

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 individuals who have a business relationship with Apple and have concerns about possible wrongdoing that involves Apple. This includes but is not limited to all current and former employees; directors and officers; and contractors and subcontractors of Apple and its subsidiaries. This Policy sets out Apple's commitment to protecting and supporting individuals who report such concerns.

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 policy, regulatory, or legal violation.

Reporting of certain types of actual or suspected wrongdoing that relates to legal, regulatory, or criminal misconduct that impacts the public interest may fall within the scope of "whistleblowing". Depending on applicable law, whistleblowing reports may include, but are not limited to, actual or suspected 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 and consumer protection
- Insider trading
- Breaches of financial and economic sanctions or export control rules
- Violations of human rights, such as modern slavery and human trafficking
- Facilitating or attempting to conceal any of the above misconduct

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. See the internal [Reporting a Concern](#) and [Whistleblowing](#) pages for more information about reporting concerns related to this Policy.

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

We encourage any individual to report their concerns directly to Apple. This allows Apple to use its investigative 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 as provided by applicable law. You should consult local guidance to understand the requirements around reporting concerns externally.

Nothing in this or any other Apple Policy should be interpreted to restrict or interfere with your right or ability to (1) communicate, without notice to or approval by Apple, with any governmental agencies as provided for by applicable law; (2) participate in any investigation or proceeding that may be conducted by any government agency, including providing documents or other information, without notice to Apple; or (3) receive a benefit from any government agency for information provided to any such government agency, except where limited or prohibited by law.

You are also permitted to speak freely about your wages, hours, or about employment terms 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.

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 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 Inquiries](#) 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 or limit anonymous reporting.

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. This Policy may be supplemented by local guidance in accordance with those laws. Employees who would like more information on any applicable local legal requirements and resources should visit [the People site](#).