

Standards of Business Conduct

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Introduction



Chief Executive Officer Gary Dickerson

At Applied Materials, our innovations Make Possible® a Better Future. Over the past five decades, we have built a reputation for being an innovation leader, a responsible corporate citizen and a great place to work. At the

foundation of our success is a strong sense of purpose and a set of shared values – to be the most valued partner, to work as a winning team, to act with responsibility and integrity, and to deliver world class performance.

As we work together to Make Possible a Better Future, operating with the utmost integrity in all aspects of our business is vital to our success. The Standards of Business Conduct is our guidebook for acting responsibly and ensuring the highest ethical standards in our interactions with colleagues, customers, suppliers and the communities where we work and live. It is the responsibility of everyone – including our executives, officers, Board of Directors, and each and every employee – to read, understand, and comply with these Standards, as well as other Company policies.

Gary E. Dickerson
President and Chief Executive Officer
Applied Materials, Inc.



Chief Legal Officer Teri Little

At Applied, we are privileged and proud to do business in many countries around the world. As a global company, we are subject to a number of laws and regulations, and are committed to respecting and complying with them in all jurisdictions where we do business.

Our Standards of Business Conduct is instrumental in our ability to do that. It reflects our core values, as well as the policies, procedures and conduct that guide us every day, in everything we do. Acting with integrity, demonstrating a culture of inclusion, and complying with laws – putting our values into action – is how we, individually and collectively, protect and preserve our company's reputation.

Teri Little
Senior Vice President, Chief Legal Officer and Corporate Secretary
Applied Materials, Inc.



Expectations of our leaders

Everyone at Applied is responsible for adhering to our Standards of Business Conduct. Our directors and officers, as well as other executives and members of management, have a special responsibility to lead by example and model our core values day-in and day-out.

Leaders' responsibilities:

- **Lead by example.** Set the tone for integrity within your team, not just through words, but through your daily actions.
- **Communicate expectations.** Talk to your team about making ethical decisions, acting with integrity, and the importance of understanding the policies that apply to them.
- **Be clear in your messages.** Set expectations that are clear and consistent with our values. Doing what is right is an expectation.
- **Create a safe and respectful environment.** Take steps to make sure your team is comfortable raising concerns and feels heard when they do.



Expectations of each other

Applied relies on each of us to conduct ourselves with the utmost integrity and professionalism in our interactions with each other, with our business partners, and when representing Applied.

Our responsibilities:

- **Be accountable.** Read, appreciate and comply with the policies and procedures that apply to your roles and functions.
- **Speak up.** Ask questions and seek help when we need it. Raise concerns if we see behavior inconsistent with our values, standards, and policies.
- **Cooperate and protect.** If asked to participate in a company investigation, we all must cooperate. Be open and truthful, protect confidentiality, and preserve company records if asked to do so.
- **Exercise oversight.** When managing our business partner relationships, make sure they are aware of our values, policies, and expectations.



Expectations of our business partners

We expect our business partners to adhere to our Standards of Business Conduct as well. We seek out partners who share our values and high standards for integrity and professionalism. When providing goods and services or acting on our behalf, all partners are required to understand and comply with the [Applied Materials Standards of Business Conduct for Business Partners](#).





We ask questions and raise concerns

If we witness or are asked to engage in conduct that is not consistent with Applied's values or policies, we are expected to speak up and seek guidance, and will be supported when doing so.

There are many resources available to assist you with questions or concerns.

- Your manager should be available to listen and address your concerns.
- You can always reach out directly to Global Ethics & Compliance or another member of the Legal & Compliance Organization.
- You can also reach out to Global Employee Relations, Human Resources or Global Internal Audit.



We speak up, even when it's hard

If one of us is asked to engage in, or witness others engaging in, conduct that is not consistent with Applied's values or policies, we are expected to speak up and seek guidance, and can expect to be supported in doing so.

While it is not always easy to come forward with concerns, especially when we feel uncertain whether something is a violation, it is important to do so.

Applied takes all reports seriously and treats them with sensitivity and discretion.



We do not tolerate retaliation

Applied prohibits any retaliation against anyone for asking questions or reporting issues in good faith. We should feel free to ask a question, make a report, or participate in any investigation without fear.

If you feel you, or someone else, has been retaliated against, you should immediately contact your manager, Global Ethics & Compliance or another member of the Legal & Compliance Organization, Global Employee Relations, Human Resources, or Global Internal Audit.

Anyone who retaliates against those who speak up in good faith will be disciplined, up to and including termination.

What is the Ethics Helpline?

It takes courage to speak up when something is not right. We understand that employees and business partners might be uncomfortable and anxious. That's why we have established the Ethics Helpline.

The Ethics Helpline is available 24 hours a day, 7 days a week and is staffed by professionals who speak 11 different languages. It is managed by an independent service provider that provides confidential and anonymous reporting services to companies around the world. If you use the Ethics Helpline, the independent service provider will send a report to Global Ethics & Compliance.

In certain countries, anonymous reporting is not available due to applicable laws. You can still contact Global Ethics & Compliance at ethics_everywhere@amat.com or another member of the Legal & Compliance Organization, Global Employee Relations, Human Resources or Global Internal Audit.



Contact Us

ethics_everywhere@amat.com
helpline.appliedmaterials.com

IP and Confidential Information

Innovation

Information Systems

Privacy and Data

Most Valued Partner

... collaborate broadly to solve
customer high-value problems
faster and better

WE COLLABORATE BROADLY TO SOLVE CUSTOMER HIGH-VALUE PROBLEMS FASTER AND BETTER.

WE BUILD TRUST BY MEETING OUR COMMITMENTS AND RELENTLESSLY SAFEGUARDING IP AND DATA.

We protect intellectual property and confidential information

They are the bedrock of our innovation and drive our competitive advantage in the marketplace. We all have a responsibility to protect this information from theft and unintended disclosure. In addition, we are responsible for respecting and protecting the intellectual property rights of our customers, suppliers, and other third parties with whom we do business. Under no circumstances do we improperly acquire or attempt to acquire the proprietary or confidential information of others.

If we need to disclose confidential information to any company or person, we first obtain the appropriate authorization and ensure a non-disclosure agreement approved by the Legal & Compliance Organization has been executed. We also seek guidance from the Legal & Compliance Organization before requesting confidential information from an external party.



We protect our innovation

All inventions, whether patentable or not, that our employees innovate are the property of Applied Materials. An exception to this rule is for inventions that are not related in any way to Applied's products, research or business, are developed entirely on an employee's own time, and are developed without the use of any of Applied's assets, equipment, facilities, or resources.

After conceiving an invention, employees are expected to promptly submit an Invention Disclosure Form to the patent management system (IPMatters/), even if they are unsure whether the invention is patentable or will be used in a product.



DID YOU KNOW?

Confidential Information (also referred to as CI) is any business or technical information belonging to Applied, its customers, suppliers or other third parties that is not publicly known or that has been provided or received under an obligation of confidentiality.

APPLIED VALUES IN ACTION

Can I share confidential information with other Applied employees?

You should only share confidential information with employees who are authorized to see it and have a need to know the information as part of their job duties.

FIND OUT MORE:

[Global Social Media Policy](#)

[Management of Confidential Information](#)

[Protection of Trade Secrets](#)

[ipmatters/](#)

[vip/](#)

We protect our information systems

In our dynamic business, we must use Company assets as efficiently as possible and remain alert to opportunities to improve performance and reduce costs. We are each responsible for the proper use of Company property, facilities, systems, and equipment. In addition, we are each responsible for protecting the resources entrusted to us. We protect the security of our technology systems and networks from cybersecurity threats, hacking, service denial attacks, ransom demands and theft by adhering to policies and infosec alerts.

If we become aware of a potential or actual cybersecurity issue, we will immediately report this to the GIS Service Desk.

We use Applied's systems only for business purposes or incidental personal use for lawful, non-commercial activities. We take reasonable care and exercise sound judgment about such use while maintaining our obligation to protect our intellectual property and confidential information. Because our technology systems are owned and controlled by Applied and are intended for business uses, we have no expectation of privacy, subject to local law and policy, with respect to any communication and data. This includes the information that we access, store, or transmit through the systems, networks, and devices during the course of our employment with Applied.

We ensure personal use of Applied's systems does not conflict with the company's interests, violate these Standards of Business Conduct, create security or legal risk, or associate the company with religious, political, or commercial messages that it has not approved.

We honor our commitment to privacy and safeguarding data

Many countries have data privacy laws that govern the appropriate collection and use of personal information. This means information that can be used to identify an individual, either alone or when combined with other identifying information, such as email address, physical address, government identification number, or phone number. We recognize the importance that our employees place on their personal information, and we are committed to fairly, sensitively and respectfully collecting and using this data while incorporating the core data privacy principles of lawfulness, transparency, and security.

We believe responsible stewardship of personal information and data helps maintain trust in Applied – whether personal information of our employees, customers, or other third parties with whom we do business. We help to maintain that trust by being respectful and transparent, and by following our policies and all applicable data privacy laws, when collecting, using, processing, storing, or disclosing personal information.

As Applied employees, each of us is responsible for ensuring compliance with applicable laws and regulations, contractual obligations, and company policies when handling personal information and business partner data. When questions, issues, or concerns arise, we consult a member of the Privacy & Data Governance team or others in the Legal & Compliance Organization.

DID YOU KNOW?

Here are some information security best practices:

- Keep computer updates current
- Only open emails from known senders
- Request permission before installing software
- Do not bypass security controls
- Do not use unauthorized removable storage devices
- Keep passwords secure, never share them
- Do not trust public Wi-Fi (at airports, hotels, etc.)
- Avoid commingling business and personal files

Personal Information is any information relating to an identified, or identifiable, natural person, or other information that constitutes personal data under any applicable law. This includes, for example, name, contact information, national identification number, employee ID, face, fingerprints or handwriting, digital identity, birthdays, and IT user credentials.

APPLIED VALUES IN ACTION

Can I use my company computer to check my personal email and blogs?

Some incidental personal use of company resources is permitted, but if you wish to engage in discussion or promotion of political, social, religious, personal, financial, or commercial views, you must do so on non-work personal time using your own personal email account and equipment.

FIND OUT MORE:

[Document Retention Policy](#)
[Global Internal Privacy Policy](#)
[Global Security Image Taking & Audio Recording Policy](#)
[Information Systems Security Governance Policy](#)
[help/](#)
[privacy/](#)

Culture of Inclusion

Work Environment

Human Rights

Sustainability



Winning Team

... achieve great results together in an environment where employees do their best

WE ACHIEVE GREAT RESULTS TOGETHER IN AN ENVIRONMENT WHERE EMPLOYEES ARE SUPPORTED AND ABLE TO DO THEIR BEST WORK.

WE LEVERAGE OUR TALENT TO BRING HIGH QUALITY PRODUCTS AND SERVICES TO THE MARKET.

We continually build a culture of inclusion and integrity

We are inclusive in all our interactions and leverage our diversity and integrity to solve problems and innovate. We act with respect for our colleagues and promote an inclusive, positive workplace where everyone feels a sense of belonging. We take action to increase employment opportunities for women, underrepresented minorities, people with disabilities, and veterans. We provide reasonable accommodations to qualifying employees to enable them to perform the essential functions of their job. We appreciate and value the differences of others and always treat our colleagues and business partners with the utmost respect.



We create and maintain a positive, safe and productive work environment

We share the responsibility for promoting teamwork and cooperation, as well as maintaining a work environment in which discrimination, harassment, and unsafe work practices are not tolerated. We use only merit and job criteria, such as experience and performance, in decisions regarding recruitment, hiring, promotion, training, compensation, benefits, termination, and social programs.

We must each adopt safe work practices, complete required safety training, and comply with all health and safety laws, regulations, and company policies to protect the safety, health, and general well-being of our workforce.

We honor our commitments to human rights

We respect the human rights and dignity of people throughout our operations and our global supply chain. We comply with and expect our business partners to comply with: (i) laws that promote a diverse workforce, safe working conditions, and individual security; (ii) laws that prohibit forced labor, the employment of underage children, and human trafficking; and (iii) laws that prevent discrimination against employees and workers based on their engagement in any lawful association. Our commitment and approach to these issues are demonstrated in our [Human Rights Statement of Principles](#).

DID YOU KNOW?

It is unlawful to make workforce-related decisions based on race, color, national origin, ancestry, religion, age, sex (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity, marital status, physical disability, mental disability, medical condition, genetic information, family care leave status, veteran status, or any other basis prohibited by law.

APPLIED VALUES IN ACTION

Employees who know or suspect that they or someone else have experienced discrimination should report this immediately – either to their manager, Global Employee Relations, Human Resources, Global Ethics & Compliance, another member of the Legal & Compliance Organization, or Global Internal Audit.

FIND OUT MORE:

[Corporate Responsibility](#)

[Global Policy Against Child and/or Forced Labor](#)

[Human Resources Policy Manual](#)

[Human Rights Statement of Principles](#)

[Statement under the California Transparency in Supply Chain Act](#)

[ehs/](#)

[er/](#)

We commit to sustainability, and we support our communities

We believe in taking meaningful action to advance our vision of making the world a better place. Caring for the environment is part of our corporate responsibility to current and future generations. Our holistic approach to sustainability considers our direct impact and how we run our business (1X), our industry's impact and that of our customers and suppliers (100X), and how our technology can be used to advance sustainability on a global scale (10,000X).

We are committed to contributing to the communities in which we do business and living up to a shared vision of leaving the world a better place. As part of that commitment, we maintain a corporate philanthropy program to support organizations and activities in these communities and ensure that our program complies with all applicable governmental guidelines, as well as internal policies.



DID YOU KNOW?

The Applied Materials Foundation works with nonprofits to advance education, civic engagement, arts and culture, the environment and girls' empowerment. Through the foundation's matching grant and volunteer programs, our employees are able to make a valuable impact on our communities.

APPLIED VALUES IN ACTION

What if I would like to make a donation to a local charity in lieu of giving a gift to a business partner? How should I proceed?

You must first obtain pre-approval by completing and submitting the Corporate Donations Form, which will then be routed to your manager, Communications & Public Affairs (C&PA), and Global Ethics & Compliance for approval.

FIND OUT MORE:

[Corporate Donations Form](#)

[Corporate Responsibility](#)

[RBA Code of Conduct](#)

[esg/](#)

[ethics/](#)

[giving/](#)

Insider Trading

Anti-Corruption

Conflicts of Interest

International Trade

Government Contracts

Accurate Records

Responsibility & Integrity

... operate with mutual trust and respect to make a positive contribution to the industry and community

WE OPERATE WITH MUTUAL TRUST AND RESPECT TO MAKE A POSITIVE CONTRIBUTION TO THE INDUSTRY AND COMMUNITY. WE SEEK GUIDANCE WHEN NEEDED AND TAKE RESPONSIBILITY FOR OUR ACTIONS.

WE COMPLY WITH ALL APPLICABLE LAWS AND REGULATIONS. WE ACT WITH INTEGRITY AND WE HOLD OURSELVES ACCOUNTABLE.

We support a fair and open securities market

We do not trade securities when we have material, non-public (“inside”) information, nor do we provide such information to others.

We may occasionally have access to information that the general public does not have and that a reasonable investor would consider important in making a decision to buy, sell, or hold securities of Applied or that of our business partners. If we possess any material, non-public information of Applied or a business partner, we cannot buy or sell securities of Applied or the business partner until after the information has been disclosed to the public – even if our reasons for trading are not based on that information.

We cannot disclose (or “tip”) material, non-public information to others, including friends, family members, or work colleagues who do not need to know the information and might buy or sell securities on the basis of that information. We also cannot make recommendations or express opinions about Applied’s or another company’s securities on the basis of material, non-public information.

In advance of quarterly earnings releases and other special occasions, certain individuals will receive blackout notices from the Legal & Compliance Organization. Recipients of a blackout notice must not trade in Applied’s securities during the specified blackout period.

We can help to ensure a fair and open securities market by following Applied’s Insider Trading Policy and understanding the prohibitions on insider trading, tipping, and communications around material, non-public information.



DID YOU KNOW?

Material, non-public information can include:

- Undisclosed financial results and projections
- Unannounced mergers and acquisitions
- Unreleased products
- Other information not generally known that a reasonable investor would consider important

APPLIED VALUES IN ACTION

What should I do if my broker contacts me about a short sale transaction involving my Applied shares?

You should not engage in speculative transactions relating to Applied’s securities, including short sales, derivative securities and other hedging transactions, or any transaction that has or is designed to have the effect of hedging or offsetting any decrease in the market value of Applied’s securities.

FIND OUT MORE:

[Insider Trading Policy ethics/](#)

We prohibit all forms of corruption

We must strictly abide by anti-corruption laws everywhere that Applied operates. This includes, but is not limited to, the United States Foreign Corrupt Practices Act (FCPA) and United Kingdom Bribery Act (UKBA), which prohibit all forms of bribery and corruption by our directors, officers, employees, agents, and others acting on our behalf. This means that we never offer, promise, accept or facilitate bribes, kickbacks, or other corrupt activities – including money, favors, gifts, entertainment, donations or other benefits or gratuities that are intended to improperly influence the decision-making of the recipient. This prohibition applies to both public sector and private sector interactions, but we must exercise extra caution when interacting with a Government Entity or Government Official.

When exchanging gifts, meals, entertainment, or travel – or other items or experiences of value – with business partners, you must review and comply with the Global Policy on Giving and Receiving Business Gifts, Meals, Entertainment and Travel (“GMET Policy”), including applicable pre-approval requirements.



We avoid conflicts of interest

We avoid situations where our personal interests could affect our ability to perform our jobs or appear to place our personal interests over Applied’s interests. We disclose any actual or potential conflict of interest, as well as anything that could be perceived as a conflict. This includes the following:

- You want to serve as a member of an outside board or advisory group.
- You or a family member have a financial interest or leadership position in a current or potential supplier, customer, other business partner, or competitor of Applied.
- You are involved in business activities outside of Applied, such as consulting work, part-time employment, or ownership of an outside business.
- You have a close personal relationship (familial or romantic) with someone working for a current or potential supplier, customer, or competitor of Applied, or a Government Official (a “Government Official” is an employee of a government agency, government-owned or -controlled company, public institution, or a political candidate).
- You have a close personal relationship (familial or romantic), or a business relationship, with any director, officer, employee, or contingent worker of Applied.

Global Ethics & Compliance reviews each disclosure, evaluates how the conflict can be managed or whether the conflict is so significant that it cannot be managed.

DID YOU KNOW?

“Government” is defined broadly and includes any government department, agency, office, or instrumentality at any level, including a government-owned or -controlled company or a public institution (such as a government-funded hospital, university, school, or research institute), a public international organization (such as the World Bank or United Nations), a political party, or a royal family. Visit the Global Ethics & Compliance webpage (ethics/ in your Applied browser) to view a list of government-linked companies with which Applied works.

APPLIED VALUES IN ACTION

What should I do if I am asked by a technology start-up to join its technical advisory board? I won’t receive a salary, but I will receive stock in the company, and I will have access to its confidential information and intellectual property. Is this a conflict of interest?

Yes, the above situation presents a potential conflict of interest. Global Ethics & Compliance should evaluate whether the company is an existing or potential supplier, customer, or competitor of Applied, or a potential acquisition or investment target. If it is, it most likely would not be approved.

FIND OUT MORE:

[Conflict of Interest Disclosure Form](#)

[Corporate Donations Form](#)

[Employment of Relatives Policy](#)

[Global Anti-Corruption Policy](#)

[Global Conflicts of Interest Policy](#)

[Global Policy on Giving and Receiving Business Gifts, Meals, Entertainment and Travel \(“GMET Policy”\)](#)

[GMET Approval Form](#)

[ethics/](#)

We comply with international trade regulations

Our ability to quickly deliver our products to customers, wherever they operate around the world, enables Applied to be the trusted supplier of choice. Applied is firmly committed to complying with all applicable import and export regulations in the countries where we do business. We uphold these trade policies and procedures to avoid serious consequences to the company such as product delivery delays, increased audits, seized merchandise, fines, loss of reputation, loss of export and import privileges, and even criminal penalties.

When engaging in international business activities, you should refer to Applied's internal Global Trade site to further understand Global Trade's policies and procedures. If at any time you are unclear about international trade requirements, you should first contact Global Trade with any questions or concerns.

We adhere to government contracting requirements

Applied sometimes enters into product or service contracts with the United States Government as well as governments of other countries, government agencies, and government contractors. These contracts and related procurement processes may be subject to special regulations and impose unique requirements on the Company and our workforce. If involved in the bidding process for government contracts or performance under those contracts, we must understand any special rules and seek guidance as needed from the Legal & Compliance Organization.

We keep accurate records

Applied is a public company with an obligation to maintain accurate financial records and issue accurate reports to its shareholders and the U.S. Securities and Exchange Commission (SEC). We adhere to the company's financial controls and policies as well as to generally accepted accounting principles. We do not make, or induce others to make, false or misleading entries, reports or documentation in connection with expenses, expenditures, or other transactions, or in connection with any other employment or business record.

DID YOU KNOW?

Applied is prohibited from participating in trade boycotts that are not sanctioned by the United States government. To ensure compliance with anti-boycott laws, always have the Legal & Compliance Organization review agreements, transactions, and letters of credit that contain potential boycott-related language.

APPLIED VALUES IN ACTION

What should I do if I feel pressured to "make the numbers work"?

Your first responsibility is to record and report information accurately and honestly. If you feel pressure to do otherwise, speak with someone in Global Ethics & Compliance or another member of the Legal & Compliance Organization. You always have the option of contacting the Ethics Helpline, anonymously if you prefer.

FIND OUT MORE:

[ethics/](#)

[globaltrade/](#)

[legal/](#)



Quality

Fair Competition

Communications

Supplier Integrity

Business Partners

Upholding Our Standards

World Class Performance

... create competitive advantage
and deliver superior results that
generate value and fuel growth

WE PERFORM AMBITIOUSLY AND WITH UNCOMPROMISING INTEGRITY TO DELIVER EXCEPTIONAL PRODUCTS, SERVICES, AND BUSINESS RESULTS.

We are committed to quality

At Applied, quality and continual improvement are everyone's responsibility. We focus on delivering reliable products, quality services, and innovative solutions that meet requirements and delight our customers. We are dedicated to creating and maintaining a culture where defect prevention is a routine part of everyone's job. Delivering quality and reliability solutions to our partners and customers is central to Applied's competitive advantage.

We compete fairly

Applied is committed to competing fairly and winning business in an ethical and legal manner by delivering quality products and services in compliance with all applicable antitrust and competition laws. We do not use unfair or deceptive practices to gain advantage over our competitors.

Our teams work closely with the Legal & Compliance Organization when entering into a new relationship to ensure all terms and conditions are formally documented, defining the rights, obligations, and liabilities of Applied and the other party, as well as the accounting treatment for the particular transaction. We do not make any oral or written commitment that creates a new agreement or modifies an existing agreement without obtaining approvals from the Legal & Compliance Organization and Finance, as well as following other required processes.

We communicate accurately

Unless specifically authorized, we do not communicate on matters related to Applied with the media, government representatives, investors, analysts, or other interested parties. We refer all inquiries from the press or media about the Company to Media Relations. We also refer all requests for Applied participation in third-party press releases, including those from customers and partners, to Media Relations. We recognize that social media provides unique opportunities to listen, learn, and engage with others. We use discretion and sound judgment when posting communications on social media that reference or could be viewed as relating to Applied. We recognize that as employees, our posts can be understood to represent the Applied Materials brand.

Before posting on social media, we should know and adhere to Applied's Global Social Media Policy and Social Media Guidelines and always make it clear that your views are your own and not those of Applied.



DID YOU KNOW?

We are members of the Responsible Business Alliance, "the world's largest industry coalition dedicated to social responsibility in global supply chains."

APPLIED VALUES IN ACTION

What if I become aware of any side deal made outside of the required contract approval process?

If you become aware of any side deal, side letter, or agreement made outside of the required contract approval process, report it promptly to your manager, Global Ethics & Compliance, or other member of the Legal & Compliance Organization.

FIND OUT MORE:

[Global Social Media Policy](#)

[RBA Code of Conduct](#)

[Social Media Guidelines](#)

[quality/](#)

We choose suppliers with integrity

We strive to do business only with business partners that share our values and our commitment to conducting business with integrity and in compliance with the law. We make sure that our extended supply chains do not include companies that abuse human rights, harm the environment, source materials unethically, or engage in unlawful or unethical behavior.

- We select suppliers based exclusively on their business practices, services, and products.
- We build positive relationships with our suppliers built on trust, respect, and collaboration.
- We expect our suppliers to do business ethically and lawfully.
- We deal objectively and honestly with our suppliers and compete fairly in the marketplace.

We work responsibly with business partners

At Applied, we are proud of our reputation for integrity and fairness in our commercial dealings with our customers, suppliers, and industry peers. When we engage in commercial dealings, we must ensure that we always treat our business partners in an ethical and respectful manner consistent with our Standards of Business Conduct.

We uphold our standards

At Applied, we are committed to upholding our shared values and take violations of these Standards and our policies seriously. Non-compliance can have serious consequences to Applied's reputation for honest and fair business dealings. Violations of these Standards, our Company policies, and the law can also carry serious consequences to the individuals involved, including disciplinary action up to and including termination and possibly civil and criminal personal liability.

Waivers

Any waiver of the Standards of Business Conduct for an executive officer or a director may be made only by the Board of Directors and must be promptly disclosed as required by law.



Resources

24-HOUR ETHICS HELPLINE

Report concerns (includes option to report anonymously in most countries)

helpline.appliedmaterials.com



GLOBAL ETHICS & COMPLIANCE WEBSITE

Ethics and compliance policies, procedures, and tips

Go to [ethics/](#) in your internal browser

ASK QUESTIONS OR REPORT CONCERNS

Asking questions or reporting concerns

ethics_everywhere@amat.com

CONTACTS

Directly discuss your questions or concerns

[Global Ethics & Compliance](#)

Legal & Compliance Organization

Global Employee Relations

Human Resources

Global Internal Audit

COMPLIANCE CHAMPIONS

Your Business Unit's Compliance Champion is your primary contact for Ethics & Compliance, Confidential Information and Intellectual Property management related questions

Go to [vip/](#) in your internal browser to see the list of Compliance Champions

