

Integrity
Without
Compromise:
Intuit's Code
of Conduct
& Ethics

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AS AMENDED MAR 24, 2023

A message from Sasan Goodarzi



Hello everyone.

Integrity Without Compromise is a core value at Intuit and the foundation for who we are and how we operate as a company. We value trust above all else and believe in doing the right thing, even when no one's watching. We are operating in an era of massive change –both internally and externally–with an increasing focus on integrated customer data, machine learning, and artificial intelligence. These changes make it imperative that we continue to be vigilant in how we protect our information, our workplace and culture, and each other. This isn't just about completing required training. This is about how we make decisions and what we will and will not do. This means conducting ourselves in a way that helps us earn and keep the trust of our employees, customers, and shareholders. As we move with speed and accelerate the pace of our work, we ask every employee to embrace and live our value of integrity without compromise. It doesn't matter whether you're a long-time senior leader or this is your first job out of college. Always do the right thing. Have the courage to speak up if you see something you disagree with. And no matter what, hold yourself and others accountable for acting with integrity every day and in everything we do. We all need to do our part in ensuring Intuit has a safe, ethical, and inclusive work environment where everyone can make an impact, learn and grow, and feel connected.

Thank you.

Sasan Goodarzi
Intuit CEO

Intuit Inc. and its subsidiaries (“Intuit”) are committed to fostering a safe, ethical, and inclusive environment where employees can do the best work of their lives. We expect everyone at Intuit to act with integrity, follow the law and our policies, ask for help, and report concerns. Because no document can ever address every situation that may come up, when this Code of Conduct & Ethics, Intuit’s core values, or our policies don’t answer your question, ask for help, and use good judgment.

Be open, honest, and transparent in all you do for Intuit.

Our expectations

All employees and contingent workers must follow Intuit's Code of Conduct & Ethics (this "Code") and all government laws and regulations. If laws or regulations are not as strict as this Code and Intuit's policies, follow this Code and Intuit's policies. You are accountable for your behavior at all times.

If you are a people manager, we expect you to help your team understand what it means to act with integrity and to report any concerns that are raised to you. Create an environment where employees and contingent workers feel comfortable asking questions about what it means to do the right thing for Intuit, our stakeholders (employees, customers, communities we serve, and shareholders), and other important third parties (for example, our partners and our customers' customers). Encourage reporting through any channel and ask your employees and contingent workers to be honest at all times. If you observe or learn of any behavior that is inconsistent with this Code, Intuit's core values, or our policies, it is your responsibility to appropriately respond to it.

If you see something, you must speak up and do something about it – even if it happens outside of your immediate team.

Where to go with questions or for help

For help with questions about this Code or if you have questions about what the right thing to do is in a situation:

- Review our [employee policies](#), which provide more detail and supplement this Code, and the Code of Conduct & Ethics Frequently Asked Questions
- Talk to your manager or HR Connect
- Reach out to Intuit's ethics team through Ask Ethics

Report concerns to any of these resources:

- Your manager or higher-level leaders
- HR Connect
- Ask Ethics
- The [Intuit Integrity Line](#), which is an external, third-party service that supports anonymous reporting in most countries, 24 hours a day, 365 days a year
- Your employer or the company that you are contracted with, if you are a contingent worker

If you are asked to help with an investigation or asked a question about an ethics issue, we expect you to cooperate and give complete, accurate information.

We do not retaliate

Intuit does not tolerate any form of retaliation or victimization against anyone who raises an ethics question or concern in good faith. We want employees and contingent workers to raise concerns through whatever reporting channel they are most comfortable using.

[Review Intuit's equal employment opportunity and prohibition of harassment policies for more information.](#)

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We value diversity, equity, and inclusion

At Intuit, diversity, equity, and inclusion are part of our culture and who we are as a company. We believe that innovation thrives in an environment that includes a diverse range of people, perspectives, and experiences.

Intuit provides equal employment opportunities for all genders, races, ethnicities, and other protected categories. All employees must follow our equal employment opportunity (non-discrimination) policies. We also provide employees with resources to ask for and receive reasonable workplace accommodations for disabilities and religious beliefs.

Always share different perspectives and points of view in a courteous and respectful way. Remember that not everyone may share your point of view.

[Review Intuit's equal employment opportunity policy for more information.](#)

We expect employees to help prevent harassment

We expect all of our employees to act professionally, to use good judgment, and to treat each other with respect. We prohibit unwelcome and unwanted sexual or other related inappropriate conduct that could create an intimidating, hostile, or offensive work environment for employees. We also prohibit such conduct when it is based on other characteristics protected by law or our prohibition of harassment policy.

[Review Intuit's prohibition of harassment policy for more information.](#)

The safety and security of our workforce comes first

Never put your own safety or the safety of others at risk. Intuit does not tolerate violence or threats of violence. In addition, if you are engaging in company business, attending a company event, or with other employees where alcohol is served, we expect you to always drink responsibly or choose not to consume alcohol.

[Review Intuit's safe workplace and drug and alcohol policies for more information.](#)

We avoid actual, potential, or perceived conflicts of interest

We never want anyone at Intuit to be in a situation where they might put, or appear to put, personal financial interests or another company's interests over Intuit's interests. To avoid conflicts, do not:

- Participate in a decision on behalf of Intuit that could lead to or appear to provide a financial or other personal benefit to you, your family, close friends, someone you are in a personal relationship with, or an organization that you are closely tied to.
- Use Intuit confidential information or intellectual property for your personal benefit or the benefit of another person or company.
- Take business opportunities that you learn about in your work without first disclosing those opportunities to Intuit.
- Accept a speaking fee or honorarium for events that are part of your work. You may decline or ask to have the fee or honorarium donated to a charity.

If you are involved in any other situation that could present a perceived or actual conflict of interest, contact Ask Ethics for guidance.

You must also disclose the following situations to Ask Ethics for review and approval because they may create a conflict of interest:

- Joining the board of directors or an advisory board of a for-profit company or, if you are new to Intuit, continuing on any for-profit company boards.
- Working for, holding a position with, serving as an advisor for, or receiving any financial reward from another company: (a) with whom Intuit has a current or anticipated relationship, (b) which competes with Intuit's current or reasonably anticipated future business strategy, or (c) that is developing technology that potentially overlaps with Intuit's current or reasonably anticipated use of similar technology.
- Making any investments that might influence or appear to influence decisions you may make on Intuit's behalf, including investments in a company with whom Intuit has a current or anticipated relationship or which competes with Intuit's current or reasonably anticipated future business strategy. This restriction excludes ownership of stocks, bonds, or other securities of companies listed on a public securities exchange, if the amount of the interest is less than 1% of the value of the class of such

securities. It also excludes investments in mutual funds, venture capital, or similar funds that invest in a broad cross-section of companies and industries that may include Intuit competitors, partners, or vendors, as long as you are only a passive investor.

As a general rule, membership on boards of nonprofit organizations or industry associations do not create a conflict of interest. However, always disclose nonprofit memberships to your manager. If you and your manager believe there is a potential conflict between Intuit's interests and the nonprofit, contact Ask Ethics.

Gifts and Entertainment

Gifts or entertainment must not be given or received by you or your family members if it interferes or appears to interfere with the ability to make objective business decisions.

GIFTS. Gifts can come in many forms, for example, snack baskets, flowers, branded merchandise, or tickets to an event where the giver provides the tickets but will not attend.

Gifts must be:

- Given and received openly and directly, without an expectation of anything in return
- Unsolicited
- Not in the form of cash or a cash equivalent (for example, a gift or cash card)
- Less than Intuit's gift limits
- Not a regular occurrence
- Not given or accepted as part of or during a business negotiation and
- In compliance with all laws and the policies of both the giver and the recipient, as well as Intuit's core values.

Additional guidance on gift giving between Intuit workers can be found in the guidelines for internal employee gifts.

ENTERTAINMENT. Building and cultivating strong business relationships with partners and other stakeholders is important to the work we do at Intuit. All entertainment provided and accepted must have a legitimate business purpose and be reasonable in value, using Intuit's gift limits as a guide. Like gifts, entertainment must be provided and accepted openly and directly,

If you have questions, need additional guidance or are involved in any situation that could present an actual, potential, or perceived conflict of interest, contact Ask Ethics.

unsolicited, not as a regular occurrence, and must be consistent with all applicable laws and policies as well as Intuit's [core values](#).

Some examples of entertainment include non-working meals or tickets to an event where the giver and recipient attend together.

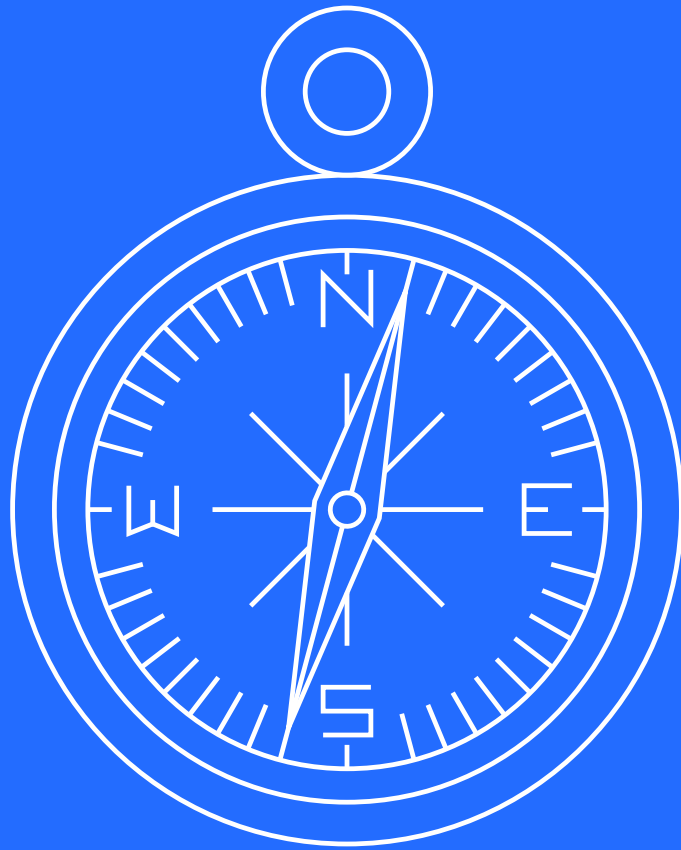
You may not accept travel or accommodations in connection with gifts or entertainment.

We prohibit insider trading, including trading by family and other household members

Trading in Intuit's stock - or the stock of vendors, partners, or any other company - based on material nonpublic information violates many laws and Intuit policy. "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. You cannot trade outside any trading windows set by Intuit management either by personally making trades or by arranging to have trades made by others on your behalf. This means that when the window is closed, you cannot purchase or sell any Intuit stock in public markets, and you cannot sell Intuit shares acquired through the Employee Stock Purchase Plan (ESPP), the vesting of RSUs or the exercise of stock options. (Acquiring shares through the ESPP, stock option exercises or RSU vesting are not prohibited when the window is closed, but you cannot sell any of those shares.) And even if we are in an open trading window, you cannot trade if you have material, nonpublic information. These rules also apply to your spouse, dependents, and anyone living in your household (except household employees), or anyone for whom you make investment decisions.

[Review Intuit's insider trading policy for more information.](#)

[If you have questions about the materiality of specific types of information, talk with your manager or consult with Ask Ethics.](#)



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the law and
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We follow all antitrust and competition laws

We promote a free and open marketplace for the products and services we sell and the goods, services and talent we acquire. Never take action that could unreasonably restrain trade in a free marketplace. For example, never agree with an actual or prospective competitor to:

- Raise, fix, or set the price to be charged or paid for a product or service.
- Divide markets, territories, or customers or limit dealings. For example, Intuit would not agree with a competitor to not sell in a certain region.
- Set uniform terms of sales, warranties, or contract provisions.
- Pre-determine the winning bid or limit competition with other potential bidders.

When interacting with competitors or accessing information about competitors:

- Always act in an independent manner.
- Do not obtain or share commercially sensitive or proprietary information with or belonging to competitors (for example, information about pricing, contract terms or profit margins).
- Do not misrepresent your role with Intuit when attempting to collect competitive information.
- Do not share sensitive information about your former employer or ask an employee for information about a current or former employer if that employer is a competitor.
- Always obtain market information from legitimate sources, such as publications, public studies, articles, or newspapers.

Finally, never make statements in emails, texts, social media, presentations, or anywhere else that wrongly suggest that we have few competitors, we want to harm our competitors, or we want to improperly exploit our success.

[Review Intuit's antitrust policy for more information.](#)

We comply with global trade laws

We follow all applicable global laws and regulations about (a) importing and exporting products, services and technology and (b) sanctions prohibiting business or interactions with certain countries, regions, individuals, or entities.

[Review Intuit's global trade compliance policy for more information.](#)

We do not allow or support money laundering or terrorist financing

Money laundering involves hiding financial assets acquired through illegal activity or using legitimate funds to support criminal activity. Terrorist financing includes financing terrorists, terrorist acts, and terrorist organizations and may involve both legal and illegal proceeds from legitimate or illegitimate sources.

[Review Intuit's anti-money laundering policy for more information.](#)

We do not allow bribery or corruption

A bribe is any benefit offered, given, or received to encourage someone to do something dishonest, improper, or inconsistent with their duties. The term "corruption" includes any abuse of power for personal gain, and can include a wide range of unethical or potentially illegal conduct. There are many benefits that may constitute bribes. Not just cash. This could include offers of employment to relatives, gifts, hospitality, entertainment, or even a donation to a favored charity.

[Review Intuit's anti-bribery and anti-corruption policy and global corporate charitable giving guidelines for more information.](#)

Intuit requires strict compliance with applicable anti-corruption laws. No one acting on behalf of Intuit may offer or accept anything of value if doing so might appear to provide a personal gain, either directly or indirectly. It is not just unlawful for Intuit or our employees or subsidiaries to offer a bribe or engage in corrupt behavior. It is also unlawful for our partners, agents or other third parties to do anything on behalf of Intuit that is prohibited by our policies or the law.

While the risk of bribery and corruption is possible in any transaction, bribery is a particular risk when dealing with government agencies and officials. Never offer, promise, or give any benefit or gift to a government official or public

employee – directly or indirectly through a third party or their family – without prior approval from Ask Ethics. Remember that “government officials” can include not only officials and employees of the government or government agencies, but also employees of government-owned or controlled corporations or entities, candidates for political office, and members of political parties, as well as anyone acting with or on behalf of any of these persons, including family members.

Donations made on behalf of Intuit must be pre-approved. Accurate records of all business transactions and appropriate internal controls to track expenses must be maintained to comply with the law and Intuit policy.

We comply with laws related to political contributions, lobbying, and government contracts

Interacting with governments is complex. In addition to laws governing gifts and hospitality to government officials, there are many laws restricting political contributions. Intuit Global Corporate Affairs must review and approve all political contributions made on behalf of the company. You may send suggestions for political contributions, inside or outside the United States, to Ask Ethics. If you make personal political contributions, make sure you never link your contribution to, or represent that it is from, Intuit. Personal political contributions will not be reimbursed by the company.

You may not attempt to influence politicians or public officials on particular laws or issues on Intuit’s behalf, or appear to represent Intuit in political lobbying activities unless you are asked to do so by Global Corporate Affairs. If you meet with a politician/policy influencer on personal time, you may mention Intuit, your role, public information, and our values. However, you may not discuss Intuit policy positions unless briefed in advance by Global Corporate Affairs. If someone wants to talk about a policy issue and Intuit, gather their information and tell them our Global Corporate Affairs team will follow up. Then refer that request to Ask Ethics.

[Review Intuit’s political accountability policy for more information.](#)

Contracts with government agencies are subject to additional rules and regulations. They also require additional coordination to ensure there is no conflict of interest. Before setting up any contract with the government, contact Ask Ethics to work with our Legal and Global Corporate Affairs teams to ensure we fully understand and can commit to the special government rules and regulations.

We protect customer and employee privacy, confidential information, and property

Intuit has a commitment to employees, customers, partners, and shareholders to act as a responsible steward of data, personal information, and property.

To help us meet that commitment, you must:

- Follow all applicable policies, supporting standards, and controls.
- Act responsibly when collecting, using, and protecting (and, when required, deleting) personal data and information that employees, customers, or other third parties give to Intuit. This information includes names, emails, home addresses, national identification numbers, benefits information, and financial information.
- Make sure Intuit has a contract or nondisclosure agreement in place with any third parties before sharing confidential information or trade secrets.
- Treat confidential information from third parties with the same care that you treat Intuit's confidential information and trade secrets.
- Keep confidential information, data, and property safe and secure at all times.
- Protect Intuit's assets and use them only for the benefit of the company, its customers, and its shareholders.
- Do not allow inappropriate, dishonest, or illegal use of Intuit's property.

[Review Intuit's privacy statement and confidential information policy for more information.](#)

We respect intellectual property and copyright laws

We only use copyrighted materials with appropriate rights and licenses.

You must confirm that Intuit has the right to internally use copyrighted music, images, news, and content or other intellectual property that belongs to a third party before using it. Do not make copies, share, lend, resell, or transfer software to other employees, contingent workers, or to anyone outside of Intuit unless allowed by the software license agreement.



We act
with integrity.

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We speak honestly, transparently, and respectfully in public communications

Any external communications by Intuit employees or using Intuit's name can impact Intuit's brand, reputation, and the trust that current and future employees, partners, and shareholders have in the company. It is important that when we communicate externally about Intuit, we do so in a coordinated manner, always striving to give accurate, timely, and understandable disclosures.

We have designated spokespeople authorized to represent Intuit by publicly discussing our strategy, financial information, and company news in external communications channels including traditional and social media and external events. Intuit employees should refer all inquiries from the media, social channels, shareholders, industry influencers or analysts, and financial analysts to Corporate Communications or Investor Relations. External speaking or communications on Intuit's behalf or done using Intuit's name require prior approval from Corporate Communications and your manager.

See Intuit's social media communications policy or reach out to Ask Ethics for additional help or questions.

We always act with integrity in financial and accounting practices

All financial transactions must have appropriate authorization and be accurately reflected in Intuit's books and financial records. Intuit's financial records must comply with applicable laws, generally accepted accounting principles and our corporate accounting principles. All employees, including senior management and other employees with financial

reporting responsibility, must:

- Never create any false, incomplete, or misleading financial entries or records.
- Never put Intuit funds in any personal or non-corporate account or other undisclosed or unreported account.
- Provide accurate, complete, objective, timely, and understandable information to help ensure that Intuit's public disclosures and reports are fair, accurate, timely, and understandable. This includes disclosures to government or regulatory agencies, such as the Securities and Exchange Commission, or other public communications.
- Act in good faith without misrepresenting any material facts

For more information about the topics above, review our policies on Insight or contact any of the resources listed. Immediately report suspected wrongdoing, inconsistencies, or violations of this Code, no matter how small they seem, to the channels listed in this Code. Our chief executive officer, chief financial officer, controller, and other Intuit employees with financial reporting responsibilities can also report concerns directly to the vice president of internal audit, the general counsel, or the chair of the audit and risk committee. Waivers or material changes to the Code of Conduct & Ethics require formal written approval by the Ethics Committee.

We also expect our business partners, suppliers, and others who work on Intuit's behalf to act with integrity and follow the law. For more information, review [Intuit's Supplier Code of Conduct](#).

Remember to always do the right thing, have the courage to ask questions and speak up, and know that the ethics team, your leaders, and HR are here to help.

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