|--|
| | | 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 two 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. |
| Protect the Company's Assets/Reputation | | |
| 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 Brands | Assets | <p>1. An asset is something of value to its owner; is often referred to "property". Assets may come in the form 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> |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
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| Safeguarding Trademarks and Brands | Trademark | A trademark is anything that identifies the source of one's goods or services and distinguishes them from those of another, including a word , a name , a design , a color , a phrase , a sound , or even a scent . It is a word (Tide*), name (Howard Johnson*), symbol (McDonald's Golden Arches*), device (Pillsbury Doughboy*), phrase (The Ultimate Driving Machine*) or sound (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. |
| Safeguarding Trademarks and Brands | Brands | <ol style="list-style-type: none"> 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. 2. Is often used interchangeably with "trademark". 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. |
| 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. These may found at the http://legal.intel.com website. |
| 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 rd parties. |
| Representing Intel | Authorized Representative | This refers to an employee who has been designated as a representative of Intel for external purposes or 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 |

INTEL CODE OF CONDUCT

| Topic | Term | Definition |
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| | | the limits of signing authority of certain employees. |
| Representing Intel | Antitrust Violations | <p>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 at http://legal.intel.com/Antitrust/Overview/dos+and+donts.htm.</p> |
| Asking Questions/Reporting Concerns | | |
| Non-Retaliation Policy | Retaliation | To seek revenge |