



Apple Global Whistleblowing Policy

Apple conducts business ethically, honestly, and in compliance with applicable laws and regulations. This applies to every business decision in every area of the company worldwide. Apple is committed to ensuring that the company fosters a culture where our people and stakeholders are encouraged to report concerns without fear of retaliation.

This Global Whistleblowing Policy applies to all current and former employees, directors and officers, contractors and subcontractors of Apple and its subsidiaries, and sets out Apple's approach to protecting and supporting individuals who report potential misconduct.

The Audit and Finance Committee of Apple's Board of Directors is responsible for overseeing management's implementation of this policy and associated procedures. Apple's Business Conduct organization has overall operational responsibility for this policy. In addition, the Audit and Finance Committee of Apple's Board of Directors has established procedures to govern the retention and treatment of complaints regarding Apple's accounting or auditing matters.

This Policy does not constitute a contract of employment, and Apple reserves the right to update this policy from time to time.

Speak Up

If you have knowledge of, or a reasonable good-faith ground to suspect, wrongdoing related to Apple — whether it be a breach of internal policies, principles, or legal or regulatory obligations — we encourage you to speak up. You should feel comfortable about voicing your concerns so that Apple can investigate.

If you are an employee of Apple or its subsidiaries, you are expected to notify either your manager, People, Legal or Business Conduct if you become aware of any violation of the Business Conduct Policy, other Apple policies, or legal or regulatory requirements.

Reporting of certain types of actual or suspected wrongdoing that are in the public interest and affect others is often described as whistleblowing. Depending on applicable law, whistleblowing reports may include, but are not limited to, suspicions of wrongdoing regarding:

- Financial malpractice, misrepresentations, impropriety, or fraud, including accounting and auditing or disclosure concerns
- Failure to comply with a legal or regulatory obligation
- Public health and product safety
- Risk or damage to the environment
- Criminal activity
- Bribery, facilitation of tax evasion or money laundering
- Privacy and data protection breaches
- Anti-competitive conduct
- Breaches of sanctions
- Violations of human rights, such as modern slavery and human trafficking
- Attempts to cover up any of these behaviors

Reporting Concerns

If you are an Apple employee, you can contact Apple's Business Conduct team by phone, email, or through the Business Conduct website. You can also report concerns to your manager, the People team, or Legal. If you believe you have been harassed or discriminated against, or have witnessed such behavior, visit the People team's internal [Reporting a Concern](#) page.

Apple's external helpline (apple.ethicspoint.com) is available for both internal and external parties to report concerns, and provides the option of anonymous reporting, where permissible under applicable laws. The external helpline is available at any time, and provides online reporting as well as local, toll-free phone numbers that connect reporters to a multilingual reporting service.

Concerns regarding accounting or auditing matters can be directed to the Audit and Finance Committee through the above internal and external channels.

When making your report, we encourage you to provide as much detail as possible concerning the suspected wrongdoing. This will allow us to conduct any investigation promptly and effectively.

Reporting Wrongdoing Outside of Apple

Many laws and regulators require or encourage current and former employees to first report their concerns internally, and we encourage any individual to report their concerns directly to Apple. This allows Apple to use all its investigate resources to look into the concern. However, Apple recognizes the rights of its employees to raise concerns externally, including making disclosures to prescribed persons or bodies under local laws, such as local regulators, in certain cases. You are also permitted to speak freely about your wages, hours, and working conditions, including information about harassment, discrimination, or any other conduct you have reason to believe is unlawful, and nothing in this Policy, or any Apple policy, should be interpreted as being restrictive of your right to do so.

External reporting may be appropriate if there is immediate and significant danger to the public interest, reasonable suspicion that the company at large is involved in the suspected wrongdoing, or a clear risk of evidence being falsified or destroyed. Nothing in this policy will prevent you from communicating your concern, as covered by this policy, to a regulator or certain third parties, provided any such communications comply with applicable legal requirements.

If external reporting is appropriate, we strongly encourage you to seek local advice before reporting a concern externally. In many jurisdictions there are designated bodies to which such reports must be made.

Confidentiality

Apple will treat all disclosures of suspected wrongdoing in a confidential and sensitive manner and maintain your privacy. Confidential means that your identity will be shared only with those who have a need to know in order to effectively conduct any investigation and follow up action (including, if necessary, disciplinary action) on your concern, or where there is a legal requirement to share your identity.

You should only disclose information that is relevant to the concern and avoid providing information not relevant to the concern. Any personal information that you disclose while reporting

a concern will be managed as outlined in the [Whistleblowing Personal Information Guidelines](#). If you have further questions on the treatment of your personal data, you should contact us as detailed on the [Privacy Enquiries](#) site.

If you make an anonymous report, keep in mind that it may be more difficult to investigate an anonymous concern due to difficulty in obtaining specific details and/or answers to follow up questions. Some local laws also discourage anonymous reporting, including in most European countries, where anonymous allegations are discouraged and should be limited to accounting and internal controls issues, including fraud, inaccurate records, auditing, bribery and corruption, and other financial matters.

Regardless of how a report is made, we encourage you to share all the information you have concerning the suspected wrongdoing. Providing sufficient details will help Apple in conducting a thorough and effective investigation.

No Retaliation

Apple will not retaliate — and will not tolerate any retaliation — against any individual for raising a good-faith and genuine concern within Apple or to the appropriate body under local law, or for participating in the investigation of any complaint.

Any person who retaliates against a whistleblower, threatens any such retaliation, or is involved in any such conduct may be subject to disciplinary action, up to and including termination of employment or contractual relationship with Apple.

Regional Laws and Agencies

Some states/provinces and countries have specific laws associated with whistleblowing. Employees who would like more information on any applicable local legal requirements and resources should visit [the People site](#).