



Supplier Code of Conduct

June 2024

Contents

ARM SUPPLIER CODE OF CONDUCT	2
1. Our Corporate Responsibility	2
2. Diversity in Arm's Supplier Base	3
3. Employment Standards	3
4. Compliance with Laws, Rules, and Legal Regulations	4
5. Conflicts of Interest	5
6. Human Rights and Non-Discrimination	5
7. Health & Safety.....	6
8. Environment.....	6
9. Security, Data Protection, Confidential Information, and Intellectual Property.....	7
10. Risk Management in Arm's Supplier Base	7
11. Compliance with this Code	8





A Message from our Chief People Officer – Kirsty Gill

At Arm our [Code of Conduct](#) is an embodiment of how we operate as an employer, a partner, a customer and a business. We are committed to operating transparently with the highest ethical standards, and to creating an inclusive environment in which sustainability and representation matters, people are valued, diverse perspectives are heard, and everyone’s skills are fully utilized working towards our strategy and North Star:

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

Where we partner with organizations across the globe, this Supplier Code of Conduct sets out the behaviors we expect of everyone in our supply chain. Please read the Code, understand it, and put it into practice. Thank you for your active and ongoing commitment to Arm’s success as an integrity-first organization.

Kirsty Gill

ARM SUPPLIER CODE OF CONDUCT

Driving positive change for people and planet is an essential principle of Arm’s business activities. We are committed to operating ethically and responsibly, acting with fairness, honesty and integrity. This Supplier Code of Conduct (the “Code”) outlines a clear set of standards to promote honest and ethical conduct in how we conduct business together.

We expect our suppliers to commit to responsible business standards and have appropriate process in place for the management of their supply chain. Violations of this Code may constitute grounds for immediate termination of any and all agreements between you and Arm.

1. Our Corporate Responsibility

Arm’s aim is to minimize our environmental impact and maximize our societal impact across all of our operations which includes the suppliers that we choose to work with and how we collaborate with them. The respect for human rights is an essential principle of Arm’s business activities. It creates the framework of our operations and is a pre-requisite for our success. Arm is committed to the principle of sustainability. This includes the responsible and sustainable use of available resources, at present and in the future.

As a participant member of the United Nations (U.N.) Global Compact, Arm has committed itself to the ten principles in the areas of human rights, labour, the environment, and anti-corruption. Where Arm partners with independent organizations

(such as CDP Supply Chain) to help it meet these principles, our suppliers are required to support these partnerships by sharing data and shaping their strategies in line with the principles.

2. Diversity in Arm's Supplier Base

In line with Arm's commitment to Diversity, Equity, Inclusion and Accessibility, we are taking steps to increase the number of smaller, local organizations that are suppliers. We also encourage existing suppliers to increase the diversity of their workforce through measuring and setting targets. Suppliers are expected to support us in our efforts by providing details of ownership structure and Diversity, Equity, Inclusion and Accessibility policies and procedures if requested.

3. Employment Standards

Arm has signed up to the UNGC (United Nations Global Compact) which includes the UNGC guiding principles on business and human rights and adheres to the UK's Modern Slavery Act. As such, we expect our suppliers to share our commitment to human rights and equal opportunity in the workplace.

Child Labour

Arm opposes the use of any form of child labour or practices that inhibit the development of children. Suppliers must comply with all applicable child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.

Freely Chosen Employment and Combating Modern Slavery

Suppliers must not participate in human trafficking; use forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

Compensation and Working Hours

Suppliers must comply with the applicable wage and hour labour laws and regulations governing employee compensation and working hours. No salary deductions are permitted for disciplinary purposes. Arm encourages suppliers to pay their employees a Living Wage as a minimum in line with the ILO definition of a living wage (Real Living Wage within the UK).

Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment. Any overtime must be paid at an amount that is the same as or greater than 1.25 times the base hourly amount in accordance with the requirements of the International Labour Organisation.

At Arm we discourage the use of contracts with no guarantee of work (zero hours contracts in the UK) within our supply chain and ask that if this is a model a supplier uses they raise this with the Arm procurement team or alternatively procure.responsibly@arm.com to discuss in more detail.

4. Compliance with Laws, Rules, and Legal Regulations

Suppliers will comply with all applicable laws, rules and regulations in the countries in which they operate and will maintain suitable measures to ensure compliance with such laws, rules and regulations. In the case that Arm's requirements are more stringent than local requirements, suppliers are required to meet the terms of the relevant supplier contract.

Bribery, Corruption and Money-Laundering

Arm does not tolerate any form of corruption. Thus, Suppliers shall comply with applicable laws and regulations concerning anti-bribery and anti-corruption, including those concerning foreign anti-corruption practices. Suppliers will neither engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company, or government official, for the purpose of influencing the decision-making process in violation of applicable laws. Also, records should always accurately reflect business activities and include accurate accounting, financial controls, internal reporting, and taxation records.

Specifically, suppliers must not offer or solicit illegal benefits or illegal favors such as bribery payments, kickbacks, or other illegal benefits including inappropriate gifts and undue hospitality towards Arm employees, themselves, or other third parties for the exchange of business opportunities. Suppliers are prohibited from paying expenses for travel, lodging, gifts, hospitality, entertainment or charitable contributions for government officials on Arm's behalf.

At Arm, we also expect our suppliers to comply with all applicable statutes governing the prevention of money laundering and not to take part in any money laundering or other fraudulent activity. We also expect our suppliers to comply with all applicable taxation laws, including by accounting for all taxes that are lawfully due, and not to take part in or facilitate the evasion of taxes due by them, Arm, or any third party.

Insider Trading

As part of working with Arm suppliers may become aware of material "inside information" about Arm or the companies we do business with. It is against the law to use inside information to buy or sell shares or other securities such as listed bonds, which is known as "insider dealing" and is a serious criminal offence.

Fair Trade and Competition

Suppliers shall strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers. Suppliers will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

Conflict Minerals

Suppliers must adhere to applicable legal requirements in relation to “conflict minerals” including tin, tantalum, tungsten, ores and gold originating from conflict areas and shall ensure compliance with such laws. Additionally, suppliers will use their best efforts to avoid the use of raw materials in their products that directly or indirectly finance armed groups violating human rights.

Export and Import Regulations

It is Arm policy to operate in strict compliance with all applicable export controls, sanctions laws and regulations, customs requirements, and related reporting obligations. Suppliers are expected to operate in strict compliance with such regulations as well. Specifically, Suppliers will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology and payments. Suppliers shall immediately notify Arm of any concerns, knowledge of potential non-compliance, or other issues related to export and customs compliance.

5. Conflicts of Interest

Suppliers shall avoid engaging in any business activity that could create an actual or perceived conflict between the suppliers' interest and those of Arm. Private interests and personal consideration shall not affect any business decision. Suppliers becoming aware of a conflict-of-interest situation shall immediately notify Arm.

6. Human Rights and Non-Discrimination

Arm respects human rights and actively promotes their observance. We follow the Universal Declaration of Human Rights of the United Nations.

In addition, Arm respects the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labour Organization (ILO) as well as the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Suppliers shall treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labour Organization (ILO), including, but not

limited to, the prohibition of forced or child labour, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

Where permitted by law, Suppliers must not restrict any rights to collective bargaining nor discriminate against any members of such groups.

Suppliers will maintain an environment free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity, culture or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable laws.

7. Health and Safety

Suppliers are expected to have appropriate management systems, controls, policies and training in place to ensure their operations run in a safe manner, protecting their employees, visitors, customers or the local communities in which they operate from harm. This includes compliance with all applicable law and regulation in relation to health and safety.

8. Environment

Suppliers are expected to conduct their operations in a way that minimizes the impact on natural resources, climate change and protects the environment, customers, and employees.

All suppliers are required to have strategies and targets in place to reduce their material environmental impacts including Green House Gas emissions; and to publicly report details of these emissions and progress against targets annually. If for any reason the supplier does not report strategies, targets and progress publicly then suppliers are required to share those directly if requested by Arm.

Arm also encourages suppliers to obtain 100% of electricity from renewable/green sources.

Suppliers must ensure their operations comply with all laws related to pollution including air emissions, water discharges, toxic substances, and hazardous waste disposal. Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. Arm expects all suppliers to have plans and strategies in place to minimize any waste resulting from their operations.

As part of any buying decision, Arm may ask suppliers to evidence that the life cycle impact of any product being purchased has been considered and what options are available once that product has come to the end of its life. Suppliers are expected to be

able to answer these questions in a way that demonstrates that the concept of circularity has been factored into the product's design.

If requested to provide data then suppliers are required to respond. Allowances will be made where considered appropriate for Small and Medium Enterprises following discussion with the Arm Procurement Team.

9. Security, Data Protection, Confidential Information, and Intellectual Property

Suppliers will comply with all applicable laws, regulations, and compliance requirements concerning security and data protection.

Any information, personal data, technology, know how or intellectual property (IP) that suppliers receive, or have access to, through dealings with Arm must be kept confidential and never used for personal gain or outside of the permitted scope. This includes commercial, technical, and financial information. Appropriate non-disclosure or confidentiality agreements are and will continue to be used to formalize the process of protecting proprietary information. Suppliers should refer to the contractual terms of business or supply agreement(s) with Arm or existing non-disclosure agreements for details on obligations relating to proprietary and confidential information. Where AI is used suppliers should follow the OECD AI Principles Suppliers may not use the Arm trademark, images, or other materials unless explicitly authorized.

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees.

Suppliers shall have an ongoing process to create and maintain documents and record to ensure regulatory compliance, enable audit where appropriate, and conformity to the Code and the contractual terms of any agreement(s) with Arm.

Suppliers shall conduct themselves and their services while on Arm property or in Arm's network in a secure manner, consistent with Arm's security policies and standards. Supplier shall ensure that its business practices are consistent with sound, industry standard security practices.

10. Risk Management in Arm's Supplier Base

Arm works with third parties who provide tools for measuring, reporting and implementing targets and action plans in relation to Environmental, Social and Governance risks and opportunities. Suppliers may be approached to provide information on their own practices, policies, data, targets etc. and are encouraged to take part with the aim of improving all of our activities across these topics.



Suppliers may never engage in any activity prohibited by this Code by knowingly employing, or failing to impose appropriate corrective actions, up to and including termination, upon a subcontractor or agent who performs the prohibited activity on behalf of such supplier.

Arm supports responsible sourcing practices, and suppliers should carry out due diligence on the source of materials to promote sustainable sourcing and ethical best practice. If requested, suppliers must disclose the geographical locations of facilities producing goods for Arm, as well as the origin of materials within the supplier's supply chain.

11. Compliance with this Code

This Supplier Code of Conduct contains general requirements applicable to all Arm suppliers. Suppliers' contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any provisions of a particular contract, and to the extent there is any conflict between this Code and any provision of a particular contract, the contractual provision will control.

Suppliers shall conduct themselves in line with the Code and have a program to ensure that their own suppliers who directly or indirectly provide products or services (or components thereof) to Arm meet expectations consistent with those set out in this document. Suppliers will be required to confirm their compliance with this Supplier Code of Conduct on an annual basis. Any failure to respond to such requests will be deemed as a non-compliance and may result in the termination of any contracts with Arm.

You have a responsibility to identify and report in good faith any concerns or violations of the Code. Suppliers and Arm will discuss any questions or potential violations in relation to this Code in a prompt, open and respectful manner. Arm will never retaliate against anyone who raises a concern.

In addition, suppliers may also report violations of this Code to the **Arm Raise a Concern Helpline**:

- + In the United Kingdom: 0-808-189-1053
- + In the United States: +1-800-461 9330
- + In France: 0805-080339

In other countries: please [click here](#) for local numbers.

