

Summary of 2009 Business Conduct Policy Changes

Open Source Software (p.6) – In this section, the definition of Open Source Software was updated and the issue of modifying open source software was addressed. In addition, a new link to Apple’s Open Source Policy was added.

Gifts to Non-U.S. Officials (p.7) - This section was updated to clarify the existing Apple policy on Gifts to Non-U.S. Officials, and a link was added to a new chart that identifies meal limit amounts by country. In addition, information on page 7 related to the definition of “gifts” was consolidated.

Political Contributions (p.7) – This new section addresses the policy on cash and in-kind contributions on behalf of Apple to any candidate or campaign. It also addresses contributions by individual employees and includes links to the related Apple policies.

Outside Employment and Inventions (p.12) – The final paragraph of this section was updated to clarify approvals for inventions or outside businesses. In addition, a link to Apple’s Conflicts of Interest policy was added.

Substance Use or Abuse (p.14) – A sentence was added to this section for consistency with the existing Apple policy on Drugs in the Workplace.