



# Worldwide Standards: Code of Conduct

GF Inc. and its related companies







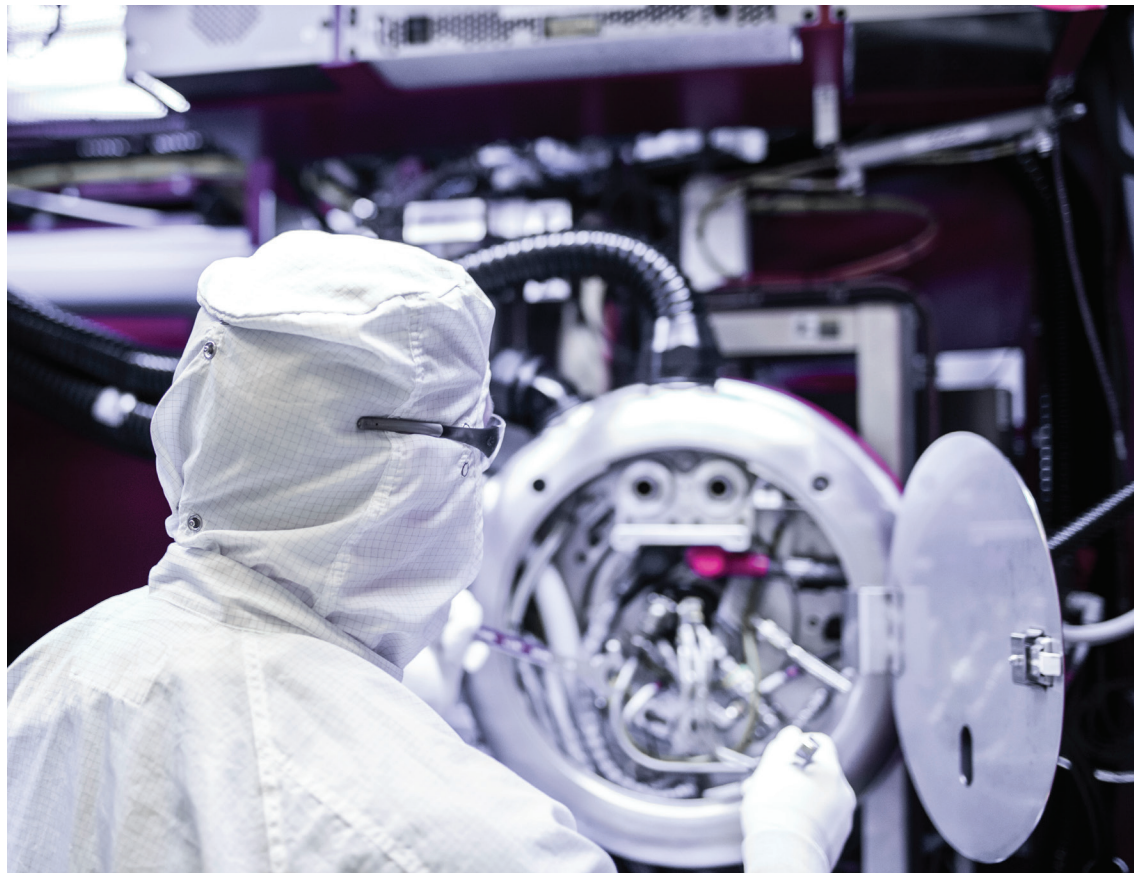
# Contents

---



<b>What The Code of Conduct is all about</b>	<b>5</b>
How our compliance program is managed	8
How to raise a question or report a concern	10
<b>Integrity as we conduct our business</b>	<b>11</b>
Preventing improper payments in cash or in kind	12
Avoiding market misconduct (including insider trading)	14
Complying with international trade laws	16
Preventing money laundering	18
Following antitrust and competition laws	19
<b>Integrity as we work with our customers, partners, suppliers and governments</b>	<b>21</b>
Offering and receiving gifts and entertainment appropriately	23
Avoiding conflicts of interest	25
Handling competitive information correctly	26
Working closely with suppliers	28
Working compliantly with governments	30
<b>Integrity as we protect our company</b>	<b>32</b>
Maintaining good controllership	33
Being good stewards of assets	35
Using our information technology resources appropriately	36
Protecting intellectual property and confidential information	38
Managing our documents	40
Ensuring our people, assets and information are secure	41
Communicating externally effectively	43
<b>Integrity as we work together</b>	<b>45</b>
Treating each other with respect	47
Maintaining a healthy and safe workplace	49
Protecting our privacy	51
<b>Integrity as we Support Our Communities</b>	<b>52</b>
Protecting the environment	54
Serving in our communities	55
<b>Your personal commitment</b>	<b>56</b>
<b>Our commitment</b>	<b>58</b>

# What the Code of Conduct Is All About







# What the Code of Conduct is all about

---

## Why do we need a Code of Conduct?

We approach our work and our relationships with unyielding integrity.

To accomplish this, we must maintain the trust of our employees, customers, shareholders, and other stakeholders by ensuring we conduct our business ethically, every time.

## What is in our Code of Conduct?

The Code sets forth the basic rules, standards and behaviors necessary to achieve our objectives and uphold our values. It summarizes legal and ethical standards, provides practical advice, and serves as a guide to help us all make ethical decisions. The Code also identifies the major elements of our compliance program and explains how you can seek support.

GF's Code of Conduct aligns with industry standards, primarily the Responsible Business Alliance (RBA) Code of Conduct. As a member of the RBA since 2016, we stand committed to the RBA Code and its continuous pursuit of excellence in corporate responsibility and extension of responsible practices throughout the supply chain. GF has instituted supply chain management practices that clearly communicate these expectations to our suppliers.

## Who Must Comply With The Code of Conduct?

The Code applies to everyone who works directly for or represents GF, including all GF employees,

the Leadership Team, and the CEO. These expectations extend to third parties who work with or represent GF, such as contractors, consultants or contingent workers. You must ensure that such parties are made aware of the Code and should seek their cooperation in adhering to the Code. This includes, where possible, a contractual requirement to act consistently with the Code when working on our behalf.

## Does the Code tell me everything I need to know?

The Code of Conduct describes our commitment to act ethically. However, keep in mind that no guidelines can cover every instance and the absence of a guideline to deal with a particular situation does not relieve you of the responsibility to act ethically at all times. Where there is no specific guidance on a particular matter or you face an ethical dilemma, ask yourself these questions:

- Is this legal?
- Is this consistent with our Code of Conduct?
- Is this consistent with GF values?
- How would it look to others or in the media?
- Am I willing to be held accountable for this?
- Have I verified the significant facts?

You should also keep the “STAR” principle in mind — Stop, Think, and Act Responsibly.



In addition to the Code, there are specific company policies and procedures published on GF intranets worldwide that must be followed when dealing with the subjects discussed here. You are responsible for familiarizing yourself with the policies and procedures applicable to your role and your location.

If you need assistance interpreting or applying policies or guidelines, or you are unable to find applicable guidance, you are encouraged to seek help from your manager, Human Resources, the Legal Department, the Ethics & Compliance Office or your leadership team.

### **What are my responsibilities?**

*Each of us must:*

- Read, understand and comply with the Code of Conduct
- Demonstrate our commitment to integrity by words and through actions
- Be knowledgeable of, and follow, the laws, regulations and policies that affect our operations

- Identify and manage compliance risks related to our responsibilities
- Avoid any activity that may lead to unlawful practices or harm our reputation
- Know when and where to seek advice
- Do the right thing ... tell the truth even when it's hard

### **What happens if the Code of Conduct is not followed?**

By working for, or representing, GF, you agree to uphold our commitment to do what is right and to follow our Code. Those who fail to uphold this commitment put themselves, their colleagues and GF at risk and may be subject to disciplinary action.

---

**If you have a question, seek help from your manager, Human Resources, the Legal Department, the Ethics & Compliance Office or your leadership team.**





# How Our Compliance Program is Managed

---

## Who in GF is responsible for compliance?

Each of us is responsible for acting ethically and complying with all applicable laws, regulations, standards, and policies. The GF Board of Directors is responsible for ensuring that there is an effective compliance program in place. The Board fulfills its oversight duty through the Audit, Risk and Compliance Committee of the Board, the Chief Executive Officer (CEO) and other senior managers. To assist, the Ethics & Compliance Office was established to develop, coordinate and support the compliance program. The head of the Ethics & Compliance Office works directly with the Audit, Risk and Compliance Committee.

- Integrating ethics and compliance as a foundational component of our culture
- Assessing compliance risks and ensuring that internal controls are responsive to such risks
- Seeking to prevent unlawful or unethical business conduct and detecting it if it occurs
- Providing compliance training and communications
- Managing the internal compliance reporting and investigation process
- Preparing compliance performance and assessment reports for the Ethics Committee, the CEO and the GF Audit, Risk and Compliance Committee

## How is the compliance program structured?

The Ethics Committee, which includes the Chief Human Resources Officer, Chief Financial Officer, Chief Legal Officer, Chief Business Officer, Chief Audit Executive, and other senior operations leaders, is charged by the Board of Directors to oversee the compliance program. The Ethics & Compliance Office implements the compliance program through an Ethics Network, which is made up of representatives nominated from various GF sites and business functions. The Ethics Network helps to identify and manage key compliance risks, and provides training, communications assistance and support to ensure effective and efficient ethics and compliance programs are in place.

## What is the role of the Ethics & Compliance Office?

The Ethics & Compliance Office's responsibilities include, among other things:

## How does the ethics and compliance program help me do my job?

The Ethics & Compliance Office is here to help you by answering questions, providing guidance, training, advice and support. Contact them BEFORE making a difficult decision to talk through any potential ethical issues. This Code is a good place to start the search for guidance, advice and answers. Additional resources such as the Legal Department, Ethics Network representatives and the Corporate Policies page on the company intranet can also provide valuable information and insight. It is your responsibility act ethically and comply with the laws and standards that govern our business. The Ethics & Compliance Office and its associated resources are all here to help when the correct path forward is not immediately clear.

Each of us is responsible for acting ethically and complying with all applicable laws, regulations, standards, and policies. The Ethics Network helps to identify and manage key compliance risks, and provides training, communications assistance and support to ensure effective and efficient ethics and compliance programs are in place.





# How to Raise a Question or Report a Concern

## Why is raising a compliance question or reporting a concern important?

GF expects our people to act ethically at all times. In part, this requires you to be alert to what is happening and to ask a question or raise a concern if you believe a provision of the Code has been or is being violated. Only by raising a question or reporting a concern can a potentially detrimental situation be promptly and effectively addressed. In turn, you must cooperate with the Ethics & Compliance Office on investigations so that matters are properly resolved.

## Will raising a concern be held against me?

We encourage you to raise any good faith compliance question or concern. You can be assured that retaliation or discrimination of any kind directed against anyone who reports suspected misconduct in good faith, or participates in an investigation will not be tolerated. Individuals engaging in retaliatory conduct will be subject to disciplinary action. Confidentiality will be maintained at all times and information will only be disclosed on a need-to-know basis.

## Where should I report a concern or issue?

Contact the Ethics & Compliance Office, the Legal Department or Human Resources. They are available to address your compliance questions and concerns. If you are uncomfortable using the resources outlined above, a confidential GF Ethics First Helpline is available for your use. The Ethics First Helpline is managed by an independent third party that will not disclose your identifying information to GF without your consent. The Ethics & Compliance Office will look into your concern and ensure an appropriate investigation and follow-up.

Reports are tracked with an identification number so that reporters who prefer to remain anonymous can follow up to receive a response or provide more information.

The GF Ethics First Helpline is available 24 hours a day, seven days a week, by phone at 1-866-345-6885 (U.S.) or online at [www.globalfoundries.ethicspoint.com](http://www.globalfoundries.ethicspoint.com), where you can find direct dial numbers for Singapore, Germany, Bulgaria, and other company locations.

You can report concerns through the Ethics First Helpline anonymously, as permitted by applicable laws.

## YOU CAN ALSO REACH THE GF ETHICS & COMPLIANCE OFFICE BY:

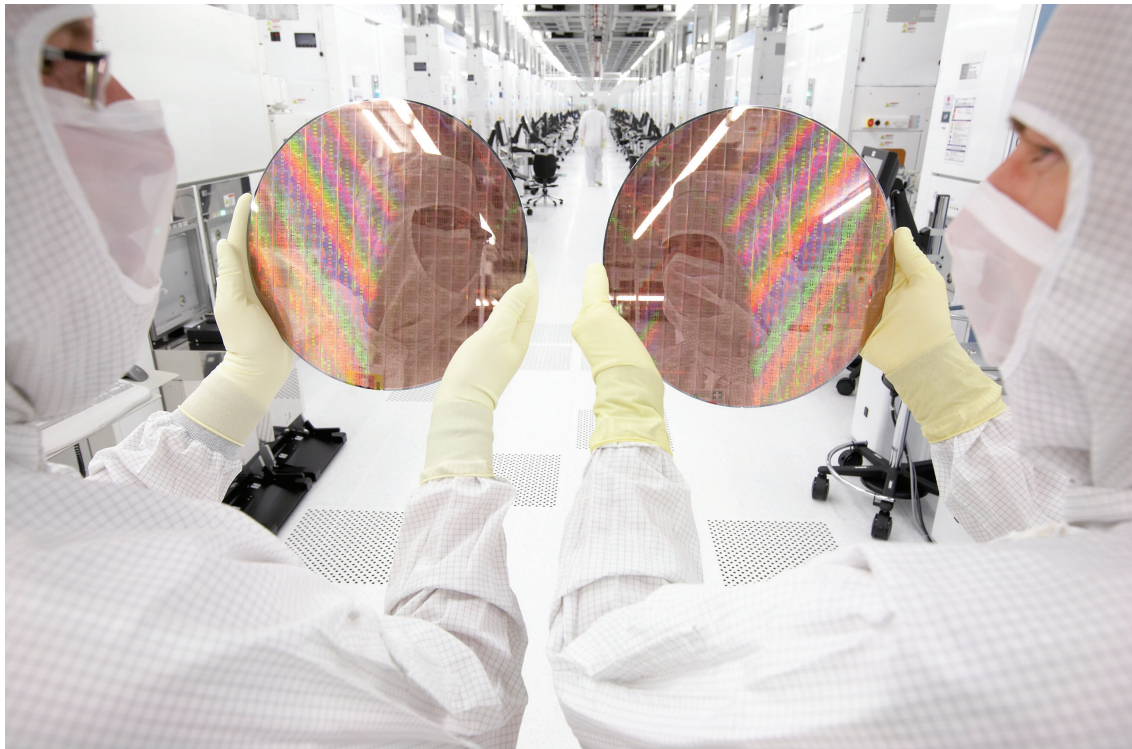
- **PHONE:** U.S. (518) 305-5025; Internal Extension 65025
- **EMAIL:** [global.compliance@globalfoundries.com](mailto:global.compliance@globalfoundries.com)
- **REGULAR MAIL:**  
Ethics & Compliance Office  
400 Stone Break Road Extension  
Malta, New York 12020





# Integrity

## as we conduct our business



We will not engage in unfair business practices, and conduct business in compliance with all applicable laws and accepted standards.





## Our Commitment

We will conduct our business around the world in accordance with all applicable laws and regulations. In our business dealings, **GF** will compete but will do so fairly, complying with all laws protecting the integrity of the marketplace. We will not engage in unfair business practices and we will be fully compliant with competition, trade, financial and other international laws and accepted standards.

We will meet these commitments by:

- Preventing improper payments in cash or in kind
- Avoiding market misconduct (including insider trading)
- Complying with international trade laws
- Preventing money laundering
- Following antitrust and competition laws

## Preventing Improper Payments in Cash or in Kind

### What you should know

Most countries have strict laws prohibiting bribery, extortion, corruption and similar kinds of fraud by companies, their employees and third parties such as consultants or agents. Such laws generally prohibit offering or receiving bribes or kickbacks to secure or retain business, providing anything of value to a government official or making such payments through an agent.

GF employees should never attempt to influence government officials, companies or individuals directly or indirectly by paying bribes, kickbacks, facilitating payments or by any other unethical

means, nor should they ever accept such payments or advantages.

GF is subject to laws that require that payments of any value are accurately reflected in the company's books and records.

Third parties representing GF must be subject to due diligence, commit to following our Code and be carefully managed to avoid improper conduct.

Facilitating payments are payments made to individual government officials to obtain expedited goods or services. These types of payments are prohibited by GF, and in many cases, by law.



Gifts and entertainment may be offered in accordance with GF's Gifts & Entertainment Policy. Consistent with this policy, these exchanges should have a proper business purpose to avoid even the appearance of an improper payment.

### **What is expected of you**

Never offer, give or accept an improper payment, i.e., a bribe, a kickback or anything of value directly or through a third party that attempts to gain business or to influence a business decision.

Report any suspicious or unusual activity regarding inappropriate payments immediately to the Legal Department or the Ethics & Compliance Office.

Do not make any facilitating payments. Contact the Legal Department or the Ethics & Compliance Office if you have been solicited for a payment of this type, if you believe one may be expected, or for any suspected extortion attempts. Carefully select and monitor third parties who act on our behalf to ensure no improper payments are being made or received by them.

### **What you should watch out for**

Any offers of extravagant, frequent or numerous gifts & entertainment.

Third parties who do not clearly account for their expenditures or whose commissions/fees seem in excess of the services provided.

Customers or officials who hint or suggest that certain payments be made to obtain business or information, or to prevent delays or other harm from affecting current business.

Any questionable or suspicious book or record entry, or any unrecorded expenditure.

### **Q&A**

**QUESTION:** We want to hire a third party to help us obtain permits for a new office expansion project. Is that okay?

**ANSWER:** It may be. Company procurement decisions must be made in conjunction with Global Procurement and must comply with the company's procurement policies. Through Global Procurement, the company must ensure that the third party is reputable and committed to acting consistently with our Code. Specifically, we need to conduct due diligence during the selection process, ensure they understand and comply with our improper payments policies and regularly monitor their work. We may be liable and our reputation is at risk for the actions of third parties working on our behalf.

---

**Refer to our Global Anti-Bribery and Anti-Corruption and Gifts and Entertainment policies for further information. Any questions or concerns about improper payments should be raised immediately with the Legal Department or the Ethics & Compliance Office.**

# Avoiding Market Misconduct (Including Insider Trading)



## What you should know

Market misconduct includes a wide range of activities such as insider trading, stock tipping, disclosing false information and stock market manipulation. Information concerning these activities can be obtained directly or indirectly and requires that you be alert when handling such information.

Material Nonpublic Information is any information that could substantially impact an investor's decision to buy, sell or hold a security that has not been made available to the public and is not otherwise in the public domain.

Insider Trading: Buying or selling, in violation of applicable law, a publicly traded security on the basis of material nonpublic information.

Stock Tipping: Disclosing material nonpublic information to enable another person to trade a security on the basis of that information.

Market misconduct by any employee would be extremely damaging to us all, and individuals involved may be subject to criminal proceedings in many countries.

## What is expected of you

Do not engage in market misconduct or insider trading.

Do not discuss or disclose any material nonpublic information inside or outside GF unless for necessary and properly approved business purposes.

Be cautious when discussing any GF-related confidential information in public places.







Contact the Legal Department or Ethics & Compliance Office if you are considering a transaction involving any securities and you believe you may have material nonpublic information.

Report suspicions of market misconduct of any type immediately to the Legal Department or to the Ethics & Compliance Office.

### **What you should watch out for**

Individuals soliciting confidential information for which they do not have a need to know.

Discussing confidential information with family, friends or associates.

Unsolicited trading advice from individuals who may have material nonpublic information.

### **Q&A**

**QUESTION:** A potential customer made a confidential presentation to my group that included information about a new product they plan to introduce to the market. We decided that we were not going to go ahead with the opportunity, but I think their new product is a real breakthrough. May I purchase their stock?

**ANSWER:** No. You should not purchase their stock until the public is aware of the new product. This is material nonpublic information as the briefing received was confidential. The information is material because it would likely influence an investment decision about the company's securities.

---

**Refer to the Insider Trading Policy for more information, and contact the Legal Department or the Ethics & Compliance office with any questions or concerns.**

# Complying with International Trade Laws



## What you should know

Trade laws cover the transmission of goods, services, and software across international borders as well as the release of technology and know-how whether domestically or internationally to unauthorized persons due to nationality status or restrictions imposed by government agencies.

Most countries have laws regulating export, import and customs procedures and include restrictions on dealings with certain countries, entities and individuals. This applies to both exports and imports for certain direct and indirect dealings.

Exports and imports can be made electronically in addition to traditional shipping methods. An export or import can also be made during discussions or visits to a facility.

We have a collective obligation to ensure we understand and follow applicable trade compliance laws and regulations of the jurisdictions where we do business. These laws and regulations may include restrictions on the release of technical information to foreign nationals, electronic transmissions of data and/or software, or the shipment of products to other countries. Because GF's products are used in commercial as well as defense markets, we must be aware of and closely scrutinize all transactions to determine where and to whom our products are being distributed and for what end purpose. Based upon this information, we can then determine the eligibility of a product, service or technical information to be exported, transferred or re-exported in compliance with export control laws and regulations. GF places the utmost importance on its trade compliance obligations.

## What is expected of you

Understand and comply with the trade regulations and restrictions that apply in the jurisdictions where you conduct business or procure goods and services. Seek out the advice of the GF Global Trade Compliance (GTC) team whenever you have a question.

Maintain records of all import and export transactions, including purchase orders, contracts, invoices, and payment records in accordance with regulatory and other requirements.

Know your customers and suppliers — who they are, what they do, where they are based and how they will use our services, technology or information.

Report any suspected or known non-compliance with trade laws, regulations or restrictions to the GTC team, the Legal Department or the Ethics & Compliance Office.

## What you should watch out for

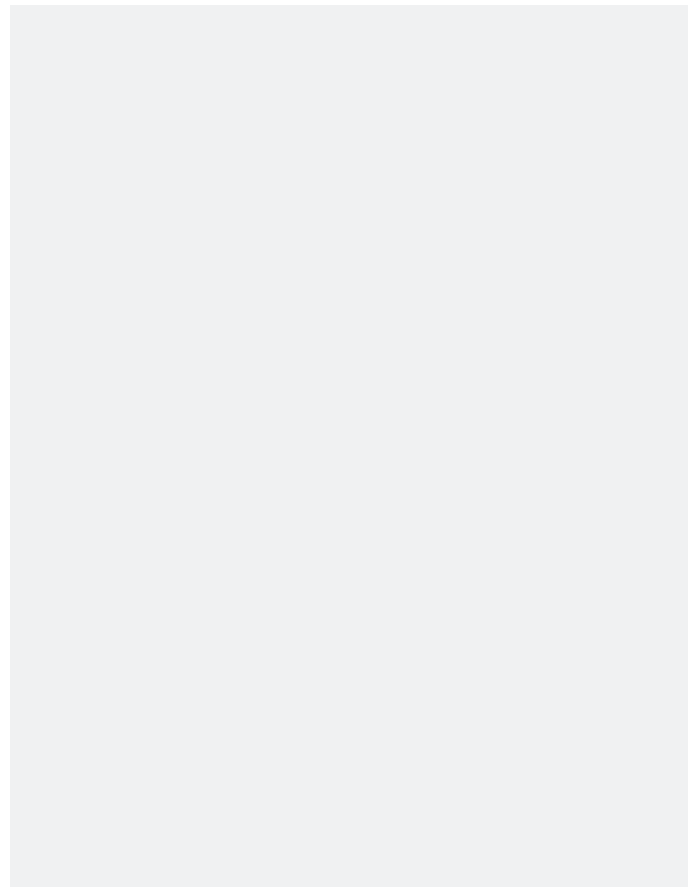
Trade restrictions in the jurisdiction where you are conducting business.

Transfers of export controlled technical data that take place across international borders or to foreign nationals domestically.

Traveling across international borders with export controlled goods or technical data.

Customs payments that look suspicious or do not occur in the ordinary course of business.

Transfer of restricted software, technical data, know-how or technology by email, Teams or other virtual sharing platforms, during meetings or visits to GF facilities or with external parties.



## Q&A

QUESTION: A local company contacted me and said they could expedite our imports through customs. We could use the help; can I hire them?

ANSWER: GF must first review this company by involving Global Procurement and complying with the company's procurement policies. GF must ensure they are a knowledgeable, legitimate, ethical and reputable firm to handle GF's commodities.

---

Trade Compliance laws are both complex and vary across GF's global footprint. GF's GTC team is the best source to answer any questions related to export and import control laws and regulations.



# Preventing Money Laundering

## What you should know

Money laundering is a process where individuals or entities attempt to conceal illicit funds or otherwise make the source of their illicit funds appear legitimate.

GF is committed to ensuring that our operations comply with money laundering regulations. We conduct business only with reputable customers and partners involved in legitimate business activities using funds from legitimate sources.

Each of us must understand the origin of monies and property we receive or procure, and the identity of the person to whom we make payments.

Most countries have laws prohibiting money laundering. These laws often place criminal liability on both the company and the employees.

## What is expected of you

Know your customers, partners and suppliers. Conduct the due diligence necessary to ensure their business activities and transactions are reputable and responsible.

Be watchful for any payments that look irregular or for customers who appear to lack integrity in their operations.

Report any suspicious transactions or incidents of money laundering to the Legal Department or the Ethics & Compliance Office.



## What you should watch out for

Any proposed or actual payments in cash from a customer or partner who has not been subjected to thorough diligence.

Customers who overpay for goods or services, and then request a refund.

Any customer, supplier, agent or partner who provides incomplete or suspicious information.

Orders and purchases that are not consistent with a customer's normal business activities.

Funds paid from or to unusual sources, or from or to countries not normally associated with the customer.

## Q&A

**QUESTION:** In relation to a potential sales transaction, the buyer proposed an unusually large refundable deposit. This is the first time I have seen this; what should I do?

**ANSWER:** You are right to be wary and to raise the question. Talk to the Legal Department or Ethics & Compliance Office. It is your responsibility to report suspicious activity; the experts will determine if it is likely money laundering and how to proceed.

**Refer to the Anti-Money Laundering Policy for more information. Contact the Corporate Controller, the Legal Department or the Ethics & Compliance Office if you have a question or concern about suspected money laundering.**



# Following Anti-Trust and Competition Laws

## What you should know

Many countries have laws concerning antitrust and unfair competition. These laws are strict, complex, often reach across borders and carry severe penalties for companies and individuals who do not comply with them.

Antitrust and unfair competition laws prohibit agreements that limit or restrain trade such as price fixing, bid rigging, division of markets, predatory pricing or agreements on resale prices.

Unfair competitive actions can include such things as making false statements about competitors, misusing a competitor's trade secrets, providing a competitor with information about pricing or territories, restricting their source of supply or inducing a supplier to break contracts with them.

Careless discussions at trade associations or events involving competitors or inappropriate statements in marketing materials can cause serious problems.

Many jurisdictions have laws that require prior clearance of mergers, acquisitions, joint ventures or other similar transactions, especially if competitors are involved.

## What is expected of you

Be careful that comments you make about competitors are accurate.

Do not use the company's size to intimidate or threaten any individual or organization.

Do not discuss or enter into arrangements or understandings with competitors or potential competitors concerning prices of products/services or production levels, or other competitively sensitive policies or practices.

Do not discuss or enter into arrangements or understandings with competitors or potential competitors to allocate customers, markets, geographies, or products/services.

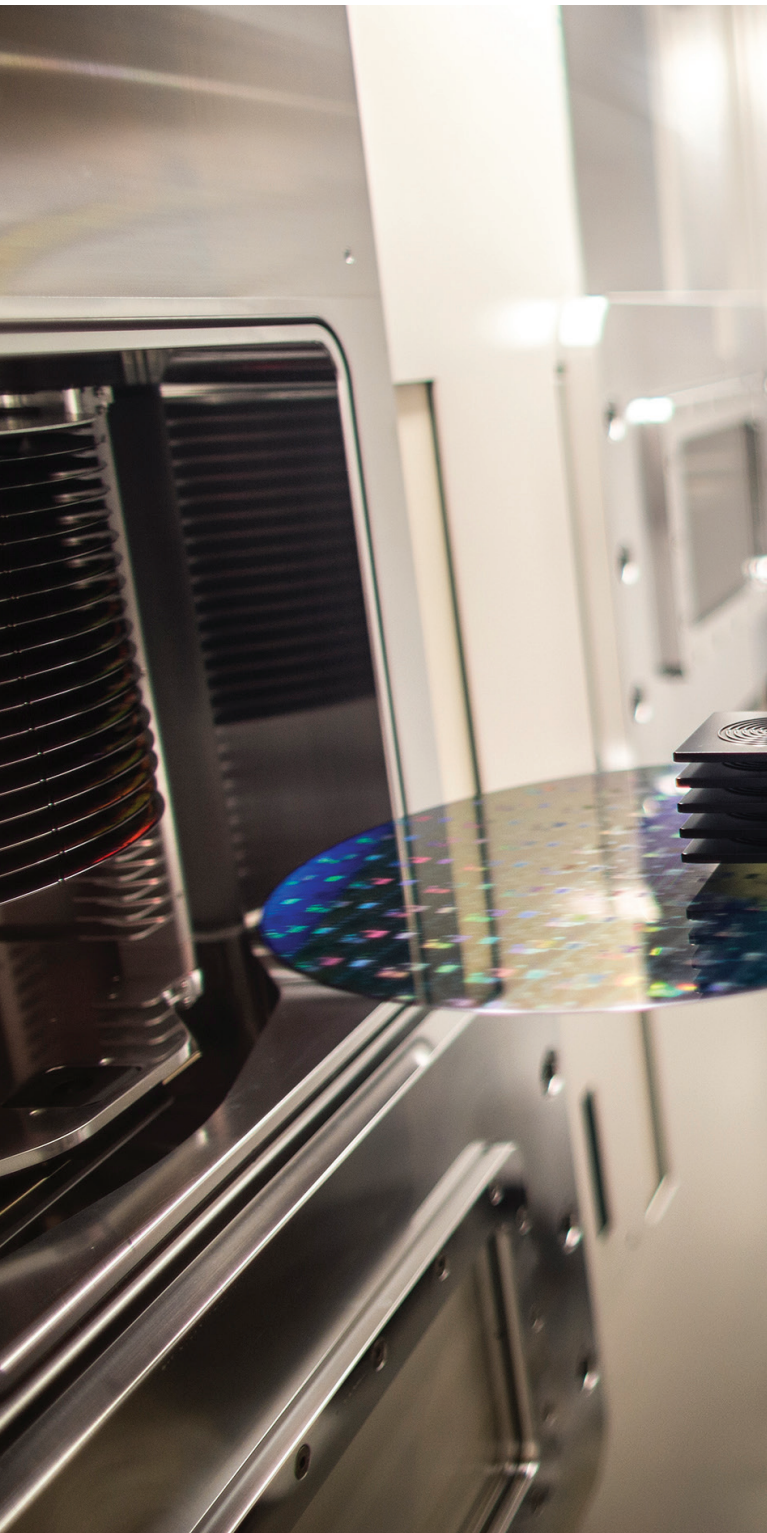
Do not engage in discussions in connection with any joint ventures or projects with competitive organizations that are not limited to the specific transactions involved. (The GF Legal Department must be advised before any such discussions are initiated.)

Do not discuss or enter into arrangements or understandings with a competitor or customer not to deal with a particular customer or supplier.

Work with the Legal Department or the Ethics & Compliance Office to ensure that you understand the competition laws that apply to your operations.

Partner with the Legal Department to ensure all acquisitions, mergers and joint ventures meet the approval criteria required by applicable competition laws and regulatory bodies.

Report any suspicious competitive activity to the Legal Department or Ethics & Compliance Office immediately.



## What you should watch out for

Any competitor who attempts to discuss competitive information such as pricing, bids, sales or territories.

Discussions relating to prices, markets, profits or other topics that could be of interest to competitors at trade associations, meetings or events where competitors are in attendance.

Inappropriate competitive information that may show up on your desk, e.g., a competitor's proposal or pricing information during a bidding process.

Any type of exclusive agreements for the purchase or sale of products.

## Q&A

**QUESTION:** I am invited to an industry sponsored meeting where our key competitors will be in attendance. Can I attend?

**ANSWER:** Such meetings are appropriate but you must follow certain precautions to protect yourself and GF. Discuss the meeting with your manager to get approval before you attend and, as needed, consult with the Legal Department or Ethics & Compliance Office. Do not engage in any competitive discussions and keep a record of attendees and what was discussed in case any questions are raised later.

---

**Competition laws are complex and vary in their nature and application around the world. The Legal Department or Ethics & Compliance Office can assist you.**





# Integrity

**as we work with  
our customers,  
partners, suppliers  
and governments**



We will treat our customers, partners, suppliers, employees and government representatives with respect and will always conduct our business activities with them professionally and ethically.

The background image shows a long, brightly lit industrial corridor. On the left, there are tall, white industrial machines with various panels and doors. On the right, there are more machines and equipment, some with colorful safety lights. In the center, several workers wearing white cleanroom suits and masks are walking away from the camera. The ceiling is high with visible structural elements and lighting fixtures. The overall atmosphere is clean and professional.

## Our Commitment

We will treat our customers, partners, suppliers, employees and government representatives with respect and will always conduct our business activities with them professionally and ethically. We will offer gifts and entertainment that are carefully chosen and appropriate under the circumstances, protect their confidential information and avoid even the appearance of a conflict of interest that might harm our relationships.

We will meet these commitments by:

- Offering and receiving gifts and entertainment appropriately
- Avoiding conflicts of interest
- Handling competitive information correctly
- Working closely with suppliers
- Working compliantly with governments



# Offering and receiving gifts and entertainment appropriately



## What you should know

Gifts and entertainment can be a means of building goodwill in relationships with our valued business partners. However, when offered or received inappropriately, these exchanges can bring into question your intentions and objectivity.

Gifts and entertainment include anything of value offered to, or received from, any third party by an employee, a representative of GF or their family members. The rules surrounding gifts and entertainment vary widely among companies and governments and are often very restrictive. Appearances can be more important than the gift itself. For this reason, you must use care and good judgment, and follow these guidelines whenever you are involved in the offering or receipt of any gift or entertainment.

Any gift or entertainment offered must be reasonable and consistent with ethical, cultural and professional practice and in accordance with our policies.

Before offering a gift or entertainment, make sure you know the recipient's rules regarding the acceptance of gifts so as not to place you or them in an embarrassing situation.

GF employees may be considered government officials in some jurisdictions.

Government agencies generally have stricter rules than those used in commercial practice regarding the receipt of gifts or entertainment by their employees or entities.

Third parties such as agents or partners representing GF are expected to follow these policies and guidelines without exception.

## What is expected of you

Be familiar with and comply with GF policies pertaining to the provision and receipt of gifts and entertainment. We maintain a separate policy on Gifts and Entertainment that you should be familiar with and must follow.

Use good judgment to avoid even the appearance of impropriety in both the amount and type of any gift or entertainment offered or received.

Never offer or provide any gifts or entertainment to third parties without complying with our gifts and entertainment policies.

Never offer or provide any gifts or entertainment of any kind to any government official without prior approval from your manager and the Ethics & Compliance Office.

Never offer or receive cash or cash equivalents.

As required by our Gifts and Entertainment Policy, seek approval and report gifts or entertainment offered or received.

Record all expenditures for gifts or entertainment of any type fully and accurately.

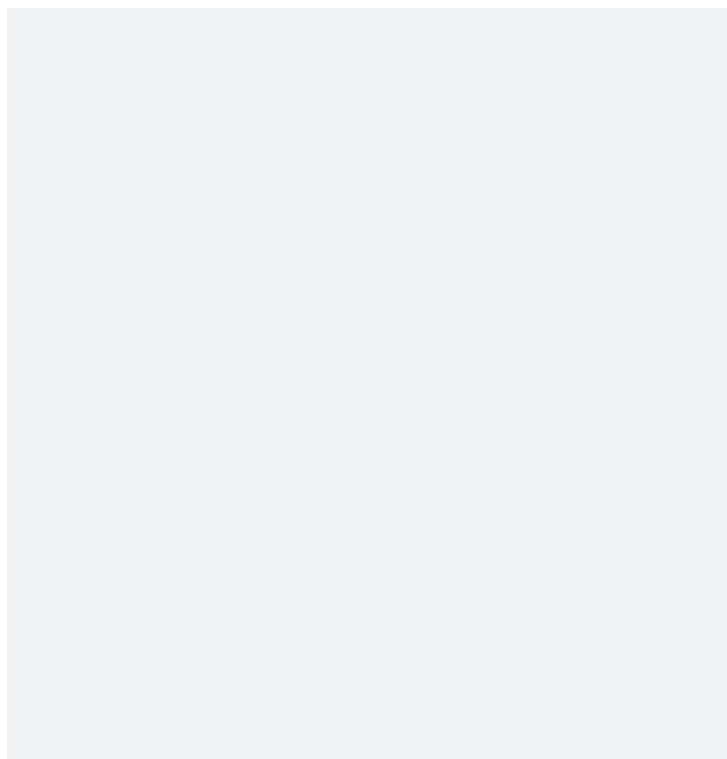
## What you should watch out for

Any request or hint that a gift or entertainment would be appreciated.

Any exchange of gifts or entertainment involving a government official.

Inappropriate gifts or entertainment, such as cash or cash equivalents, or an offering during a tender process or contract negotiation.





Gifts or entertainment offered or given to one of your family members.

Any gift or entertainment that puts or appears to put your objectivity in question.

## Q&A

QUESTION: A supplier asked me to attend a sporting event with him. Is this okay?

ANSWER: You are right to ask. You should discuss the invitation with the Ethics & Compliance Office or an Ethics Network representative before accepting. It will depend on several factors such as your position, your relationship with the supplier, who is paying for the event, and the venue.

Accepting gifts and entertainment could put your objectivity into question.

QUESTION: We are having a meeting with some government agency officials next week and would like to host a luncheon. Is this okay?

ANSWER: It depends on what the government agency's rules are. Each government agency differs but generally they are very restrictive on these matters. You must check with Government Affairs, the Legal Department or the Ethics & Compliance Office for guidance. Often pre-approval is required by a government agency before one of their employees can accept even a lunch. Checking ahead can avoid an embarrassing situation.

---

Review the **GF Gifts and Entertainment Policy** for further guidance on what is and is not acceptable.

Talk to your manager, the Ethics & Compliance Office or a Compliance Network representative if you have any questions or concerns in this area.



# Avoiding conflicts of interest

---

## What you should know

We respect that you may take part in legitimate financial, business and other activities outside of work. However, these activities must be lawful and free of any conflict with your work responsibilities.

A conflict arises whenever an employee's personal, social, financial or other activities or relationships interfere or have the appearance of interfering with an employee's objectivity or loyalty to GF.

It is not possible to list all of the potential conflicts but they include such things as holding a second job, having a financial interest in a GF project or investment, having family members who work for customers or suppliers, or serving as a consultant or director of any entity outside of GF.

## What is expected of you

Avoid any activity that creates a conflict between your personal interests and the interests of GF or even the appearance of a conflict that would bring into question your objectivity or loyalty to GF.

We maintain a separate policy on Conflicts of Interest that you should be familiar with and must follow.

Be alert to any potential conflicts of interest and report them to your manager and the Ethics & Compliance Office and they will assist you in resolving them. This is essential to maintain our and your own personal credibility.

## What you should watch out for

Financial interests by you or your family members in companies that do business with GF.

Outside affiliations with current or potential competitors, customers or suppliers of GF.

Part time employment outside of your employment that may conflict with your job.

Someone attempting to use your position within GF to promote an outside activity.

The offer of gifts or entertainment from a current or potential supplier.

Hiring, promoting or supervising a family member.

## Q&A

**QUESTION:** I have been asked to serve on the Board of Directors for a local charity. I read that this could be a conflict of interest. Is that correct, and if so, what must I do?

**ANSWER:** Correct. You have already taken the first step in resolving the situation, which is to disclose it. The reason for disclosing this type of activity is to maintain your credibility by obtaining review and approval of the activity from your manager and the Ethics & Compliance Office. As long as there is no direct relationship between the charity and GF that could cause a conflict and the associated time commitment would not impact your job responsibilities, there should be no problem with you serving on the Board.

---

**If in doubt, disclose. Your manager and the Ethics & Compliance Office can advise on whether a conflict may exist and, if so, how to resolve it. Refer to the Conflicts of Interest Policy for more information.**

# Handling competitive information correctly



## What you should know

Knowledge and understanding of competitors and suppliers is an important aspect of any business; however, competitive information must be gathered and used in accordance with applicable laws and good business practice.

Legitimate sources of competitive information include available literature, industry publications, publicly available material, technology trends, etc.

Theft, misrepresentation, eavesdropping, inducement and similar means of gathering information are never acceptable.

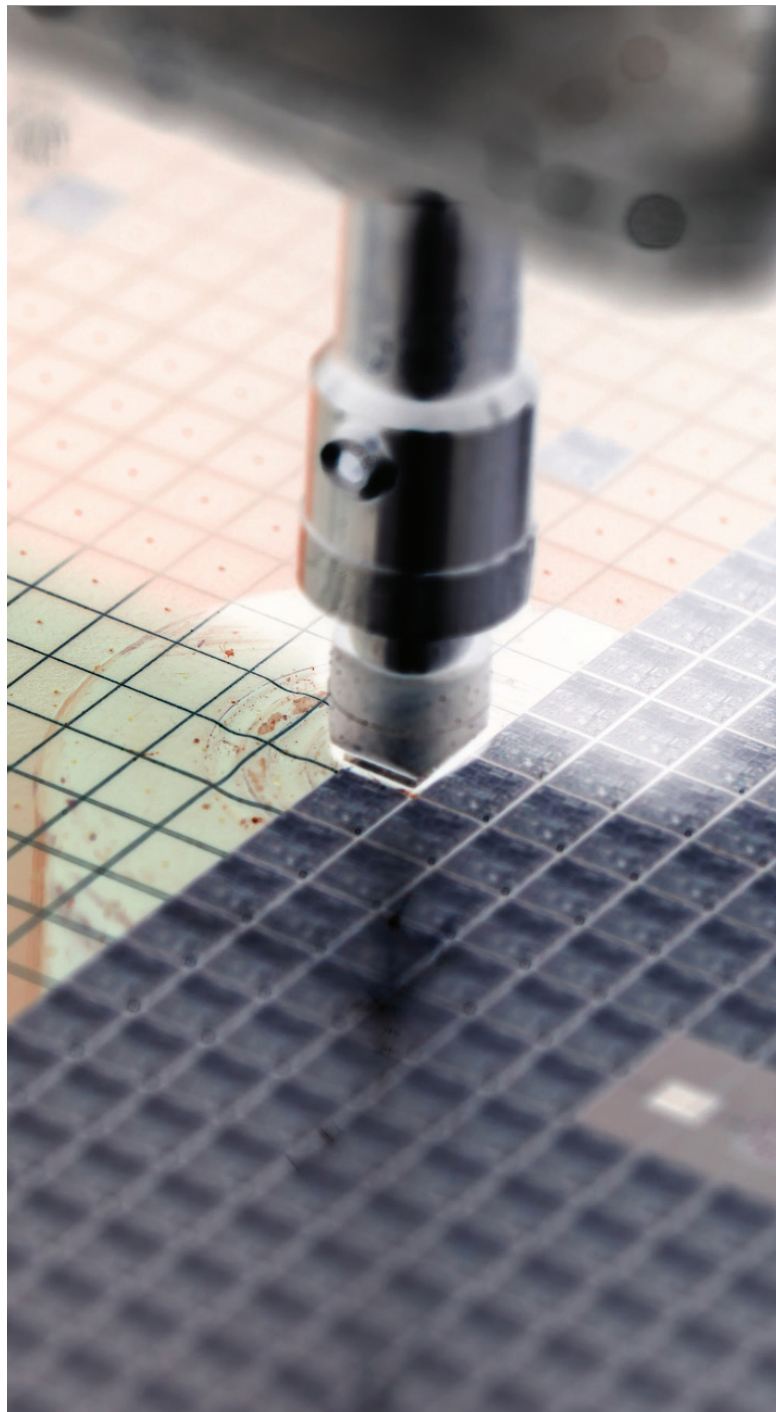
Third parties must live up to the standards in our Code and cannot be used to gather information inappropriately.

## What is expected of you

Collect competitive information only from legitimate sources and never do so illegally or unethically.

Guard against receiving, disclosing or using confidential information that belongs to competitors or other third parties (including prior employers), unless you have received written consent from the owner of that information or as permitted by law.

If you are uncertain whether you are permitted to disclose or use certain information or whether it is considered third party confidential, check with the Legal Department or Ethics & Compliance Office before you use it.







## What you should watch out for

Competitive information that you have access to, become aware of, or receive from unidentified sources.

The use of confidential information when appropriate agreements are not in place or use of such information in contravention of confidentiality agreements.

Pressuring an employee for confidential information about his former company.

## Q&A

QUESTION: I received a copy of a competitor's proposal for a project we are bidding on. What should I do with it?

ANSWER: You should never seek or hold on to this type of information. However, if you do come upon this data accidentally, protect it, do not forward it to anyone or share it, and do not use it. Contact the Legal Department or Ethics & Compliance Office and they will inform you how to proceed.

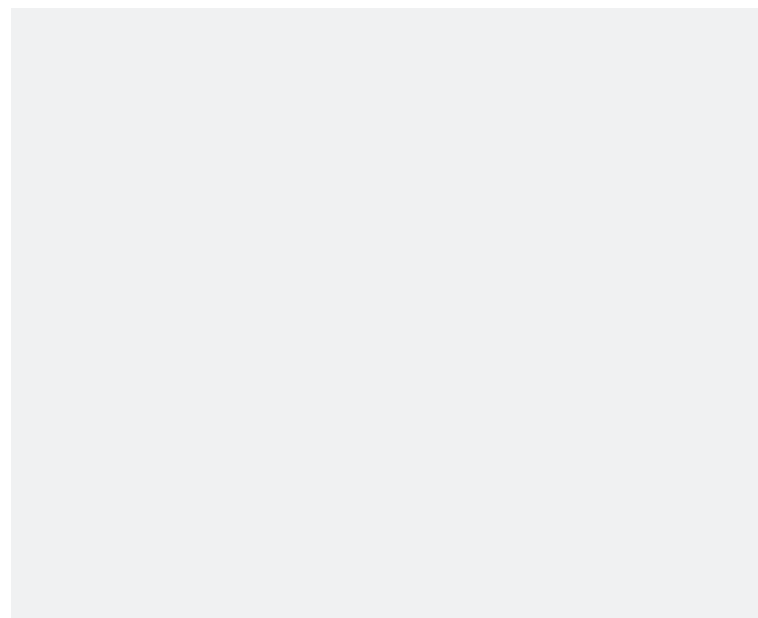
Competitive information of a confidential nature, particularly bidding information, is very sensitive and is almost always inappropriate to use.

QUESTION: I have a lot of information from my former company that might be useful as GF formulates its competitive strategy. What should I do with it?

ANSWER: We will always honor another company's information restrictions, just as we would expect them to honor ours. You should not disclose any confidential information from your former employer as this disclosure could result in potential legal and reputational risks. Additionally, you probably signed an agreement with your former employer stating you would not do so.

---

**Whenever there is any question about gathering or using competitive information, talk to the Legal Department or the Ethics & Compliance Office.**





# Working closely with suppliers

## What you should know

Suppliers of goods and services play an integral and critical role in our business and we expect that they conduct themselves ethically.

GF strictly forbids child labor and forced/ compulsory or bonded labor and will not permit the existence of such practices, or of human trafficking, in any aspect of its business or supply chain. In addition, we will not obtain materials designated as “Conflict Minerals” from sources that contribute to armed conflict.

Company procurement decisions, including selection of and communications with suppliers, must be made in conjunction with Global Procurement and must comply with the company’s procurement policies.

Suppliers must be selected fairly and on merit, with a contractual requirement that they act ethically and comply with all applicable laws, regulations and industry standards (including the RBA Code of Conduct).

Suppliers are expected to treat workers fairly, provide a safe and healthy workplace and protect the environment.

## What is expected of you

Choose suppliers based on merit and competitiveness in accordance with company procurement policies. Avoid any conflict of interest such as inappropriate gifts or entertainment or any kind of favoritism that might compromise the selection.

Work with suppliers who act in a manner that is consistent with our commitment to integrity and applicable laws.

Ensure proper approvals and documentation are in place before making any commitments to suppliers.

Ensure suppliers are aware of and comply with our Code’s applicable standards when dealing with us (e.g., gifts and entertainment and improper payments policies).

Protect a supplier’s confidential information.

## What you should watch out for

Supplier activities or practices that are inconsistent with or that deviate from our Code.

Situations where a supplier is chosen on a basis other than open competition.





Business given to a supplier owned or managed by a relative or a close personal friend.

Inappropriate use of, or access to, either GF or third party confidential information.

## Q&A

QUESTION: My brother works at a company that we are considering doing business with. Could that cause a problem?

ANSWER: It depends on several things such as whether you are involved in determining who receives that award. If you are, you should notify your manager and Global Procurement and remove yourself from the selection process. The point is to avoid any appearance that the contract was granted inappropriately. If you have any question about what you should do, talk to the Legal Department or to the Ethics & Compliance Office.

---

For further information or for any questions or concerns you may have, contact Global Procurement, the Legal Department or the Ethics & Compliance Office.





# Working compliantly with governments

---

## What you should know

Government officials include employees, agencies, government owned enterprises and anyone acting for or on their behalf.

Special rules apply when you conduct business with governments and they can differ greatly from those that apply to dealings in commercial businesses.

Business practices that are acceptable in the commercial arena, such as providing entertainment, may be unacceptable in government business and may even be illegal.

In the U.S. and other countries, laws apply that prohibit kickbacks in connection with government contracts. The term “kickback” means any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind that is provided, directly or indirectly, by a contractor, contractor’s employee, subcontractor, or subcontractor’s employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with a contract.

Special care must be taken to ensure the accuracy of financial and other information provided to governments.

Many countries have strict laws governing a company’s participation in the political or electoral process, e.g., donations to political groups or lobbying of government officials.

GF involvement with any form of political or electoral activity (including contributions to parties, candidates, or initiative or referendum campaigns) must be handled by the Government Affairs department and approval of the General Counsel is required.

Personal political or electoral activity by employees, such as support of local candidates or donations to candidates running for office, may be appropriate but it must be within the laws of the jurisdiction where you reside, carried out on your own time and in no way involve or be seen to involve GF.

Violations of governmental rules and regulations can result in serious criminal and civil penalties.



## What is expected of you

Due to the complexities of government rules and regulations, ensure that you know when you are dealing with a government official.

Be accurate and complete in all representations and certifications you provide to government officials and agencies.

Contact Government Affairs, the Legal Department, or the Ethics & Compliance Office if you have any questions about applicable laws or regulations regarding working with governments or government representatives.

Follow the GF gifts and entertainment policies as applicable to government officials.

Notify the Legal Department, Ethics & Compliance Office, or Government Affairs of any external investigations, audits or unusual requests for data.

Ensure that all governmental special requirements are flowed down to subcontractors or vendors and that they are following them.

## What you should watch out for

Special requirements that apply to government contracts or transactions.

Non-routine requests for data from a government official or agency.

The appearance that your personal political choices are company positions.

Any exceptions or deviations from a contract requirement.

Any business or social event that includes gifts or entertainment in which government officials are likely or are expected to participate.

## Q&A

**QUESTION:** I am not a member of the Government Affairs Department, but my job sometimes requires me to interact with representatives of the government anyway. What do I need to do?

**ANSWER:** Check in with your local Government Affairs representative. If it is a routine interaction as part of your normal duties, there is likely no need for any further action. But it is important for Government Affairs to be aware of all the ways in which GF interacts with governments around the world.

**QUESTION:** A government regulator called me to ask for project financial data that we have been working on. I have it ready to go; is it okay for me to send it?

**ANSWER:** It depends on who asked for it and why. If this is a routine request covered under the contract, you can provide it. If this is an unusual request, check with Government Affairs, the Legal Department or the Ethics & Compliance Office, before you respond.

We should always try to be responsive, but we need to understand who is requesting the data, and why, before we proceed.

---

**Government business is a specialized area and requires special training. If you have any questions or concerns, contact Government Affairs, the Legal Department or the Ethics & Compliance Office.**



# Integrity

**as we protect  
our company**



We will protect GF's reputation and assets, and utilize our time, equipment and information judiciously.



## Our Commitment

We will be responsible guardians of GF resources. We will protect GF's reputation and assets, and utilize our time, equipment and information judiciously.

We will meet these commitments by:

- Maintaining good controllership
- Being good stewards of assets
- Using our information technology resources appropriately
- Protecting intellectual property and confidential information
- Managing our documents
- Ensuring our people, assets and information are secure
- Communicating externally effectively

## Maintaining good controllership

### What you should know

We must comply with legal and regulatory obligations requiring accurate recording of financial and business information.

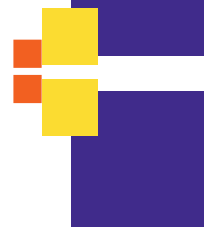
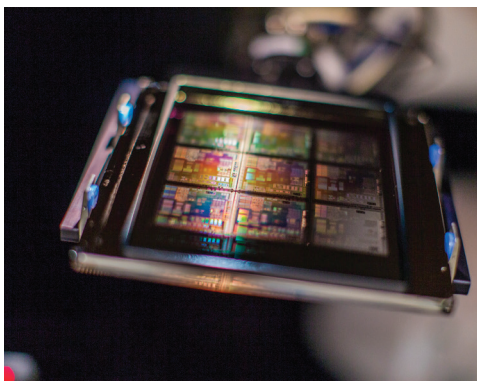
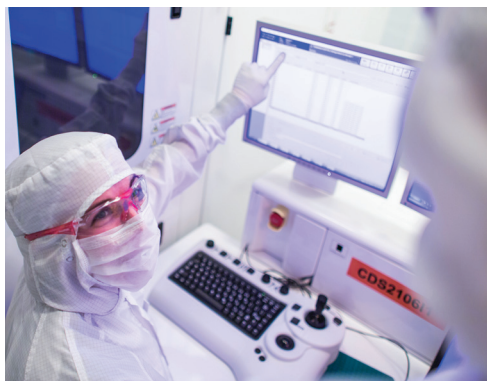
Financial data, books and records must comply with applicable financial reporting standards, other applicable laws and regulations, and GF business and financial policies and procedures.

Transactions and balances must be classified appropriately and consistently; routines and controls must be in place to protect assets and to ensure that information is recorded consistently.

The Corporate Approvals Policy, delegations of authority and supporting financial policies ensure internal controls and processes are in place across GF. Acting outside one's authorization may lead to disciplinary action.

Misrepresenting facts or falsifying information is fraud and can lead to significant penalties for GF and the individuals concerned.

Employees are prohibited from entering into "side agreements" — i.e., any oral or written agreement on behalf of the company, whether signed only on behalf of the company or fully executed by all parties — which has not been approved by the Legal Department and executed in accordance with company policies.



Our stakeholders, the public and our shareholders depend on the information we report and our reputation is tied to the credibility of that reporting.

### What is expected of you

Record financial and non-financial information accurately, timely and honestly and ensure that all transactions are properly authorized and understandable.

Comply with GF's business and financial reporting policies and procedures.

Be alert to any indication that reporting may not accurately reflect the situation.

Be aware of and comply with the limits and authorities granted in the Corporate Approvals Policy.

Before signing or forwarding a document with your signature on it, verify the facts for accuracy and completeness.

Cooperate fully with internal and external auditors by being responsive to their questions, providing documentation and clarification as required.

Report any indications or suspicions of financial misconduct to Finance, Internal Audit, the Legal Department or the Ethics & Compliance Office.

### What you should watch out for

Inaccurate or incomplete reporting such as overstated financial forecasts or incorrect expense claims.

Any indication of fraudulent activity such as funds being used for purposes other than what are recorded.

Absence of controls such as signature requirements for bank transactions or authorizations, or other expenses, especially when cash is involved.

The accuracy and completeness of your travel and other expenses.

Financial results that seem inconsistent with underlying business performance.

### Q&A

**QUESTION:** The quarter ends this Thursday but I have been asked to include a sales transaction that will likely take place next week. We are confident the transaction will close. Can I do it?

**ANSWER:** No. Our books must reflect exactly what is taking place with no exceptions. It may seem a minor thing but such an action would bring into question the credibility of our financial and accounting system. Record the transaction when it takes place in accordance with legal and accounting requirements.

---

**For any questions or concerns on financial reporting, controls or procedures, contact Finance, Internal Audit, the Legal Department or the Ethics & Compliance Office.**



# Being good stewards of assets

---

## What you should know

We each have the responsibility for judiciously managing GF assets under our control. This covers a wide range of activities such as overseeing the performance of GF business activities, usage of equipment (computers, systems, telephones and mobile devices) and material (office furnishings and supplies), overseeing expenditures or purchases, recording travel expenditures and managing our time at work in a way that fulfils our responsibilities.

We must exercise due care and responsibility while maximizing our assets and building value.

Company assets are intended to help employees achieve business performance goals. Careless, inefficient, unsecure, or illegal use of company assets hurts all of us.

The use of GF assets for personal use should be avoided, but if used, must be reasonable, kept to a minimum, and consistent with site and local policies and standards. Any usage beyond this minimum must be approved in advance by your Director.

## What is expected of you

Protect company assets and funds as you would your own.

Use good judgment to ensure company assets are not misused, unsecured, or wasted.

Ensure all expenditures are appropriately approved and accurately recorded.

Do not dispose of any asset without proper authorization and documentation.

Use company assets judiciously and only for appropriate purposes.

## What you should watch out for

Physical assets or other resources that are being misused, tampered with, or wasted.

Assets that are not being properly protected from theft or damage.

Any indications of fraud, theft, loss or inappropriate use.

Purchases that are not competitively procured as required by company policy, extravagant in their nature or not properly approved.

## Q&A

**QUESTION:** What do you mean by “keep use of company assets to a minimum?” For example, could I use a company printer to print flyers for my friend’s start-up business?

**ANSWER:** It is hard to write a prescription that fits every situation and there are always gray areas. We depend on you to use good judgment in following our Code. Occasionally using a company printer to print something personal is acceptable provided it complies with your site policies, but using a company printer to print flyers for your friend’s business would be excessive. If you have any doubt about the appropriateness of an action, ask your manager, the Legal Department, the Ethics & Compliance Office or a Compliance Network representative.

---

**Any questions or concerns you have in this area should be raised with your manager in the first instance or with Finance, the Legal Department, the Ethics & Compliance Office or the Information Security Office.**



# Using our information technology resources appropriately



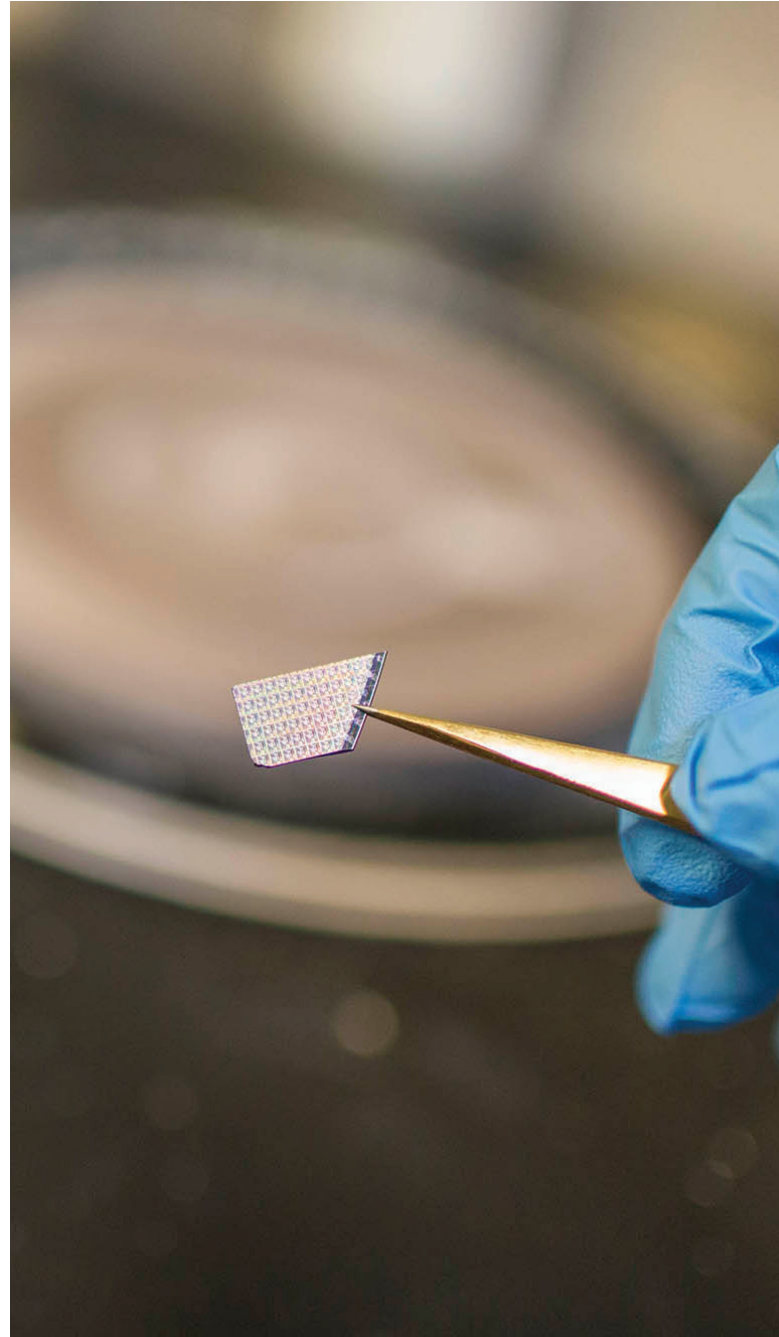
## What you should know

The hardware, software, data and networks that comprise our information technology resources are critical GF assets and are essential to meeting our business objectives. They are how we communicate internally and externally, store our information and conduct our business.

The communications you make using a GF computer, telephone, mobile device, cloud service, or other electronic resource and the information stored on them are company property. In accordance with applicable law, we make records of your communications and monitor activity on these resources to ensure they are used to conduct company business legally and in accordance with our policies and procedures.

The company has the right to monitor, in accordance with applicable laws, all of its assets, including its electronic information systems, and cloud services, and review information on them. While the company respects the privacy of its employees, it monitors its assets to promote safety, prevent criminal activity, investigate alleged misconduct and security violations, manage information systems, and for other business reasons.

Work time is for work. Accordingly, most activities performed by employees while at work will not be considered private. When you are at work or using company assets, you should not have the same expectations of privacy you might have in other places.





Email communications are considered company records and are often a prime target in regulatory investigations and litigation. Exercise good judgment when using company email.

### What is expected of you

Use your computer and other information technology assets responsibly and judiciously for business purposes.

Do not download software or data that is not licensed or approved for use at GF.

Never use your computer inappropriately to engage in communications or access sites that are offensive, illegal, harmful or obscene.

Protect your computer, the information contained on it and passwords from theft or unauthorized access by others.

Do not tamper with any security settings or features enabled on IT assets.

Comply with all IT policies.

### What you should watch out for

Emails that contain inappropriate content or information such as chain letters, solicitations or offensive material.

Potential email scams such as targeted phishing or social engineering attempts.

Applications not approved and licensed.

Unattended or unprotected computers or mobile devices.

Inadvertent disclosure or sharing of passwords and/or GF data.

Use of social media websites that does not comply with the GF Social Media policy.

### Q&A

**QUESTION:** What should I do if I observe inappropriate or unsafe use of company assets?

**ANSWER:** Talk to your manager as soon as possible, contact Information Security, or reach out to the Ethics & Compliance Office.

---

**For more information, refer to the relevant IT and Social Media policies.**

**For any questions or concerns, contact the Legal Department, the Ethics & Compliance Office or the Information Security Office.**



# Protecting intellectual property and confidential information



## What you should know

Intellectual property is one of our most important assets, and we must carefully manage and protect it.

Intellectual property includes research and technology development and know-how, trade secrets, patents, trademarks, copyrights, and a wide range of other confidential information such as sales and marketing plans, pricing information, business plans, employee records and financial data.

Any information that is not public about the technology or business of the company is our confidential information. Similarly, nonpublic information about the technology or business of a customer, supplier or vendor is confidential information of that other company.

Our confidential information should only be shared internally on a need-to-know basis.

If our confidential information has to be shared externally (i.e. with a third party), an appropriate non-disclosure agreement (NDA) must be in place prior to disclosure of any confidential information, and any disclosure should be limited to that necessary to achieve the business purpose stated in the NDA.

It is equally important to protect the intellectual property and confidential information of third parties that is in our possession. Failure to do so can subject us and you to lawsuits, fines and other penalties.

## What is expected of you

Be aware of and safeguard any intellectual property or confidential information that is in your possession, whether it is ours or belongs to a third party.

Never disclose company confidential information, or confidential information related to a customer, supplier or vendor, without appropriate approval(s) and never use it for personal gain or advantage.

If you are uncertain as to whether a particular disclosure requires an NDA, please consult with the GF Legal Department. Be aware of any confidentiality agreements that cover information under your control.

Before disclosing any confidential information outside of the company, make sure the recipient has a genuine need to know, that an NDA is in place and that there is a valid business purpose in releasing it.

Do not seek confidential information through improper means such as hiring someone for that purpose or accessing documents unethically.

## What you should watch out for

Acceptance of external confidential information without consulting with the Legal Department.

Discussing confidential information with third parties without a non-disclosure agreement. Inadvertent disclosure of confidential information in external meetings or forums or in public places, such as, airplanes, restaurants or other open areas.





Do not place confidential information, or create the appearance of any confidential information, on the Internet, on printers, or in any external communications not covered under NDA and appropriately transmitted via secure means to the party under NDA.

## Q&A

QUESTION: A former employee called and asked that I send him a copy of a report that he worked

on when he was here. I looked it up and it appears confidential. Since he worked on it and is well aware of what is in it, can I send it to him?

ANSWER: You should first discuss the situation with the Legal Department or Ethics & Compliance Office. It is unlikely there is a legitimate reason for him needing it in his current position. When someone works for GF, they sign an agreement that limits their use of confidential information.

---

For further information or any questions or concerns in this area, contact the Legal Department or the Ethics & Compliance Office.



# Managing our documents

---

## What you should know

Documents and records — written, printed and electronic — are essential to our business and must be appropriately managed from their creation to final disposal.

Records include both physical documents such as paper, DVDs, CDs and tapes, and all computer or electronic data and information. Note that emails are considered records.

Most countries have special restrictions surrounding the disposal of documents related to litigation, investigations and audits.

## What is expected of you

Do not create unnecessary records or retain records beyond the applicable retention date.

Know the documents that you have that must be retained and protect them accordingly and in compliance with company policy.

Review documents periodically that are under your control and dispose of them accordingly and in compliance with company policy.

Do not dispose of any records that are related to or are expected to become the subject of litigation, administrative proceedings, investigations or audits.

## What you should watch out for

Disposal of records without knowing the content.

Documents that are kept beyond their retention date.

Documents related to a litigation, administrative proceeding, investigation or audit.

## Q&A

**QUESTION:** Our office is scheduled for a move next week. We discovered a desk with several old files and records. What should we do with them?

**ANSWER:** You're right in asking the question as records management is important. We need to determine whether or not there is a business need or a regulatory requirement to retain these records. Contact the Quality department, Legal Department or the Ethics & Compliance Office who can help you with this determination.

---

**For more information, refer to the global document control process or to the retention schedule applicable to your department.**

**For any questions or concerns, contact Quality, the Legal Department or the Ethics & Compliance Office.**



# Ensuring our people, assets and information are secure



## What you should know

As we expand the reach of our business globally, our people, facilities and information are exposed to more security risks. GF is committed to providing a secure environment and to protecting our people, assets and information.

Each of us is responsible for following safety and security policies and regulations, and for helping make the workplace safe for everyone. This includes the security of our people, equipment and information.

We must consider and implement appropriate security measures as we conduct operations around the world. These measures include such things as taking proper precautions for people traveling in troubled areas, securing access to facilities and protecting computer assets and the information they contain.

Controlling access to our facilities and knowing who is visiting us are important aspects of good security.

In order to promote safety and prevent criminal activity, GF will investigate alleged misconduct. GF has the right, in accordance with applicable laws, to conduct searches or inspections of personal property at the workplace (including lockers, lunch boxes, purses, briefcases, baggage, and vehicles located on company premises or work sites) in various situations. In certain locations, your entry onto company premises constitutes your consent to such searches or inspections.

There is no tolerance for any type of violence or harassment in our workplaces.







## What is expected of you

Be observant and alert for any threats as you travel or conduct business off site. Plan ahead and take necessary precautions. Secure the company property you are responsible for such as your computer; do not make it easy for a thief to take it or use it. Be especially alert if you travel with company property.

Watch for unauthorized intrusions into your computer and alert the IMIT Department if you have any indication of viruses or hackers.

Do not use threatening speech or actions.

Report any lapses in security you observe to your manager, the Security Department or the Ethics & Compliance Office.

## What you should watch out for

Individuals in your area who do not have a proper badge.

Exposure of sensitive information to visitors in your area.

Unsecured computers, equipment or confidential information in areas open to the public or on your desk.

Travel alerts for countries or regions you are scheduled to visit.

Any signs of threats or intimidation.

## Q&A

**QUESTION:** We are having a large meeting on our site next week. It is by invitation only and the attendees will be here just one day. Do we need to go through security procedures and badge all our visitors?

**ANSWER:** Yes. We are responsible for knowing who is on our site at any time. This is for both security and safety reasons. Additionally, you should control where they are on our site at any time so that sensitive information is not inadvertently exposed. If they do have access beyond the meeting room, you should ensure that the office areas they visit are aware that there are visitors in the area and that they are escorted appropriately.

---

**Talk to the Security Department, the Legal Department or the Ethics & Compliance Office if you have any questions or concerns about any aspect of security.**





## Communicating externally effectively

---

### What you should know

Effective communications are an important aspect of our business. However, we must ensure that the communications are accurate, timely and fully coordinated before release.

Global Communications is responsible for coordinating and approving any external releases of information to the news media, industry analysts, social media and bloggers. Any engagement with news media, market analysts, social media, bloggers and financial analysts must be approved and facilitated by Global Communications.

Only authorized individuals may communicate on behalf of GF. The only people authorized to speak to securities/financial analysts or other members of the investment community on behalf of GF are our Chief Executive Officer and Chief Financial Officer.

If publishing a paper or speaking at a technical conference, employees must gain approval via the GPRS (Global Publication Review System) prior to sharing any information externally.

Use of the GF brandmark, logos, and colors must be in compliance with company marketing and trademark guidelines, including specific logo and trademark usage guidelines, and with company brand guidelines, which are published on GlobalConnect.

The company generally does not endorse products or services, or the firms or individuals who supply them.

Endorsements of partners may, on occasion, be permitted if determined to be of strategic value to GF. Prior to committing to any kind of endorsement or providing any testimonials in relation to the company's use of any materials, supplies, equipment, or service, or by allowing the use of the company's name in advertising, publicity, or catalogs you must obtain prior approval from your department Vice President, Global Communications, Global Procurement and the Ethics & Compliance Office.

Our reputation is judged by the quality, timeliness and accuracy of our communications.

### What is expected of you

Do not release any information externally without coordination and the appropriate approvals. This prohibition extends to your personal internet use and social media accounts. Please see the Social Media Policy for more information.

Follow the GF brand guidelines. If you see use of our GF logo, other GF logos, or company colors by those not authorized to represent GF, contact Global Communications.



Any questions or inquiries you receive for information from external sources such as the news media, market analysts, securities/financial analysts, bloggers, or regulators should be directed to Global Communications, the Legal Department or the Ethics & Compliance Office.

Coordinate any invitations you receive to speak externally about GF with Global Communications.

Never communicate on behalf of an entity or person unless you are specifically authorized to.

### **What you should watch out for**

Communications or postings on a website that contain confidential information.

The appearance that you are speaking on behalf of GF when engaging in personal activities.

Questions from or discussions with people outside GF who attempt to gain inside or sensitive information.

### **Q&A**

**QUESTION:** I was asked by a local business forum to give a talk about GF. Can I do this?

**ANSWER:** Most likely you can, but you must first get approval from and coordinate your remarks with your manager and Global Communications. They will provide you with guidelines and help you with the latest information on the company's mission and objectives. Keep in mind that your audience will judge us by your words and actions, so strive to be professional, objective and engaging.

---

**For more information or any questions, contact Global Communications or the Ethics & Compliance Office.**





# Integrity

## as we protect our company



We will create a healthy and safe working environment in which we treat each other with the utmost respect.



## Our Commitment

We will create a healthy and safe working environment in which we treat each other with the utmost respect. Our values are important to us and are reinforced as we uphold our Code.

We are committed to achieving clarity of purpose and maintaining a sense of pride in and a passion for what we do.

We will meet these commitments by:

- Treating each other with respect
- Maintaining a healthy and safe workplace
- Protecting our privacy





# Treating each other with respect

## What you should know

Our strength lies in the talent and diversity of our people and we respect the rights and dignity of our employees around the world.

GF strives to create a working environment that respects diversity and allows employees the opportunity to learn, grow and develop their talents. Employees, in turn, must treat each other respectfully and fairly, and not tolerate harassment, abusive or offensive behavior.

GF is committed to providing all employees with the same opportunities for success regardless of age, ancestry, color, marital status, medical condition, mental or physical disability, national origin, race, religion, political and/or third party affiliation, sex, sexual orientation, gender identity, or veteran status.

The company has a zero-tolerance policy against harassment, including sexual harassment, and discrimination based on any of these factors.

The company is committed to providing employees with internally equitable and externally competitive rewards and benefits that help foster employees' physical, financial and emotional wellbeing. Rewards are based on industry and other market factors, local laws, as well as company and individual employee performance. GF's benefits offerings are aligned to local market practices, local requirements, and are reviewed for competitiveness to attract, retain, and support the needs of our employees.

Employee working hours are set in accordance with local laws and with consideration of industry standards.



The company strictly forbids child labor and forced/compulsory or bonded labor, and it will not permit the existence of such practices, or of human trafficking, in any aspect of its business or supply chain.

The company respects the rights of employees to associate freely and is committed to complying with all applicable laws regardless of where we operate.





Employment laws vary widely from country to country and managers and employees in conjunction with Human Resources must ensure that they are followed.

### What is expected of you

Treat your fellow employees, customers, partners, suppliers and others with respect - never threaten, humiliate or use harassing language. We should all strive to avoid overly aggressive or bullying behavior and remember to act professionally in every interaction with GF employees and partners.

Require third parties, suppliers and contractors to follow applicable employment laws, regulations and standards when they represent or work for or with GF.

Ensure your employment-related decisions, e.g., hiring, promotion, compensation, etc. are carried out in compliance with laws, internal policies and procedures, are based on legitimate business reasons, and provide opportunities for employees' success and growth.

Report any type of harassment or abuse you experience or observe, such as racial or sexual discrimination.

### What you should watch out for

Any signs of threatening or inappropriate behavior or treatment in the workplace.

Any potential violation of employment laws or policies.

### Q&A

**QUESTION:** My manager often uses inappropriate language of a sexual nature that makes me feel uncomfortable. What can I do?

**ANSWER:** Inappropriate sexual language is unprofessional and unacceptable in the workplace. You should talk to someone. If you do not feel comfortable discussing the situation directly with your manager and letting them know that this is unacceptable, you can talk to your Human Resources Business Partner or Employee Relations. Additionally, the Ethics & Compliance Office is always available to you on a confidential basis.

---

**For information concerning local employment laws or for questions or concerns, contact Human Resources, the Legal Department or the Ethics & Compliance Office.**



# Maintaining a healthy and safe workplace



## What you should know

We are committed to providing a healthy and safe working environment for all our employees and any people working on or visiting our premises.

We are committed to meeting or exceeding the requirements of health, safety and environmental laws and regulations established in the jurisdictions we operate in. The Global Environmental, Health and Safety (EHS) Policy reflects that commitment, which is incorporated in and implemented through the Global EHS Standards.

Each of us must be alert to and responsible for following safety and security policies and regulations in making the workplace safe for all. Safety and security depend not just upon safe equipment and facilities but most importantly on competent, safety-conscious people.

Safety must be an important consideration in everything we do whether providing customer service, evaluating a new acquisition, operating machines or driving our vehicle safely while on company business.

## What is expected of you

Be familiar and comply with all health and safety regulations, policies and guidelines applicable to your job and your place of work.

Be alert to what is going on around you and report any health or safety concerns or areas of improvement that you observe to your manager or EHS.

Be vigilant regarding substance abuse. Substance abuse poses a threat to all of us and for this reason it is important that our workplaces are free from substance abuse. Each of us is prohibited from being at work or on company business while under the influence of alcohol, illegal drugs or controlled substances.

In the workplace (which includes all work sites, company vehicles, and company premises), employees shall not (1) manufacture, sell, or otherwise distribute drugs or controlled substances or inhalants, (2) use or possess alcohol without proper authorization from Human Resources and the Legal Department, (3) use or possess illegal drugs or controlled substances, or (4) illegally use drugs or controlled substances, including prescription drugs.

Managers and employees are responsible for ensuring their operations and workplaces are safe and that employees are trained on health and safety matters.

## What you should watch out for

Any unsafe conditions or practices in your workplace such as a failure to use safety equipment, exposed electrical or chemical hazards or blocked emergency exits.

Any failure to follow applicable safety regulations or safety policies.

Any indication during the evaluation of a new project that adherence to safety requirements may be a concern.

Any signs of substance abuse.



## Q&A

**QUESTION:** I noticed a chemical dripping in the sub-Fab. It was small and did not appear toxic. Do I need to report it?

**ANSWER:** Yes. Never hesitate when you see something that could be harmful or damaging. Report it immediately to your manager and local Environmental Health and Safety representative. It is always best to be cautious when safety is concerned.

**QUESTION:** During a project review I learned that one of our contractors had received several safety citations. What should I do?

**ANSWER:** Talk to your manager and Environmental Health and Safety representative immediately. The well-being of the people working on any GF project is a primary concern and any indication that they may be at risk must be thoroughly reviewed. We also must always consider the impact on GF's reputation.

---

**Any questions or concerns should be addressed with the Environmental Health & Safety team, the Legal Department or the Ethics & Compliance Office.**





# Protecting our privacy

---

## What you should know

We respect the confidentiality of employees' personal information and will limit access to personal records to those with appropriate company authorization or as required by law.

Each of us must protect employee personal information by accessing and sharing confidential employee data for legitimate business purposes only, with proper approvals and on a need-to-know basis.

Personal data can be defined very broadly and varies from country to country, and can range from personal identification and phone numbers to information related to age, gender or health.

Many countries have laws and regulations that restrict the dissemination and use of personal information outside of their borders.

## What is expected of you

Protect the confidentiality of the personal data that you have access to and ensure it is used only for legitimate business purposes and consistent with the Global Data Privacy Policy.

Collect or release personal information only where there is a legitimate business need and the collection or release has been properly authorized.

Understand the applicable laws and regulations that apply to personal data under your control - seek legal advice if you have questions.

Report any unauthorized disclosure of personal data to your Human Resources Business Partner, your local Data Privacy Officer, the Legal Department or the Ethics & Compliance Office.

## What you should watch out for

Requests for personal data from external or questionable sources. Regardless of the requestor, check to ensure there is a legitimate business need.

Inadvertent release or exposure of personal data.

Files that contain personal data.

Personal data in an insecure or unattended location such as at a printer, open filing cabinet or on an unattended desktop.

Transfer of personal data across any international border that is inconsistent with the Global Data Privacy Policy.

## Q&A

**QUESTION:** Our site is being audited and we are required to show personnel records as part of the response. What do I need to know before I do?

**ANSWER:** Ensure that there is an NDA in place between GF and any third party company who will need to view the records. Also ensure **ONLY** the people who have a direct need to see the personnel records have access. This may require you to ask people to log off a call or leave the room. If permissible, consider redacting the records to remove personally identifiable information (PII).

You should contact your local Data Privacy Officer or Human Resources Business Partner for guidance.

---

**Privacy laws can be complex so check with your Data Privacy Officer, the Legal Department or the Ethics & Compliance Office whenever you have any questions or concerns.**



# Integrity

## as we support our communities



We will be good corporate citizens in the communities where we live and work. We will be guardians of the environment and will enhance our communities through our service.

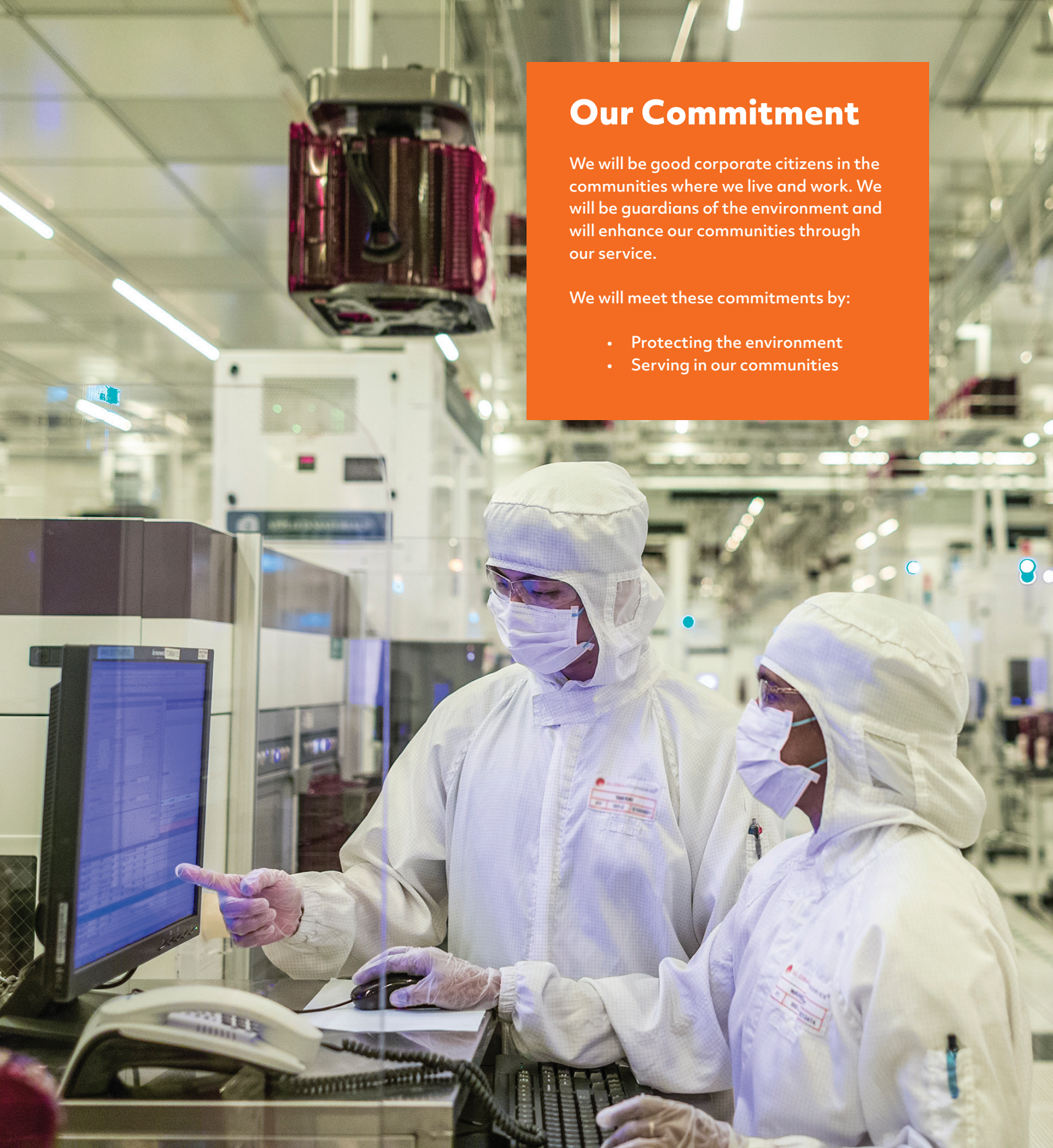


## Our Commitment

We will be good corporate citizens in the communities where we live and work. We will be guardians of the environment and will enhance our communities through our service.

We will meet these commitments by:

- Protecting the environment
- Serving in our communities







# Protecting the environment

---

## What you should know

GF is committed to complying with or exceeding industry standards and to meeting the relevant environmental rules and regulations in the jurisdictions in which we conduct business.

GF operates in an environmentally complex and heavily regulated industry.

We will live up to our commitment to environmental protection and sustainability by operating our global businesses compliantly in a way that minimizes environmental impact.

## What is expected of you

Follow the guidelines for environmental sustainability where you work.

Reduce the use of energy, water and other resources wherever feasible.

Understand and comply with all local environmental regulations in the jurisdictions where you work.

Carefully evaluate potential environmental issues relating to any project, partnership or acquisition.

Report any environmental issues or non-compliance with environmental regulations to your manager and the Environmental Health & Safety team, or the Ethics & Compliance Office.

## What you should watch out for

Any environmental-related complaints.

Discussions with, visits by and reports from environmental regulators.

Opportunities to reduce waste and the use of resources such as energy and water.

## Q&A

**QUESTION:** I was taking a tour of one of our Fabs, in an area where work was being performed by contractors. I saw what looked like a chemical being stored improperly. I mentioned it to the contractor who said it is always like that. That does not sound right to me. What should I do?

**ANSWER:** You are right to be concerned. You should talk to your manager and follow up with the Environmental Health & Safety team. Any potential environmental impact is important and is a threat to our employees and our reputation. The issue should be promptly resolved by those responsible. This is also a good example of what to do if you raise a concern and do not receive a satisfactory answer. Do not give up, raise it to the next level and you can always talk to the Legal Department or the Ethics & Compliance Office.

---

**For more information, talk to the Environmental Health & Safety team to ensure compliance with environmental regulations.**

**Any questions or concerns should be raised with the Environmental Health & Safety team, the Legal Department or the Ethics & Compliance Office.**



# Serving in our communities

---

## What you should know

The communities where we work are important stakeholders and GF is committed to being a good corporate citizen by caring for the environment and supporting community service.

We encourage employees to be involved in and supportive of their communities through donations of resources and time.

## What is expected of you

Be a good citizen and support the improvement of your community with efforts of your choice.

Do not let your support of external organizations interfere with your responsibilities at work.

Be careful to avoid any conflict of interest that may arise between support of a community organization and your job.

Do not give any indication that you officially represent GF as you carry out your personal commitments unless specifically authorized to act on behalf of GF as articulated in the Communicating Externally Effectively section of the Code.

Do not pressure fellow employees to contribute to organizations you support.

## What you should watch out for

Outside commitments that interfere with your ability to meet your responsibilities at work.

The misuse of company resources in support of external organizations.

Any conflict of interest between your outside personal commitments and your job responsibilities.

## Q&A

**QUESTION:** I would like to volunteer for a local charity. Is this permissible?

**ANSWER:** It probably is, but there are a few things that you should consider before you volunteer. Make sure that volunteering would not impact your responsibilities at work or appear in any way to be a conflict of interest or appear to be a representation of GF. If you have any questions, talk to your manager, Legal or the Ethics & Compliance Office. Community service is important and commendable.

---

If you have a question or concern about an outside commitment or community service, talk to your Human Resources Business Partner or the Ethics & Compliance Office.

# Your Personal Commitment







Our Code of Conduct clearly states our commitment to being an ethical and compliant company. However, words are not enough. It requires the personal commitment of each of us to make it a reality.

By working for or with GF, you agree to uphold this commitment. Each one of us is required to acknowledge annually that we have read, understand and will comply with the requirements contained in our Code of Conduct. Those who fail to follow our Code put themselves, their colleagues and GF at risk.

# Our Commitment





## Integrity as we conduct our business

We will conduct our business around the world in accordance with all applicable laws and regulations. In our business dealings, GF will compete but will do so fairly, complying with all laws protecting the integrity of the marketplace. We will not engage in unfair business practices and we will be fully compliant with competition, trade, financial and other international laws and accepted standards.

## Integrity as we work with our customers, partners, suppliers and governments

We will treat our customers, partners, suppliers, employees and government representatives with respect and will always conduct our business activities with them professionally and ethically. We will offer gifts and entertainment that are carefully chosen and appropriate under the circumstances, protect their confidential information and avoid even the appearance of a conflict of interest that might harm our relationships.

## Integrity as we protect our company

We will be responsible guardians of company resources. We will protect GF's reputation and assets, and utilize our time, equipment and information judiciously.

## Integrity as we work together

We will create a healthy and safe working environment in which we treat each other with the utmost respect. Our values are important to us and are reinforced as we uphold our Code. We are committed to achieving clarity of purpose and maintaining a sense of pride in and a passion for what we do.

## Integrity as we support our communities

We will be good corporate citizens in the communities where we live and work. We will be guardians of the environment and enhance our communities through our service.

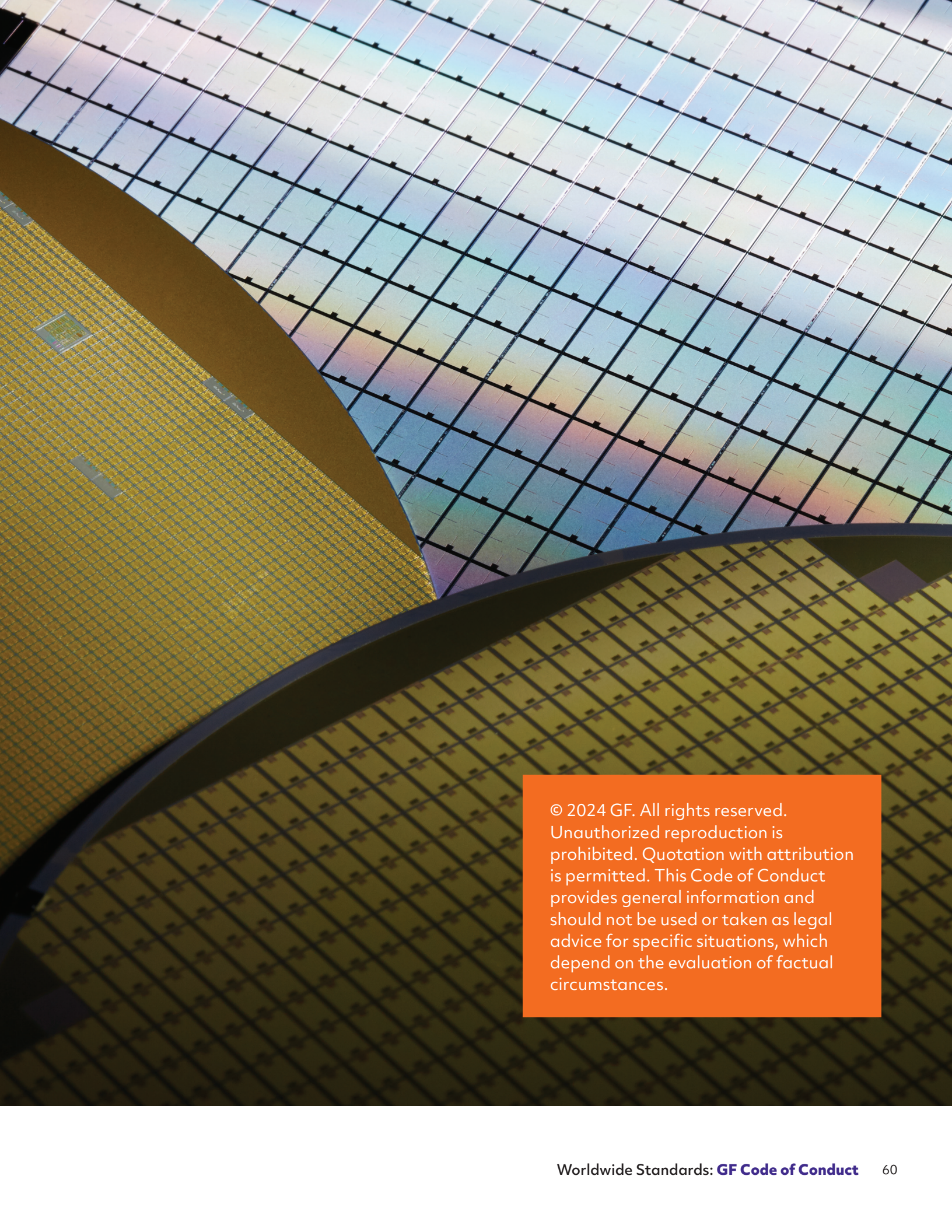


## Visit the GF Ethics & Compliance intranet page:

You'll find more information including:

- Policies and procedures
- How to raise a question or report a concern
- Policy owners and other experts
- Compliance tools and resources





© 2024 GF. All rights reserved.  
Unauthorized reproduction is  
prohibited. Quotation with attribution  
is permitted. This Code of Conduct  
provides general information and  
should not be used or taken as legal  
advice for specific situations, which  
depend on the evaluation of factual  
circumstances.