

The ARM logo is displayed in a bold, lowercase, white sans-serif font. It is positioned in the upper left corner of the page, set against a dark grey diagonal background that cuts across the top of the image. The background of the entire page is a blurred office scene with people working and talking.

arm

ARM HOLDINGS PLC

Our Code of Conduct



SEPTEMBER 2023



OUR CODE OF CONDUCT

Arm's Code of Conduct
Supports How We Manage
the Business in a Responsible
Way, Consistent With Our
Core Beliefs.



OUR CODE OF CONDUCT

Contents

CONTENTS

Redefining
What's Possible

The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct

+ Redefining What's Possible

- 02 CEO Message
- 03 CLO Message
- 04 Core Beliefs

+ The Core That Drives Us

- 11 One Company One Code
- 11 Ask Yourself When Planning to Take Action
- 11 Administration of the Code

Our Expectations

- 12 We Comply with All Applicable Laws and Regulations
- 12 The Special Role of Arm Leaders and Management
- 12 We Complete Training
- 13 We Speak Up

Reports, Investigations, and Potential Violations

- 14 Consequences of Violating the Code
- 14 Cooperating in Investigations
- 14 Non-Retaliation
- 14 Investigating and Resolving Reported Violations

Waivers of the Code

+ What Connects Us

- 16 We Respect Each Other
- 16 We Are Committed to Diversity, Equity, and Inclusion (DEI)
- 16 We Engage in Safe and Secure Working Environments
- 17 We Avoid Conflicts of Interest
- 18 We Keep Data and Assets Safe
- 18 We Prepare for Business Disruptions
- 19 We are One Arm
- 19 We Protect Personal Data
- 19 We Manage Our Data With Care

+ We Conduct Business Ethically

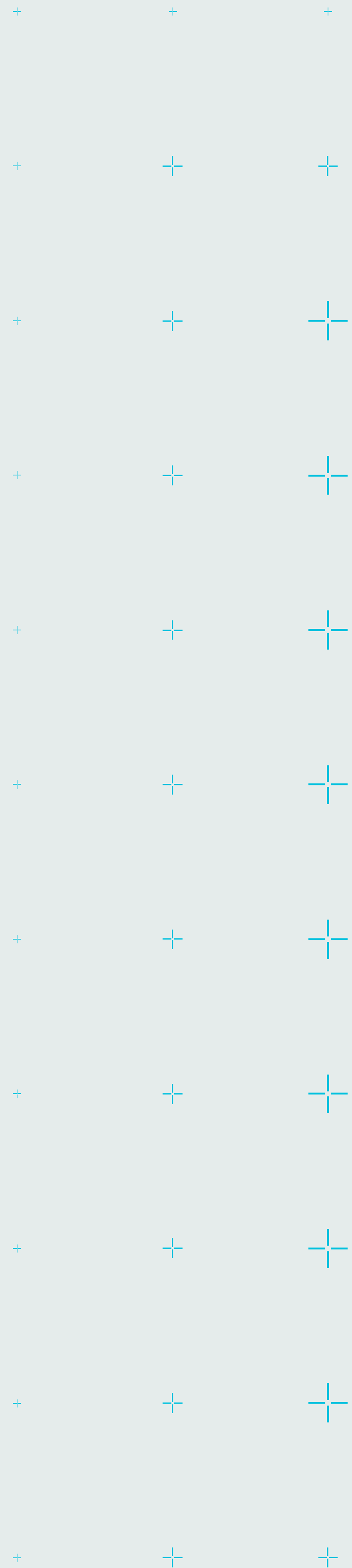
- 21 We Do Not Pay Bribes, to Anyone, at Any Time, for Any Reason
- 21 We Are Committed to Compliance with Global Anti-Corruption Laws
- 21 We Give and Receive Gifts, Meals, Entertainment, and Travel ("GMET") Responsibly
- 22 Doing Business With the Government
- 22 We Make and Keep Accurate Books and Records, Including Tax Records
- 22 We Meet Our Disclosure Obligations

+ Our Partner's Trust

- 24 We Deal Fairly
- 24 We Work Responsibly With Our Suppliers and Partners
- 24 We Protect Our Partners' Data and Property
- 24 We Do Not Misuse Inside Information
- 24 We Help Prevent Money Laundering
- 24 We Communicate Responsibly

+ Smarter World

- 27 We Follow Trade and Sanction Rules
- 28 We Compete Fairly and Ethically
- 28 We Respect Human Rights
- 28 We Protect the Environment
- 28 Responsible Political Activity
- 29 We Practice Responsible Corporate Giving and Support
- 29 We Operate Sustainably





OUR CODE OF CONDUCT

Redefining What's Possible

CONTENTS

+ Redefining
What's Possible

The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct



CONTENTS

+ Redefining
What's Possible

The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

+ 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



CONTENTS

+ Redefining
What's Possible

The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

The Code of Conduct should be used by the entire company. At the highest level, the Code aligns required business practices, including legal and regulatory requirements, with Arm's Core Beliefs 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 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.

We are subject to complex laws and regulations everywhere we operate. How we should respond to a given situation, what would be the right choice or the right thing to do, may not always be clear. This Code is one of the many resources available to guide you and 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





OUR CODE OF CONDUCT

Core Beliefs

CONTENTS

+ Redefining What's Possible

The Core That Drives Us

What Connects Us

We Conduct Business Ethically

Our Partners' Trust

Smarter World

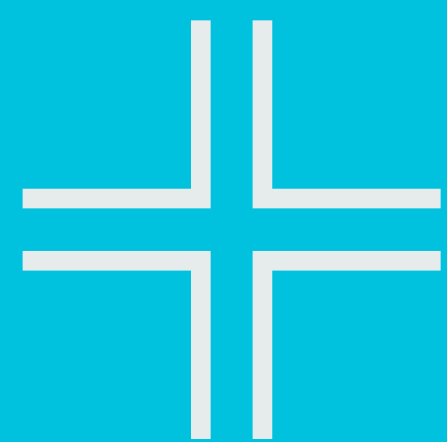
Contact

Our Code of Conduct



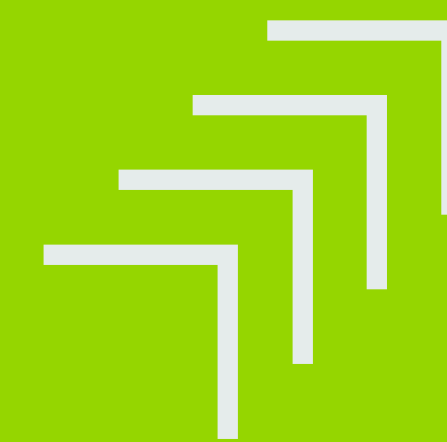
Be Your Brilliant Self

Skillful individuality, performance and inclusion



We Not I

Win together, not alone



Do Great Things

Working at pace, facing challenges, finding a way

Asking Questions and Resources for Assistance

CONTENTS

+ Redefining What's Possible

The Core That Drives Us

What Connects Us

We Conduct Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code of Conduct

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

Note: This service is provided by a third party and is available 24 hours per day, 7 days per week, including to persons outside of Arm.

We all must be familiar with all applicable company policies contained within [PeopleHub](#) Knowledge base.

Ask Yourself...

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

CONTENTS

Redefining
What's Possible

+ The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct





One Company One Code

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, executive officers, 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.

This Code governs how all full-time and part-time employees, Executive Officers and members of the Board of Directors of Arm or any Arm majority-owned subsidiaries and joint ventures (collectively “Employees”) should conduct business. Our Code is designed to promote (i) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (ii) full, fair, accurate, timely, and understandable disclosure in reports and documents that Arm files with, or submits to, the Securities and Exchange Commission (“SEC”) and in other public communications made by Arm; (iii) compliance with applicable governmental laws, rules, and regulations; (iv) the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and (v) accountability for adherence to the Code. We must all be familiar with all applicable company policies contained within the [PeopleHub](#) Knowledge base.

Arm also expects our suppliers, contractors, consultants, and other business partners to follow these principles when providing goods and services to Arm or acting on our behalf. Arm also requires our suppliers to comply with the [Arm Supplier Code of Conduct](#).



Ask Yourself 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.



Administration of the Code

Our Board of Directors has established the standards set forth in this Code and, directly or through the Head of Compliance, oversees its compliance. The Board has tasked the Executive Committee with ensuring that the Code and other corporate policies govern the Company’s activities, and has delegated day-to-day responsibility for administering and interpreting the Code to the Compliance Team.

CONTENTS

Redefining What’s Possible

+ The Core That Drives Us

What Connects Us

We Conduct Business Ethically

Our Partners’ Trust

Smarter World

Contact

Our Code of Conduct



Our Expectations

CONTENTS

Redefining
What's Possible

+ The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct



We Comply with All Applicable Laws and Regulations

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. Obeying the law is the foundation of our Code. We operate in many different countries and jurisdictions, and employees are required to comply with the applicable laws in all countries to which they travel and any location where Arm does business. If anything is unclear, employees should seek advice for further details regarding any laws, rules and regulations.

We support and encourage one another to follow the Code and act with integrity by setting the tone from the top. 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.



The Special Role of Arm Leaders and Management

All employees who have supervisory authority over others have special responsibilities under this Code to lead by example, to escalate issues, and to maintain an ethical work environment at Arm. 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 also must ensure that the employees they supervise complete all required compliance training.

Leaders should be aware that observing misconduct and not acting is being complicit in the misconduct. Leaders and Managers must 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 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.



CONTENTS

Redefining
What's Possible

+ The Core That
Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact



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 and we all must be familiar with all applicable Company policies contained within [PeopleHub](#) Knowledge base.

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, the [People Enablement Team](#) via [PeopleHub](#), Arm's Deputy General Counsel, IP & Litigation, Arm's Head of Compliance, Arm's Head of Internal Audit, or the [Office of Ethics and Compliance](#). You may also use one of two secure and trusted options via the Arm Raise a Concern Helpline to report concerns.



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

Note: This service is provided by a third party and is available 24 hours per day, 7 days per week, including to persons outside of Arm.

Consult Arm's Raising a Concern and Whistleblowing Policy for what to do if you feel you have been retaliated against, or are aware of possible acts of retaliation.

Reports, Investigations, and Potential Violations

CONTENTS

- Redefining What's Possible
- + The Core That Drives Us
- What Connects Us
- We Conduct Business Ethically
- Our Partners' Trust
- Smarter World
- Contact

- + **Consequences of Violating the Code** Violation of any law or this Code is a serious matter. Any employee who compromises or violates any applicable law or the Code may be subject to disciplinary action, up to, and including, termination; loss of employment-related benefits; and, if applicable, criminal, or civil proceedings.
- + **Cooperating in Investigations** You may be asked to cooperate or provide information in an investigation. Your full cooperation and assistance are required and the failure to fully cooperate will be considered a violation of the Code and Arm policy.
- + **Non-Retaliation** We will not tolerate retaliation against any employee who makes a report about a violation or possible violation of applicable law or the Code, or who participates in any investigation conducted internally or by a government enforcement agency. Any employee who believes he or she has been retaliated against should promptly report it to one of the resources listed below.
- + **Investigating and Resolving Reported Violations** The Audit Committee has established procedures for the receipt, investigation, and resolution of whistleblower reports. All reports of possible violations of the Code or applicable laws will be evaluated promptly and investigated, where appropriate in line with Arm's Raising a Concern and Whistleblowing Policy. Investigations will be handled discreetly, and the information will be disclosed to others only on a need-to-know basis and as required by law, with an emphasis on (i) protection of complainant and witnesses from harassment, intimidation, and retaliation, (ii) preservation of evidence, (iii) accurate testimony, and (iv) impartial examination of the facts and circumstances.

Waivers of the Code

It is our expectation that waivers of the Code will rarely be requested or granted. In the event an individual wishes to request a waiver of a provision of the Code, the waiver must be submitted in writing to the Compliance Team. The Compliance Team will review the request and consult with the Chief Legal Officer. The determination will be reported to the Board of Directors or the Audit Committee.

As outlined on the left, approved waivers of the Code can only be granted by the Compliance Team. Approved waivers for members of the Board of Directors and Executive Officers can only be granted by the Board of Directors or the Audit Committee and must be disclosed by Arm as required by law or regulation. No waiver will be given if such a waiver would violate applicable laws or stock exchange regulations.





OUR CODE OF CONDUCT

What Connects Us

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

+ What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct



CONTENTS

Redefining
What's Possible

The Core
That Drives Us

+ What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

+ 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 any behavior that creates a hostile, offensive, intimidating and demeaning work environment is unwelcome. 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 Enablement 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 Enablement 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 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, our 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](#).

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

+ What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct

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.

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.

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.

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 relevant 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 Enablement Team](#) and obtained all relevant approvals.

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

+ What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct

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 and personnel 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, data, networks and other electronic resources.

We take care not to reveal any passwords or accidentally allow unauthorized 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 internal policies, including our [Information Security Policy](#), [Information Management Policy](#) and [Internal Privacy Policy](#). If you have any questions or need to report a potential breach or other information security issue, please contact the [Enterprise Security Team](#).

We must all take responsibility for using our company resources with care and for 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, as detailed in our [Acceptable Use Policy](#).

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

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, discuss our work with colleagues and share 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](#).

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

+ What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact



We are One Arm

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, such as private health data or National Insurance, Social Security or other national identification numbers, be collected, processed and stored. When that is the case, access should only be granted 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, as detailed in our Internal Privacy Policy and other security policies and standards. 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 relevant 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. For more information, see the Arm Data Retention Schedule.

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](#).



OUR CODE OF CONDUCT

We Conduct Business Ethically

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

+ We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct



CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

+ We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct

We Do Not Pay Bribes, to Anyone, at Any Time, for Any Reason

We lead globally by example. The decisions that each of us make can have a significant impact on our business. Bribery and corruption are serious international issues and there are many laws that prohibit corrupt conduct and create offenses with serious penalties for both companies and individuals who break those laws.

We Are Committed to Compliance With Global Anti-Corruption Laws

Arm is committed to complying with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and the anti-corruption laws of all other countries where we do business (collectively, the Global Anti-Corruption Laws). It is never appropriate to offer, give, request, or accept bribes, kickbacks, or any other type of improper preferential benefit to or from anyone whether they are a government official, political candidate, party official, customer, supplier, business partner or other third-party intermediary. In addition to cash, be aware that gifts, business entertainment (such as meals, travel, or other hospitality), offers of employment or internships (even if unpaid), political contributions or charitable donations may also constitute a bribe, kickback, or other type of unlawful benefit. Arm is committed to doing business only with business partners that share our ethical values and commitment to anti-corruption compliance. For more information, see the Arm [Anti-Bribery and Anti-Corruption Policy](#).

To be clear, 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. Similarly, we never accept or demand anything of value to influence our decision-making on behalf of Arm.

You should consult and be familiar with our [Anti-Bribery and Anti-Corruption Policy](#) and the guidance on such topics 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](#) or the [Arm Raise a Concern Helpline](#) 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 Anti-Corruption Policy](#), no hospitality involving foreign public officials can be provided without prior authorization under the process detailed on our [Ethics and Compliance website](#).

We Give and Receive Gifts, Meals, Entertainment, and Travel ("GMET") Responsibly

Offering, giving or receiving gifts to or from our partners, customers and suppliers is a common part of business practice. That said, we have a duty to spend Arm resources responsibly. Promoting Arm and building good relationships can properly include gifts, meals, entertainment, and travel ("GMET") involving a third party. Giving and receiving modest GMET is not against our policy as long as the GMET 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. The provision of any such GMET must comply with this Code, the requirements outlined in our [Anti-Bribery and Anti-Corruption Policy](#), all applicable local laws, and any policy or procedure in place at the recipient's organization. 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](#). The specific thresholds for the giving or receipt of any GMET are contained in our [Anti-Bribery and Anti-Corruption Policy](#). If you have any questions, you should consult the [Office of Ethics and Compliance](#).

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

+ We Conduct
Business Ethically

Our Partners' Trust

Smarter World

Contact

Doing Business with the Government

Doing business with any 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 GMET 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 Anti-Corruption Policy](#) and in the [Anti-Bribery and Anti-Corruption section of Arm's Ethics and Compliance website](#).**

We Make and Keep Accurate Books and Records, Including Tax Records

Accurate information is essential to Arm's ability to meet legal and regulatory obligations and to compete effectively. As such, our books and records must meet the highest standards and accurately reflect the true nature of the transactions they record. Destruction of any records, books of account or other documents except in accordance with applicable law, regulation, or Arm's document management and retention policies is strictly prohibited.

You must not create, use, or accept false or misleading documents or accounting, financial, or electronic records for any purpose relating to Arm, and no one may direct anyone else to do so. You are responsible for the accuracy of your records, time sheets and reports. For example, expense reports must accurately document expenses actually incurred in accordance with Arm's policies. You must not obtain or create "false" invoices or other misleading documentation or invent or use fictitious entities, sales, purchases, services, loans, or other financial arrangements for any purpose relating to Arm.

No undisclosed or unrecorded account or fund may be established for any purpose. No disbursement of corporate funds or other corporate property may be made without adequate supporting documentation or for any purpose other than as described in the documents. All employees must comply with generally accepted accounting principles and Arm's internal controls at all times. Employees should never facilitate or participate in any third-party attempts to defraud Arm.

We must also 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](#) or the [Arm Raise a Concern Helpline](#) immediately.

We Meet Our Disclosure Obligations

We are committed to timely, accurate and balanced disclosure to our investors, regulators, and public markets, as well as in other public communications. For more information, please consult our Disclosure Policy.



OUR CODE OF CONDUCT

Our Partners' Trust

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

We Conduct
Business Ethically

+ Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct



CONTENTS

Redefining What's Possible

The Core That Drives Us

What Connects Us

We Conduct Business Ethically

+ Our Partners' Trust

Smarter World

Contact



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. Under the Global Anti-Corruption Laws, Arm can be held responsible for what is done by a third party in Arm's name, on Arm's behalf, or with Arm's resources. To that end, we expect every third party with whom we engage to abide by all relevant laws and our standards for conducting business, including this Code, our [Anti-Bribery and Anti-Corruption Policy](#), as well as our [Global Supplier Code of Conduct](#). Our continued ethical reputation depends on all of us competing with better products and services in an ethical manner.



We Work Responsibly with our Suppliers and Partners

We treat our suppliers fairly and keep our commitments to these partners. The Procurement Policy sets forth 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.

Moreover, 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. To that end, we expect all suppliers to adhere to our [Supplier Code of Conduct](#) and all applicable laws and policies.



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 Do Not Misuse Inside Information

We never buy or sell the stock of any company, including our ecosystem partners 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.



We Help Prevent Money Laundering

When dealing with our customers, suppliers, and other partners, we must be aware of the signs of money laundering and make sure we prohibit the movement of illicit or illegal funds if detected through our 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 or departure from standard payment terms or practices 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](#) or the [Arm Raise a Concern Helpline](#).



Q Steve is working with a new supplier, but the supplier has not provided to Arm all the requested information via Ariba and therefore has not yet been approved by Arm Procurement. His manager wants to move ahead and for the supplier to start work so as not to delay a large project. Is this okay since his manager is suggesting it?

A No, Steve's manager 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.



CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

We Conduct
Business Ethically

+ Our Partners' Trust

Smarter World

Contact

Our Code
of Conduct



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 [External Communications Team](#). Except as set forth in our [PR and Social Media Policy](#), we should not make any external statements about our company or work-related matters on behalf of Arm to any members of the press, investors or industry and investment analyst community or others, and instead immediately alert our [Investor Relations Team](#) or [External Communications 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, proprietary, 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 [External Communications Team](#) or review our [PR 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

For additional guidelines, please review our [PR and Social Media Policy](#).





OUR CODE OF CONDUCT

Smarter World

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

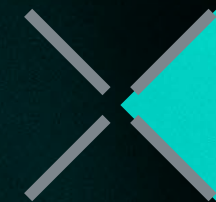
We Conduct
Business Ethically

Our Partners' Trust

+ Smarter World

Contact

Our Code
of Conduct



CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

+ Smarter World

Contact

Our Code
of Conduct

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 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](#), the [Office of Ethics and Compliance](#), or the [Arm Raise a Concern Helpline](#).



- 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](#) or use the other resources described in our Code.

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

+ Smarter World

Contact

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, allocate markets or customers, rig bids in the context of a tender, to boycott or refuse to deal with a competitor, or engage in anticompetitive practices. We also must not enter standalone agreements with other companies to refrain from hiring or attempting to hire each others' employees. Similarly, we must be mindful during our interactions with suppliers and customers, particularly when dealing with issues related to exclusivity, discounting or pricing, or product bundling, as these types of practices are subject to scrutiny under competition laws. If you have questions about these activities, please review our Competition Compliance Policy or contact the [Office of Ethics and Compliance](#).

- + When we meet with competitors, either directly or in the context of trade associations or similar groups, 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, ask that the discussion stop and leave the meeting if the inappropriate discussion does not stop, record your exit (e.g., in meeting minutes or in a document to file); and report the incident to Arm Legal, the [Office of Ethics and Compliance](#) or the [Arm Raise a Concern Helpline](#). Competitively sensitive information includes all information that could significantly affect the competitive process or reduce strategic uncertainty between competitors and should not be shared with competitors, as defined in the Competition Compliance Policy.

Competition laws can be complex, and we should always ask questions and report concerns to the [Office of Ethics and Compliance](#) or the [Arm Raise a Concern Helpline](#) if we are unsure about any issue or incident.

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 condone, 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](#).

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.

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](#).

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](#).



CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

+ Smarter World

Contact

Our Code
of Conduct



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 our 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, [Anti-Bribery and Anti-Corruption Policy](#), or other related policies, 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](#)



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 is described further in our Sustainability Reports.

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

In lockstep with a global community of like-minded industry leaders, we continue to work toward the United Nations Sustainable Development Goals.

For further information about Sustainability at Arm please contact sustainability@arm.com.



Contact

CONTENTS

Redefining
What's Possible

The Core
That Drives Us

What Connects Us

We Conduct
Business Ethically

Our Partners' Trust

Smarter World

+ 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 Raise a Concern 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

Note: This service is provided by a third party and is available 24 hours per day, 7 days per week, including to persons outside of Arm.



