Intel Political Accountability Guidelines

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Intel Corporation is committed to the highest levels of corporate accountability. As a way to provide transparency with respect to Intel's political contribution decision making and disclosures, Intel adopted these Intel Political Accountability Guidelines (the "Guidelines").

Intel Political Action Committee

Intel created the Intel Political Action Committee ("IPAC") in 1980 to enable employees to support candidates whose legislative goals align with Intel's public policy priorities, as outlined below. IPAC is a separate segregated fund registered with the Federal Election Commission. All funds in IPAC come from voluntary contributions from Intel's employees and directors. IPAC makes contributions to candidates, ballot initiatives, and political action committees where permitted by law. Corporate funds are used only for the administration of IPAC, and no corporate funds are deposited in the IPAC account.

Corporate Political Activity

Some states allow corporate contributions to state and local candidates, as well as ballot initiatives. Where permitted by law, and in compliance with its giving guidelines set forth below, Intel contributes to candidates, ballot initiatives, and political action committees from its corporate funds. Intel does not make contributions to so-called "527 organizations" that are not principal campaign committees, political action committees, or political parties. Intel does not use corporate funds to make independent expenditures or to fund electioneering communications. Intel does not make political contributions from its corporate funds where it is prohibited by law, such as to federal candidates. All contributions to federal candidates come from IPAC.

Industry and Trade Groups

Intel uses corporate funds to participate in industry and trade associations. These memberships allow Intel to work collaboratively with other companies and groups to address key public policy issues. Intel reviews these memberships annually to assess their business value and alignment with its policies and priorities. Intel discloses its payments to trade associations and other tax-exempt organizations such as 501(c)(4) organizations.

How We Select Contribution Recipients

Throughout the year, Intel receives contribution requests from candidates and political action committees. Intel officers and employees also initiate contribution requests. Decisions on political contributions, whether from IPAC or from Intel's corporate funds, consider Intel's business objectives, corporate policies, and public policy priorities, which are outlined on its Public Policy and Corporate Responsibility websites. Intel's approach is to make contributions in a bipartisan manner that balances support between Republicans and Democrats in each election cycle. Intel's decisions regarding making of political contributions are guided by its public policy positions and protecting and enhancing the long-term best interests of the company, our stockholders, employees, and other stakeholders.

Intel reviews contribution requests against Intel's political contribution policy guidelines, which take into account: connection to the technology industry positions on key strategic business and policy issues for Intel; leadership on key committees or within Congress; whether Intel has a large presence in a given state or district; the impact of the proposed support on the candidate's campaign; and whether the candidate's conduct is consistent with Intel's values and business interests. The weight assigned to each of these factors may vary with the circumstances in a particular case. Corporate contributions are reviewed by Intel's Vice President, U.S. Government Affairs and Intel's Vice President of Corporate Services. Intel uses this formal review process to ensure its contributions are in line with Intel's interests, rather than those of individual directors and officers. IPAC contributions are determined by the leadership of IPAC in accordance with the IPAC Bylaws.

Review

Intel's Global Public Affairs and Global Government Affairs teams analyze Intel's corporate and IPAC political contributions regularly to ensure contributions made during the year are consistent with these Guidelines. The reports are presented to the Board's Corporate Governance and Nominating Committee for review.

Transparency

Intel has a long-standing commitment to transparency. These Guidelines are available on Intel's Corporate Responsibility website. In addition to information included in its annual Corporate Responsibility Report, Intel reports its corporate contributions and IPAC contributions on a semi-annual basis. Intel also reports payments to trade associations and other tax-exempt organizations on an annual basis. These reports are available on Intel's Report Builder website.