Dear Team Members,

At Micron, we are all committed to our Company’s success. But success is about more than meeting our business objectives—it’s also about how we do business. Above all, we act with integrity in everything we do.

Our Code of Business Conduct and Ethics provides guidelines on how to act with integrity and make the right choices. All of us—officers, employees and directors—are accountable for knowing and employing the guidelines. No matter where at Micron we work or what our specific job might be, integrity always matters.

Of course, the Code cannot provide advice for how to act in every situation—no single document can. In some cases, it may be difficult to decide on the right course of action. At those moments, you can always speak to your manager, the Legal Department, or any other resource listed in the “Where to Go for Help” section of our Code. You can also speak to these resources if you think you may have witnessed a violation of our Code. Micron welcomes questions and reports, and we will never retaliate against anyone who reports a concern in good faith.

We each play a key role in Micron’s success, and our Company depends on each of us to demonstrate integrity in all our business dealings. With your help, we can build on Micron’s reputation for quality products and ethical conduct, every day.

Sincerely,

Sanjay Mehrotra
Chief Executive Officer
Dear Team Members,

Welcome to Micron’s Code of Conduct. In this document, you’ll find guidance to help you make the right decisions every day. Our Code provides answers to some of the most important ethical questions we may face, as well as tips to help us know what to do in tricky situations. The Code also includes a list of our Company’s policies, where you can find more information when you need it.

If you’re unsure how the Code’s guidance translates into behavior, don’t guess. Ask your manager, a member of the Legal Department or any other resource listed at the end of our Code. You can also use our Compliance Hotline at any time, if you feel more comfortable doing so.

Regardless of how you choose to voice a concern, you can rest assured that it will be addressed appropriately. We all strive to uphold our “speak up” culture, where everyone feels comfortable asking questions and making reports.

As we work together to conduct business in an ethical manner, we’ll reduce business risk and increase our competitive edge in the marketplace.

Sincerely,

Joel L. Poppen
Vice President, Legal Affairs, General Counsel, Corporate Secretary and Chief Compliance Officer
Our Commitment

Nothing is more important than our commitment to integrity. The quality of our reputation is just as important as the quality of our products.

Our future is built on continuous innovation, but our day-to-day operations wouldn’t be possible without our team members’ commitment to conducting business with uncompromising integrity and professionalism.
Your Role

Following Our Code

Acting ethically means that we must uphold our responsibility to follow all laws and regulations that apply to the work we do and to our location. We never violate any law—no matter how small. However, the standards we set for ourselves are higher than just following the law. We want to make the ethical choice in every situation. Good judgment can often point to the right course of action—but if there’s ever a case when you aren’t sure, don’t hesitate to ask.

This Code of Business Conduct and Ethics (“Code”) represents our commitment to doing what is right. By being a part of the Micron team, you agree to uphold this commitment. You must understand the standards of our Code, our policies and the laws that apply to your position or function—and you must always follow them. Team members who do not follow these standards put themselves, their coworkers and Micron at risk. Anyone who violates the Code may also be subject to disciplinary action, up to and including termination.

This Code applies to everyone who works on Micron’s behalf worldwide, including team members (employees, officers and directors), temporary workers, vendors, suppliers and contractors. We are all expected to adhere to the standards contained in this Code. Any third parties we work with should also follow the standards outlined in this Code or their organization’s own code of conduct and policies, if those principles are substantially similar. We should consult our Code for guidance if the right course of action is ever unclear.

At Micron, we’ve built a culture of integrity. Maintaining that culture is critical to our success.

Manager and Supervisor Responsibilities

We all play an important role in creating our ethical culture, but managers and supervisors have additional responsibilities. If you are a manager or supervisor, you must do your part to create a culture of compliance. You do this by:

• Setting an example of ethical behavior
• Ensuring your reports understand how to follow the Code and the resources available to them
• Monitoring your reports to make sure they are following the Code
• Enforcing the standards in our Code
• Supporting team members who raise questions or concerns about possible violations of the Code, compliance or integrity

As a manager or supervisor, ethical behavior starts with you. Remember—leading by example is the best way to inspire ethical behavior in others.
# Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEO Introduction</td>
<td>i</td>
</tr>
<tr>
<td>Chief Compliance Officer Introduction</td>
<td>ii</td>
</tr>
<tr>
<td>Our Commitment</td>
<td>iii</td>
</tr>
<tr>
<td>Your Role</td>
<td>iv</td>
</tr>
<tr>
<td>Following Our Code</td>
<td></td>
</tr>
<tr>
<td>Manager and Supervisor Responsibilities</td>
<td></td>
</tr>
<tr>
<td>Doing Business with Integrity: An Introduction to Our Code</td>
<td>1</td>
</tr>
<tr>
<td>What Our Code Does</td>
<td></td>
</tr>
<tr>
<td>Where to Go for Help</td>
<td></td>
</tr>
<tr>
<td>Acting with Integrity for Our Fellow Team Members</td>
<td>5</td>
</tr>
<tr>
<td>Diversity in Our Company</td>
<td></td>
</tr>
<tr>
<td>Respectful Treatment</td>
<td></td>
</tr>
<tr>
<td>Fair Labor Standards</td>
<td></td>
</tr>
<tr>
<td>Safety in Our Workplace</td>
<td></td>
</tr>
<tr>
<td>Drugs and Alcohol</td>
<td></td>
</tr>
<tr>
<td>Acting with Integrity for Our Company</td>
<td>12</td>
</tr>
<tr>
<td>Micron’s Assets</td>
<td></td>
</tr>
<tr>
<td>Intellectual Property and Confidential Information</td>
<td></td>
</tr>
<tr>
<td>Technology Systems</td>
<td></td>
</tr>
<tr>
<td>Privacy</td>
<td></td>
</tr>
<tr>
<td>Conflicts of Interest</td>
<td></td>
</tr>
<tr>
<td>Acting with Integrity for Our Marketplace</td>
<td>22</td>
</tr>
<tr>
<td>Product Quality</td>
<td></td>
</tr>
<tr>
<td>Expectations of Our Suppliers</td>
<td></td>
</tr>
<tr>
<td>Fair Conduct in the Marketplace</td>
<td></td>
</tr>
<tr>
<td>Respect for Our Customers</td>
<td></td>
</tr>
<tr>
<td>Gifts and Entertainment</td>
<td></td>
</tr>
<tr>
<td>Bribery and Corruption</td>
<td></td>
</tr>
<tr>
<td>Government Contracting</td>
<td></td>
</tr>
<tr>
<td>Doing Business Around the World</td>
<td></td>
</tr>
<tr>
<td>Acting with Integrity for Our Investors</td>
<td>35</td>
</tr>
<tr>
<td>Books and Records</td>
<td></td>
</tr>
<tr>
<td>Investigations and Audits</td>
<td></td>
</tr>
<tr>
<td>Insider Trading</td>
<td></td>
</tr>
<tr>
<td>Speaking for Our Company</td>
<td></td>
</tr>
<tr>
<td>Acting with Integrity for Our Communities</td>
<td>41</td>
</tr>
<tr>
<td>Environmental Commitments</td>
<td></td>
</tr>
<tr>
<td>Political Activity</td>
<td></td>
</tr>
<tr>
<td>Charitable Involvement</td>
<td></td>
</tr>
<tr>
<td>Waivers</td>
<td>44</td>
</tr>
<tr>
<td>Code Certification</td>
<td>45</td>
</tr>
<tr>
<td>Additional Resources</td>
<td>46</td>
</tr>
</tbody>
</table>
Doing Business with Integrity: An Introduction to Our Code
What Our Code Does
At Micron, we are committed to doing business with integrity. Our Code sets out the standards of behavior that we must meet in order to support that commitment—even when the right course of action isn’t always clear. Our Code is here to present an overview of the laws and ethical principles that apply to our work, including industry standards like the Responsible Business Alliance (RBA) Code of Conduct. In some cases, these standards may go beyond the requirements of the law. Our Code also lays out our Company’s commitment to integrity in everything we do and the high ethical standards we expect of each other. It explains the standards we hold ourselves to, as well as the resources we can turn to if we need help. Following our Code will help Micron succeed and help us build trust with each other and our stakeholders.

What is the RBA?
The RBA—or Responsible Business Alliance (formerly known as EICC)—is a group of leading companies, including Micron. We have joined with these other companies to promote responsible working conditions, ethical business practices and environmental stewardship throughout our global supply chain.

Along with other RBA members, we adhere to the RBA Code of Conduct. The RBA Code addresses what we expect from ourselves and our supply chain in terms of labor, health and safety, environmental practices, ethics and management. We are all expected to comply with the RBA Code of Conduct and to ensure that our suppliers do the same. Our Code includes information about a number of important provisions of the RBA Code of Conduct on a general basis. For more information about these topics, please refer to the RBA Code of Conduct.

Micron has other resources in place to help us make ethical choices. These include policies, our Team Member Handbook and additional materials available at the Compliance & Ethics Center on our intranet, MicronNow. These materials are referenced throughout this Code to provide additional information. Where our Code or supplemental materials are more stringent than the laws and regulations that apply to us, we should always follow our Code and supplemental materials and ask questions where we are not sure. For more information, see the “Additional Resources” section at the end of the Code.

Our Code sets out the standards of behavior that we must meet in order to support our commitment to doing business with integrity.
Where to Go for Help

By speaking up when we have questions or know of potential wrongdoing, we uphold the Company’s commitment to integrity. Reporting actual or suspected misconduct allows Micron to investigate potential problems, stop misconduct and prevent behavior that could damage our reputation as an industry leader. To report a concern or ask a question, you can turn to:

- Your department manager
- An officer of the Company
- A department with special expertise related to your concern (such as Safety, Human Resources (HR) or Security)
- The Legal Department
- The Chief Compliance Officer
- The Vice President, Compliance and Sustainability
- Micron’s Compliance Hotline

Micron encourages you to direct questions or concerns to your department manager, if you feel comfortable doing so. If not, you may contact one of the other in-person resources or the Compliance Hotline. The Compliance Hotline is operated by a third-party provider and is available 24 hours a day, 7 days a week.
Our Compliance Hotline allows you to report your concerns anonymously, where allowed by local laws. However, you are encouraged to leave your contact information so our Company can better investigate the matter. Please be open and honest when making a report. Provide as much information as you can, as this will help our Company conduct a full and proper investigation. We take all reports seriously.

When you make a report, you’re doing your part to help our Company remain ethical and successful. Though you are welcome to go straight to your manager with any concerns or ask specific individuals or departments about certain topics, you can always speak to any of the resources listed above about any concern or potential violation. Remember, speaking up as soon as possible is more important than worrying about finding a specific expert.

Micron is committed to creating a “speak up” environment where we can report suspected violations and participate in investigations without fear of retribution or retaliation. No one may retaliate against you for raising a concern or participating in an investigation in good faith. Anyone who retaliates against someone who makes a good faith report may be subject to discipline, up to and including termination. Holding each other accountable for our actions is central to our success.

If you feel you have experienced or witnessed retaliation, report the situation immediately to one of the resources listed above or as detailed in the “Additional Resources” section.

No one may retaliate against you for raising a concern or participating in an investigation in good faith.
Acting with Integrity for Our Fellow Team Members
Diversity in Our Company

We all want and deserve a workplace where each of us is respected and appreciated for our unique skills and backgrounds. Micron is committed to providing a workplace free of discrimination, where all team members are treated fairly and with respect. Our Company strictly prohibits any form of unlawful discrimination against any team member or applicant for employment. We recruit, hire, train, promote, discipline and make other employment decisions without regard to race, color, ethnicity, religion, gender, sexual orientation, gender identity and expression, age, national origin, disability, veteran status, marital status and other classifications protected under law or Company policy. In addition, we are committed to providing reasonable accommodation for team members’ disabilities or religious beliefs and practices.

Q: Mariana’s coworker James loves to tell jokes he reads online to his coworkers. Often, the punch line relates to an ethnic, racial or gender stereotype. Mariana finds the jokes offensive, and she knows a few other people do, too. What should she do?

A: Mariana should tell James that his jokes are making her uncomfortable and ask him to stop. If she’s not comfortable doing that, or if James continues to make these types of comments, she should speak to her manager about his behavior. The workplace is no place for offensive or distasteful jokes. These types of comments can create a negative environment and make others feel unwelcome. At Micron, we want to create an environment where everyone feels respected and can do their best work.

Respectful Treatment

In a courteous and productive workplace, everyone is treated with respect and professionalism. Respect is fundamental to our team’s success, and we expect it from ourselves and each other at all times. Therefore, our Company does not tolerate harassment of any kind.

Harassment can take many forms, including verbal remarks, physical advances or visual displays. It can come from coworkers, supervisors, vendors, suppliers, contractors or even customers. The legal definition of harassment may vary depending on where we work, but it always has the purpose or effect of creating an intimidating, offensive or demeaning environment for another person. It is a form of discrimination and, as such, has no place at Micron.

Keep in mind that harassment can be sexual or non-sexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors and inappropriate comments about someone’s appearance. Non-sexual harassment may include offensive comments, jokes or pictures related to race, religion, ethnicity, gender or age. In order to keep our workplace respectful, our comments and actions must always be appropriate.
Fatima is a devout Muslim and wears a head scarf every day. Her coworkers often comment on it, and she sometimes hears them make jokes or rude remarks about her Muslim faith. It makes her uncomfortable, but she’s not sure it qualifies as harassment. Is Fatima being harassed?

This may qualify as harassment. Fatima’s coworkers are making her feel uncomfortable with their remarks based on her religion. She should speak up about the situation by telling her coworkers their comments make her uncomfortable. She can also contact her manager or another resource. We all deserve respect in the workplace.

Respect is fundamental to our team’s success, and we expect it from ourselves and each other at all times.
**Fair Labor Standards**

We are strongly committed to respecting and protecting human rights wherever we operate. To that end, we follow all applicable laws relating to working hours and wages, as well as all RBA Code of Conduct guidelines. Under these guidelines, work weeks must not exceed the maximum set by local law and, generally, should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days.

We do not use child or forced labor in any of our operations or facilities, and we never participate in human trafficking or slavery of any kind. In all of our operations, we do not permit exploitation of children; physical, verbal or emotional abuse; or involuntary servitude. We fully respect and adhere to all applicable laws establishing a minimum age for employment. Additionally, Micron respects our rights to freedom of association. All team members are free to join—or not join—a labor union or other workers’ group.

Our suppliers play a key role in helping us manage our global supply chain in a socially responsible and ethically sound manner. We hold our suppliers to the same high standards that we hold ourselves to. This means that we expect our suppliers to embrace and follow this Code and the RBA Code. If you suspect that human rights violations are occurring in our supply chain, you have a responsibility to speak up about it.

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**Q:** Dara works at a Micron manufacturing facility. They are short staffed because a number of team members have taken time off to celebrate a local holiday. To cover shifts, her manager has asked everyone to work extra hours—more hours than they should. Dara knows that this isn’t right, but her manager has promised to give everyone extra time off later to make up for it. Should Dara work the extra hours?

**A:** No. Dara should tell another manager or Human Resources that her manager is asking her to work more hours than she should. We should never work more hours than we are legally allowed to, or more than 60 hours per week without unusual or emergency situations. We follow all applicable laws and regulations related to working hours and working conditions. Micron is committed to creating a workplace where everyone works a fair number of hours and is paid fairly for the work they do.

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**Micron is committed to providing a workplace free of discrimination, where all employees are treated fairly and with respect.**
Safety in Our Workplace

Micron is committed to providing all team members with a safe work environment. While working in a Micron facility, we must follow the safety and health rules that apply to us. Our Company complies with all health and safety laws, as well as Company health and safety policies that may go beyond what the law requires. This includes the standards in the RBA Code of Conduct. Specifically, we meet the RBA’s standards for occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, housing and health and safety communication.

Micron’s commitment to maintaining a safe and healthful workplace means each of us must be alert to potential safety and health risks as we go about our jobs. This allows us to anticipate hazards and prevent injuries and illnesses. All team members, anyone else working on behalf of Micron and employees of other companies working on our premises must be vigilant in upholding the highest standards of safety. We should strive to be an example for everyone around us.

For supervisors, this means:
- Actively analyzing the workplace to anticipate and prevent hazards, including process hazards
- Deterring casual behavior or horseplay when safety is at risk
- Encouraging team members to identify hazards and follow safe work practices
- Enforcing established policies, procedures and work rules
- Ensuring team members are adequately trained
- Responding to reports of potential hazards in a timely manner

For all team members, this means:
- Reporting potential hazards to your supervisor, host or the Safety Department promptly
- Wearing required protective equipment while on the job
- Exercising care with chemicals and other potentially hazardous materials
- Complying with all safety rules and procedures when operating and maintaining machinery and equipment
- Following all ergonomic guidelines
- Responding appropriately in an emergency
- Reporting any job-related injury or illness

*Micron’s commitment to maintaining a safe and healthful workplace means each of us must be alert to potential safety and health risks as we go about our jobs.*
To keep all of our team members safe, we never engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instill fear in others. Weapons are not allowed in the workplace, consistent with local law. If you believe someone is in danger, immediately contact building security or local authorities.

When it comes to safety, we hold our vendors, suppliers and contractors to the same high standard to which we hold ourselves. This means that we expect our suppliers to embrace and follow both our Code requirements and the RBA’s guidelines regarding health and safety.

Our *Environmental Health and Safety Policy* is located on the Global Policy Site (alias “policy”)


Drugs and Alcohol
Micron is committed to providing a safe and productive work environment. We want to employ a workforce free from the use of illegal drugs and the abuse of alcohol. Substance abuse limits our ability to do our work safely. Therefore, we may never work while impaired or under the influence of alcohol, illegal drugs, or other drugs or medications.

In addition, when working or while on Company premises, we may never use, possess, transfer or sell illegal drugs, or misuse alcohol, prescription drugs or over-the-counter medications.

You are always welcome to speak to your manager about any questions. However, the following resources are especially well-equipped to address concerns about how we create a respectful and safe workplace:

- For issues related to harassment or discrimination, speak to HR Employee Relations, your manager, any vice president, the Legal Department or call our Compliance Hotline.
- For safety concerns, contact the Safety Department.
- If you observe that another team member is impaired on the job, immediately notify your supervisor, Security, HR Employee Relations, or contact the Compliance Hotline.
Acting with Integrity for Our Company
Micron’s Assets

Every day, we use Micron’s assets to achieve business goals and ensure our Company’s success. We all have a responsibility to protect Micron’s assets and to use them efficiently. The Company’s assets include, but are not limited to:

- Property
- Inventory
- Equipment and supplies
- Computer data and time
- Confidential information and trade secrets
- Time and skills of team members during work hours

We must never use any of Micron’s assets for unauthorized purposes. Theft, carelessness and waste have a direct impact on Micron’s profitability, so we should always use Company assets wisely and carefully.

Q: Isabel occasionally uses her Company credit card to pay for groceries or gas for her car. She doesn’t do it that often, and she figures the Company owes her for all the overtime she’s been working lately. Is she doing the right thing?

A: No, she’s not. We should use Company assets—like credit cards—only as we need them to do our jobs. No matter how much overtime Isabel has worked, it’s never ok to use her Company credit card for personal expenses.
We all have a responsibility to protect Micron’s assets and to use them efficiently.

Intellectual Property and Confidential Information

Micron’s intellectual property is one of its most valuable assets. Just as we must protect Micron’s physical assets, we must also safeguard our Company’s intellectual property (“IP”). IP includes Micron’s patents, copyrights, trademarks and trade secrets. Just as we respect our Company’s IP rights, we should also respect the IP rights of others. This means that we must:

- Never copy information from the internet or any other source without permission from the copyright owner or approval from the Legal Department
- Never load or install unlicensed software onto a Micron computer or device
- Never assume that just because a document, photo or video does not have a copyright symbol it is free to use
- Always obtain approval from the Legal Department before adopting a new trademark or brand name
- Consult with the Patent Development Group in the Legal Department for questions about patents
- Check with the Legal Department regarding any question about the right to use a third party’s IP

Confidential information

We must also protect Micron’s confidential and proprietary information. Generally, this means any information that has not been approved for release to the public.

Confidential information can include:

- Team member information regarding sensitive personal, medical or financial information, such as benefits, compensation or contact information
- Manufacturing and product specifications
- Technical information
- Financial information
- New product information
- Pricing policies, manufacturing costs or budgets
- Business Processes
- Information entrusted to Micron by third parties under a Nondisclosure Agreement (NDA)
To protect our Company’s confidential information, we should follow these guidelines:

- Never disclose Micron’s confidential information to anyone outside of Micron without an NDA in place that has been approved by the Legal Department, and use all reasonable safeguards to prevent any loss, destruction or inadvertent disclosure of the confidential information.
- Do not remove Micron confidential information from Company premises without permission.
- Do not send Micron confidential information to a personal email address, save it on a personal storage device, or upload it to a personal file sharing site.
- Make sure all Micron confidential information—including e-mail—is conspicuously labeled as such.
- While traveling, keep your laptop, briefcase and all other Company property with you at all times. Even on Micron’s premises, be sure to keep sensitive information and e-mail accounts under password protection when you are not using them.
- Do not discuss Company-related information in public settings such as airports, hallways and restaurants. Always assume a third party is listening.
- Take extreme care when copying, faxing or discarding sensitive papers, disks, drives, audiotapes or other Company property. Do not discard them in any place or format where the information could be intercepted.
- Share Micron’s confidential information with other team members only if you have authorization and a valid business need to do so.
- If you come into contact with team members’ personal information or other confidential information because of the nature of your job, take special care to safeguard it from loss or theft. Use it only to the extent necessary in accordance with the law.
- If you need to send any confidential or proprietary data to an outside source, you should use all reasonable safeguards to prevent any loss, destruction or inadvertent disclosure.
- Safeguard Micron’s information even after your employment with Micron ends.
- Never ask an interviewee or team member to disclose confidential information about a former or current employer.

Never use or disclose to anyone outside of Micron confidential information provided to us by customers, vendors, suppliers, contractors or other third parties, except in strict compliance with the terms of the applicable NDA or confidential disclosure agreement. Additional information regarding the protection and classification of Micron’s confidential information can be found in our Confidential and Information Classification Policy, our Acceptable Use Policy, and in certain other global policies located on our Global Policy Site (alias “policy”).

**Q:** Roberto and Elise have been working on developing a new solid state drive. One day after work, they decide to go out for drinks at a local bar. They continue talking about their ideas for the new drive loudly enough for others to overhear. Have they done anything wrong?

**A:** Roberto and Elise should not have discussed products in development—or any other confidential Company information—in a public place where others could overhear. The information might fall into the wrong hands, and we could lose our competitive edge.
Yukiko was recently hired by Micron. She previously worked for one of our competitors, where she was in charge of developing a social media marketing plan for their latest flash memory device. Can she share details about that social media marketing plan with her new coworkers so they can develop a competing strategy for Micron?

No, Yukiko cannot share this information with her new Micron colleagues. Just as we all have a responsibility to safeguard Micron’s confidential information; we must also protect information that belongs to third parties—including past employers. Yukiko can best help Micron by working with her team to create a new and unique marketing plan that will showcase our products.

Technology Systems

We each have a responsibility to use our Company’s network and computer systems ethically and legally. While we may make incidental personal use of these systems, our Company reserves the right to monitor our use, except as prohibited by local law. This includes Company e-mail and voicemail accounts, as well as all electronic documents on Company laptops and other mobile devices. At no time may we use the Company’s network and computer systems for unauthorized, illegal or unethical purposes, or to download sexually suggestive or explicit material. In addition, we must promptly report any suspected or known breach of the security of our Company’s network or computer systems.

Additional information regarding our Company’s policies relating to our network and computer systems can be found on our Global Policy Site (alias “policy”), including the Acceptable Use Policy, the Access Management Policy, the Enterprise Information Security Policy, the IT Physical and Environmental Security Policy, the Network Communication Security Policy, the Site and Systems Access Policy for Former and JV Employees and the System Operation Management Policy.
Privacy

We must all protect the personal information of our team members, customers and other partners with appropriate administrative, technical and physical safeguards. If we have access to personal information, we must act with discretion and professionalism and always follow Company policies and security protocols. When dealing with personal information, we should comply with the terms of our personal confidentiality agreements and our Company’s rules. We should also follow Micron’s policies, including our Privacy Policies posted at www.Micron.com and www.Crucial.com. These policies apply in general to personal information we gather from our external websites. In addition, specific departments that deal with personal information may also have policies and procedures related to personal information. For more information, speak to a department representative.

If someone from outside of Micron requests personal information about a team member, refer them to the HR Department. In addition, you should consult with the Legal Department before sending personal information to new third-party service providers.

Additional information regarding our Company’s policies relating to privacy can be found on our Global Policy Site (alias “policy”), including the EU Data Protection Policy and the Privacy Shield Policy.

In addition to your manager, you can speak to others for guidance about how to protect Micron’s assets.

- For questions about intellectual property and confidential information, speak to the Legal Department.
- For information about how to handle team members’ personal information correctly, or if someone from outside the Company requests information about a team member, contact the HR Department.
Conflicts of Interest

We are always responsible for acting in the best interests of our Company. In order to uphold our reputation for integrity, we must be alert to any situations that may create a conflict of interest. A conflict of interest arises when we have personal or private interests (financial or otherwise) that could—or could be perceived to—interfere with our duty to act in Micron’s best interests. Conflicts can also arise when our personal interests test our objectivity or our loyalty to Micron, interfere with our work performance or compete with Micron’s interests.

It is not possible to describe every situation that could give rise to a conflict of interest. However, some of the more common conflict of interest situations are outlined below.

Doing business with family members

A conflict of interest can arise if you, a close relative or close personal friend have a personal stake in a company that is a vendor, supplier, contractor, customer or competitor of Micron. This can create problems because our personal interests, or those of our family or friend, may be different than Micron’s. A close relative includes all of the following:

- Spouse
- Domestic partner
- Significant other
- Parents or Stepparents
- Children
- Stepchildren
- Siblings and step siblings
- Nephews and nieces
- Aunts and uncles
- Grandparents
- Grandchildren
- In-laws

If you find yourself in one of these situations, you must not use your position at Micron to influence business decisions, such as a bidding process or negotiations, in any way.

*In order to uphold our reputation for integrity, we must be alert to any situations that could—or could be perceived to—interfere with our duty to act in Micron’s best interests.*
Relationships in the workplace
Our Company discourages employment relationships that create real or perceived impropriety, undue influence, bias or favoritism. When two team members have a close personal or family relationship—particularly if there is also a reporting relationship—it may seem that one team member is receiving preferential treatment or favoritism. To prevent this, unless approved by the Chief Executive Officer, no Micron team member should have direct reporting or decision-making authority over a close relative or close personal friend.

Q: Oliver works in our marketing department. His sister Shawna is applying for a job in another department at Micron. Does she need to disclose on her application that her brother works at Micron?

A: Yes, she does. Even though they would not be working together, Oliver and Shawna still need to disclose that they are related. This will help Micron make a fair decision about whether they will be able to work impartially.

Outside employment
Our activities outside of our work at Micron should not significantly take away from the time and attention we are expected to devote to our duties for the Company. In addition, we may not make use of corporate equipment, facilities or supplies for outside activities, except for limited insignificant use without prior approval. Further, you must be careful if an outside employment opportunity is available because of your position at the Company. If you or a family member wish to accept such an outside employment opportunity while you work at Micron, you must obtain prior approval before proceeding.
Investments in other companies
As Micron team members, we need to be careful that our investments—and those of our close relatives and friends—do not create conflicts of interest or hinder our ability to make objective decisions for Micron. Any substantial interest in a competitor, supplier or customer requires prior approval. A substantial interest is any economic interest that might influence or appear to influence our judgment.

Some investments are never okay, for example, if you have been involved in selecting or negotiating with a supplier or customer (or you supervise someone who has); you may not have a substantial investment in that company. Likewise, you should not do business on Micron’s behalf with any company for which you have some decision-making authority. On the other hand, publicly-traded mutual funds, index funds and similar investments usually do not present conflicts because the individual investor has no say in which investments are included.

Financial opportunities
We may find ourselves in situations where it would be a conflict to pursue specific financial opportunities using information we gain during our time at Micron. In order to make objective business decisions on behalf of Micron, we should use caution when entering into a situation where we could be competing with our Company. We may not take for ourselves any business or financial opportunities that we discover through our position at Micron or through Company proprietary information.
Board memberships
Micron encourages us to engage with our communities by serving as members of community groups, schools, and non-profit boards or on the board of directors of other organizations. However, we should participate on boards outside of our Micron job duties only with our own resources, and not as a representative of Micron, unless we have advance approval. If an outside organization you are involved with would like to receive Micron resources, support or other Company involvement beyond your participation, you should contact the Micron Foundation.

If you are asked to serve on an outside organization’s board of directors as a result of your service with the Company, you should disclose any compensation you receive to the Chief Compliance Officer and you may have to forfeit it to the Company. Only senior vice presidents and above may serve on the board of a publicly held company. In all cases you must obtain approval from the Company’s Chief Executive Officer before accepting a seat on the board of a publicly-held company or a supplier or customer of Micron.

With regard to time served on boards on an entirely personal basis, please check with your management or local Human Resources.

Disclosing a potential conflict
If you believe you have a conflict of interest (or a potential or perceived conflict), disclose it immediately to your Department Manager, Vice President or Site Manager, the HR Department, the Vice President, Compliance and Sustainability or the Chief Compliance Officer and seek approval or guidance as needed. This way, the situation can be properly reviewed and handled in accordance with our Company’s conflict of interest policies. Our Compliance and Ethics SharePoint Site (alias “CEC”) includes a form which is to be used for purposes of disclosing and clearing conflicts of interest.
Acting with Integrity for Our Marketplace
Product Quality

Micron provides best-in-class products and services that meet our customers’ needs and expectations. We comply with all internal quality control processes and follow product and customer specifications at all times. We strictly follow all laws and regulations relating to manufacturing, design, material composition, material sourcing, testing, packaging, storing, handling, labeling and shipping products. If a product recall is deemed necessary, we ensure that we follow all applicable procedures, laws and regulations. By doing so, we ensure the highest value to our customers. Our Global Quality Policy is located on the Global Policy Site (alias “policy”).

Expectations of Our Suppliers

Micron expects our suppliers to meet high standards of ethical performance in all of their business interactions. We hold our suppliers to our Code and our standards of ethical conduct. In addition, our suppliers must follow RBA standards on labor, health, safety, environment, ethics and management system—regardless of local law or custom.

Our Company also recognizes that the professionalism and integrity of our business partners ultimately impact the quality of our products and our customer relationships. Our suppliers are expected to ensure that the products and services they provide to us are in line with all contract specifications, laws and regulations that apply. If you become aware that our suppliers are not meeting the RBA Code of Conduct’s standards for their products, operations or processes, you should report it to Global Procurement immediately.

Additionally, we are committed to sourcing our materials ethically and legally. This means we perform proper due diligence on our product supply chain. We identify and address any conflict mineral sourcing that may be directly or indirectly supporting civil violence or human rights abuses in the Democratic Republic of the Congo (DRC) or adjoining countries.

**Micron expects our suppliers to ensure that the products and services they provide to us are in line with all contract specifications, laws and regulations that apply.**
Our suppliers are key to managing our global supply chain in a socially responsible and ethically sound way. Micron utilizes monitoring and auditing procedures to ensure that our suppliers maintain our high standards. If you suspect that human rights or other compliance violations are occurring in Micron’s supply chain, you have a responsibility to speak up. Our Conflict Minerals Policy is located on the Global Policy Site (alias “policy”).

Elijah is finalizing a contract with a supplier who provides materials that contain conflict minerals and are used to make several of our best-selling products, at an excellent price. He’s on a tight budget and running behind schedule, so he secures the material from the supplier without following Micron’s vendor approval process. He also bypasses Micron’s conflict minerals diligence. Elijah figures his job is to deliver the product to the market on schedule at the lowest cost, notwithstanding any other objectives or processes. Is he doing the right thing?

Q: Elijah is finalizing a contract with a supplier who provides materials that contain conflict minerals and are used to make several of our best-selling products, at an excellent price. He’s on a tight budget and running behind schedule, so he secures the material from the supplier without following Micron’s vendor approval process. He also bypasses Micron’s conflict minerals diligence. Elijah figures his job is to deliver the product to the market on schedule at the lowest cost, notwithstanding any other objectives or processes. Is he doing the right thing?

A: No. At Micron, we’re committed to protecting human rights in our supply chain, so we take all necessary measures in compliance with the law and Micron’s policies to assure that the materials we use to manufacture our products do not support civil violence or human rights abuses in the DRC or adjoining countries. To meet this commitment, we must strictly follow all supplier due diligence procedures. We should never cut corners or try to save a few dollars if it means putting our principles in jeopardy.

Fair Conduct in the Marketplace

We strive to provide customers with a wide selection of goods at fair prices. To do this, we comply fully with fair competition laws of the U.S. and other countries where we do business. Fair competition laws ensure that businesses in the marketplace compete on the basis of quality and integrity—never by participating in unfair and anticompetitive practices such as price fixing, market, customer or supplier allocation, tying and bundling or any other agreement that would unfairly limit competition. Even if no written or oral agreement to violate these laws exists, an illegal agreement may still be inferred from our behavior. It is unacceptable to make agreements with our competitors to improperly restrain trade—or give the appearance that we have done so. To avoid even the appearance of impropriety, we should generally avoid discussing any of the following topics with our competitors:

- Pricing, credit terms or conditions of sale of products
- Plans regarding customers
- Pricing policies, bidding plans or strategies
- Marketing plans
- Restricting output, such as production volumes
- Discounts and promotions
- Dividing markets, territories (such as sales territories) or customers
- Inventories and capacity
- Whether or how to deal with a customer or supplier
We should obtain preapproval from the Legal Department before engaging in any of the following in our business conduct and communications, as they may be improper:

- Entering into collaborative arrangements with a competitor
- Establishing exclusive dealings
- Tying or bundling together different products
- Entering into “requirements” or exclusivity agreements
- Setting resale prices with resellers

We should also use caution when participating in trade association meetings or communicating through a trade association. If anyone attempts to discuss any of the topics listed above, we must immediately stop the discussion, leave the meeting and report it to the Legal Department. By making our objection to anticompetitive conversations clear and unmistakable, we can protect ourselves and our Company from accusations of anticompetitive activity.

Q: At a trade convention, Jason runs into his friend Zach, who is a sales representative for one of Micron’s competitors. Zach tells Jason, “It’s hard to make a profit when prices are so competitive. I wish there was some way we could fix that.” Jason shrugs and grins. Zach nods, gives him a thumbs-up, and says, “Great. This way, we both win.” Has Jason done anything wrong?

A: It sounds like Zach is proposing that he and Jason should both raise their prices—an illegal anticompetitive practice called price fixing. By not voicing his objection to this idea, Jason may be giving the impression that he agrees with Zach’s plan. This could lead to serious trouble for Jason—and for Micron. Instead, he should have refused to talk about pricing, left the conversation and immediately reported it to the Legal Department.
Violations of competition laws can lead to severe civil and criminal penalties for our Company and for individuals. Like many global laws and regulations, competition laws are complex and vary from country to country. Each of us needs to be sure that we understand the laws of the country where we work and be aware that conduct occurring completely outside the United States can still be subject to U.S. laws.

Gathering and using competitor information ethically
To compete in the marketplace, we need to understand industry trends. This includes staying abreast of what our competitors are offering customers in the marketplace. However, we should only gather and use information about our competitors fairly, legally, and ethically. Generally, this means gathering such information only from publicly available sources, such as customers, public filings, news sources or industry surveys and reports.

We may never obtain non-public information through illegal activities, such as industrial espionage or asking a competitor’s current or former employees or contractors to reveal confidential data. For example, we may never gather information from records brought by new hires from previous employers. In addition, we may not use information about competitive proposals or products that was given to a partner, supplier, customer or anyone else with the understanding they would treat it as confidential. Nor may we retain a third party to engage in such activities on our behalf.

Competition laws are complex, and issues can arise in many circumstances. Please review the Antitrust Compliance Manual, which is located on our Global Policy Site (alias “policy”), for a more detailed explanation of the many laws and situations relevant to Micron team members.

For guidance about competition law, or to report anticompetitive behavior, contact your manager or the Legal Department.

We should only gather and use information about our competitors fairly, legally, and ethically.
Respect for Our Customers

Team members are expected to act with integrity at all times. In all our business activities, we should act in accordance with applicable laws and regulations and Company policies. We deal honestly with all customers and never misrepresent our products. We must never take unfair advantage of the Company’s, suppliers’, customers’, competitors’ or other companies’ employees. To accomplish this we must never engage in manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or other unfair practices.

Honest sales and marketing materials

Micron’s reputation is one of our most important assets. To protect the trust customers place in us, our marketing and sales activities must always be fair, honest and accurate. When we make a claim about a product, it must be true and we must be able to prove it.

It is very important that we adhere to applicable advertising laws and regulations at all times by following the Company’s internal procedures.
Gifts and Entertainment

At Micron, we value long-lasting relationships with our vendors, suppliers, customers and other business partners. During our normal course of business, we may offer or receive gifts and entertainment as a means of maintaining goodwill in those relationships. However, we must be careful that any exchange of business courtesies is professional, appropriate and does not create the appearance of a conflict of interest.

A gift can be anything of value—for instance, tangible goods, meals, vacations, prizes, tickets, endorsements, use of vacation facilities, stocks or other securities or transportation.

Entertainment is a meal or event where both parties are present. However, if a business partner offers you access to this kind of event (tickets, for example) but does not attend with you, then it is considered a gift and strict gift rules apply.

When offering or accepting gifts, we must ensure that they are:

- Unsolicited
- Infrequent
- Customary and tasteful
- Reasonable in value
- Not cash or cash equivalents (such as gift cards or vouchers)
- For a business purpose
- In compliance with applicable agreements, laws and regulations
- Acceptable under Micron’s and the recipient’s gift policy or known company standards

Even if we give or receive gifts that meet the criteria above, we should still exercise caution when exchanging courtesies. Any item that falls outside of the above guidelines should be politely declined. If returning the gift is not practicable or would create problems, it should be turned over to Micron for Company use, sale or donation.
In addition to the guidelines above, business entertainment must meet a few additional criteria. We may offer or accept business entertainment only if it:

- Takes place in a setting that is appropriate for a business discussion
- Does not violate Micron’s commitment to mutual respect
- Is unsolicited, meaning that the recipient did not ask for or suggest it
- Does not set an unreasonable standard or appear unreasonable to other team members
- Would not influence us to act in a way that isn’t in Micron’s best interests

To be clear, strip clubs, hostess and host clubs and all similar institutions are not considered appropriate for a business discussion.

Keep in mind that we must follow much stricter rules when offering gifts, meals or entertainment to government officials. For this reason, we must never offer or provide gifts, gratuities or entertainment to government officials without prior approval from the Chief Compliance Officer. For more information, please refer to the “Bribery and Corruption” section below.

<table>
<thead>
<tr>
<th>Can I accept?</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Tickets to the World Series</td>
<td>Probably not. These tickets are expensive—and they could bias you toward this business partner. You must get approval from your Department Manager, the Compliance &amp; Ethics Group, the Vice President, Compliance &amp; Sustainability or the Chief Compliance Officer before accepting them.</td>
</tr>
<tr>
<td>A t-shirt and a few ballpoint pens with the supplier’s logo on them</td>
<td>Yes, because these items fit all of our guidelines. They are considered nominal gifts and do not require approval unless exchanged with a government official.</td>
</tr>
<tr>
<td>A voucher to board your dog at a local kennel for a week</td>
<td>No, because a voucher is considered equivalent to cash. We are not allowed to accept cash gifts.</td>
</tr>
<tr>
<td>A gift basket of fruit and cheeses that you can share with coworkers</td>
<td>Yes, provided that it isn’t very expensive.</td>
</tr>
</tbody>
</table>
Keep in mind that some departments and business units have more restrictive rules about gifts and entertainment. For example, because we must always maintain sound business practices with our suppliers, the Global Procurement Department has established more stringent gift policies for team members who interact with suppliers. More information about the Global Procurement Department’s policies is available on MicronNow.

Questions about gifts and entertainment can be directed to any of these resources:
- Your manager
- The Legal Department
- The Vice President, Compliance and Sustainability
- The Chief Compliance Officer

Q: Michael is selecting a new supplier for an important piece of manufacturing equipment. One of the companies he is working with has sent him a few small gifts, including a gift basket, a tie and a bottle of wine. Can he accept these items?

A: While these gifts are fine individually, accepting numerous gifts could make it look like Michael’s judgment is being inappropriately influenced. He should speak to his manager or the Legal Department about how to handle this situation and whether he can accept these gifts from this supplier.
Bribery and Corruption

We believe in winning business ethically through the quality of our products and customer service, never through bribery or corrupt payments. We abide by all laws, treaties and regulations that forbid bribery in all of its forms, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

Below are some key points and definitions that we must understand and follow:

Foreign and other government officials can be federal, state or local government employees, political party officials or candidates, employees of government-owned businesses or employees or officials of the U.N., the World Bank or similar organizations. In some countries, it might not be obvious that a business, school or other organization is actually government owned. Where you are unsure, ask for guidance before acting.

Bribes can be any item of value—not only money, but also any kind of gift, favor or entertainment—that could look like an attempt to influence an official’s actions or decisions or acquire an improper advantage for our Company.

A kickback is the return of a sum already paid (or due to be paid) as a reward for making or encouraging business arrangements.

A facilitating payment is usually a small cash payment made to expedite standard government services. These services may include processing permits, providing police protection or expediting utility services. We must never agree to pay facilitating payments, even if they are customary in a particular country.
The key to steering clear of corruption is never offering or accepting anything of value that could influence someone’s ability to make objective business decisions. This can take the form of deciding to do business—or continue to do business—with us, gaining a business advantage or any other form of improper influence. We can never offer, pay, solicit or accept a bribe, whether we are working with government officials, our clients or our business partners. In addition, we may never hire a third party to do something we legally may not, or knowingly allow a third party to engage in unethical behavior on Micron’s behalf.

Under the FCPA, our books and records must accurately and fairly reflect our expenditures and other transactions. We are also required to keep a system of internal controls so we can provide honest financial statements and accurately account for our profits, losses, assets and liabilities.

Civil and criminal penalties for violating anti-corruption laws are severe, making it all the more important that we always follow the anti-corruption laws that apply to us. Each of us has a duty to report any known or suspected violations immediately, no matter how small they may seem. Rest assured that you will never experience retaliation for a report made in good faith.

For additional information on bribery and corruption visit the Compliance and Ethics Center (alias “CEC”) and the Global Policy Site (alias “Policy”).

Q:
Huang needs to obtain a certain environmental permit from the local municipal office before he can open a Micron manufacturing facility. The city clerk tells him it could take up to six weeks to process the permit. He hints that he might be able to get it done more quickly if Huang can provide him with a “token of appreciation”—such as a car. Huang needs the permit as soon as possible. What should he do?

A:
No matter how much he needs the permit, Huang should not do what the clerk is suggesting. This gift would qualify as a bribe. At Micron, we never pay bribes under any circumstances. It’s not how we do business. Huang should report the incident to his manager or the Legal Department.

We can never offer, pay, solicit or accept a bribe, whether we are working with government officials, our clients or our business partners.
Government Contracting

Micron strictly observes all laws, rules and regulations that govern the acquisition of goods and services by any governmental entity, the performance of government contracts and government financial assistance agreements such as grants and cooperative agreements. When dealing with government employees and agencies, we must always be truthful and accurate. We may never provide inaccurate, incomplete or misleading information, certifications, statements or reports to government employees or agencies. Whenever we bid on a government contract or subcontract, we must take special care to use accurate figures as the basis for our pricing.

If you are part of a team working on a government contract, you are responsible for knowing and complying with the contract requirements at all times. Never deviate from contract specifications without authorization, and always follow applicable procedures. If we deal with any governmental agency—including international government agencies and organizations—it is our responsibility to learn and comply with all rules that apply to the process and to interacting with government officials and employees.

Activities that may be appropriate when we work with other customers may be improper—or even illegal—when we deal with government agencies and employees. The penalties for failing to follow these laws are severe, including substantial civil and criminal fines and imprisonment. Our Government Contracts Approval Policy, which applies to any proposed engagement with the United States Federal Government, is located on the Global Policy Site (alias “policy”). Before you engage in any non-routine interactions with any government official you should carefully review all applicable policies located on our Global Policy Site and also contact Government Affairs.

For more information about working with government officials or complying with government contracts, contact the Legal Department or Government Affairs.
Doing Business Around the World

As a global company, we deliver our products all over the world. To accomplish this, it is critical that we carefully comply with all national and local rules and regulations that apply to our international trade activity. We must understand and follow all laws that apply to us relating to exports, re-exports or imports.

An export takes place when products, equipment, materials, software or technology (including technical assistance) is sent to a person in another country. An export can also occur when technology (including technical information and assistance) or software is released in any way—including oral, visual or other written means—to a non-U.S. citizen located in either the United States or a third country. Before exporting anything, you must verify the eligibility of both the location of delivery and the recipient. You also must obtain all required licenses and permits, and pay all proper duties.

Import activity, or bringing the goods we purchase from a foreign or external source into another country, is also subject to various laws and regulations. Import activities may require us to pay duties and taxes and submit certain filings.

Because import and export laws are so complex, you should not engage in any trade involving restricted countries or persons, or suspected biological, chemical, nuclear or missile end uses without the approval of the Logistics/Traffic Department or the Legal Department. For more information, contact the Logistics/Traffic Department.

Boycotts

Regardless of where we are doing business, we must follow all applicable U.S. laws that prohibit us from participating in or cooperating with any international boycott not sanctioned by the U.S. government.

Requests to cooperate with boycotts may be oral or written. They often appear in contracts, letters of credit, or in bid or proposal materials. A request, direction, or contract provision that contains the words “boycott” or “blacklist,” or reference to specific national origins, ethnicities, religions or genders may be boycott-related.

U.S. law may require us to report requests to participate in an unsanctioned international boycott, even if we do not agree with or respond to the request. If you receive such a request, you must immediately report it to the Legal Department, so that Micron may determine its reporting obligations.

Your manager is available to answer questions about boycotts and international trade. You may also contact the following resources:

- The Legal Department
- The Logistics/Traffic Department
Books and Records

We all play a role in ensuring the integrity of our financial books, records and disclosures. Whatever information you record for our Company—from hours worked to product inventory, travel expenses or accounting—you must help ensure that the business information we report is accurate, complete and timely. This includes accurately recording or completing all of the following:

- Expenses and capital expenditures
- Sales
- Shipments
- Time sheets
- Vouchers
- Bills
- Payroll and benefits records
- Regulatory data
- Production movements
- Other essential Company information

The information we record helps our Company plan for the future. It also informs the financial data we report to shareholders and regulators. To make sure our Company can plan correctly and that our shareholders and regulators have accurate information, our books and records—whether paper or electronic—must always be complete and honest. They must fairly reflect our business assets, liabilities, expenses and revenue. We all have a duty to maintain our books and records in accordance with accounting principles generally accepted in the United States and any other regulatory requirements that apply to a multinational, publicly traded company.

What is a record?

Keep in mind that a record doesn’t have to be a paper document—it can be electronic, for instance. All of these are records:

- Paper files
- E-mail
- Instant messages
- Web page content
- Spreadsheets
- Systems files and databases
- Audio files and tapes
- Computer hard drives
- Media storage formats such as CDs, DVDs, USB drives and external disk drives
Our books and records—whether paper or electronic—must always be complete and honest. They must fairly reflect our business assets, liabilities, expenses and revenue.

Records management
In addition to creating honest, accurate financial records, we must also manage and retain our Company’s records according to our Records Management Policy. Records are vital to fulfilling our business needs and meeting regulatory requirements. Never destroy them in violation of the policy.

If certain documents or records may be needed for an investigation, audit or potential lawsuit, they may be placed under a legal hold. If a record is subject to a legal hold, we must not alter, damage, or destroy the record until we are instructed that the hold has been lifted—regardless of our usual retention schedules.

We are also firmly committed to preventing and detecting any act of fraud. Generally speaking, fraud is intentionally concealing facts in order to deceive or mislead others. Among other things, this may include:

- Misstatements due to fraudulent financial reporting or revenue recognition
- Misstatements related to using assets for illegal, inappropriate or unintended purposes (such as wire fraud or fictitious vendors)
- Fraudulently obtained revenue and assets
- Attempts to avoid costs and expenses

If you think unethical, improper or illegal conduct is taking place—particularly concerning our internal accounting practices, financial irregularities or fraud—you must report your concerns immediately.

Contact your manager, the Records Department or the Legal Department if you have questions about our Company’s books and records.

Investigations and Audits
As part of an inquiry or investigation, a government agent may contact you for information. Before providing any information, you should first contact the Legal Department where permitted by law. The Legal Department can provide advice as to how to respond and will ensure that all appropriate steps are taken and that the Company’s interests are protected.
Insider Trading

While working on behalf of Micron, you may become aware of material, non-public information about our Company, our owners, our customers or other companies. Material, non-public information (also known as *inside information*) is information about a company that is not known to the general public and that could influence a typical investor’s decision to buy, sell or hold that company’s securities. Information is no longer non-public when it has been widely disseminated to the public and a reasonable waiting period has passed so that the information has been absorbed by the marketplace.

Inside information can include information about any of the following:

- Financial results
- Projections of future earnings or losses
- Changes in manufacturing productivity or yields
- News of a proposed merger or acquisition
- Gain or loss of a substantial customer
- New products
- Changes in senior management
- Significant litigation
- Stock or debt offerings
- Stock splits
- Damage to or loss of material assets
Inside information can also relate to another company, a supplier or a customer that you obtained confidentially during the course of your work.

Trading on material, non-public information violates insider trading laws. Anyone involved in insider trading could be subject to disciplinary action, as well as potential civil or criminal penalties. It is also illegal to provide inside information to others (or tip them) to influence their investment decisions.

Insider trading is taken very seriously. You may face penalties for misusing inside information even if the amount of money involved was small—or even if you made no profit at all.

If you share inside information with other Micron team members as part of your job, you must know and follow the procedures in place for releasing such information. If you receive inside information that you should not possess, report it immediately to the Legal Department.

For more information review the Insider Trading Policy, located on our Global Policy Site (alias “policy”).

**Speaking for Our Company**

In order to ensure that our communication is accurate and consistent, only certain designated team members are authorized to speak on Micron’s behalf to the media and investment community. If you receive a request for an interview or information about our Company, politely decline to comment and refer the request to the Global Communication & Marketing Department. For more information review the Policy on Selective Disclosure of Material Non-Public Information (Regulation FD Policy) located on our Global Policy Site (alias “policy”).
Using social media

Social media is part of our everyday life and culture, and it can be a great way to engage and network with our customers, business partners and communities. We are required to use social media responsibly. Social media can take many forms, including internet forums, blogs and microblogs, online profiles, wikis, podcasts, pictures and video, e-mail, instant messaging and music-sharing. As technology evolves, so will social media platforms.

We should always remember that what we say or write on social media is a permanent record that can be shared with the world in seemingly infinite ways. Therefore, respect and good judgment must be our guide when participating in these forums. Additionally, we must make it clear that our statements represent our own personal views, unless we are specifically authorized to speak on Micron’s behalf.

Micron respects freedom of expression and, in general, what you do outside of work is not Micron’s concern. However, activities at or outside of work that violate Micron’s Code or other policies, or affect your Micron job performance, the performance of other Micron team members, or Micron’s business interests and reputation are of legitimate concern to Micron and you must use good judgment.

For more information about these topics, consult the following resources:

- If you have questions about insider trading, contact the Global Stock Plans Department or the Legal Department.
- If you receive a request for an interview or information about Micron, forward the request to the Global Communication & Marketing Department or the Investor Relations Department.
- If you want to learn more about posting appropriate content online, read Micron’s Social Media Contributor Policy, which is located on our Global Policy Site (alias “policy”).

Q: Ashley is a sales representative at Micron. She posts on her social media profile, “Time to break out the champagne! We beat our monthly sales goal by 20%!” Is this ok?

A: No. Ashley should not have posted any information—even good news—about Micron’s monthly sales. This information should always be kept inside our Company. Even though Ashley didn’t give exact numbers, she did post information about Micron’s financial performance that outsiders might use to make business decisions. If you have questions about what information may be shared, speak to your manager or supervisor.
Environmental Commitments

We all benefit from healthy air, land and water—and we do our part to protect and preserve these resources. To do this, we follow all environmental laws that apply to us. Beyond simply following the law, we strive to surpass industry standards of environmental excellence in all of our workplaces, including those standards outlined in the RBA Code of Conduct. The RBA Code of Conduct establishes standards about all of the following:

• Environmental permits and reporting
• Pollution prevention and resource reduction
• Hazardous substances
• Wastewater and solid waste
• Air emissions
• Materials restrictions
• Storm water management
• Energy consumption
• Greenhouse gas emissions

Micron provides training to team members on environmental topics according to roles and responsibilities.

In all of our operations, Micron is committed to promoting sustainable practices. We utilize safe and long-term practices for reducing waste, preventing pollution and handling and disposing of potentially hazardous materials. We also make sure to maintain our monitoring systems to ensure that we stay compliant and keep our communities healthy. We continuously look for ways to use energy efficiently and wisely. For more information review the Environmental Health and Safety Policy located on our Global Policy Site (alias “policy”) as well as our annual Sustainability Report located at micron.com.

Questions about environmental requirements should be directed to your manager, EHS personnel, the Legal Department or the Compliance Hotline.

Beyond simply following the law, we strive to surpass industry standards of environmental excellence in all of our workplaces
Political Activity
Micron encourages each of us to engage in the political process in support of candidates or parties. However, you may never create the impression that you are speaking or acting on behalf of Micron. You should participate in the political process only on your own time and with your own resources. We may never use Company time, property or equipment for personal political activities. Likewise, we should never expect to be reimbursed for personal political contributions.

Corporate political activity
Micron’s public policy agenda includes electing public officials who understand our Company’s business interests and support legislation important to Micron. However, Micron’s funds and other assets may be used as political contributions only as permitted by law and in accordance with Micron’s policies. Government Affairs and the Legal Department are solely responsible for managing political contributions on Micron’s behalf. This includes donations of products, services, transportation, and facilities.

Government Affairs also oversees Micron’s lobbying activities. In the course of your employment, you may not engage in any activity intended to influence legislation or rulemaking, or engage lobbyists or allow others to do so without the prior written authorization of Government Affairs.

Where appropriate and lawful, our Company maintains U.S. federal and state political action committees (PACs). Participation in an employee PAC is completely voluntary. You will never be pressured in any way to contribute to or support any political party or candidate.

Please speak to Government Affairs if you have questions about our PACs or if you are being pressured to support a political candidate or cause.
Charitable Involvement

As part of our Company’s mission, we seek to have a positive influence on everyone who comes into contact with our Company and our people. We are encouraged to participate in organizations or causes that we feel passionate about and may even be eligible for limited paid leave for certain types of charitable activities. However, we must not use significant Company resources for personal charitable activities without permission.

As a team member, you have discretion to take part in charitable activities. However, the charity or activity must not appear to be (or otherwise operate as a cover for) a political payment. Use good judgment and be respectful of approaching other team members about charities. For more information review the Community Service Time Policy located on our Global Policy Site (alias “policy”).

Waivers

Any waiver of the Code for executive officers or directors may be made only by the Board or a Board committee and must be promptly disclosed as required by applicable laws.

No matter where at Micron we work or what our specific job might be, integrity always matters.
Code Certification

By signing below, I acknowledge that I have read and understood the Micron Code of Business Conduct and Ethics.

I understand that I should contact any of the resources listed in our Code if I have any questions concerning this document, or any behavior or situation concerning Micron. I also understand that I have a responsibility to immediately report any violations of this Code to one of the resources listed in the Code.

I hereby confirm the following:

• I have read and understood the Micron Code of Business Conduct and Ethics.
• I understand that more detailed guidance of matters covered in the Code is provided in other resources, such as MicronNow, and through the Compliance Hotline, and I know how to access them.
• I understand that I am responsible for knowing and complying with the Code and all laws, policies, procedures and other guidance that applies to me.
• I understand that I am expected to behave honorably in all my business relationships and to treat with respect all people with whom I interact professionally.
• I understand that I have a duty to speak up and report any known or suspected violation of the Code, Company policies or law.
• I am not aware of a violation of the Code, Company policies or law which has not already been reported as necessary and appropriate.
• I understand Micron’s policy forbidding retaliation and will not retaliate against any individual who reports a concern in good faith.
• I understand that I may be subject to disciplinary action up to and including termination of employment if I violate the Code, any of Micron’s policies or the law.

Date: ______________________

____________________________________
Team Member Name (Please Print)

____________________________________
Team Member Signature
Additional Resources

In most cases, your manager will be best suited to answer any questions you have about the topics in our Code. However, in some cases, other resources may also be well-equipped to address your concerns.

<table>
<thead>
<tr>
<th>Area of Concern</th>
<th>Who to contact</th>
<th>Where to find more information in our Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alcohol or drug use</td>
<td>• Security Department</td>
<td>Pg 11</td>
</tr>
<tr>
<td></td>
<td>• Safety Department</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Human Resources</td>
<td></td>
</tr>
<tr>
<td>Antitrust and competition</td>
<td>• Legal Department</td>
<td>Pg 26</td>
</tr>
<tr>
<td>Books, records or fraud</td>
<td>• Finance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Internal Audit</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Legal Department</td>
<td></td>
</tr>
<tr>
<td>Boycotts and international trade</td>
<td>• Legal Department</td>
<td>Pg 34</td>
</tr>
<tr>
<td></td>
<td>• Logistics/Traffic Department</td>
<td></td>
</tr>
<tr>
<td>Conflicts of interest</td>
<td>• Legal Department</td>
<td>Pg 18</td>
</tr>
<tr>
<td></td>
<td>• Your department manager</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Your vice president</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Human Resources</td>
<td></td>
</tr>
<tr>
<td>Customer personal information</td>
<td>• Legal Department</td>
<td>Pg 17</td>
</tr>
<tr>
<td>Employee personal information</td>
<td>• Human Resources</td>
<td>Pg 17</td>
</tr>
<tr>
<td>Environmental commitments</td>
<td>• EHS Department</td>
<td>Pg 42</td>
</tr>
<tr>
<td></td>
<td>• Legal Department</td>
<td></td>
</tr>
<tr>
<td>Gifts and entertainment with business partners</td>
<td>• Legal Department</td>
<td>Pg 28</td>
</tr>
<tr>
<td>Gifts and entertainment with government officials</td>
<td>• Legal Department</td>
<td>Pg 31</td>
</tr>
<tr>
<td>Government contracts</td>
<td>• Legal Department</td>
<td>Pg 33</td>
</tr>
</tbody>
</table>
## Additional Resources

<table>
<thead>
<tr>
<th>Area of Concern</th>
<th>Who to contact</th>
<th>Where to find more information in our Code</th>
</tr>
</thead>
</table>
| Harassment or discrimination                        | • Human Resources  
• Employee Relations  
• A vice president  
• Legal Department                          | Pg 6                                        |
| Insider trading                                     | • Legal Department  
• Global Stock Plans Department                                      | Pg 38                                       |
| Intellectual property and confidential information  | • Legal Department                                                        | Pg 14                                       |
| Investigations and audits                           | • Legal Department  
• Internal Audit                                              | Pg 37                                       |
| Media relations or investment community             | • Global Communication & Marketing Department  
• Investor Relations Department                                | Pg 39                                       |
| Participating on a board of directors               | • Legal Department  
• Chief Compliance Officer  
• Micron Foundation  
(to discuss using Micron resources for an outside organization) | Pg 21                                       |
| Political activity                                  | • Government Affairs  
• Legal Department                                                  | Pg 43                                       |
| Requests for information about Micron               | • Global Communication & Marketing Department  
• Investor Relations Department                                   | Pg 39                                       |
| Supply chain concerns                               | • Global Procurement                                                    | Pg 23                                       |
| Workplace safety                                    | • Safety Department                                                    | Pg 9                                        |