Our Arm Code of conduct supports how we manage our business in a responsible way consistent with our Core Beliefs.

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Our Arm Code of conduct supports how we manage our business in a responsible way consistent with our Core Beliefs.

Arm’s global reputation relies not only on delivering leading technology but also on upholding a culture of responsibility supported by our actions as an ethical company. A high standard of ethics and good governance are essential to supporting a successful, growing business and maintaining the trust of our partners and employees.

Recently we have experienced significant headcount growth at Arm, with 25% more people than this time a year ago. Growth and progress bring more situations that can potentially challenge our sense of fairness, right and wrong. We put standards in place, like our Code of Conduct, not only because they’re compulsory in some geographies, but also because we care deeply about our people and protecting our organization.

Our Code of Conduct should serve as a guide for us to work with integrity and to find solutions to some challenges we may face. Our Code cannot address every issue, however, so when you do not know what to do, you should ask questions and seek assistance. The resources to do that are here.

I ask that you use our Code to guide behavior—along with your own sound judgment—to operate in a way that we all can be proud of. Each of us has a part in upholding our Code of Conduct, and I ask you to read, understand and use it.

Simon Segars, CEO
Our Code is a resource for all to use. Our Code discusses many of the issues we might face while we work at Arm and translates legal and regulatory requirements into the behaviors that we expect of all Arm employees, directors, contractors and agents. It aligns our required business practices with our values.

Arm is committed to conducting its business in an ethical and lawful manner. For those issues that our Code doesn’t address, and for those times we need more information or assistance, we encourage you to rely on our available resources. We recognize the power in saying ‘I don’t know’, and it is important for everyone to seek assistance when they have a question or need to report a concern.

We are one Arm, and it is everyone’s obligation to follow all of our rules, to report concerns and to raise questions. We should all do this with the knowledge that Arm encourages an open environment for raising concerns and does not allow any form of retaliation for those who make reports.

Information is crucial in all we do, and constructively raising issues is how we maintain our focus on moving Arm forward. The reputation of our company is a valuable business asset, and legal and ethical conduct at all levels of our business is essential to our continued success.

We act with the highest standards of ethical behavior in everything that we do, and by doing so we protect Arm’s reputation and contribute to making Arm an outstanding leader in the global business environment. And if we are faced with making tough decisions in our daily jobs, our Code of Conduct can guide us to make ethical decisions that reflect our Core Beliefs and promote trust.

Carolyn Herzog, General Counsel and Chief Compliance Officer
Core Beliefs

We, not I

Passion for progress

Be your brilliant self
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 line manager
Office of Ethics and Compliance
Your local People Services Team
Any member of the People Leadership Team

Or you may use our Arm Whistleblowing Hotline to report concerns anonymously and confidentially where allowed by local law:

In the United States: 800-361-2195
In France (CNIL number): 0800 90-7172
In other Arm countries: +1-800-361-2195

We must be familiar with all applicable company policies contained within PolicyHub and Policy Zone.

Your Code of Conduct

Ask yourself...
When planning to take an action:

Does my action follow our Code, our policies, any applicable rules, regulations or laws?

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.

Architects of Possible
Our passion for progress and responsibility to make Arm thrive must be balanced with our duty to follow our Core Beliefs, our Code and our policies. Our Code applies to everyone, including all employees, directors, contractors, and agents of Arm. Our Code cannot address every issue that may come up or every decision that must be made, so we must rely on our Core Beliefs and seek help via the resources listed here in our Code if we need help.

Leading globally from within takes sound judgment and integrity. Leaders provide support and direction for all of our goals, including compliance and ethics. Leaders promote a positive working environment where everyone is comfortable discussing issues and raising questions and concerns. Leaders must be familiar with our Core Beliefs, our Code and our policies, and they should guard against any instances of retaliation. Our leaders live our values and model expected behavior. 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.

One Company and One Code

Our Leaders Have a Special Role

We follow the law

We take responsibility for our impact and always act with integrity. We make sure that we understand and follow all applicable laws, rules and regulations. We also support and inspire each other by encouraging everyone to follow the rules and act with integrity. When we have questions about an applicable law, rule or regulation, or wish to report any practice that raises questions, we speak up and contact any of the resources detailed in our Code, including those listed in the We Speak Up section below.

Arm has a progressive discipline policy that applies when our Code, our policies or the law is violated. This process is outlined in our Disciplinary Policy.

We speak up

We do the right thing and stick with it, even when it is difficult. We will sometimes find ourselves in situations that are difficult, complex or confusing. That is why we have resources available to help answer questions and to report concerns.

When Do We Speak Up?

We should ask questions and report concerns whenever appropriate, but some specific examples when you might want to seek help include:

- You believe a violation of our Code or our policies might have happened
- You believe a crime may have been committed
- You think someone may have been bribed or you suspect corruption
- There is a danger to the health or safety of anyone
- There is a danger to the environment or to property
- There has been concealment of a violation
What Happens After We Speak Up?

We take every concern seriously and each report will be investigated fully, promptly and fairly.

Persons involved in any misconduct will be subject to discipline. Further, if criminal activity has taken place, the matter will be reported to the appropriate authorities.
What Connects Us
We Respect Each Other

Making trust our default position means that we do not engage in any form of physical or verbal harassment. We must treat one another with respect and consider how fellow employees might feel. Empathy allows us to recognize potential issues and avoid situations where our Core Beliefs are not guiding our behavior.

‘Harassment’ is unwelcome behavior that creates a hostile or offensive work environment. Examples of harassment include unwanted sexual advances, offensive comments or jokes, or threats of any kind.

We must report any situation involving harassment immediately to our Line Manager, the People Team, our Office of Ethics and Compliance or any other resource we are comfortable with. We have many resources available to help and if we ever feel that something is wrong, or feel the need to speak out, we should do so. You may always contact your local People Services Team, any member of the People Leadership Team or the Office of Ethics and Compliance with concerns.

Q: Sarah’s line 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 could violate our policies even if she believes no one has been offended. We all have a duty to report concerns to the Office of Ethics and Compliance.

We Support Diversity and Inclusion (D&I)

Diversity and Inclusion (D&I) plays a big role in building a thriving community. We stand for a workplace that is inclusive by default—where every idea is assessed on merit and without any bias. Arm welcomes different perspectives and values all perspectives equally. We want to take advantage of our collective brilliance and, therefore, D&I at Arm is at the heart of everything that we do and permeates at every level and in all places. By providing opportunities for everyone to be heard and understood, we are open to new ideas and we leverage these differences to make the biggest impact. We do not make employment-related decisions nor discriminate based on any legally protected class or status.

For further information about Diversity and Inclusion at Arm please contact us.

Safe Working Environments

We take responsibility for safety and the environment, and we make sure we are aware of, and in compliance with, all applicable health and safety laws and regulations, as well as all health, safety and security notices. We recognize that our safety and the safety of our fellow employees cannot be compromised. We keep all access cards safe and do not allow others to use them.

For more information please review our Health and Safety Policy. Our Health & Safety Policy details our accident and near miss reporting system and the roles each of us has in establishing and maintaining a safe and healthy environment. If you have any questions, contact Health and Safety.

We are also committed to the highest standards for the environment and avoid adverse impacts to the environment and communities where we conduct our business.

We do not possess illegal drugs or alcohol at company facilities, nor do we work under the influence of drugs or alcohol. Further, we do not possess firearms or any offensive weapon while working.

We report any injury or accident at work to a First Aider as described in our Health and Safety Policy.
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, we should come forward and contact the People Team or the Office of Ethics and Compliance. You must declare personal or family relationships during the hiring process and be sure to discuss any relationships that could be seen as conflict of interest or having ethical implications with your line-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 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. Even if the second job would not interfere with Zang’s duties at Arm, he is taking an opportunity that belongs to our company. There could be confusion about who is responsible for the work.
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 line manager.

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 & copyright development | Business plans & strategy |
| Research plans | New product plans | Salary and benefits data | Databases |
| Employee & medical 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, networks and other electronic resources. We take care not to reveal any passwords or accidentally allow access to any of these resources.

While our business requires that we work with and share information, we must keep security of our valuable data in mind. We have specific procedures for sharing and handling our information that each of us should be familiar with, as detailed in our Information Security Policy. If you have any questions or need to report an information security issue, please contact the Security Team.

We must all take responsibility for our impact, which means using our company resources with care and 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.

If we feel there might be an issue, or need to report any loss, theft or misuse of company assets, we contact our line manager.

We Prepare for Business Disruptions

How should we be prepared for business disruptions?

✦ Take our laptop home with us every day, if we have one.
✦ Read and understand the Business Continuity Plan for our group and our own role in making it work.
✦ Maintain our out-of-hours mobile/cell phone contact details in SAP (or send it in to bcm@arm.com).
✦ Consider our Business Continuity Management (BCM) requirements and raise any concerns to our line manager.

What should I do if an incident prevents me from working in my normal location?

✦ Ensure we are safe and remain contactable.
✦ Check for any notifications and updates from Arm Alert on our mobile/cell phone or email.

If you have any questions about this topic, refer to our Business Continuity Management Policy.
We Protect Personal Data

We respect our fellow employees and contractors and their right to privacy and data protection by keeping personal information and data private. Completing our work may require that personal data, including private health data, be collected, processed and stored. When that is the case, we only provide access 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. If you have any questions, please visit our Protecting Personal Data website or contact our Office of Ethics and Compliance.

We Manage Our Data with Care

Taking responsibility and having integrity means that we accurately and completely record all data. We have a duty to provide our stakeholders with correct and complete information in a timely manner. Our records should always accurately reflect our business activities and include accurate accounting, financial controls, internal reporting and taxation records.

We have a strict policy on how we obtain, record, hold, use, disclose and destroy personal data. Please refer to We Protect Personal Data in our Code for further information.

We only keep data for as long as we need it for the purpose we collected it, and we will protect it from unauthorized access while we keep it (see We Keep Data and Assets Safe).

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 Information Management team or the Office of Ethics and Compliance.
Our Partners’ Trust
Q: Hana works with Arm suppliers and one supplier she has worked with for years recently sent her a holiday gift basket worth 200 GBP. Can she keep it?

A: Not without approval. Our Anti Bribery and Corruption Policy Supporting Information is clear and Hana must follow the procedures in our policy and have her line manager approval to keep any gift worth 200 GBP or more.

We Deal Fairly

We lead globally from within, not above, and all of us take responsibility for our 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. Our continued ethical reputation depends on all of us competing with better products and services in an ethical manner.

We Protect Our Partners’ Data and Property

Just as we protect Arm’s data and assets, we must also protect information, intellectual property and any other assets belonging to our partners and other third parties. We never disclose any non-public information (including personal data regarding partner employees) to any other third party except as authorized by our partner. Information is shared only with those who need to know.

We Give and Receive Hospitality, Entertainment and Gifts Responsibly

Our passion for progress must be balanced by operating ethically and fairly. Offering, giving or receiving gifts to or from our partners, customers and suppliers is a common part of business practice. Giving and receiving modest hospitality, entertainment or gifts is not against our policy as long as the hospitality, entertainment or gift is not meant to improperly influence us, our partner or our customer and is reasonable and proportionate to the circumstances of the relationship. Generally, there should be a clear business purpose and the hospitality, entertainment or gift should be infrequent.

We have a clear bar on offering, giving or receiving hospitality, entertainment and gifts over 200 GBP in value unless approved by a line manager under the processes detailed in our Anti-Bribery and Corruption Policy Supporting Information.

Any hospitality, entertainment and gifts involving a foreign public official are not permitted except with prior approval from our Office of Ethics and Compliance.

If you have any questions, you should consult our Anti-Bribery and Corruption Policy Supporting Information before giving or receiving any hospitality, entertainment or gifts, or contact the Office of Ethics and Compliance if you have questions or concerns.

We Do Not Misuse Inside Information

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.

For more information please consult our Insider Trading and Communications to the Financial Markets Policy.

We Help Prevent Money Laundering

When dealing with our customers and other partners, we must be aware of the signs of money laundering and make sure we do not aid covering up the source of illicit or illegal funds through our legitimate business.

Money laundering is the attempt to hide the source of illicit or illegal funds through transactions that appear to be legitimate. We should watch for requests to:

1. Pay invoices or transfer funds in currencies other than those specified in the relevant contract or agreements
2. Pay or transfer funds to countries with no relation to the relevant contract or agreements
3. Pay in cash
4. Pay to third parties who are not included in the relevant contract or agreements
5. Any other odd or uncommon practice regarding payment or transfer of funds.
Q: Steve is working with a potential new supplier who has not yet provided all the required information to be approved by Arm procurement, but his line manager wants to move ahead with approval so as not to delay a large project. Is this okay since his line manager is suggesting it?

A: No, Steve’s supervisor 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.

We Communicate Responsibly

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.

As we continue to push forward with our passion for progress and promote our company and our mission, there are certain reminders to keep at the forefront. If contacted by an outside analyst or a member of the media, we refer those requests immediately to our public relations team. We should not make any external statements about our company’s performance, initiatives or any other internal matter to any investors or others, and instead direct them to our investor relations team.

Many of us like to participate in online communities, blogs, forums and social media networks. Done in a smart way, participating in social media will help us cement our position as a technical and thought leader. Please lead with common sense—do not post any business-related, confidential, undisclosed financial or internal-use-only information obtained or learned as part of Arm job duties.

Keep in mind what is shared is public and often permanent. If we have any questions, we can email the social media team or review our Social Media Policy.

Some good guidelines for posting or contributing online include:

1. Consider that what we write will be public, possibly forever
2. Make sure it is clear we are speaking for ourselves and not Arm
3. Do not violate our Code or our policies online, including engaging in harassment or disclosing confidential or proprietary information

We expect all suppliers and other partners we work with to share our commitment to integrity by following the law, our Supplier Code of Conduct, all applicable policies, and by acting in an ethical manner. We also treat our suppliers and other partners fairly and keep our commitments to these partners. We work with our suppliers and partners to ensure quality and value for our customers.

Additionally, we require that our suppliers and partners exhibit our same commitment to fundamental standards for employment, health and safety, the environment, confidential and proprietary information and our fundamental ethical values.
Smarter World
We lead globally by example. The decisions that each of us make can have a significant impact. Bribery and corruption are serious international issues and there are many laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act, that prohibit corrupt conduct and create offenses with serious penalties for both companies and individuals who break those laws.

We do not offer, give, accept or agree to accept bribes under any circumstances, nor do we tolerate anyone acting on behalf of Arm engaging in such behavior.

Specifically, we never offer, promise or provide anything of value to anyone, whether commercial partners or public officials, to secure any advantage, obtain or keep customer business or influence any commercial decisions. Neither do we accept or demand anything of value to influence our decision-making on behalf of Arm.

Please keep in mind that this policy can affect:
- Giving and receiving of hospitality, entertainment and gifts
- Political and charitable donations
- Selection and retention of third parties such as agents, distributors and consultants

When contemplating any of these actions, you should consult our Anti-Bribery and Corruption Policy and our Anti-Bribery and Corruption Policy Supporting Information. Make sure you are complying with our policy and procedures and seek assistance by contacting the Office of Ethics and Compliance with any questions or concerns you might have.

If you are aware of any potential instance of bribery, no matter how small, you should report these concerns to the Office of Ethics and Compliance immediately.

Q: Nils works with engineers who are employed by a government-owned company. Some of the engineers would like to come to one of our facilities in the United States to discuss some possible business with Arm. They also would like to bring their spouses along and want Arm to pay for their travel and accommodation. Is it a good idea for Nils to approve this type of expense?

A: No. Under the Anti-Bribery and Corruption Policy, no hospitality involving foreign public officials can be provided without prior authorization from our Office of Ethics and Compliance. In any event, while there might be limited circumstances when Arm funding expenses for public officials would be allowable, expenses paid for spouses and others would not generally be allowed given the lack of clear business purpose for doing so.
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.

Our collective brilliance and drive to succeed means that we have many important pieces of intellectual property and tangible goods that we use in our business daily. Moving these items around the world means paying close attention to our obligation to comply with all applicable export and sanctions laws and regulations. There are many laws that govern exports in both the United States, Europe and worldwide.

It is important to realize that an ‘export’ is not always obvious and can include sending information, services, technology or goods electronically, physically or simply by handing it off to a person who is not allowed to receive it. When we introduce proposed technologies and products, they must be classified for export control prior to any export or release of the technology. There may be licenses that need to be obtained as well as regulations, sanctions restrictions and other rules to be complied with. We must seek assistance early before any potential violation of our policy or the law.

Because the rules around exports can be complex, we all must be familiar with our Export Compliance Policy and how our activities might be covered. These rules apply to everyone, and we must be aware if we are working with or have access to information, services, technology or goods that might be covered by export or sanctions rules. We must not share anything without first following the procedures outlined in our Export Compliance Policy.

This is a complex area of compliance, and if you need advice you should contact the Trade Compliance Team. If you believe or suspect a potential breach of our policy or the law, you must report to a member of the Trade Compliance Team.

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 to both our company and the individuals involved.

For these reasons, we must never agree with competitors to fix prices, share markets or customers, rig bids in the context of a tender or engage in anti-competitive or monopoly practices. If you have questions about these activities, please review our Antitrust Policy.

We meet with competitors, we must be vigilant that our discussions remain on legitimate topics and that we do not share competitively sensitive information. If you ever have a concern that inappropriate discussions are taking place at a meeting, state your objection clearly, make sure it is reflected in the minutes and leave the meeting if the inappropriate discussion doesn’t stop; and when back in the office, report any issue or concern immediately to the Office of Ethics and Compliance.

Competitively sensitive information is information that we would not normally share with competitors, such as, but not limited to:

- Costs and margins;
- Pricing;
- Business and commercial strategies and plans;
- Sales volumes;
- Our research; and
- Employee pay and agreements.

Competition laws can be complex, and we should always ask questions and report concerns to the Office of Ethics and Compliance if we are unsure about any issue or incident.
We lead globally, and we seek to reduce and improve 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.

Arm engages with governments and other institutions around the world on a variety of specialist policy issues related to our business interests. These are handled by our Public Affairs and Government Relations teams. We are politically neutral and do not support particular political parties. We do not make political donations. We occasionally receive requests to indicate public support for particular policies, and we judge these on a case by case basis. All such requests should be reported to the Public Affairs team.

We are encouraged to offer our time and expertise to help charities and other groups in need.

We will also provide support in the form of cash, employee time, in-kind donations and policy and public affairs assistance for qualifying projects or initiatives. All requests must be evaluated by Corporate Responsibility Committee.

All corporate donation requests are evaluated under the following guidelines:

- Charitable donations can only be made to registered charities.
- Arm reserves the right to use its sole discretion in deciding which organizations receive donations and to decline donations to any cause which could be deemed harmful to Arm’s good name or reputation.
- Arm will not make donations to any organization whose principles conflict with our Code or other related policies, such as human rights, or those which conflict with legislation.
- Arm will not make donations to political organizations.
- 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 Corporate Responsibility Committee.

We always 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 must avoid transactions where goods, intellectual property or funds are transferred outside of a normal, documented contractual relationship and not properly recorded in our records.

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 support, whether directly or indirectly, slavery or trafficking in any form. Employees are never forced to work, nor forced to work hours in excess of local law, and we never employ child labor. If you have any questions about this subject, please contact the Office of Ethics and Compliance.
Our Corporate Responsibility strategy addresses responsible business within our organization and through our value chain, benefiting our communities.

We embed responsible business practices throughout our operations, including supply chain, value chain and in how we respond to the needs of our people. We are also committed to open and transparent communications and integrity in our engagement with external stakeholders including ecosystem partners, charities, community members, governments and non-governmental organizations.

We deliver our corporate responsibility approach organized around four strategic themes:

**Education**
- inspiring everyone to develop the skills necessary to thrive in a future digital economy

**Health**
- using technology to enable affordable healthcare for everyone

**Impact of our technology**
- accelerating cross-sector solutions to the United Nations Global Goals for sustainable development through technology

**Responsible Business Practice**
- encouraging employee volunteering, diversity and inclusion, health and well-being, environmental footprint and impact, supply chain, local community investment and compliance