Arm’s Code of Conduct supports how we manage the business in a responsible way, consistent with our Core Beliefs.
Redefining What’s Possible
Arm’s Code of Conduct is an embodiment of how we operate as an employer, a partner, and a business. It sets out the behaviors we expect of everyone in Arm, and the behaviors we expect everyone we interact with to reciprocate.

We are committed to our Core Beliefs, to operating transparently with the highest ethical standards, and to creating an inclusive environment in which representation matters, people are valued, diverse perspectives are heard, and everyone’s skills are fully utilized.

As we build for the future, it is essential that we maintain the high standards we set for ourselves. Whether it’s our technology, partner engagements, leadership and education of the wider industry, the way we treat our people, or the way we engage in the communities in which we work, we do what is right, not what is easy.

This year we set out a North Star for Arm to clarify our strategic direction and to create a single expression that encapsulates what we’re all working towards. It is:

Building the future of computing, on Arm. Together. For everyone.

The Code of Conduct is foundational to our North Star because it is fundamental to how we operate. Please read the Code of Conduct, understand it, and put it into practice. 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.

Rene Haas
CEO
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. It is not an exhaustive list. Each of us 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.

Thank you,

Spencer Collins
Chief Legal Officer
Core Beliefs

Be Your Brilliant Self
Skillful individuality, performance and inclusion

We, Not I
Win together, not alone

Do Great Things
Working at pace, facing challenges, finding a way
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 Leader
- 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.

When planning to take 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.
Our Code of Conduct

The Core That Drives Us

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Doing great things for Arm and our partnership requires everyone to follow our Core Beliefs, our Code, our policies and our Management System. 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.

Leaders should be aware that observing misconduct and not acting is being complicit in the misconduct.
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. We treat one another with respect and consider the impact of our actions. Empathy allows us to recognize potential issues and avoid situations where our Core Beliefs are not guiding our behavior.

Harassment of any kind is unacceptable and unwelcome behavior that creates a hostile, offensive, intimidating and demeaning work environment. Harassment can be considered as any offensive conduct including, but not limited to, unwanted sexual advances, unwelcome comments, physical assaults or threats, intimidation, ridicule or mockery, insults or put-downs, offensive objects or pictures, or derogatory slurs.

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

We report any situation involving non-inclusive behavior immediately to our Manager, the People Team, the Office of Ethics and Compliance or other channels we are comfortable with. We are aware of the resources available if we need to speak up and express concerns without fear of retaliation of any kind.

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)

United In Purpose, Empowered Through Inclusion

Diversity, Equity and Inclusion (DEI) plays a significant role in how we operate as a company and uphold a thriving Arm community. We have made significant progress since the beginning of Arm’s DEI journey in 2019, and acknowledge we have a long road ahead of us.

We all play an important role in co-creating an inclusive environment in which representation matters, people are valued, diverse perspectives are heard, and everyone’s skills are fully utilized. We continue to integrate DEI practices into everything we do to effectively collaborate across teams and regions, innovate with our ecosystem partners, and be impactful leaders, managers, and individuals.

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 so that everyone can authentically ‘be their brilliant self’ and have the capacity to ‘do great things’.

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

We engage in safe and secure working environments

We take responsibility for the security and safety of our sites, and people within the sites and we make sure we are aware of, and in compliance with regulations and laws.

We do not possess or use 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.

We respect others’ health and do not come into the office if we are feeling unwell to prevent the spread of infectious diseases.

We keep our access badges visible when on site, we do not tailgate, and we respect restricted access areas. We report any incidents, accidents or near misses at work in the PeopleHub Ticket System or to the local Workplace Experience Team.

For more information, please review our Health and Safety Policy and local Safety and Security arrangements.

For further information on Physical Security and Health & Safety, please contact the Workplace Enablement Team.
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 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:

<table>
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<th>Business plans &amp; strategy</th>
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<tr>
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<td>Salary and benefits data</td>
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<tr>
<td>Employee data</td>
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<tr>
<td>Financial data</td>
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<td>IT system details &amp; software</td>
<td>Technical drawings</td>
<td>Marketing strategies</td>
<td>Bid information</td>
</tr>
</tbody>
</table>

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 prepare for business disruptions

We plan for disruptive events to ensure that we can continue to perform our most critical activities under any circumstance. We create crisis response and business continuity plans and test them regularly to ensure they are fit for purpose when needed.

- We stay prepared by taking our laptop home with us, discussing our work with colleagues and sharing knowledge regularly to ensure deadlines are met.
- We read and understand Arm’s business continuity plans and our role in making Arm a resilient organization.
- We maintain our out-of-hours contact details on PeopleHub so that we can be easily contacted if there is an incident or crisis at our place of work.
- We raise risks and discuss any concerns we have that could prevent us from completing our work with our management so that appropriate action can be taken to reduce the impact of an incident.

If you have any questions on this topic please contact Business Continuity Management.
The Arm Management System is what the business does every day, continuously improving and working towards our goals. We have one operating model, we work as one business, we collaborate and align our strategy to work together as one Arm.

The Arm Management System articulated here, is designed to bring together the key components across Arm that are used every day to work towards our North Star. It sets out key business wide processes, links key management elements, details our accountabilities and how we govern the business.

Published externally our Quality Policy supports our Management System. Committing to meet our partners’ requirements and expectations by continually improving our product solutions, processes, and services.

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 provide access to only 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 keep data for only 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 Global Privacy Office.
We deal fairly

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

When we do great things, this 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 are not permitted to offer, give or receive 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.

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.

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.

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.
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.

We communicate responsibly

As we continue to push forward to do great things 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

The Procurement Policy sets out how entities and individuals acting on behalf on Arm, shall engage in or undertake procurement activities with third party suppliers.

We always ensure that Procurement is engaged early to make sure that all procurement activities are conducted in accordance with the Procurement Policy and exercise commercial judgement and diligence when committing expenditure with third party suppliers for Arm.

We always ensure that suppliers don’t deliver goods or services to Arm until full due diligence has been completed, the Supplier has been approved to work with Arm and we have an approved commercial agreement and purchase order.

We expect all suppliers to adhere to our Supplier Code of Conduct and all applicable laws and policies.

We treat our suppliers fairly and keep our commitments to these partners.

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

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.

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 partner 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. We do not fund partner travel unless very specific circumstances such as relocation.
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 laws 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 prior 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 (i.e., for both civilian and military purposes) 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.

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 Anti-trust 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.

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 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 do not engage in 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 leadership 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 protect the environment

We take action to minimize 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.

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. 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 practice responsible corporate giving and support

We are encouraged to offer our time and expertise in support of charities and other groups in need. Arm also provides support at a corporate level in the form of cash donations, pro-bono expertise, access to Arm’s social impact and commercial network, 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 giving guidelines.

All corporate giving requests are evaluated under the following guidelines:
- Charitable donations can only be made directly 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, Equal Opportunity Policy or other related policies, such as human rights, or those which conflict with legislation.
- Arm will not make donations to pressure groups, political organizations or causes.
- 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.

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 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.

- **Decarbonizing Compute**: working to minimize the environmental impact of our technology
  Our current focus is to decarbonize our own footprint before we explore our role to reduce our climate impact more widely.

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@arm.com.
OUR CODE OF CONDUCT

Contact

Speak Up when we see possible violations of our Arm Code of Conduct.

You may contact the Office of Ethics and Compliance or our Arm Integrity Helpline:

- Make a report online
- 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