

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

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 believe in doing the right thing, even when no one's watching—for our employees, customers and partners around the world. Change continues to happen all around us—both internally and externally—with greater focus on integrated customer data, machine learning and artificial intelligence. These changes make it imperative that we do better 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 partners. As we move at speed and accelerate the pace of our work, we ask every employee to embrace and live up to 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 is 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 our Code of Conduct & Ethics, our core values and 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 and all government laws and regulations. If laws or regulations are not as strict as this Code of Conduct & Ethics and Intuit's policies, follow this Code of Conduct & Ethics 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 and all our stakeholders (employees, customers, partners and shareholders). Encourage reporting through any channel and ask your employees and contingent workers to be honest at all times. It is also your responsibility to respond to inappropriate and unethical behavior if you observe it.

If you see something, you must say something 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 of Conduct & Ethics 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 of Conduct & Ethics, or 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
- Your HR Business Partner
- Ask Ethics
- Your employer or the company that you are contracted with, if you are a contingent worker
- HR Connect
- 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

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 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 foster a safe,
ethical and inclusive
environment.

intuit

We value diversity and inclusion

At Intuit, diversity 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, 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 protected characteristics like race and ethnicity, national origin, age, disability sexual orientation and gender identity.

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 or are attending a company event where alcohol is served, we expect you to always drink responsibly or choose not to consume alcohol.

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

We avoid actual or potential 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 or someone you are in a personal relationship with.
- 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.

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 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.

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

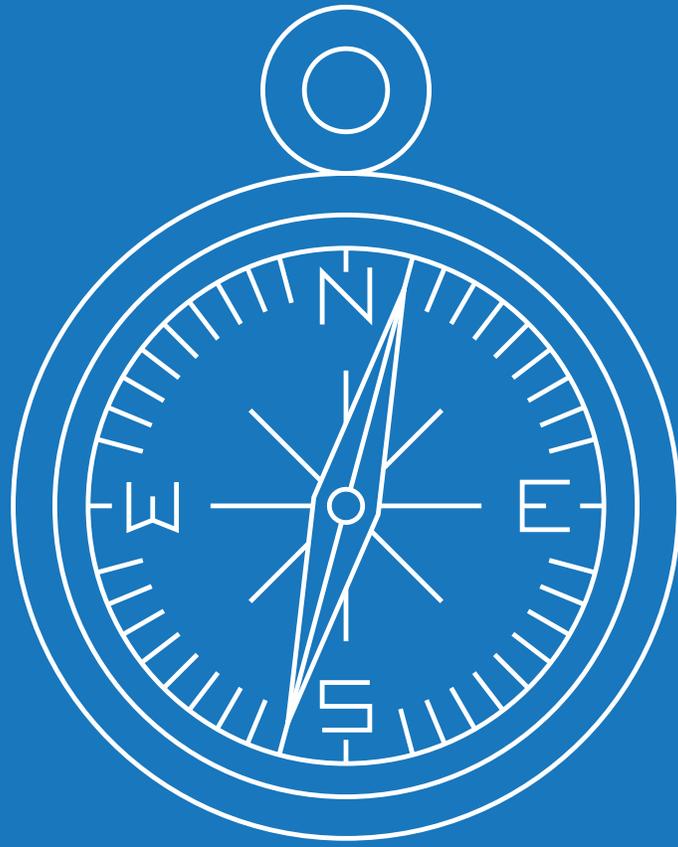
As a general rule, membership on boards of nonprofit organizations or industry associations do not create a conflict of interest. However, always disclose nonprofit memberships to your manager. If you and your manager believe there is a potential conflict between Intuit's interests and the nonprofit,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

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

Gifts and entertainment: You and your family members may not accept gifts or participate in any entertainment if they appear to interfere with your ability to make objective business decisions.

Gifts and entertainment must be:

- Given 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 commercial gift and entertainment limits
- Not a regular occurrence
- Not 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.



We follow
the law and
our policies.

intuit.

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

Trading in Intuit's stock—or the stock of vendors or partners—based on material nonpublic information violates U.S. and other countries' 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.

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.

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:

- Always act in an independent manner.
- Do not obtain or share commercially sensitive information with competitors (for example, information about pricing, contract terms or profit margins).
- Do not share sensitive information about your former employer or ask an employee for information about a former employer if that former 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 we have few competitors, that we want to harm our competitors or that we want to improperly exploit our success.

We comply with international trade laws

We follow all laws, rules and regulations about importing and exporting products and services and restrictions on trade or interactions with certain countries, individuals or entities. If you have questions on international trade, contact Ask Ethics for guidance.

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. We do not allow or support money laundering or terrorist financing.

We do not allow bribery or corruption

Bribery is never allowed. A bribe is a payment, gift or an offer to provide anything of value, including meals, entertainment and travel, to improperly influence someone in their official or professional capacity or to induce someone to use their influence improperly. Never encourage anyone to act illegally to help Intuit. It is not just unlawful for Intuit or our subsidiaries to directly offer a bribe. It is also unlawful for our partners or agents to offer a bribe.

Intuit requires strict compliance with the U.S. Foreign Corrupt Practices Act (FCPA), as well as similar laws in other countries. Anyone who intends to provide a gift, hospitality, payment or entertainment of any value to a government official must first review and comply with Intuit policy and, where required, submit requests to Ask Ethics for prior approval. Remember that under the FCPA, "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.

Review Intuit's anti-corruption policy for more information.

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 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 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 Corporate Affairs. If someone wants to talk about a policy issue and Intuit, gather their information and tell them our Corporate Affairs team will follow up. Then refer that request to Ask Ethics.

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 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 and personal information.

Review Intuit's privacy policy for more information.

To help us meet that commitment, you must:

- Follow all corporate privacy policies, security policies and supporting standards.
- 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.

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.

intuit

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 and the trust that current and future employees, partners, shareholders have in the company. It is therefore important that we communicate in the right way and stay coordinated with external messages, always striving to give full, fair, accurate, timely and understandable disclosures in public communications.

We have designated spokespeople authorized to publicly discuss our strategy, financial information and other significant corporate events. Refer all inquiries from the media, social channels, stockholders, industry, Wall Street or other financial analysts to Corporate Communications or Investor Relations. Any other external speaking or communications on Intuit's behalf or done using Intuit's name require approval from Corporate Communications and your manager.

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

We always act with integrity in financial reporting 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.
- Immediately report suspected wrongdoing or inconsistencies or suspected breaches of this Code of Conduct & Ethics, no matter how small they seem, to the channels listed in this Code of Conduct & Ethics. 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 committee.

For more information about the topics above, review our policies on Insight or contact any of the resources listed above. Waivers or material changes to the Code of Conduct & Ethics require formal written approval by the Ethics Committee.

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

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powering prosperity