

# Intuit Code of Conduct & Ethics



integrity

## Message from Intuit's President and Chief Executive Officer



**Integrity Without Compromise is at the core of everything we do at Intuit.** It's our first Operating Value and the standard for how we do business every day. We formally adopted it as part of our Values back in 1993, and it's been an implicit part of our culture since day one. Living up to that value is more than using good judgment and common sense. It's an important part of becoming the best, most-admired company in the world.

Intuit's Code of Conduct and Ethics takes this commitment to the next level. It explicitly explains how our Values and culture guide us in making the right decisions in our daily jobs. As the cornerstone of our Ethics and Compliance Program, the Code provides important information about our business relationships and practices, the proper use of company assets, safeguarding and protecting information, and how to seek help and report concerns.

Nothing is more important to our culture – and our success – than our integrity. That's why the Code of Conduct has my personal support, as well as the support of our leadership team and Intuit's board of directors.

This Code is more than just required reading for all of us at Intuit. Take the time to understand it, know what's expected of you, and how it relates to your job. By committing to our Values and embracing the Code, together we will continue to make Intuit a company where Integrity Without Compromise is not just a slogan, but a way of life.

Thank you for all you do to continue to make Intuit a world-class, ethical organization.

A handwritten signature in white ink that reads "Brad D. Smith". The signature is written in a cursive, flowing style.

Brad



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# I. INTRODUCTION

Our [Operating Values](#) define our company culture and have represented the heartbeat and spirit of Intuit since 1993 when employees first defined them. They are the foundation for our actions and our decisions, shaping everything we do, from how we develop and market our products to how we serve our customers, employees, and communities.

In 2010, we refreshed our Values to reflect the company we have become and the company we aspire to be. Our six refreshed Operating Values are:

- **Integrity Without Compromise.**
- **Delight Customers.**
- **It's the People.**
- **Innovate and Improve.**
- **Own the Outcome.**
- **We Care and Give Back.**

The first of those Values, Integrity Without Compromise, is at the heart of everything we do.

**“We hold ourselves and each other to the highest standards in all we say and do.  
Our actions and communications are always direct, honest, and transparent.”**

This Code of Conduct & Ethics (referred to as the Code of Conduct or the Code) is an important part of our Ethics & Compliance Program. Our Code provides a written standard for upholding our Operating Values and reinforces our expectation that everyone at Intuit will comply with the law and our corporate policies and guidelines.

**Our Code of Conduct establishes our standards for:**

- Honest and ethical conduct, including the disclosure and ethical handling of actual or apparent conflicts of interest.
- Full, fair, accurate, timely and understandable disclosure in the reports and documents that Intuit submits to any governmental agency, as well as in other public communications.
- Compliance with applicable government laws, rules and regulations.
- Prompt internal reporting of violations of our standards.
- Accountability for adhering to this Code of Conduct and other company policies and standards.

## II. YOUR RESPONSIBILITIES

This Code of Conduct applies to all employees of Intuit and its subsidiaries working at every level. When we mention “Intuit” in this document, we’re referring to Intuit Inc. and all its subsidiaries.

As an employee, you are expected to read the Code of Conduct, understand your obligations under it and comply with the standards it sets. Failing to read the Code of Conduct or to ask questions when in doubt will not excuse you for violations or a lack of understanding of the Code. In addition, we expect you to take all required trainings on a timely basis.

The Code of Conduct provides an overview of Intuit’s expectations and standards around ethical behavior and compliance. However, it’s impossible to cover every situation you may face or every law or standard you need to follow. If the Code does not address a particular topic, please use good judgment and common sense, basing your decision on Integrity Without Compromise. If you’re unsure about the right legal or ethical choice, be sure to seek guidance from your manager or the [Ethics & Compliance Program Office](#) *before* taking action.

The Code is based primarily on United States laws. Under some circumstances, local country laws may be less restrictive than our Code. In those situations, you must comply with the Code even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than our Code, you must comply with the applicable local laws. If you work outside the United States, it is your responsibility to understand and comply with all local laws and policies in the area where you conduct business.

### A. Additional Responsibilities for Managers

Managers at all levels have a special responsibility to engage in ethical behavior and ensure that employees under their supervision understand and comply with Intuit standards and policies.

#### It is especially important that managers:

- Understand the Code of Conduct.
- Regularly reinforce and discuss principles set forth in the Code and be available to their team members to discuss questions and concerns.
- Ensure that their employees take all required trainings on a timely basis.
- Seek guidance from the [Ethics & Compliance Program Office](#) whenever they have a question about the Code of Conduct.



## III. SEEKING GUIDANCE AND REPORTING CONCERNS

In addition to seeking guidance and clarification as needed, you are expected and required to report any conduct that does not live up to Intuit's values, such as suspected violations of the law, this Code of Conduct, other corporate policies and standards, and improper accounting and financial reporting practices. Failure to report may result in discipline up to and including termination of your employment.

### A. Where to Seek Guidance or Report Concerns

There are several channels available that ensure your question, issue or concern is addressed in a timely and meaningful way:

**Your Manager** – Your manager is an excellent resource for seeking guidance and help, sharing ideas and resolving issues. We encourage you to contact your manager as your first line of support.

**Intuit Leadership Team** – You may also seek guidance from anyone on Intuit's leadership team. Any leader you are comfortable approaching will be able to assist you and help you find the appropriate resources.

**Human Resources** – Human Resources is an important channel to help you address concerns and discreetly discuss your matter. You may always contact the Human Resources Business Partner responsible for your business unit or functional group, or [HR Connect](#) by calling 800-819-1620 or x13333.

**Ethics & Compliance Program Office** – The Ethics & Compliance Program Office helps promote an organizational culture of ethical behavior and compliance with the law and in administering this Code of Conduct. You may also contact the [Ethics & Compliance Program Office](#) directly via the [Ask Ethics QuickBase](#), or by sending a letter to:

**Intuit Ethics & Compliance Officer**  
P.O. Box 7850, MS 2700C  
Mountain View, CA 94039

**Intuit Integrity Line** – If you are not comfortable using any of the above options, please seek help or report your concerns through the Intuit Integrity Line. The trained professionals working there will protect your anonymity and confidentiality to the fullest extent possible. Please provide as much information and detail as possible when using this channel. All matters reported will be looked into and handled appropriately.

- Intuit's Integrity Line is an external, third-party service available to you for anonymous reporting 24-hours a day, seven days a week, and 365 days a year. The staff will report your questions or concerns to Intuit in a timely way.
- You may contact the Integrity Line by:
  - Calling toll-free at 877-379-3939.
  - From outside the U.S., dialing the direct access code for the country from which you are calling, followed by 877-379-3939. ([Contact a local operator to find a direct access code.](#))
  - Or, go online to complete an [Integrity Line Web form](#).

**Special note for employees located in the European Union:** EU laws and regulations prohibit EU employees from anonymously seeking guidance or reporting a matter unless the concern falls into one of the following areas: (i) accounting, (ii) internal accounting controls, (iii) auditing matters, (iv) fight against bribery, or (v) banking and financial crime. Intuit makes the anonymous features of the Intuit Integrity Line available to EU employees for such concerns. For all other areas of concern, EU employees may use one of the non-anonymous channels outlined above. The data related to these concerns or reports will be retained as permitted under applicable law.

If you have any questions regarding these reporting channels, your responsibilities, seeking help or reporting concerns, please contact the [Ethics & Compliance Program Office](#).

### **B. Your Responsibility to Cooperate**

Living up to Integrity Without Compromise requires us to always act honestly and transparently. Intuit expects and requires you to cooperate and provide truthful information when asked to participate in any investigation of a violation of the Code, any law, regulation or other matter.

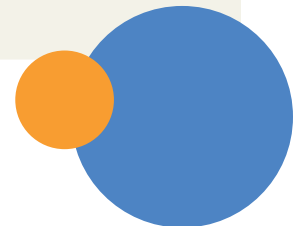
## **Living the Code**

**Q: What should I do if my manager is engaged in behavior that seems inconsistent with our Code or makes me uncomfortable?**

**A:** If your manager's behavior seems inappropriate, you can contact HR Connect, the Ethics & Compliance Program Office or the Intuit Integrity Line to share your concerns. They'll investigate and protect you from retaliation.

**Q: I reported a concern, but haven't heard back. Should I assume nothing has been done?**

**A:** No. To protect confidentiality and privacy, we cannot share findings of certain investigations. And, in the case of anonymous reporting, we may not have a way to report the status of the investigation back to you. If you haven't heard anything and still have a question or concern, please raise the issue again.



## IV. PROTECTION FROM RETALIATION

Intuit does not tolerate retaliation, and we will make every effort to protect those who report concerns or cooperate in an investigation in good faith. Any employee who retaliates against another will face disciplinary action, up to and including termination of employment, and may be subject to civil or criminal liability, or both.

If you believe you are being penalized for having reported an issue or cooperated in an investigation, please report the matter immediately using one of the reporting options referenced in Section III, *Seeking Guidance and Reporting Concerns*.

## V. IN THE WORKPLACE

It's the People, another of our Operating Values, defines us.

**“We are high-performing people who achieve great things.  
We embrace personal growth and development, diversity, and teamwork.”**

Intuit lives this Operating Value through our commitment to diversity and inclusion, preventing unlawful discrimination, harassment and retaliation, and promising to provide a healthy and safe work environment.

### A. Creating an Environment of Global Inclusion and Diversity

Intuit strives to hire a strong, diverse workforce. Diversity creates global inclusion, inspiration and innovation. By attracting and maintaining a diverse workforce, we create an environment where differences are valued and respected – differences in experience, background, and opinion.

### B. Preventing Discrimination and Harassment

Intuit is committed to providing equal employment opportunities for all applicants and employees and maintaining a workplace free from discrimination, harassment and retaliation. We do not tolerate this type of behavior by anyone. This includes unlawful discrimination or harassment on the basis of sex, race, color, religion, gender, age, mental or physical disability, medical condition, national origin, ancestry, marital status, veteran status, sexual orientation, gender identity, genetic information, or any other characteristic protected under applicable laws. This principle applies to all areas of employment, including recruiting and hiring, promotions and transfers, compensation and benefits.

If you believe you have observed or been subjected to unlawful harassment, discrimination or retaliation, you should immediately contact [HR Connect](#) or the [Integrity Line](#).

You can find more information about related policies on Insight, Intuit's intranet, including: [Equal Employment Opportunity](#), [Reasonable Accommodation and the Americans with Disabilities Act](#), and the [Prohibition of Harassment and Protection from Retaliation Policies](#). There may be additional local policies and/or guidelines in your location. For more information, contact your manager or [HR Connect](#).



## C. Maintaining Health and Safety

Intuit is committed to maintaining a healthy, safe and productive workplace and follows all laws and regulations related to workplace safety.

### 1. Preventing Workplace Violence

Intuit does not tolerate violence, threats of violence, or other conduct that threatens or harms the safety of persons in the workplace. We don't allow firearms, explosives, or weapons of any kind in the workplace, even if you possess a permit to carry concealed weapons. We also prohibit weapons at off-site locations where Intuit business is conducted and at Intuit-sponsored events. You can find more information in our [Workplace Violence Prevention Policy](#) on Insight. There may be additional local policies and guidelines in your location. For more information, contact your manager or [HR Connect](#).

### 2. Alcohol Use and Drug-free Workplace

Intuit strives to provide a safe workplace for all of its employees. While at work, you may never use, possess, or be under the influence of any illegal or unauthorized controlled substances. In addition you may not have excessive amounts of otherwise lawful, controlled substances in your system – such as alcohol and over-the-counter medications – that impair your ability to work or make you appear to be “under the influence.” These rules apply whether you are on or off Intuit property, including parking lots. Regardless of the occasion, we expect you to act responsibly and abide by all local laws and regulations. Nothing in this Code of Conduct or our policies preclude the appropriate use of legally prescribed medications.

You'll find more information in the [Drug-free Workplace Policy](#) on Insight. There may be additional local policies and guidelines in your area. For more information, contact your manager or [HR Connect](#).

You may direct health or safety concerns to [safety@intuit.com](mailto:safety@intuit.com). In addition, you can reach an Intuit Security team member 24 hours a day, seven days a week, 365 days a year by calling 650-944-6911. You can make anonymous reports through the [Intuit Integrity Line](#). Immediately report all emergencies and imminent threats of harm to the police or other emergency personnel (9-911 from U.S. Intuit sites). For more information on Intuit's safety and security programs, go to the [Safety and Security](#) page on Insight.

## Living the Code

**Q:** Last week was my department's offsite and it seemed like people were enjoying themselves too much. Several co-workers got drunk and were at the hotel pool acting rowdy. I'm embarrassed to have Intuit's name associated with this event. What can I do?

**A:** Intuit's Operating Values, policies and this Code apply any time and anywhere you are conducting Intuit business. That includes off-campus Intuit-related events. If you have observed inappropriate or offensive behavior, you should report your concerns to your manager, HR Connect or the Integrity Line.

## VI. AVOIDING CONFLICTS OF INTEREST

A conflict of interest is any activity where your personal interests are inconsistent with, or appear to be inconsistent with, Intuit's interests. You have a responsibility to avoid actual or potential conflicts of interest or the appearance of a conflict of interest, which can undermine your personal reputation, as well as Intuit's business reputation. You must ensure that any outside business activities by you or your family do not create a conflict with Intuit's interests. It is not possible to list all possible conflict situations, but some examples of situations where conflicts of interest may arise include:

- **Personal Interest:** You or a family member having a significant financial or personal interest in a supplier or vendor with whom Intuit does business, and attempting or appearing to influence Intuit's business decisions related to that supplier or vendor.
- **Gifts, Meals, Entertainment or Hospitality:** Accepting gifts, services, meals, entertainment or hospitality from a supplier, vendor, partner or customer where acceptance interferes, or appears to interfere, with your objectivity in making a business decision.
- **Discounts:** Accepting discounted products or services for personal gain in exchange for providing special treatment or consideration to a vendor, supplier, partner or customer.
- **Outside Employment:** Simultaneous employment with a company or individual Intuit has a relationship with (such as a customer, partner or vendor), or participating in any activity that competes with Intuit's current or reasonably anticipated future business strategy.

You should always disclose any conflict of interest to your manager. The [Ethics & Compliance Program Office](#) is always available as a resource. In certain situations, which are described below, you must disclose and seek guidance from the Ethics & Compliance Program Office before taking on or continuing the activity in question. This guidance may include asking you to end the activity that raises the conflict of interest.

The following sections provide additional guidance on how to handle some of the most common conflict situations you may be faced with as an Intuit employee.

### A. Outside Employment, Ideas and Inventions

Your work at Intuit requires your full attention and loyalty. For this reason, you may not perform work for another company if it interferes with your ability to do your job at Intuit. You should disclose all outside employment to your manager.

Additionally, Intuit may limit the type of work you may perform for another company if the activity creates or appears to create a conflict of interest or otherwise violates this Code of Conduct. Generally speaking, to prevent your outside activities from creating a conflict of interest or potential conflict of interest you should not:

- Conduct outside work or develop an idea or invention for an outside interest in an area related to Intuit's current or reasonably anticipated future business strategy.
- Use Intuit confidential information for your own benefit, or the benefit of others.
- Use any Intuit resources or assets for your outside work, ideas or inventions.



- Use your position at Intuit to solicit business or to obtain a favorable benefit for your outside work, ideas or inventions.

These guidelines also apply to employees who wish to create an idea or invention outside of Intuit. Consult with the [Ethics & Compliance Program Office](#) before developing an idea or invention outside of work that may relate in any way to Intuit's current or reasonably anticipated future business strategy. Intuit's Intellectual Property Group will obtain written permission from your organization's product development vice president and from the organization most closely aligned to the idea or invention. Refer to Section VIII, *Company Resources, Privacy and Protecting Information*, for further information on Intuit's intellectual property rights.

### B. Board and Advisory Board Memberships

Before serving on the board of directors or joining an advisory board of an outside for-profit business, you should disclose your plans to your manager and seek approval of the [Ethics & Compliance Program Office](#). As a general rule, membership on boards of nonprofit organizations or industry associations should not create a conflict of interest; however, you should disclose your plans to your manager, as well as any potential conflicts between Intuit's business interests and those of the organization. In such cases, the [Ethics & Compliance Program Office](#) is available as a resource for further guidance.

### C. Investments in Other Businesses

During your employment with Intuit, you or your family members may have opportunities to invest in companies that are (or are reasonably likely to be) Intuit partners, suppliers, vendors, competitors or customers. You must ensure that such investments don't create a conflict of interest with Intuit. You should reach out to your manager and the [Ethics & Compliance Program Office](#), or both, for further guidance before investing. Whether such investments can create a conflict of interest depends on:

- Your ability to influence or appear to influence decisions or transactions between Intuit and the other company.
- How similar the other business's strategy is to Intuit's current or reasonably anticipated future business strategy.
- Whether you will personally gain at Intuit's expense (such as when you own an interest in a competitor,

a company Intuit is considering buying or in which Intuit otherwise invests its money or resources).

- Your access to the confidential information of Intuit or the other company.

If you join Intuit with pre-existing interests or investments that could create a conflict of interest, you should disclose those investments immediately to your manager and the [Ethics & Compliance Program Office](#) to determine the appropriate steps to address the conflict.

### D. Business with Family Members

You should not conduct Intuit business with family members, nor should you use your position at Intuit to obtain favorable treatment for yourself or for your family. This includes hiring employees, or selecting contractors, partners, vendors or suppliers. You must disclose all situations in which you or your work group is conducting business or considering conducting business with a family member to your manager, [HR Connect](#) or the [Ethics & Compliance Program Office](#). These resources can help determine whether the relationship may proceed and under what circumstances. This may include restrictions on your ability to make decisions about the hiring, supervision and evaluation of the services or person.

### E. Gifts, Meals, Entertainment and Hospitality

Giving and receiving gifts, meals, entertainment or hospitality in the course of business may create a conflict of interest that can undermine the integrity of the relationship between the giver and the recipient. There are serious consequences for failing to follow the rules, which is why it is important for you to use good judgment in these situations. The following guidelines should assist you in determining whether giving or accepting gifts, meals, entertainment or hospitality is appropriate. However if you have questions about a specific situation, you should consult your manager or the [Ethics & Compliance Program Office](#).

#### 1. Gifts

Intuit defines a gift as any object or service that you do not pay for, or something for which you pay less than fair market value, such as tickets to a sporting event or discounted products or services. Neither you nor members of your immediate family may

give or accept a gift, regardless of the value, if accepting it interferes or appears to interfere with your ability to make objective business decisions. Permissible gifts include those that are:

- Given openly and directly, without an expectation of anything in return.
- Unsolicited.
- Not in the form of cash or a cash equivalent, such as a Visa or other type of check or cash card.
- Not significant in value. Gifts must comply with the [Intuit gift limits](#).
- Not a regular occurrence, such as once a week or once a month.
- Not accepted as part of or during a business negotiation.
- In compliance with global anti-corruption laws or any other local law and with the policies of both the giver and the recipient.

## 2. Meals, Entertainment or Hospitality

“Hospitality” or “entertainment” is a term that refers to meals or leisure events and activities with third parties affiliated with Intuit, such as suppliers, vendors, partners and customers that are generally considered outside of the scope of a structured business setting. This includes activities such as sporting events, lunches, dinners, concerts and golf.

As with gifts, neither you nor members of your immediate family may give or accept hospitality or entertainment, regardless of the value, if accepting it interferes or appears to interfere with your ability to make objective business decisions.

In general, you may accept invitations to attend and participate in these events if the hospitality or entertainment meets the following conditions:

- The hospitality or entertainment is offered openly and directly, without an expectation of anything in return.
- It is unsolicited.
- It is not a regular occurrence, such as once a week or once a month.
- You do not accept entertainment, hospitality or meals as part of or during a business negotiation.
- The hospitality, meal or entertainment is in compliance with global anti-corruption laws or any other local law and with the policies of both the giver and the recipient.
- There is a legitimate business purpose for attending.
- The event or activity is of a reasonable dollar value and is easily available, such as a regular season baseball game or football (soccer) game, but not the World Series or World Cup matches.
- The third party (supplier, vendor, etc.) attends with you. If not, the hospitality or entertainment is a gift and subject to the [Intuit gift limits](#) and guidelines above.



All gifts, meals, entertainment or hospitality given on behalf of Intuit must be properly recorded on Intuit's books. You should not use your own money or resources to pay for gifts, entertainment or hospitality for Intuit partners, suppliers, vendors or customers offered in the course of doing business. Any exceptions to the gifts, meals, entertainment or hospitality guidelines require disclosure to the [Ethics & Compliance Program Office](#) and the advance written approval of your department's vice president.

### **3. Government Officials**

Giving anything of value to a government employee or official is strictly regulated and, in many cases, prohibited by law. You must comply with U.S. federal, state and local laws, as well as laws in other countries governing the acceptance of business gratuities and/or courtesies. Before authorizing, providing or paying for any gifts, meals, hospitality, entertainment or anything of value to any government official or agency, you must consult Intuit's [Global Anti-Corruption Policy](#). Any exceptions to the [Global Anti-Corruption Policy](#) require advance approval from [Intuit's Corporate Affairs Group](#) or the [Ethics & Compliance Program Office](#). Refer to Section VII, *Complying with Laws, Guidelines and Standards*, for more information.

### **F. Speaking Fees and Honoraria**

Speaking at events, when it is determined to be in Intuit's best interest or to further your role at Intuit, is part of your normal job responsibilities. Because Intuit pays you for the time you spend preparing, attending and delivering the presentation, you should not request or accept any forms of compensation. If offered a speaking fee or honorarium, you should decline it, or request it be donated to a nonprofit charitable organization consistent with Intuit's [We Care and Give Back program guidelines](#).

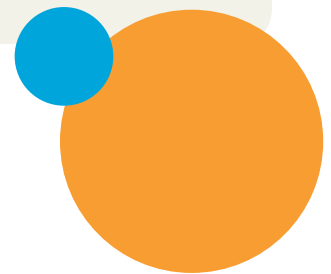
## Living the Code

**Q: My boyfriend has a business doing just the kind of tax analysis work that Intuit needs. It is part of my job responsibilities to identify and hire a vendor to provide this tax analysis. Would it be a conflict of interest for me to hire my boyfriend's company?**

**A:** Although you know that your boyfriend's company has just the right skills for Intuit's work, hiring someone with whom you have a close personal relationship creates an apparent conflict of interest. Even though your boyfriend may be the best qualified for the job, others may think that your judgment has been influenced by your relationship. If you believe that your boyfriend's business is the right choice for Intuit, you should fully disclose the relationship to your manager and remove yourself from the selection process.

**Q: My role requires me to evaluate potential partners for a deal and recommend the best one to management. I have worked with one of the bidding companies before and I know the people there very well. In fact, they just sent me a wedding gift – beautiful, sterling silver candlesticks. We both know that I won't make my decision based upon the gift, so it's OK to keep it, right?**

**A:** Keeping the gift creates an apparent conflict of interest, even though you know that you won't make the decision of which partner to recommend based on the wedding gift. Others, including the giver, may think that your judgment has been influenced, especially because you received the gift during the evaluation process. In addition, the gift is not one that is modest in value and likely exceeds the Code's guidelines. The best solution is to return the gift to the giver or donate the gift to a charitable organization and advise the giver of your donation. It is important to let the giver know that you did not keep the gift so they know that your judgment was not influenced.



## VII. COMPLYING WITH LAWS, GUIDELINES, AND STANDARDS

We expect you to conduct yourself ethically, professionally and with the utmost integrity and transparency in all business dealings related to Intuit, including complying with all applicable laws, rules and regulations. We also expect our business partners, suppliers, contractors and agents to abide by similar values and standards and will always act with integrity and in accordance with applicable laws, rules and regulations.

Depending on your role and job function, there are several areas of compliance that may apply to you in your day-to-day work. They're discussed in more detail below. If you have questions about how these provisions apply to you, or your obligations under them, contact your manager and the [Ethics & Compliance Program Office](#) before undertaking the activity.

### A. Insider Trading Prohibition

As part of your job, you may have access to significant information about Intuit's business – or our vendors and partners – that has not been publicly disclosed. Trading in Intuit's stock – or the stock of those other companies – based on material nonpublic information is a serious violation of U.S. federal law, foreign laws and Intuit policy. In this context, "material nonpublic information" means information not publicly announced by Intuit that a reasonable investor would consider important in deciding whether to buy or sell shares of stock.

#### Examples of material nonpublic information could include:

- Merger, acquisition or divestiture discussions.
- Significant changes in Intuit's financial condition.
- Undisclosed earnings results or guidance.
- Major product announcements or defects.
- Major financing or restructuring activities.
- Changes in executive management that have not been announced.

This is only a partial list. If you have questions about the materiality of specific types of information, review Intuit's [Insider Trading Policy](#), talk with your manager or consult with the [Ethics & Compliance Program Office](#) before trading.

Federal and foreign securities laws and Intuit policy also forbid you from tipping or passing on material nonpublic information to people outside Intuit, including family members, friends, business associates and personal advisers.

Intuit's management establishes quarterly trading windows and special, one-time trading windows, during which specific employees are prohibited from trading in Intuit stock. You are responsible for complying with all trading windows. If you have any questions about the windows, consult the [Insider Trading Policy](#) or contact the [Ethics & Compliance Program Office](#).

The insider trading policy applies to you, your immediate family members and others in your household. Violation of insider trading laws or this policy can result in disciplinary action as well as severe civil and criminal penalties. You can find more information regarding trading limitations, trading windows, and inside information in the [Insider Trading Policy](#) on Insight or by contacting the [Ethics & Compliance Program Office](#).



## B. Antitrust and Competition Laws

As part of Integrity Without Compromise, we promote a free and open marketplace for the products and services we sell and the goods, services and talent we acquire. Our policy is to comply with all applicable global antitrust and competition laws. Antitrust laws – also known as anti-monopoly, competition or consumer protection laws – are intended to preserve competition by prohibiting actions that could unreasonably restrain trade in a free marketplace. Generally, these laws regulate the way we (i) sell to customers; (ii) acquire supplies, services, real estate, workers and customers; and (iii) interact with our competitors. For purposes of these laws, a competitor is anyone with whom Intuit competes for anything of value, such as goods, services, real estate or workers.

Although the spirit of these laws is straightforward, their application to particular situations can be quite complex. Some things are almost always illegal and are prohibited by Intuit policy. While this list is not exhaustive, you should never:

- Agree with a competitor to raise, fix, or maintain the price to be charged or paid for a particular product or service.
- Agree with a competitor to divide up markets, either by customer or region (e.g. Intuit agrees not to sell into a competitor's region and the competitor agrees not to sell into Intuit's region).
- Agree with a competitor to pre-determine the winning bidder or otherwise limit or eliminate competition among potential bidders.

Some activities may not be illegal, but can raise significant risk for Intuit. As a result, you should exercise extreme caution whenever you:

- Share competitively sensitive information with a competitor. In particular, in areas where we compete with a competitor, you should never share price, contract terms and compensation data with such competitor unless you have engaged the Legal Department to set up appropriate safeguards.
- Make statements (such as in e-mails, IMs, presentations or anyplace else) that wrongly suggest that Intuit has few or no competitors or that we seek to harm our competitors or improperly exploit our success.

In addition, you should always:

- Consult the Legal Department before engaging in any cooperative venture with a competitor or potential competitor such as a joint venture, joint advertising, joint purchasing or joint research and development agreement.
- Limit contact with competitors to legitimate business purposes only.
- Treat competitors with integrity.

If you have a question about how to apply these laws to your work, seek guidance from your manager or the [Ethics & Compliance Program Office](#).

## C. International Trade

Intuit expects you to comply with all applicable laws and regulations concerning importing and exporting products and services. This includes complying with regulations preventing U.S. companies from supporting or cooperating with an unsanctioned boycott of another country, or from doing business with certain persons or entities. Please refer to the [International Trade Office](#) on Insight for further information or contact the [Ethics & Compliance Program Office](#) for guidance.

## D. Global Anti-bribery and Anti-corruption

Bribery and corruption are inconsistent with Intuit's first value of Integrity Without Compromise and are harmful to a free and open marketplace. Bribery is never allowed. A bribe is a payment, gift or an offer to provide anything of value to improperly influence someone in their official or professional capacity, or to induce someone to use their influence improperly. You may not offer, make or accept a bribe. Similarly, you should never encourage someone else to act illegally to further Intuit's business. This is known as a direct or indirect corrupt offer.

Global anti-corruption laws such as the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and similar regional laws prohibit, among other things, bribes and corrupt offers to a government official. The term government official may include an employee of a government-controlled company, political party, party member, party official, candidate for political office, official of a public international organization, royal family members or relatives of any of these individuals. These laws apply to all Intuit employees, officers and directors and also to our agents, consultants, distributors, contractors or anyone working on Intuit's behalf. That is why we only seek to engage and retain business partners who share our commitment to Integrity Without Compromise. Penalties for violating global anti-corruption laws are severe and can include large fines and prison time. Refer to Intuit's [Global Anti-Corruption Policy](#) for specific guidelines on anti-corruption laws or contact your Legal Business Partner or the [Ethics & Compliance Program Office](#) for further guidance.

## E. Interacting with Government Entities and Government Officials

In addition to standards set in the Code, there are specific regulations, rules and laws that you must follow when you are engaging with government entities and government officials.

### 1. Gifts, Meals, Hospitality and Entertainment

Giving anything of value to a government employee or anyone discharging a governmental function may be viewed as a bribe under applicable anti-corruption or anti-bribery laws.

Before authorizing, providing or paying for any meals, travel or lodging expenses, entertainment, hospitality or gifts, or giving anything of value to any government official or agency you must consult Intuit's [Global Anti-Corruption Policy](#). Any exceptions to the [Global Anti-Corruption Policy](#) require advance approval from Intuit's [Corporate Affairs Group](#) or the [Ethics & Compliance Program Office](#). Refer to Section VII.D. *Complying with Laws, Guidelines, and Standards, Global Anti-bribery and Anti-corruption* for more information on these laws.

### 2. Political Contributions and Lobbying

Business contributions to U.S. political campaigns are strictly regulated by U.S. federal, state and local law. Similar restrictions, policies and procedures apply in other countries. Accordingly, all political contributions involving Intuit funds, whether inside or outside the U.S., must be coordinated and approved in advance by Intuit's [Corporate Affairs Group](#). You may make personal political contributions as an individual citizen, but not on Intuit's behalf. You can find more information on Insight at Intuit's [Corporate Affairs Group](#) or contact the Ethics & Compliance Program Office for guidance.

You may not lobby on Intuit's behalf. Additionally, you should never appear to represent Intuit in lobbying activities without the advance, written authorization from the [Corporate Affairs Group](#). For example, you may not prominently wear Intuit's logo, insignia or other identifying marks while participating in a lobbying activity that could reasonably be associated with our business. Please consult with Intuit's [Corporate Affairs Group](#) if you have any questions on this matter.

### 3. Governments as Customers

Government entities are unique customers that require specific bidding, pricing, certification and other requirements based on significant federal, state and local rules and regulations for government contracts. This is true in the U.S. and in other countries. When working with government entities who are customers or prospective customers, you are responsible for understanding and complying with all of the special rules and regulations that may apply. Accordingly, all business opportunities with a government entity, including submitting bids, must be coordinated with and pre-approved by Intuit's [Corporate Affairs Group](#) and the Legal Department's [Business and Legal Team](#).

## Living the Code

**Q: My business unit is thinking about changing the pricing on its flagship product. I thought it might be helpful for me to have lunch with my buddy, who works for our main competitor, to explore whether his company is contemplating changing its pricing too. Is this OK?**

**A:** No, you may not discuss pricing information with your buddy. Intuit respects and complies with the laws that protect and promote competition. Among other things, these laws prohibit competitors from collaborating on pricing decisions. You also may not discuss with competitors any confidential information, such as future pricing details, costs, margins or similar sensitive information. If your buddy tries to discuss these matters with you, stop the conversation immediately and report the situation to the Ethics & Compliance Program Office.

**Q: Our business unit could accelerate its journey to mobile if it purchased a key technology that we currently get from a vendor. Since there are only two small companies that provide that technology, I'm concerned that our competitor will purchase both companies leaving Intuit without the technology. I plan to contact my counterpart at the competitor and propose that Intuit purchase one of the technology vendors and the competitor purchase the other. That way, we'll both have the technology we need, and neither company will bid up the price. We can keep this confidential by doing this orally, instead of entering into a formal, written agreement, right?**

**A:** Agreements to divide or carve up a market for technology, talent, customers, real estate or anything of value violate the antitrust laws since they restrain competition. The fact that you are not entering into a written contract does not make this behavior less improper. In fact, anytime someone asks you not to put something into writing so that it will remain confidential, you should be concerned that the conduct proposed is improper. If you have more questions about this, contact the Ethics & Compliance Program Office.

**Q: Our competitor called and asked me to share with him the license fees and royalty terms Intuit has negotiated with TechCo, a provider of key technology used by both Intuit and the competitor. He has promised to share with me the license fees and royalty terms that they are able to negotiate with TechCo so that both companies can be sure we are getting the best deal. Is it okay for me to give him this information?**

**A:** No, you should not engage in any exchange of cost or pricing data with a competitor. It does not make any difference whether the information sought relates to products or services Intuit sells or to those which it buys.

**Q: I'm trying to get a permit for a new Intuit office building and the local government employee is suggesting that if I could provide her with a bicycle for her son, she could really help speed up the process. This permit is critical for us to meet our project plan to open the office on time. What should I do?**

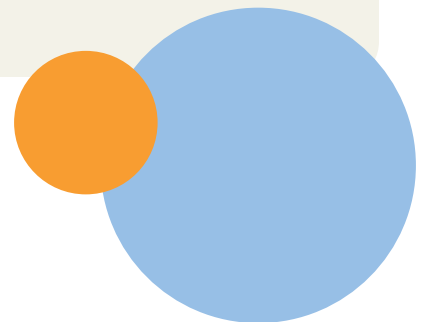
**A:** It is inappropriate to offer anything of value to influence someone in their official or professional capacity, or to induce someone to use their influence improperly. You should politely reject her request and report the matter immediately to your manager and the Ethics & Compliance Program Office. They will work with you to obtain the permit through appropriate channels.

**Q: When can I sell my shares of Intuit stock?**

**A:** Most employees can sell their stock at any time, provided they don't have access to material, non public information about Intuit. This applies to ESPP shares as well as stock options and restricted stock units. If your job gives you regular access to Intuit's quarterly financial reporting information, earnings projections or guidance, you may only trade during specified quarterly windows. Refer to Intuit's Insider Trading Policy for further guidance.

**Q: My business unit has an opportunity to sell to the U.S. government. Is there anything special I need to do or be aware of?**

**A:** Yes. There are strict rules that govern how we interact with national and local governments around the globe. These rules are complex, and failing to comply with them can lead to substantial civil and criminal penalties. Intuit employees who deal with any governmental agency should learn and follow all rules related to government contracting and interacting with the government. Contact Intuit's Corporate Affairs department before engaging with any governmental agency on potential business opportunities and reach out to the Business Legal Team in Legal for guidance on unique contract terms, conditions and compliance obligations.



## VIII. COMPANY RESOURCES, PRIVACY AND PROTECTING INFORMATION

Intuit provides you with resources you need to do your job effectively and efficiently, such as computers, cell phones, company credit cards and printers. You must properly use, care for and protect the resources you use.

### A. Use and Protection of Intuit Resources and Assets

Intuit's resources and assets are company property and, as a general rule, should only be used by employees for company business. If you leave Intuit, you must promptly return all company property to your manager or Human Resources.

Intuit may inspect or monitor all company resources, assets and property at any time, without your prior approval, knowledge or consent in accordance with applicable laws. This includes monitoring and retrieving information that is stored or transmitted on Intuit's electronic devices, computers and systems. In addition, any use of Intuit's property, systems or information for illegal purposes is a violation of law and the Code of Conduct, and is also strictly prohibited.

You are accountable for Intuit resources, assets, and funds that are under your control, such as credit cards, tickets, cash and checks and the money spent on outside service providers or vendors. If you are authorized to use company funds for legitimate business purposes, you must ensure that we receive proper value in return. Using Intuit property in a way that conflicts with Intuit's interests, or in any manner that may reasonably be considered offensive, is strictly prohibited.

You can find more information in these related policies on Insight at [Asset Protection Policy](#), [Worker Access to Confidential Information](#), and the [Electronic Communications Policy](#). There may be additional local policies and guidelines in your location.

### B. Privacy and Protecting Personal Information

Intuit is committed to being a responsible steward of the data and personal information of its end users, customers and employees. This helps create an environment of trust and integrity with our customers and the business community and ensures that Intuit complies with applicable global data protection and privacy laws.

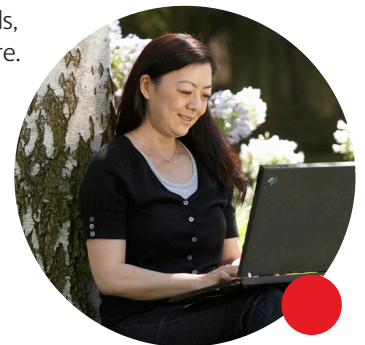
Our policies and standards are consistent with applicable laws and our Operating Values. This reflects our commitment and obligations associated with data entrusted to us by individuals, companies, and employees. Some data may be considered sensitive and require special care.

You must follow all corporate privacy policies, security policies and supporting standards and procedures when engaging in any business process or practice or when using applications or systems that involve the use, storage or transmission of data and personal information.

You can find more information in Intuit's [Privacy](#) and [Security](#) policies on Insight.

#### 1. Protecting the Information of Intuit Customers and Third Parties

You must responsibly collect, use and protect the data and personal information that customers give to Intuit. This includes the data and personal information that our customers give us about their own customers or employees. Personal information from Intuit customers includes names, e-mail and street addresses, telephone numbers and login identification. It also includes tax return, credit card, financial account or personal health information, benefits information, Social Security, national identification and driver's license numbers.



## 2. Protecting the Information of Intuit Employees

You must responsibly collect, use and protect the data and personal information of Intuit employees. An employee's personal information includes name, home and e-mail addresses, telephone numbers, login identification and employee identification. It also includes salary and some job performance data, credit card information, financial account or health information, background check information, benefits information, Equal Employment Opportunity information, Social Security, national identification and driver's license numbers.

It is your responsibility to understand and comply with Intuit privacy policies and standards, and data classification and retention policies.

## C. Intuit's Confidential Information and Trade Secrets

Confidential information is any material that Intuit does not make or want to make publicly known at a given time. Trade secrets are the subset of confidential information that gives Intuit a competitive advantage. Trade secrets include things like source code, offering plans, unpublished patents and customer lists. In addition, they also include internal process improvements and operating mechanisms that give us a cost or efficiency advantage over competitors.

Intuit's trade secrets are among our most valuable assets and are considered strategic intellectual property of the company, similar to patents, copyrights and

trademarks. Therefore, you must take all necessary steps to protect them.

You have agreed to protect Intuit's confidential information and trade secrets to which you may have access during the course of your work, as set out in your employment agreement or in the Employee Invention Assignment and Confidentiality Agreement ("EIACA") you signed as a condition of employment. These agreements are in effect throughout your employment and have some obligations which continue even after you leave the company. Specifically, you may not disclose Intuit's confidential information or trade secrets to anyone or use it to benefit anyone other than Intuit, during or after your employment, without executive approval and appropriate contractual protections in place. More information on the EIACA is available from [HR Connect](#).

Depending upon your role, you may need to disclose certain Intuit-confidential materials to third parties, such as vendors, contractors and companies with whom Intuit works. Disclosing confidential information or trade secrets to a third party requires a Nondisclosure Agreement, or NDA, between Intuit and the third party. It must comply with our guidelines and be signed by authorized personnel. You can find more information about [NDAs](#) on Insight.

If you are unsure whether certain information is confidential, you must ask your manager and/or leadership team for guidance before disclosing it to anyone externally.

## Living the Code

**Q: I run an online antique business and sometimes need to get back to customers during the workday. Is it a problem if I use my Intuit e-mail to communicate with them?**

**A:** While occasional personal use of Intuit's computer, email and telephone/voicemail is permitted if it does not interfere with your job performance, it is not appropriate to use Intuit resources to engage in outside employment.

## Living the Code

**Q: I recently did a Follow Me Home with a customer and called him afterward with some additional questions. During the course of the conversation, the customer offered to send me more detailed information about his business, including a list of his employees' names and Social Security numbers. What should I do?**

**A:** Ask the customer not to send you the information. We're responsible to protect our customers and their personal information, even when those customers are willing to share more information with us. If we do not need the information, we should not collect or accept it. If we receive information that we don't need, it is our obligation to delete the data in a safe way.

**Q: I came across a QuickBase that contained sensitive personal information about Intuit employees that was not appropriate for everyone to see. What should I do?**

**A:** Contact the QuickBase administrator and express your concerns. Ask why that information is needed and appropriate to share with all QuickBase users. If you are not satisfied with the results of that conversation, escalate to your manager or the Privacy team.

### D. Intuit's Intellectual Property Rights

All intellectual property you create or develop during your employment using Intuit resources or that relates to Intuit's current or reasonably anticipated future business strategy is owned by Intuit. Before beginning work that you believe falls outside of these guidelines, you should disclose it to your manager and consult with the [Ethics & Compliance Program Office](#).

### E. Other Companies' Confidential Information and Trade Secrets

Just as Intuit protects our own confidential materials, we respect the rights of other people and companies to protect their confidential information and trade secrets. You must not reveal any information to Intuit that other people or companies might reasonably consider either confidential or a trade secret without their permission. This also includes materials belonging to a former employer of yours.

You may, under an authorized Nondisclosure Agreement, become aware of another company's confidential information or trade secrets in the context of exploring a business relationship with that company. You must respect the proprietary nature of this information and not use or disclose it publicly without authorization.

### F. Copyrighted Materials

Our policies require us to use only those copyrighted materials that we have obtained appropriate rights and licenses to use. We pay for all proprietary copyrighted material we copy and distribute internally.

You must comply with rules and laws governing internal distribution of copyrighted articles, content and subscription materials. This helps ensure that we do not violate an author's or publisher's rights to control duplication or

distribution of their own content and to obtain licensing fees or subscription revenue from such content. You may distribute copyrighted news and professional content, including via e-mail and other internal collaboration tools, only after confirming that Intuit has, or obtains a right to internally distribute such content.

Intuit has several existing enterprise licenses to distribute news and professional content. You can find more information about properly referencing, distributing or quoting from other companies' copyrighted materials on Insight at [Permissions and Licensing](#).

In addition, much of the software we use, including certain open source software, is owned by other companies and protected by copyright law, license restrictions or both. Software is usually governed by corporate site license agreements or open source agreements and it is our policy to comply with these agreements and make proper use of all such software. Sharing, copying and installing software without appropriate licenses or other authorization may violate these agreements, the U.S. Copyright Act, and the copyright laws of other countries. You should not make copies, share, lend, resell or transfer software to other employees or to anyone outside of Intuit unless it is authorized under the applicable software license agreement. If you have questions about the rules surrounding the use or copying of a particular software program, please contact your manager, Intuit's Legal department, or the [Ethics & Compliance Program Office](#). For more information on open source code or third party code and the process for obtaining approval to use them, visit the [Intellectual Property](#) page on Insight.

## G. External Communications

Intuit is committed to providing full, fair, accurate, timely and understandable disclosure in our public communications. In addition, we must be truthful in our promotional efforts and other public announcements.

Because any external communications can affect our business, you must be careful about what you say and write in public. You may participate in online discussions or other online communities, provided you make it clear that you are not representing Intuit and you comply with our [Social Communication Policy](#). In general, employees may not speak or write on behalf of Intuit in any external communication including advertisements and promotional or public announcements without prior approval from appropriate Intuit management, including our Corporate Communications department.

We have designated spokespeople who are authorized to publicly discuss our strategy, financial information and other significant corporate events. You should refer all inquiries from the media, stockholders, industry or Wall Street analysts to Intuit [Corporate Communications](#) or [Investor Relations](#).



## Living the Code

**Q: My team has figured out a way to save substantial costs by using off-the-shelf software tools to change and improve an internal business process. Can I share the details of our success with using this tool at an industry conference?**

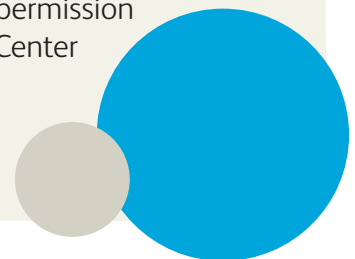
**A:** Internal process improvements can give Intuit a meaningful competitive advantage over others in the marketplace. Even when we use off-the-shelf tools to achieve improvements, the particular way we use those tools may not be obvious or well-known externally, and in some cases the process improvement may be patentable. Therefore, you should always get advice and approval from your business leadership and, if needed, your functional partners before presenting internal business process improvements publicly.

**Q: A friend of mine used to work at one of Intuit's competitors and offered to meet with me and share some "inside information." He believes this will help us compete with his former employer. Should I take him up on his offer and hear what he has to say?**

**A:** No. Our Code of Conduct and our confidential information policies prohibit us from soliciting or accepting confidential information of another company outside of a formal business exploration or arrangement with that company under a signed Non-Disclosure Agreement. If you believe that someone is attempting to provide you with confidential information of another company you should decline any such offer and inform Intuit's Legal department immediately.

**Q: I am a paid subscriber to a professional publication that frequently includes in-depth analyses and articles about key trends in my field. I'd like to scan and e-mail them to co-workers who might find them helpful. Can I do this?**

**A:** You cannot copy and share other companies' content internally without written permission that explicitly covers those you wish to share it with. Intuit has licenses that allow for internal sharing of certain popular news and professional publications. It's your responsibility to ensure that these licenses cover any content you wish to post or share internally. If not, you must purchase or otherwise obtain written permission for all internally-generated copies. Visit the Copyright Clearance Center on Insight to learn more.



## IX. FINANCIAL ACCOUNTING, REPORTING AND RECORDS

Keeping Intuit's records accurate and in compliance with standard accounting principles and guidelines makes good business sense and is required by law.

### A. Integrity in Financial Reporting and Accounting Practices

All Intuit payments and other transactions must be properly authorized by management and be accurately and completely recorded in Intuit books and financial records. These records must comply with applicable laws, generally accepted accounting principles, or GAAP, and established corporate accounting policies.

You must never create any false, incomplete or misleading financial entry or record. In addition, you may not place Intuit funds in any personal or non-corporate account or any other undisclosed or unreported account. All corporate assets must be properly protected and asset records regularly compared with actual assets. You must promptly and properly reconcile any variances.

Our commitment to full, fair, accurate, timely and understandable disclosure applies to all reports and documents that you file with, or submit to, governmental agencies and to all other public communications that you make – written or oral. All employees, including senior management and other employees with financial reporting responsibility, must uphold these standards in all of our public disclosures.

You should immediately report suspected wrongdoing or inconsistencies related to financial reporting, accounting practices or any other financial irregularities, regardless of how small or insignificant they may appear. Information about your reporting options is available in Section III, *Seeking Guidance and Reporting Concerns*.

#### 1. Special Ethical Obligations for Senior Financial Officers

There are special ethical obligations that apply to our chief executive officer, chief financial officer, controller and all other Intuit employees with financial reporting responsibilities. These employees have an important role in fostering a companywide culture that ensures the timely and accurate reporting of Intuit's financial results and condition. These employees must:

- Act at all times with honesty and integrity, avoiding actual or apparent conflicts of interest between personal and professional relationships.
- Provide accurate, complete, objective, timely and understandable information to help ensure that public disclosures and reports made by Intuit, whether in filings with government agencies (including the Securities and Exchange Commission) or in other public communications, are full, fair, accurate, timely and understandable.
- Comply with all applicable governmental laws, rules and regulations.
- Act in good faith without misrepresenting any material facts.
- Discuss with the [Ethics & Compliance Program Office](#) or the general counsel any transaction that reasonably could be expected to create a conflict of interest.
- Promptly communicate any suspected breach of the Code of Conduct (including these special ethical obligations) to the [Ethics & Compliance Program Office](#), the vice president of internal audit, the general counsel, or the chair of the audit committee. This may be done anonymously, through the [Intuit Integrity Line](#).

Violating these obligations will result in disciplinary action up to and including termination of employment.

## B. Records Management: Retention and Legal Holds

Intuit's records and information are important company assets. They must be carefully maintained and disposed of as legally required by retention schedules and other policies that address disposition, storage, and destruction. You must comply with established records policies and retention schedules. You can find more information on related policies and guidelines in the [Records and Information Management policy and guidelines](#) on Insight.

From time to time, Intuit may be involved in litigation or inquiries that require us to indefinitely preserve certain documents and records. This is generally referred to as a "Legal Hold," and you will receive written notification of any hold that may apply to the information in your possession. You must review any Legal Hold notice carefully and comply with its terms. You can find more information about our [Legal Hold Policy and Legal Hold Procedures](#) on Insight.

### Living the Code

**Q: I think I can save Intuit money if I hire a vendor outside of our normal procurement processes. Is this OK?**

**A:** No. Regardless of your motive, you should always follow established internal policies and processes. If a particular policy or process doesn't meet your business needs, escalate your concern to the process owner and work with them to find an appropriate solution. Never look for ways to get around an Intuit policy or process.

**Q: I am about to close a deal with a partner. To complete this by the end of the quarter, they have asked me to give them a special discount or agree to buy some of their product to lower their cost of the deal. Do I need to report this to my finance leader?**

**A:** Yes, you must report the additional deal terms to your finance leader before you sign any deal. These deal terms may affect the overall value of the deal and it is important that Intuit's accounting practices properly reflect all elements of the transaction.

**Q: I received a Legal Hold Notice. What am I supposed to do?**

**A:** Whenever we reasonably anticipate an upcoming legal investigation or litigation, we are required by law to preserve all information related to the matter. We do this by issuing Legal Hold Notices to employees who may have relevant information. If you receive such a notice, you must preserve and not destroy, delete, modify or alter the potentially relevant information described in the Legal Hold. If you have any questions about your obligations, contact the attorney listed on the Legal Hold Notice.



## X. CODE OF CONDUCT GOVERNANCE AND ADMINISTRATION

Intuit's Board of Directors oversees our Ethics & Compliance Program. In its discretion, the board may assign oversight responsibilities to a committee of the board.

### A. Governance and Authority

The board or its designated committee has assigned overall management responsibility for the program to Intuit's senior executive team. The [Ethics & Compliance Program Office](#) is responsible for day-to-day management, administration and implementation of the program. This office assists the board and the senior executive team in promoting an organizational culture of ethical behavior and compliance with the law and in administering this Code of Conduct.

### B. Administration and Interpretation

The most current Code of Conduct is available to all Intuit employees on Insight and our external Internet site. The [Ethics & Compliance Program Office](#) leads and manages the process and deliberation to assess, evaluate and provide guidance regarding the appropriate interpretation and application of this Code. This may include consultation with other Intuit departments and escalation to senior management or to the board of directors or its designated committee as appropriate.

### C. Investigations, Enforcement and Discipline

Intuit will investigate alleged violations of the Code of Conduct. The company will take necessary and appropriate action against any employee who acts unethically, violates the law, this Code of Conduct, other corporate policies or the lawful direction of management. Disciplinary action may include termination of employment, in accordance with applicable laws. If Intuit has suffered a loss, it may pursue its remedies against the individuals or entities responsible as appropriate.

This Code of Conduct in no way alters an employee's at-will relationship with Intuit for U.S. employees and those working in other countries governed by "at-will" employment rules.

### D. Code of Conduct Changes, Modifications and Waivers

The board of directors or its designated committee has reviewed and approved the Code of Conduct and will approve all material changes before they are incorporated and implemented. Changes will also be publicly filed as required by applicable laws, regulations or stock market listing rules.

The [Ethics & Compliance Program Office](#), in consultation with the general counsel, may make non-material changes to the Code as necessary. The Code of Conduct may be updated periodically to address a specific need, change in the law, or to provide additional guidance and instruction. Any material or significant changes will be communicated to employees through management, online channels or both, as appropriate.

All requests for waivers to the Code of Conduct's standards, guidelines and requirements must be made in writing and reviewed by the [Ethics & Compliance Program Office](#) before taking action on the waiver.

The board of directors or its designated committee must approve any waiver of the Code of Conduct that affects an executive officer, or specific employees in the finance and accounting functions. The timely and proper handling and disclosure of Code of Conduct waivers are particularly important. More information on reporting procedures is available in Section III, *Seeking Guidance and Reporting Concerns*.



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