



arm

# Our Code of Conduct





January 2022



# Arm’s Code of Conduct supports how we manage the business in a responsible way, consistent with our Core Beliefs.

Simon Segars, CEO

## Contents

 <b>Architects of Possible</b>	<b>03</b>	 <b>Our Partners’ Trust</b>	<b>17</b>
CEO message	04	We deal fairly	18
CCO message	05	We protect our partners’ data and property	18
Core Beliefs	06	We give and receive hospitality, entertainment and gifts responsibly	18
Asking questions and resources for assistance	07	Doing business with the government	18
		We do not misuse insider information	18
 <b>The Core That Drives Us</b>	<b>08</b>	We help prevent money laundering	19
One company and one Code	09	We communicate responsibly	19
The special role of Arm leaders	09	Working with suppliers and other partners responsibly	19
<b>Our Expectations</b>	<b>10</b>	 <b>Smarter World</b>	<b>20</b>
We follow the law	10	We do not bribe	21
We complete training	10	We follow trade and sanction rules	22
We speak up	10	We compete fairly and ethically	22
Our first line of support is our managers	10	We keep accurate tax records	23
When to speak up?	11	We respect human rights	23
What happens after you speak up?	11	We protect the environment	23
		Responsible political activity	23
 <b>What Connects Us</b>	<b>12</b>	We practice responsible charity activity	23
We respect each other	13	We operate sustainably	24
We are committed to Diversity, Equity, and Inclusion	13	We are committed to Artificial Intelligence (AI) Ethics	24
We engage in safe working environments	13		
We avoid conflicts of interest	14		
We keep data and assets safe	15		
We prepare for business disruptions	15		
We protect personal data	16		
We manage our data with care	16		



# Architects of Possible





Arm's Code of Conduct is an embodiment of how we operate—as an *employer*, a *partner* and a *business*—and sets out the behaviors we expect of everyone in Arm, and the behaviors we expect everyone we interact with to reciprocate. We want Arm to be a place where everyone can bring their best self to work to maximize their contributions and potential.

We set a high standard at Arm, from the ways in which we create new technologies, our engagement with partners, our efforts to lead and educate the wider industry, and how we treat our people and engage in the communities in which we work. We do **what is right**, not what is easy. A commitment to our Core Beliefs, an adherence to operating transparently with the highest ethical standards and evolved inclusive practices are at the essence of what has contributed to Arm's success over the past 30 years.

Businesses and industries naturally operate against a backdrop of uncertainty—the COVID-19 pandemic is proof enough of that, in addition to the recent social justice movements that have sparked around the world. These are significant and impactful events that will forever change how we interact with one another and how businesses operate. Evolution is essential, which is why an unwavering commitment to protecting our people and our business keeps us grounded in what matters most. As we build for the future, it is essential that every voice is heard and can contribute, that we enable everyone to reach their full potential, and that we build the strongest organization we can by leveraging, not suppressing, the differences that make us our brilliant selves.

Please read, understand, and put our Code of Conduct into practice. And, if you are ever in doubt about how to address a challenging situation, [ask someone](#). We must rely on each other for support so we can all benefit from the collective contributions of our brilliant colleagues.

Thank you,

Simon Segars, CEO







“

The Code of Conduct is a critical resource that should be actively referenced and used by the entire company. At the highest level, the Code aligns required business practices, including legal and regulatory requirements, with Arm’s values and translates those concepts into the expected behaviors for all employees, directors, contractors and agents. Adherence to the Code protects our business, our people and our stakeholders.

Our obligation to operate ethically and in keeping with Arm’s Core Beliefs remains unchanged whether we engage face-to-face in the same physical location, or remotely via technology. Our Code has driven our behavior to-date and will continue to drive our behavior going forward. We will continue to approach each situation from a position of transparency, trust and integrity. The Code is the foundation of that approach.

If you witness or hear of behavior that conflicts in any way to Arm’s Code of Conduct, it is your responsibility to raise a concern and prompt the necessary action; Arm encourages an open, supportive environment for raising concerns without fear of retaliation. This document outlines scenarios you might come across and the appropriate routes to resolution, but is in no way an exhaustive list. Each of us at Arm must be an advocate for an inclusive, supportive, environment where everyone can thrive. Thank you for your active and ongoing commitment to Arm’s success as an integrity-first organization.

**Carolyn Herzog**, *EVP General Counsel, Chief Compliance Officer and Corporate Secretary*



# Core Beliefs



We, not I



Be your brilliant self



Passion for progress





# Asking Questions and Resources for Assistance

If our global community is going to thrive, each of us must always act with integrity and speak up when we have questions or need to report concerns. There are many resources at Arm we can contact, including:

- Your Manager
- People Team via PeopleHub
- Office of Ethics and Compliance

Or you may use two secure and trusted options via the Arm Integrity Helpline to report concerns confidentially and anonymously where allowed by local law:

-  1. [Make a report online](#)
-  2. Make a report verbally:  
  
United Kingdom: 0-808-189-1053  
United States: 1-800-461-9330  
France: 0805.080339  
Other countries, please [click here](#) for local numbers

We all must be familiar with all applicable company policies contained within PeopleHub Knowledge base.

# Ask yourself...

When planning to take an action:

Does my action follow our Code, our policies, any applicable rules, regulations or laws?



Does my action follow our Core Beliefs?



Could I defend my action if it were reported on the front page of the newspaper?



We must be able to answer “yes” to all of these questions.





# The Core That Drives Us



One company  
one Code

Our passion for progress and responsibility to help Arm thrive must be balanced against our duty and expectation of everyone to **follow our Core Beliefs, our Code and our policies**. Our Code applies to everyone, including employees, directors, contractors, and agents of Arm. The Code cannot address every issue that may arise or every decision that must be made, which is why we should rely on the Core Beliefs and seek help via the [resources](#) listed here if help is needed.



The special  
role of Arm  
leaders

Leading globally from within takes sound judgment and integrity. Leaders provide support and direction in support of Arm’s goals, including compliance and ethics.

Leaders promote a positive working environment by setting the culture and work environment for their teams and by creating a safe space for people to feel comfortable discussing issues and raising [concerns](#). Leaders are expected to uphold and practice the Core Beliefs, our Code and our policies, and should guard against any instances of retaliation. Leaders should also be aware of the reporting resources available and know when and how to properly escalate issues of misconduct through the appropriate channel. Leaders support the completion of training assignments in a timely manner.





# Our Expectations

## We follow the law

We take responsibility for our impact and always act with integrity. In addition to complying with our Code, we ensure that we understand and follow all applicable laws, rules and regulations.

We support and encourage one another to follow the Code and act with integrity. When we have [questions](#) about an applicable law, rule or regulation or wish to report questionable practices, we speak up, and if needed, contact the resources detailed in our Code, including those listed in the We Speak Up section, below.

Persons involved in any misconduct are subject to the appropriate disciplinary action in line with Arm policies. Further, if criminal activity has taken place, the matter will be reported to the appropriate authorities.

## We complete training

We hold ourselves accountable for completing regular training on our Code, and we understand and commit to complying with the expectations set out in this document. Failing to read or attest to the Code does not excuse us from our responsibilities.

## We speak up

We do the right thing, even when it is difficult. Although we may find ourselves in complex or confusing situations, we speak up if there are possible violations of the Code, Arm policies, or legal and regulatory requirements. We escalate these [concerns](#) to the appropriate channels by making use of the resources available to report [concerns](#). When we speak up, we are truthful, transparent, and we cooperate fully while concerns are being looked into. We never conceal or destroy information.

## Our first line of support is our managers

Managers keep an open-door policy and are the primary resource for answering questions and providing support. Seek out their help when you have questions.

We all must be familiar with all applicable company policies contained within PeopleHub knowledge base.

We have several other resources to ask questions or report concerns:

- People Team via PeopleHub
- Office of Ethics and Compliance

Or you may use two secure and trusted options via the Arm Integrity Helpline to report concerns confidentially and anonymously where allowed by local law:



1. [Make a report online](#)



2. Make a report verbally:

United Kingdom: 0-808-189-1053  
United States: 1-800-461-9330  
France: 0805.080339  
Other countries, please [click here](#) for local numbers

When you contact these resources, your reports will be treated with confidentiality to the extent possible, and the company will properly and promptly address any questions or issues you report.

When we make a report, ask a question or participate in any investigation, we can do so without fear of retaliation. Arm has a zero-tolerance policy for any retaliation. If you feel you have been retaliated against, or are aware of possible acts of retaliation, you should immediately contact the Office of Ethics and Compliance.





### When to speak up?

Ask questions and report concerns whenever appropriate. Please contact the Office of Code of Ethics and Compliance if you encounter any of the following scenarios, including but not limited to:

- ✦ You believe a violation or a concealment of a violation of our Code or our policies has taken place.
- ✦ You believe a crime has been committed.
- ✦ You think someone may have been bribed or you suspect corruption.
- ✦ You believe there is a danger to someone's psychological and/or physical safety.
- ✦ You believe there is a danger or threat to the environment and/or to Arm's property.
- ✦ **You are aware of** inappropriate or unprofessional behaviors, or unlawful actions that are not in alignment with Arm's inclusive and equitable environment (e.g. harassment, discrimination, retaliation, etc.).



### What happens after you speak up?

- ✦ We require everyone's vigilance to create and sustain an inclusive, equitable and respectful workplace and applaud your courage in speaking up and sharing your concerns.
- ✦ We take every concern seriously and each report is investigated fully, promptly and fairly. We believe each case requires a different level of support and approach to remedy.
- ✦ Persons involved in any misconduct will be subject to the appropriate disciplinary action in line with Arm's policies. Further, if criminal activity has taken place, the matter will be reported to the appropriate authorities.
- ✦ If you feel you have been retaliated against, or are aware of possible acts of retaliation, you should immediately contact the Office of Ethics and Compliance.



# What Connects Us



We respect each other

We interact with one another from a default position of trust, which means that we do not engage in any form of physical or verbal harassment. We treat one another with respect and consider how fellow employees might feel based on our actions. Empathy allows us to recognize potential issues and avoid situations where our Core Beliefs are not guiding our behavior.

Harassment is unacceptable and unwelcome behavior that creates a hostile, offensive, intimidating or demeaning work environment. Examples of harassment include unwanted sexual advances, offensive comments or jokes, threats of any kind, or non-inclusive behavior.

We report any situation involving harassment immediately to our Manager, the People Team, the Office of Ethics and Compliance or other channel we are comfortable with. We are aware of the [resources](#) available if we need to speak up and express [concerns](#).

Q

Sarah’s manager often touches female employees when he speaks to them. Sarah doesn’t think this is appropriate, but she isn’t sure the female employees feel the same way, so she has not reported the conduct. Is she right?

A

No. Sarah should report any conduct that she believes is in violation of our policies even if she believes no one has been offended. We all have a duty to report [concerns](#).

We are committed to Diversity, Equity, and Inclusion (DEI)

Diversity, Equity and Inclusion (DEI) plays a significant role in how we operate as a company and uphold a thriving Arm community. We recognize the world is continuously evolving, and how we operate today and tomorrow will differ from the past. True to our Core Beliefs, we have a “Passion for progress” when it comes to DEI. We strive to create an organization that builds strength through difference. We know representation matters and we are committed to engaging with the broadest talent pool possible. We aim to maximize the potential of every person in the company to enable their full contributions so everyone can live out the Core Belief of ‘Being their brilliant self’. We intentionally and consistently take strides to create a workplace that ensures every voice is heard, respected and valued. Our DEI strategy focuses on strengthening Arm, its ecosystem and the communities where we live and work. In the essence of, ‘We not I’, we call upon each other to act thoughtfully and responsibly to make Arm, and the world at large, a more diverse, equitable and inclusive place.

For further information about Diversity, Equity and Inclusion at Arm, please contact the DEI Team.

We engage in safe working environments

We take responsibility for the safety of Arm and others and we make sure we are aware of, and in compliance with, all applicable health and safety laws, regulations, and security notices. We recognize that safety cannot be compromised. We keep all access cards safe and do not allow others to use them.

For more information, please review our Health and Safety Policy. Our Health and Safety Policy details our accident and near miss reporting system and the roles each of us plays in establishing and maintaining a safe and healthy environment. If you have any questions, contact Health and Safety.

We do not possess illegal drugs or abuse alcohol at company facilities or Arm sponsored events, nor do we work under the influence of illegal drugs or alcohol. Further, we do not possess firearms or any offensive weapons while working.

Please report any accident or near miss at work to the PeopleHub ServiceNow Ticket System.





We avoid conflicts of interest

Our commitment to make the Arm community thrive and to do so collectively means we never put our own financial interests above our duty to Arm and each other. Even the mere appearance of a conflict of interest can be damaging.

Conflicts can arise in many situations including but not limited to: outside employment with a competitor, customer or supplier; accepting improper benefits or opportunities such as gifts, loans or investment opportunities; competing against the company for the purchase or sale of products, services, property or other interests; or directing contracting opportunities and other transactions to yourself or those related to you.

A ‘conflict of interest’ is when an employee has a competing interest that interferes with the interests of our company. Conflicts arise when we use our role at the company, or information to which we have access, to personally benefit from business or opportunities.

We do not take for ourselves business opportunities that arise from the use of company property, information or our position with Arm. We simply do not compete with our company or ever attempt to take opportunities meant for Arm.

From time to time Arm employees may be asked to serve on a board of a different organization. While these opportunities can help both us and our company progress and improve, we must make sure such positions do not cause a conflict and that we have received the proper approval and followed all Arm procedures before we accept.

Additionally, a conflict is potentially created when you embark on a relationship with someone at work or if you work with members of your family or extended family. When a personal or family relationship may impact our decision-making or hiring, or might lead to the appearance of a conflict of interest, you should come forward and contact the People Team or the Office of Ethics and Compliance. You must declare personal or family relationships during the hiring process and be sure to discuss any relationships that could be seen as conflict of interest or having ethical implications with your manager, the People Team or Office of Ethics and Compliance.

We avoid even the mere appearance that we are not committed to our company’s interests. Should you have any questions or need to report potential conflicts, you should contact the Office of Ethics and Compliance regarding any material transaction or relationship that may violate these standards.

+

Q

A customer Zang knows from a previous Arm project now has some additional work that Zang is skilled at. The customer suggests that Zang should do the work on his own time. The suggested work is not a large project and can be completed after hours and on weekends without affecting Zang’s job. Is this okay?

A

No. Unless Zang has disclosed the potential Conflict of Interest to the Office of Ethics and Compliance, the People Team and obtained all relevant approvals.



We keep data and assets safe

While we want to share information and collaborate effectively, we must also be mindful of keeping data and resources safe. Data that we use in our daily activities can include confidential information and proprietary company data that we should always protect from disclosure to anyone who is not explicitly authorized to access such data. Some examples of data we must protect include:

Trade Secrets	Patent research	Trademark & copy-right development	Business plans & strategy
Research plans	New product plans	Salary and benefits data	Databases
Employee & medical data	Customer data & specification	Supplier data	Pricing information
Financial data	Costs	Technical data	Design information
IT system details & software	Technical drawings	Marketing strategies	Bid information

We must protect our systems and networks and avoid unauthorized access to our systems, networks and other electronic resources. We take care not to reveal any passwords or accidentally allow access to any of these resources.

While our business requires that we work with and share information, we must keep security of our valuable data in mind. We have specific procedures for sharing and handling our information that each of us should be familiar with, as detailed in our Information Security Policy. If you have any questions or need to report an information security issue, please contact the Enterprise Security Team.

We must all take responsibility for our impact, which means using our company resources with care and doing our best to avoid loss, theft and misuse of company assets such as equipment, supplies, electronic resources (including hardware and software), vehicles and facilities. We use our company assets to make an impact and further Arm’s goals, never for our own purposes or for the purposes of other organizations or individuals.

If we feel there might be an issue, or need to report any loss, theft or misuse of company assets, we contact our Enterprise Security Team.



- Q

Soo Jung frequently travels for Arm and takes along her laptop computer. On a recent trip she realized she had forgotten her charger and her laptop would not boot up. She decided to access some Arm files on a public computer in the business center of her hotel by using a thumb drive. Is this okay?
- A

No. Soo Jung should only use approved, secured means to access Arm data. We must not access company data in public places or on unsecured devices.
- Q

Arjun was emailing personal employee data to a new health insurance provider when he realized he had sent it to the wrong email. He received no response. Is it okay if he just waits to see if there is a response?
- A

No. We must report such breaches immediately to our Enterprise Security Team.

We prepare for business disruptions

If you have any questions on this topic please contact [bcm@arm.com](mailto:bcm@arm.com) or refer to the Business Continuity Management Policy.

- How do we stay prepared?
- + We take our laptop home with us every day, if we have one.
  - + We maintain our out-of-hours mobile contact details via ‘Edit Personal Details’ tab in PeopleHub.
  - + We regularly discuss our work with colleagues to ensure deadlines are met in times of absence.
  - + We consider our Business Continuity Management (BCM) requirements and raise any concerns to our manager.
  - + We have read and understand the Business Continuity Plan for Arm so that we understand our role in making business continuity successful.
- In the event that an incident prevents us from working in our normal location:
- + We ensure we are safe and remain contactable.
  - + We check for any notifications or updates from the Arm Crisis Notification Tool via mobile or email.
  - + We regularly check the relevant office Slack, Yammer or office intranet page for updates from our Site Leads and local Leadership Team.



**We protect  
personal data**

We respect our fellow employees and contractors and their right to privacy and data protection by keeping personal information and data private. Completing our work may require that personal data, including private health data, be collected, processed and stored. When that is the case, we only provide access to those who have a specific business purpose and have been provided authorization.

We have strict policies on how we obtain, record, hold, use, disclose and destroy personal data. If you have any questions, please contact our Global Privacy Office.

**We manage  
our data  
with care**

Taking responsibility and having integrity means that we accurately and completely record all data. We have a duty to provide our stakeholders with correct and complete information in a timely manner. Our records should always accurately reflect our business activities and include accurate accounting, financial controls, internal reporting and taxation records.

We only keep data for as long as we need it, for the purpose we collected it, and we will protect it from unauthorized access while we keep it. Please refer to [We Keep Data and Assets Safe](#) in our Code for further information.

We all must follow the applicable policies and procedures for preparing our records. If you are aware of any inaccurate or incomplete record, or have any questions about data management, you should contact our Information Management Team or the Global Privacy Office.





# Our Partners' Trust



**We deal fairly** We lead by example and each of us takes responsibility for the company. That means that we all must deal honestly and fairly with all third parties when we are representing Arm. Whether it’s our customers, our suppliers, our competitors or the public, we act with integrity and fairness. We do not take advantage through manipulation, concealment, misrepresentation or any unfair practice. Our continued ethical reputation depends on all of us competing with better products and services in an ethical manner.

**We protect our partners’ data and property** Just as we protect Arm’s data and assets, we must also protect data, intellectual property and any other assets belonging to our partners and other third parties. We never disclose any non-public data (including personal data regarding partner employees) to any other third party except as authorized by our partner. Data is shared only with those who need to know. Arm’s commitment to security extends beyond continuously improving and innovating security in our technology; see the Arm Security Manifesto for our vision on security.

**We give and receive hospitality entertainment and gifts responsibly** Our passion for progress must be balanced by operating ethically and fairly. Offering, giving or receiving gifts to or from our partners, customers and suppliers is a common part of business practice. Giving and receiving modest hospitality, entertainment or gifts is not against our policy as long as the hospitality, entertainment or gift is not meant to improperly influence us, our partner or our customer and is reasonable and proportionate to the circumstances of the relationship. Generally, there should be a clear business purpose and the hospitality, entertainment or gift should be infrequent.

We have a clear bar on offering, giving or receiving hospitality, entertainment and gifts over 200 GBP in value unless approved by a manager under the processes detailed in our Anti-Bribery and Corruption section of Arm’s Ethics and Compliance website.

Any hospitality, entertainment and gifts involving a foreign public official are not permitted except with prior approval under the process detailed in our Ethics and Compliance website.

If you have any questions, you should consult our Anti-Bribery and Corruption Policy before giving or receiving any hospitality, entertainment or gifts, or contact the Office of Ethics and Compliance if you have questions or concerns.

**Doing business with the government** Doing Business with the Government is not always the same as doing business with private parties. Activities that might be appropriate when working with private sector customers may be improper—or even illegal—when a national or local government is our customer. For example, business courtesies or entertainment that might be acceptable when dealing with private parties—like paying for meals or drinks—may not be appropriate when working with government officials. In addition, due to complex legal requirements, some types of bid-related information, which might be proper in a transaction with a private party, may not be requested or received when dealing with governments or their officials. When conducting business with government officials, it is each person’s responsibility to know and comply with all applicable laws, rules, and regulations. Any hospitality, entertainment and gifts involving a foreign public official are not permitted except with prior approval under the process detailed in our Ethics and Compliance website.

Q

Hana works with Arm suppliers and one supplier she has worked with for years recently sent her a holiday gift basket worth 250 GBP. Can she keep it?

A

Not without approval. Gifts and Hospitality received that are greater than 200 GBP must be logged for review and manager pre-approval. Also, the item/event must not be intended as a bribe. Further information can be found in the Anti-Bribery and Corruption Policy and in the Anti-Bribery and Corruption section of Arm’s Ethics and Compliance website.

**We do not misuse inside information** We never buy or sell the stock of any company, including our parent company, its other subsidiaries or our business partners, while in possession of material, non-public information—known as ‘inside information’—about the company in question.

Inside information is information of a precise nature about a company and/or its listed securities that is not generally available but which would, if made generally available, be likely to have a significant effect on the price of a company’s securities.

We never ‘tip’ others nor share inside information in casual conversations, as the misuse of inside information is a serious and potentially illegal matter, even if we do not intend for ourselves or others to profit from it. For more information please consult our Insider Trading Policy.



We help prevent money laundering

When dealing with our customers and other partners, we must be aware of the signs of money laundering and make sure we do not aid covering up the source of illicit or illegal funds through our legitimate business. Money laundering is the attempt to hide the source of illicit or illegal funds through transactions that appear to be legitimate.

We should watch for requests to:

- + Pay invoices or transfer funds in currencies other than those specified in the relevant contract or agreements
- + Pay or transfer funds to countries with no relation to the relevant contract or agreements
- + Pay in cash
- + Pay to third parties who are not included in the relevant contract or agreements
- + Any other odd or uncommon practice regarding payment or transfer of funds

While conducting business with a customer, supplier or any business partner, should you notice something strange or become concerned about any transactions, you should immediately report such concerns to our Office of Ethics and Compliance.

+

Q

Steve is working with a potential new supplier who has not yet provided all the required information to be approved by Arm procurement, but his manager wants to move ahead with approval so as not to delay a large project. Is this okay since his manager is suggesting it?

A

No, Steve’s supervisor cannot ignore Arm policy and procedure for approving a supplier. Steve should report this conduct to the Office of Ethics and Compliance or use the other resources described in our Code.

We communicate responsibility

As we continue to push forward with our passion for progress and promote our company and our mission, there are certain reminders to keep at the forefront. If contacted by an outside analyst or a member of the media, we refer those requests immediately to our Public Relations Team. We should not make any external statements about our company’s performance, initiatives or any other internal matter to any investors or others, and instead direct them to our [Investor Relations Team](#).

Many of us like to participate in online communities, blogs, forums and social media networks. Done in a smart way, participating in social media will help us cement our position as a technical and thought leader. Please use common sense—do not post any business-related, confidential, undisclosed financial or internal-only information obtained or learned through your role at Arm.

Keep in mind what is shared is public and often permanent. If we have any questions, we can email the Social Media Team or review our Public Relations and Social Media Policy.

Some good guidelines for posting or contributing online include:

- + Consider that what we write will be public, possibly forever
- + Make sure it is clear we are speaking for ourselves and not Arm
- + Do not violate our Code or our policies online, including engaging in harassment or disclosing confidential or proprietary information

Working with suppliers and other partners responsibly

We expect all suppliers and other partners we work with to share our commitment to integrity by following the law, our Supplier Code of Conduct, all applicable policies, and by acting in an ethical manner. We also treat our suppliers and other partners fairly and keep our commitments to these partners. We work with our suppliers and partners to ensure quality and value for our customers.

Additionally, we require that our suppliers and partners exhibit our same commitment to fundamental standards for employment, health and safety, the environment, confidential and proprietary information and our fundamental ethical values.



# Smarter World







We do not  
bribe

We lead globally by example. The decisions that each of us make can have a significant impact. Bribery and corruption are serious international issues and there are many laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act, that prohibit corrupt conduct and create offenses with serious penalties for both companies and individuals who break those laws.

‘Anything of value’ is very broad and can include cash, cash equivalents gift cards), gifts, favors, food, entertainment and opportunities.

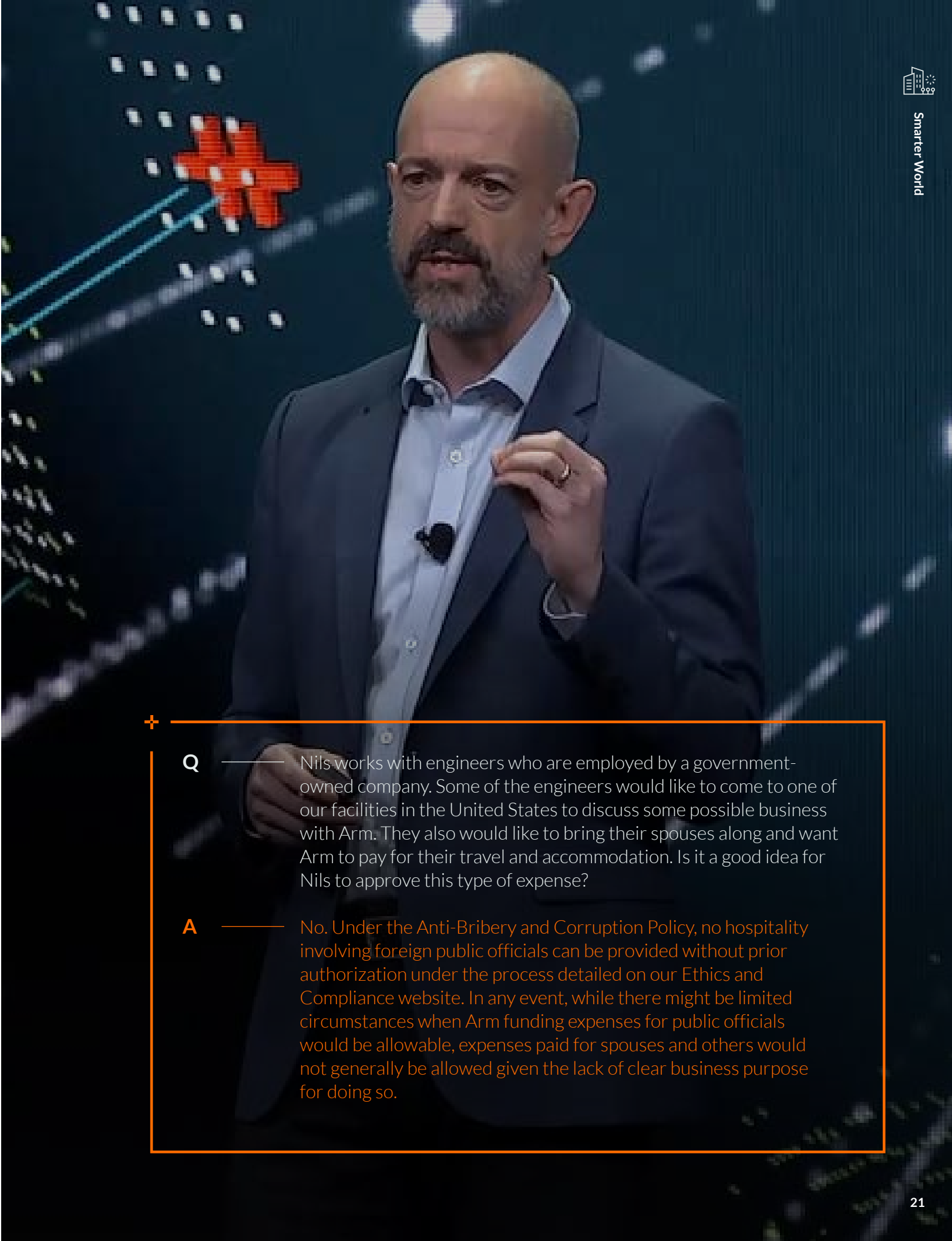
We do not offer, give, accept or agree to accept bribes under any circumstances, nor do we tolerate anyone acting on behalf of Arm engaging in such behavior. Specifically, we never offer, promise or provide anything of value to anyone, whether commercial partners or public officials, to secure any advantage, obtain or keep customer business or influence any commercial decisions. Neither do we accept or demand anything of value to influence our decision-making on behalf of Arm.

Please keep in mind that this policy can affect:

- + Giving and receiving of hospitality, entertainment and gifts
- + Political and charitable donations
- + Selection and retention of third parties such as agents, distributors and consultants

When contemplating any of these actions, you should consult our Anti-Bribery and Corruption Policy and the guidance on Anti-Bribery and Corruption available on our Ethics and Compliance website. Make sure you are complying with our policy and procedures and seek assistance by contacting the Office of Ethics and Compliance with any questions or concerns you might have.

If you are aware of any potential instance of bribery, no matter how small, you should report these concerns to the Office of Ethics and Compliance immediately.



Q

Nils works with engineers who are employed by a government-owned company. Some of the engineers would like to come to one of our facilities in the United States to discuss some possible business with Arm. They also would like to bring their spouses along and want Arm to pay for their travel and accommodation. Is it a good idea for Nils to approve this type of expense?

A

No. Under the Anti-Bribery and Corruption Policy, no hospitality involving foreign public officials can be provided without prior authorization under the process detailed on our Ethics and Compliance website. In any event, while there might be limited circumstances when Arm funding expenses for public officials would be allowable, expenses paid for spouses and others would not generally be allowed given the lack of clear business purpose for doing so.



We follow trade and sanction rules

The considerable reach of Arm’s business means that we have many important pieces of intellectual property and tangible goods that change hands daily. Moving these items around the world means we comply with all applicable export and sanctions in the United States, United Kingdom, Europe and worldwide.

It is important to realize that an ‘export’ is not always obvious. An export can include sharing of technical information, services, technology or goods not only electronically and physically, but also verbally or by simply handing it off to a person (colleague, customer, or partner) who may not be able to receive it without export authorization.

When we develop technologies and products, we classify them for export control prior to any sharing, export or release of the technology. Classification is key to determining whether export licenses are required, or other restrictions apply. Arm products and technologies are considered dual use and are not subject to military-related export control restrictions. However, Arm services could include handling of data that is military in nature and such services must be provided in accordance with applicable export rules.

Compliance with export rules is a shared responsibility. These rules apply whenever and wherever anyone is working with or accessing technical information, services, technology or goods. We do not share this type of content without first ensuring we are adhering to such rules. For further guidance, contact Arm Trade Compliance. Violations of export rules can have serious consequences. If you believe or suspect a potential breach of our policy or the law, you are expected to report your concerns to Arm Trade Compliance.

Q

Jamie was attending an industry dinner where a competitor said to her that he was frustrated with the new pricing changes at his company. He spoke, in detail, about his company’s plans to inflate the prices of certain products and services. What should Jamie do?

A

Jamie must not use this information in any way. She must end any conversation and tell him that he should not be sharing competitively sensitive information about his company with her. As soon as possible, Jamie should also inform the Office of Ethics and Compliance.

We compete fairly and ethically

In order to maintain our reputation for trust, we must avoid any behaviors or business practices that are, or even appear to be, anti-competitive. We compete with passion and vigor, and we recognize that competition leads to innovation and better products and services for our customers. Competition law violations carry significant fines and sanctions, and we cannot afford the damage a violation can bring both our company and the individuals involved.

For these reasons, we must never agree with competitors to fix prices, share markets or customers, rig bids in the context of a tender or engage in anticompetitive practices. If you have questions about these activities, please review our Antitrust Policy or contact the Office of Ethics and Compliance.

When we meet with competitors, we must be vigilant that our discussions remain on legitimate topics and that we do not share competitively sensitive information. If you ever have a concern that inappropriate discussions are taking place at a meeting, state your objection clearly, make sure it is reflected in the minutes and leave the meeting if the inappropriate discussion doesn’t stop; and when back in the office, report any issue or concern immediately to the Office of Ethics and Compliance.

Competitively sensitive information is information that we would not normally share with competitors, such as, but not limited to:

- + Costs and margins
- + Pricing
- + Business and commercial strategies and plans
- + Sales volumes
- + Our research
- + and Employee pay and agreements

Competition laws can be complex, and we should always ask questions and report concerns to the Office of Ethics and Compliance if we are unsure about any issue or incident.







**We keep accurate tax records**

We always accurately document our tax obligations and comply with all required procedures to ensure any possible gaps or issues are prevented or quickly resolved. We are committed at all levels of Arm to ensure proper care in monitoring and communicating these responsibilities to all concerned.

Additionally, we must avoid transactions where goods, intellectual property or funds are transferred outside of a normal, documented contractual relationship and not properly recorded in our records. We are committed to and take reasonable steps in preventing persons associated with us from engaging in criminal facilitation of tax evasion. Our management fosters a culture in which activity intended to facilitate tax evasion is never acceptable. If you believe or suspect a potential breach of our policy or the law, you must report these concerns to the Office of Ethics and Compliance immediately.

**We respect human rights**

A key to what connects us is the idea that we only succeed when we all succeed. We do not thrive at the expense of others. This means we keep human rights and fair labor practices in mind when we operate our business and expect the same of our suppliers and partners.

Specifically, we do not support, whether directly or indirectly, slavery or trafficking in any form. Employees are never forced to work, nor forced to work hours in excess of local law, and we never employ child labor.

If you have any questions about this subject, please contact the Office of Ethics and Compliance.

**We protect the environment**

We lead globally by improving our operational impact on the environment wherever and however we can. We seek to reduce waste, energy consumption and emissions through efficient management and dedicated action. For more information, please review our Environmental Policy.

**Responsible political activity**

Arm engages with governments and other institutions around the world to provide technical expertise and public policy positions related to our business interests. These are handled by our Public Affairs and Government Relations Team. Arm is politically neutral and does not support particular political parties. Arm does not make political donations. Arm occasionally receives requests to indicate public support for particular policies, and these are reviewed on a case by case basis. All such requests should be made in consultation with the Public Affairs Team.

**We practice responsible charity activity**

We are encouraged to offer our time and expertise in support of charities and other groups in need. Arm also provides support in the form of cash, employee time, in-kind donations and policy and public affairs assistance for qualifying projects or initiatives. All requests must be evaluated by the Sustainability Team, which is overseen by the Sustainability committee, with decisions for local requests for support delegated to local Arm offices in line with the corporate donations guidelines.

All corporate donation requests are evaluated under the following guidelines:

- + Charitable donations can only be made to registered charities and non-profit organizations.
- + Arm reserves the right to use its sole discretion in deciding which organizations receive donations and to decline donations to any cause which could be deemed harmful to Arm’s good name or reputation.
- + Arm will not make donations to any organization whose principles conflict with our Code or other related policies, such as human rights, or those which conflict with legislation.
- + Arm will not make donations to political organizations.
- + Arm will not usually make donations to religious organizations.
- + A community project, run by a faith-based organization, that has community-wide goals may be eligible, and is subject to approval by the Sustainability Team.





We operate sustainably

We strive to embed responsible business practice throughout our operations, both within our organization and through our value chain, guided by our integrated sustainability strategy which focuses on:

Closing the Digital Divide: extending the reach of our technology to connect everyone, everywhere

Leveraging our ecosystem-building capabilities to close the gap between those who have full access to digital technologies and the 3.7 billion who currently do not—enabling social progress while addressing new markets and unlocking commercial opportunity.

Decarbonizing Compute: working to minimize the environmental impact of our technology

Leveraging our expertise in low-power compute to increase performance per watt, providing a unique opportunity to drive up connectivity while driving down carbon emissions wherever compute happens .

The approach is enabled by our people—**Global Problem Solvers**—and underpinned by trust, through our commitment to **Responsible Technology**.

In executing our strategy, we can help realize the United Nations’ Global Goals as more people are able to access information and opportunity, and become a part of the solution themselves.

For further information about Sustainability at Arm please contact Sustainability.

We are committed to Artificial Intelligence (AI) Ethics

Arm cares about ethics and the role we play in bringing about a world built on trusted Artificial Intelligence technology—see Arm’s Drive for Ethical and Trustworthy AI to learn more. Our Artificial Intelligence Ethics Review Committee (the “AI Ethics Committee”) reviews and advises on ethical aspects of Arm systems, projects and products involving or enabling AI, drawing on the guidance in the Arm Manifesto and other widely recognized frameworks, such as those developed by the EU and the IEEE. Please refer to the AI Ethics Review Committee Rules of Procedure for more detail.

We ensure all systems, projects and products involving AI are assessed by the AI Ethics Committee and then based on the committee’s analysis and assessment, we implement their recommendations on how any identified issues should be approached and managed. Since ethics is a critical foundation to AI implementation, it is essential that anyone working in this field has a strong understanding of the issues. As such, anyone working in AI at Arm is required to complete training on AI Ethics. Contact the Office of Ethics and Compliance for questions.





