



Global Anti-Bribery and Anti-Corruption Policy	
Subject: Antitrust Bribery and Anti-Corruption Compliance Effective Date: 2/14/2022 Previous Revision Date: N/A (Previously contained as an Appendix to the AMD Worldwide Standards of Business Conduct)	Policy: Global P1201 Global Compliance Policy Revision: N/A

I. Purpose

Advanced Micro Devices, Inc. and its subsidiaries and affiliates (collectively, “AMD” or the “Company”) are committed to conducting business in a fair, ethical, honest and lawful manner and in compliance with all laws, rules, and regulations applicable to our business. The Company complies with all anti-corruption laws everywhere we operate. Accordingly, AMD does not tolerate the giving or receiving of bribes, kickbacks, or other improper payments in connection with our business.

The purpose of this Global Anti-Bribery and Anti-Corruption Policy (“Policy”) is to ensure observance of and compliance with anti-bribery and anti-corruption laws. This Policy also provides guidance aimed at avoiding even the appearance of questionable or corrupt conduct in carrying out AMD’s business.

This Policy applies to everyone, including employees, officers, directors, and third parties, joint venture partners, and other business partners performing work on or behalf of AMD (collectively, “Workers”). The anti-bribery provision in this Policy applies to all third parties acting on AMD’s behalf, including but not limited to subcontractors, consultants, suppliers, distributors, agents, representatives or other vendors (collectively, “Business Partners”).

This Policy supplements the anti-bribery and anti-corruption provisions found in AMD’s Worldwide Standards of Business Conduct (“WWSBC”) and requires compliance with all anti-bribery and anti-corruption laws applicable to AMD in the United States and abroad, including specifically the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Brazil Clean Company law, Russia’s Federal Anti-Corruption Law, and any other applicable anti-corruption laws in countries where AMD transacts business.

II. Definitions

- A “**bribe**” is an offer, promise, or gift of money or anything of value that is given with the intent to influence or reward any person or entity to gain an improper business advantage.



- A “**Government Entity**” is any government; public international organization; department, agency, or instrumentality of such a government or organization; public authority; political party; or a company or entity owned or controlled by or acting on behalf of any such Government Entity.
- “**Government Officials**” include any official from any local, state, national, or international government, branch, agency or entity owned or controlled by the government; anyone working for or on behalf of, or engaged by, a Government Entity to perform duties or functions for such Government Entity, such as a tax or environmental inspector from a government agency or anyone working for a government-owned energy or oil company; members of political parties, party officials or candidates for political office; employees of public international organizations (e.g., United Nations or The World Bank); law enforcement officials; customs officials; taxing or licensing authorities; and/or employees of state-owned entities.
- A “**kickback**” is a form of bribery that involves an agreement to accept or provide money or anything of value in exchange for favorable treatment or services rendered, with any person or entity, including clients, vendors, subcontractors or other third parties.

III. Responsibilities of Workers

All Workers must:

- Read, comply with, and understand how this Policy applies to their job functions;
- Ask their supervisor or AMD’s Law Department for guidance when they are uncertain about how to comply with this Policy;
- Complete all required training and certifications related to this Policy, if any; and
- Report violations or potential violations of this Policy.

Compliance with this Policy is mandatory. If local law imposes stricter requirements than those described in this Policy, Workers and Business Partners must comply with those legal requirements.

IV. Bribery and Corrupt Behavior is Strictly Prohibited

a. Bribes

Workers and Business Partners must not attempt to influence individuals to gain an improper business advantage for AMD. Giving or accepting bribes or entering into kickback agreements to gain an improper business advantage for AMD or to otherwise benefit any Employee or AMD, is strictly prohibited. This prohibition applies when dealing both with private individuals and/or entities, and with Governmental Officials and Governmental Entities.



An improper business advantage for the purposes of this Policy refers to improper actions made in a business context, such as paying or giving anything of value to a Government Official, commercial entity or individual, directly or indirectly, in order to, for example: (1) Influence or prevent a governmental action, or any other action, such as the awarding of a contract, imposition of a tax or fine, or the cancellation of an existing contract or contractual obligation; (2) Obtain a license, permit, or other authorization from a Government Entity or Official that AMD is not otherwise entitled to; (3) Obtain confidential information about business opportunities, bids, or the activities of competitors; or (4) Influence the termination of a disadvantageous contract to AMD.

Bribing or offering a kickback to a relative, friend, or colleague of an individual (including Government Officials and employees of Government Entities) is the same as bribing the individual. Furthermore, engaging a third party to pay a bribe, offer a kickback, or make an inappropriate political or charitable contribution on AMD's behalf is the same as if AMD or an Employee directly engaged in the corrupt behavior and is strictly prohibited.

b. Facilitation Payments

Facilitation payments (also called “grease” or “expediting” payments) are payments made to Government Officials to increase the speed at which they do their job. For example, small payments made to immigration officials to speed up visa processing, or to customs officials to expedite customs clearance can be considered facilitation payments. All facilitation payments, regardless of amount, are prohibited, unless prior written approval has been obtained by the AMD Law Department. This prohibition does not include payment of published expediting fees, such as published premium processing for certain US immigration cases.

c. Special Considerations for Transactions with Government Officials and Entities

Workers and Business Partners may occasionally or even routinely conduct certain transactions with Government Officials or Entities. Pre-approval is not required to conduct routine government transactions. A transaction is a routine government interaction if:

- It involves the payment of taxes or fees, or the purchase of goods or services;
- The amount of payment (if any) is objectively calculated, such as by a predetermined fee schedule or a published tariff, or fees associated with submitting government applications or obtaining copies of official documents; and
- The Government Entity lacks discretion to refuse payment or withhold the goods/services for reasons other than the customer's inability to pay or the Entity's inability to provide the goods/services at the time or place requested.

In contrast, a non-routine transaction with a Government Official occurs when the official has discretion to act. Examples of such transactions include: seeking a special permission business license;



renting space in a government-owned office or industrial park at a negotiated rate; or entering into a contract with a company that is partially owned or controlled by a Government Entity or Government Official. Workers and Business Partners must obtain pre-approval for all non-routine transactions with Government Entities and Government Officials from AMD's Law Department.

d. Engagement with Business Partners

In many cases, bribes, kickbacks or other improper payments or gifts are not given by a company's own employees but are instead offered by third parties using funds provided by the company. Failure to conduct proper oversight of third parties can expose AMD to criminal and civil sanctions. AMD can be held liable for the improper actions of third parties working on its behalf and for ignoring the actions of third parties that pose corruption risks. AMD and any Workers involved in the improper conduct may have liability even if the specific improper action of the third party was not known and warning signs were ignored.

In light of the risks presented by third parties, AMD has policies and procedures that must be followed when engaging any Business Partners (see for example [Global Policies 1150, 1151](#) and [1702](#)). AMD prohibits corrupt offers, promises, and payments of money or anything of value to government or nongovernment officials through third parties. AMD Workers are responsible for clearly communicating this policy to third parties with whom they interact.

In addition, any red flags indicative of possible corrupt behavior or concerns of misconduct over the course of the Business Partner's relationship with AMD must be reported to AMD's Law Department. Such red flags may include, but are not limited to:

- Excessive commissions or fees being charged by a third party;
- Unreasonably large discounts being given to a third-party broker or reseller;
- Consulting agreements that include vaguely described services;
- A third party that represents it is in a particular line of business, but is later discovered to be in a different line of business;
- Requests for payment to offshore bank accounts or to a nominee;
- Requests for reimbursement for unexplained or vague expenses, or insufficient or irregular documentation provided in support of invoices;
- A third party is able to obtain non-public information from government sources;
- A third party is related to or closely associated with a Government Official; or



- A third party is a shell company incorporated in an offshore jurisdiction.

e. Gifts, Hospitality, and Entertainment

The purpose of business gifts and the provision of hospitality or entertainment in a commercial setting is to create goodwill and sound working relationships. However, these business courtesies can sometimes be used to disguise bribery or other improper payments. To ensure that any provision of gifts, hospitality or entertainment is appropriate and reasonable, AMD has implemented gifts, hospitality, and entertainment policies and procedures in its WWSBC and related policies. Workers providing or receiving gifts, hospitality or entertainment related to AMD business are expected to comply with these procedures and guidance and exercise good judgement in each case.

Additionally, **Workers may not provide to, or accept, a gift, travel, hotel, meal or entertainment benefit from a U.S. Government Official.**

Gifts, travel, hotel, meal, or entertainment benefits to non-U.S. Government Officials must:

- Be only for the Government Official;
- Not include family and/or friends of the Government Official unless approved in advance by the AMD Law Department;
- Have been approved in advance by your vice president (or for vice president-level employees, approval by your manager), and the AMD Law Department, before offering or giving benefits to the government official in any commercial dealing; and
- Be properly recorded in the Company's books and records.

Approval requests should be submitted as early as possible prior to the event, and will be evaluated on a case-by-case basis to determine whether the benefits may have the appearance or effect of improperly influencing the recipient. Approval requests must include at least the following information, and you may use the approval form found on the [Law Department](#) page of the AMD Intranet. The following information will be required:

- Description of the benefit
- Value of the benefit
- Identity of the recipient of the benefit, including name, affiliation, position, employer, and location
- Whether the recipient of the benefit is affiliated with a current or prospective AMD customer



- Reason or occasion for the benefit
- If Company-sponsored travel is involved, a daily agenda (including any scheduled leisure activities) and detailed breakdown of Company costs (including airfare, daily hotel rate, and cost per meal)
- Regarding approval of AMD-Paid Travel, Hotels, and Special Events for any government official: The specific facts of each situation must be reviewed by the Law Department, and the following criteria followed:
 - The Company should not specify which foreign official is to attend the event;
 - The Company may not pay expenses for a foreign official's family or friends;
 - The Company will only pay for direct travel to and from the event;
 - The Company will not pay for any side trips;
 - Any meals or entertainment for the foreign official will be governed by the guidelines listed above;
 - The costs of the event must be reasonable;
 - The vendors must be paid directly by the Company;
 - There should be no "per diem" payments.

Examples of legitimate / approvable expenses might include travel to a Company facility for the purpose of demonstrating the Company's products; or hosting a seminar for the purpose of educating potential customers about the Company's products.

Requests for approval of benefits are typically rejected when they involve or include any of the following:

- High-value gifts intended for personal use or consumption
- Long-term loans of Company products
- Cash payments or stipends, or reimbursements paid to a government official (AMD should pay all expenses directly)
- Luxury travel, meals or entertainment, or inappropriate business entertainment



- Company-sponsored travel lacking a substantial business purpose or involving significant leisure time
- Benefits directed to a government official's family or friends
- Contributions relating to training, charities, or other social programs requested by a Government Official (without prior approval of the AMD Law Department)
- Undocumented benefits
- Benefits intended to induce and/or likely to result in an improper business advantage

f. Corporate Political Contributions

Political contributions are generally regarded as anything of value given to support a political or public policy goal. No Employee may make any contributions or payments to political parties, candidates or initiative, referendum, or other political campaigns on behalf of the Company nor may they participate in such activities during Company time, unless such payments are clearly permitted by law and approved by AMD's General Counsel.

Workers who engage in lobbying activities or contact with U.S. government officials on behalf of the Company must inform the AMD Public Affairs Department prior to any planned activity, and abide by all applicable laws that may regulate registration, communications, provision of food and beverage, gifts, transportation, and other issues.

This Policy does not apply to Employee's making political contributions on their own behalf with their own funds.

g. Corporate Charitable Contributions

AMD actively supports charitable giving in communities where it does business. AMD may make charitable contributions to various organizations in those communities, to individuals, in the case of scholarships, or to charitable organizations supported or sponsored by Government Officials. While charitable contributions help AMD generate goodwill and give back to the communities in which it operates, charitable contributions can also present corruption risks. Such contributions may be particularly problematic if a Government Official or Government Entity controls or has influence over the organization that receives the contributions.

Any charitable donations of AMD assets (including use of AMD premises or employee working time) require the approval of AMD Public Affairs leadership. The Policy does not apply to contributions made by Workers on their own behalf using personal funds; however, employees may not make contributions on AMD's behalf without prior approval.



h. Hiring Decisions

AMD employees are hired on the basis of their qualifications, merit, and demonstrated ability to perform the job for which they are hired. AMD prohibits hiring a relative of a Government Official for the purpose of influencing the official's decision-making. Any proposed hiring of a Government Official or a relative of a Government Official as an AMD employee should adhere to AMD's policies and applicable hiring procedures and must be reviewed and preapproved by AMD's Law Department.

i. Joint Venture Transactions, Mergers, Acquisitions, and New Market Entry

From time to time, AMD might expand its business by launching new products, competing for new business, or entering a new geographic market. AMD may conduct these activities through joint ventures, mergers, acquisitions, or new market entries

Acquisitions, mergers, joint ventures, and new market entries can all present corruption risks. For example, AMD can be held liable for bribes paid by a company that it acquires, even if the conduct occurred before the acquisition. Accordingly, before entering into a joint venture, completing a merger or acquisition, or undertaking a new market entry, Workers must ensure AMD's Law Department has been contacted to provide guidance about how to address anti-corruption aspects of the proposed transaction.

j. Recordkeeping, Accounting, and Internal Controls

Workers and Business Partners who enter into transactions on AMD's behalf are required to ensure that all transactions (no matter how small) are recorded promptly and accurately, contain sufficient detail, and are appropriately supported. Records of transactions involving Government Officials must include, at a minimum, information sufficient to prove the benefit recipient's name, position, benefit purpose or occasion, and benefit value. Absolutely no false or misleading information may be provided for any reason. Failure to record or inaccurately recording a direct or indirect transaction with a Government Official or Government Entity is a violation of this Policy. All Workers and Business Partners are responsible for complying with these requirements to the extent applicable to their job functions and roles.

V. Violations and Disciplinary Actions

A violation of this Policy is a serious matter. Any Employee determined to have violated this Policy may be subject to disciplinary action up to and including termination of employment. Any violation of law or this Policy may also result in a loss of incentive compensation, bonuses, or other awards, to the extent permitted by law. Business Partners determined to have violated this Policy will be subject to contractual remedies and, where appropriate, termination of the business relationship. AMD reserves the right to refer potential violations to regulatory and law enforcement authorities, if deemed appropriate under the circumstances.



VI. Compliance Resources and Reporting Channels

Workers and Business Partners are encouraged to ask questions regarding this Policy. Should any Workers or Business Partners become aware of any actual or potential violation of this Policy, or of any applicable law, they must immediately report their concerns. AMD is committed to investigating all concerns promptly and thoroughly, as appropriate. Workers and Business Partners may ask questions or make a report by contacting:

- Your manager
- AMD Corporate Compliance Committee
- AMD Law, Internal Audit, or Human Resources Departments
- AMD Aware, AMD's confidential ethics helpline:
 - Via secure web portal: AMD Aware.amd.com
 - Via phone
 - In the U.S. or Canada: 1-800-381-6221
 - Outside the U.S. or Canada: telephone numbers listed in "Reporting Concerns" section of the WWSBC

AMD will not tolerate retaliation against any individual who submits a good faith report of a violation or participates in a related investigation. Any individual who believes they may be the target of retaliation should promptly report the matter to AMD's Law Department. Retaliation itself is a violation of our Worldwide Standards of Business Conduct, with consequences up to and including termination.