

# Integrity Without Compromise

Intuit's Code of  
Conduct & Ethics

**INTUIT**



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Intuit Inc. and its subsidiaries ("Intuit") are committed to fostering a safe, ethical, and inclusive environment where employees can do the best work of their lives and deliver on Intuit's mission to power prosperity through our AI-driven expert platform. We expect everyone at Intuit to act with integrity, follow the law and our policies, ask for help, and report concerns. Because no document can ever address every situation that may come up, when this Code of Conduct & Ethics, Intuit's Values, or our policies don't answer your question, ask for help, and use good judgment.

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

# A message from Sasan Goodarzi

Hello everyone.

**Integrity Without Compromise** is a core value at Intuit and the foundation for who we are and how we operate as a company. We value trust above all else and believe in doing the right thing, even when no one's watching. We are operating in an era of massive change –both internally and externally– with an increasing focus on integrated customer data, machine learning, and artificial intelligence.

These changes make it imperative that we continue to be vigilant in how we protect our information, our workplace and culture, and each other. This isn't just about completing required training. This is about how we make decisions and what we will and will not do. This means conducting ourselves in a way that helps us earn and keep the trust of our employees, customers, and shareholders.

As we move with speed and accelerate the pace of our work, we ask every employee to embrace and live our value of integrity without compromise. It doesn't matter whether you're a long-time senior leader or this is your first job out of college. Always do the right thing. Have the courage to speak up if you see something you disagree with. And no matter what, hold yourself and others accountable for acting with integrity every day and in everything we do. We all need to do our part in ensuring Intuit has a safe, ethical, and inclusive work environment where everyone can make an impact, learn and grow, and feel connected.

Thank you.



A handwritten signature in black ink, appearing to read 'S. Goodarzi', written in a fluid, cursive style.

**Sasan Goodarzi**  
CEO, Intuit

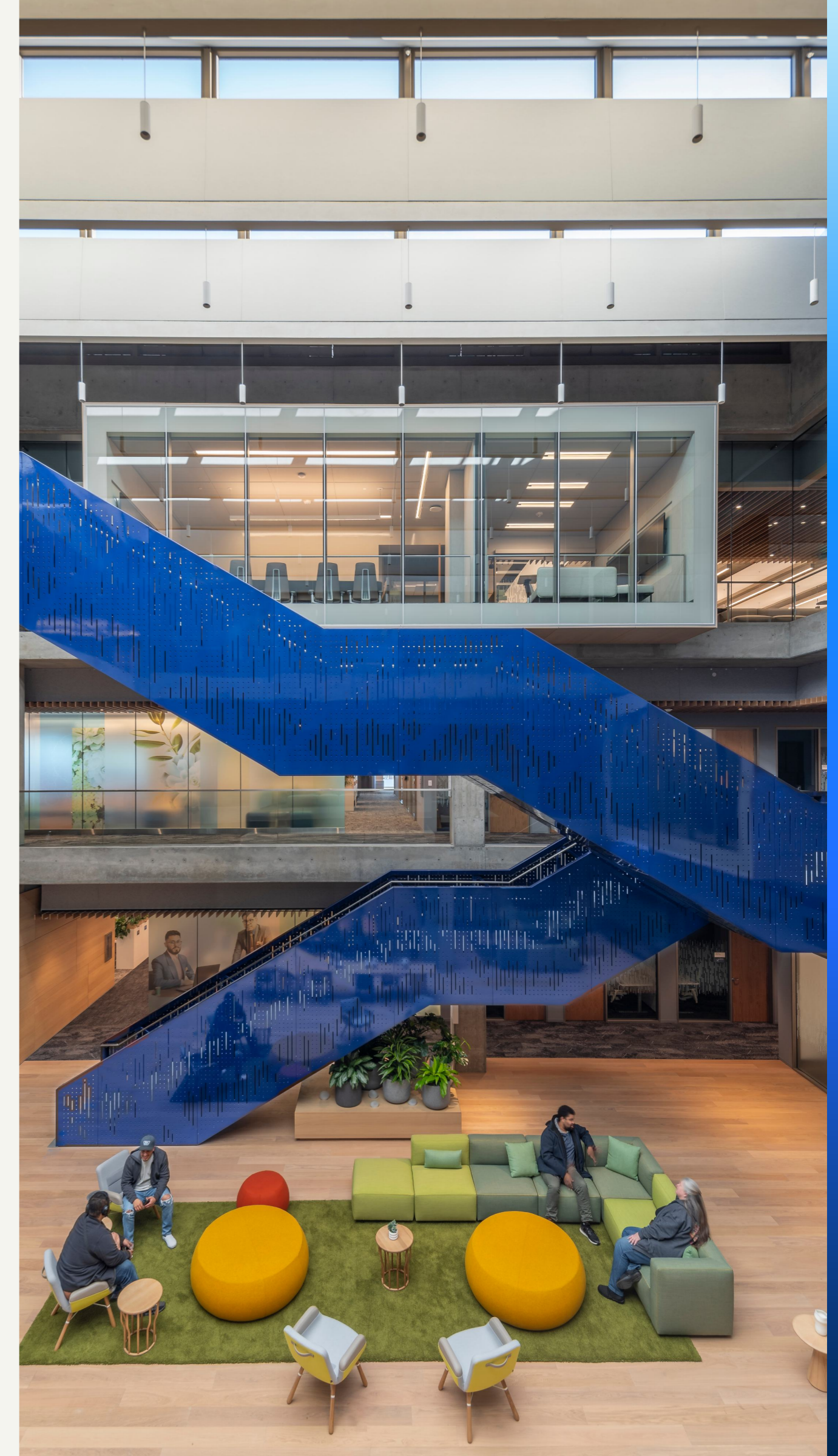
## Our expectations

All employees and contingent workers must follow Intuit's Code of Conduct & Ethics (this "Code") and all applicable laws and regulations. If laws or regulations are not as strict as this Code and Intuit's policies, follow this Code and Intuit's policies. You are accountable for your behavior at all times. Anyone who violates this Code, Intuit's policies, or applicable laws and regulations may be subject to corrective action that, in some cases, may include immediate termination.

If you are a people manager, we expect you to help your team understand what it means to act with integrity and you are required to report any concerns you see, are raised to you, or you otherwise learn about. Create an environment where employees and contingent workers feel

comfortable asking questions about what it means to do the right thing for Intuit, our stakeholders (employees, customers, communities we serve, and shareholders), and other important third parties (for example, our partners and our customers' customers). Encourage reporting through any channel and ask your employees and contingent workers to be honest at all times. If you observe or learn of any behavior that is inconsistent with this Code, Intuit's Values, or our policies, it is your responsibility to appropriately respond and ensure it is reported.

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



# Where to go with questions or for help

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

- Review our employee policies, which provide more detail and supplement this Code, and the Code of Conduct & Ethics Frequently Asked Questions
- Talk to your manager
- Contact Intuit's HR Connect or your Credit Karma HR Business Partner
- Reach out through Ask Ethics

Report concerns to any of these resources:

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

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

[Learn more about ethics investigations at Intuit here.](#)



# Our operating values

Our values keep us grounded in the most important areas that define who we are and how we operate—internally and in the world. We believe that we are stronger together by championing diversity and inclusion across the company. We care and give back to help our communities prosper. We show integrity without compromise and have courage to be bold and fearless in our thinking and actions. And we focus on customer obsession to ensure that we are delivering awesome products that drive amazing results.

These values honor our history and how we started, and guide us in delivering on our mission of powering prosperity around the world. Our values underpin a culture that attracts the world’s top talent. We empower employees to bring their whole selves to work and to do the best work of their lives.

## Integrity Without Compromise

We speak the truth and assume best intent.  
We value trust above all else.  
We do the right thing, even when no one is looking.

## Courage

We are bold and fearless in how we think and act.  
We relentlessly hold a high bar for performance.  
We value speed, a bias for learning, and action.

## Customer Obsession

We fall in love with our customers' problems.  
We deliver unrivaled customer benefit to power their prosperity.  
We sweat every detail of the experience to deliver excellence.

## Stronger Together

We champion diversity, inclusion, and a respectful environment.  
We thrive on diverse voices to challenge and inform decisions.  
We deliver exceptional results so others can count on us.

## We Care And Give Back

We are stewards of the future.  
We strengthen the communities around us.  
We strive to give everyone the opportunity to prosper.



We foster a  
safe, ethical,  
and inclusive  
environment.



## We do not retaliate

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

Review our [global diversity, equity, inclusion, and equal employment opportunity and prohibition of harassment policies](#) for more information.

## We value diversity, equity, and inclusion

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

Intuit provides equal employment opportunities for all genders, races, ethnicities, and other protected categories. We prohibit discrimination based on any protected category, and 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 our [global diversity, equity, inclusion, and equal employment opportunity policy](#) for more information.

## We expect employees to help prevent harassment

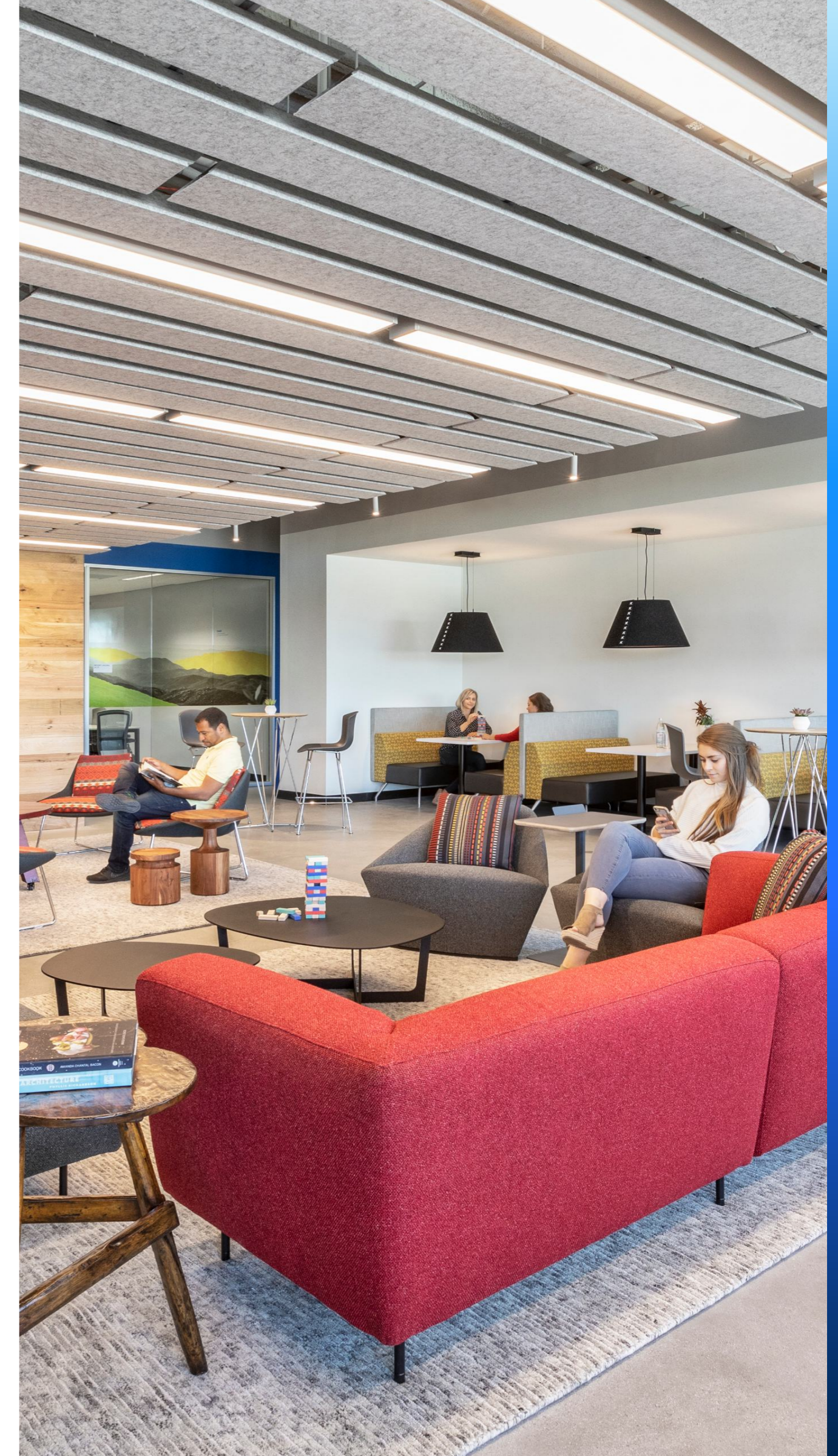
We expect all of our employees to act professionally, to use good judgment, and to treat each other with respect. We prohibit unwelcome and unwanted sexual or other conduct that could create an intimidating, hostile, or offensive work environment. We also prohibit such conduct when it is based on other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

Review our [prohibition of harassment policies](#) for more information.

## The safety and security of our workforce comes first

The safety and well-being of our workforce is our top priority. Never put your own safety or the safety of others at risk. Intuit does not tolerate violence or threats of violence. In addition, if you are engaging in company business, attending a company event, or with other employees where alcohol is served, we expect you to always drink responsibly or choose not to consume alcohol. When you see someone who has had too much to drink, help them or immediately notify someone else who can help.

Review our [global workplace violence mitigation and drug free policies](#) for more information.



## We avoid actual, potential, or perceived conflicts of interest

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

- Participate in a decision on behalf of Intuit that could lead to or appear to provide a financial or other personal benefit to you, your family, close friends, someone you are in a personal relationship with, or an organization that you are closely tied to.
- Use Intuit confidential information or intellectual property for your personal benefit or the benefit of another person or company.
- Take business opportunities that you learn about in your work at Intuit 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.

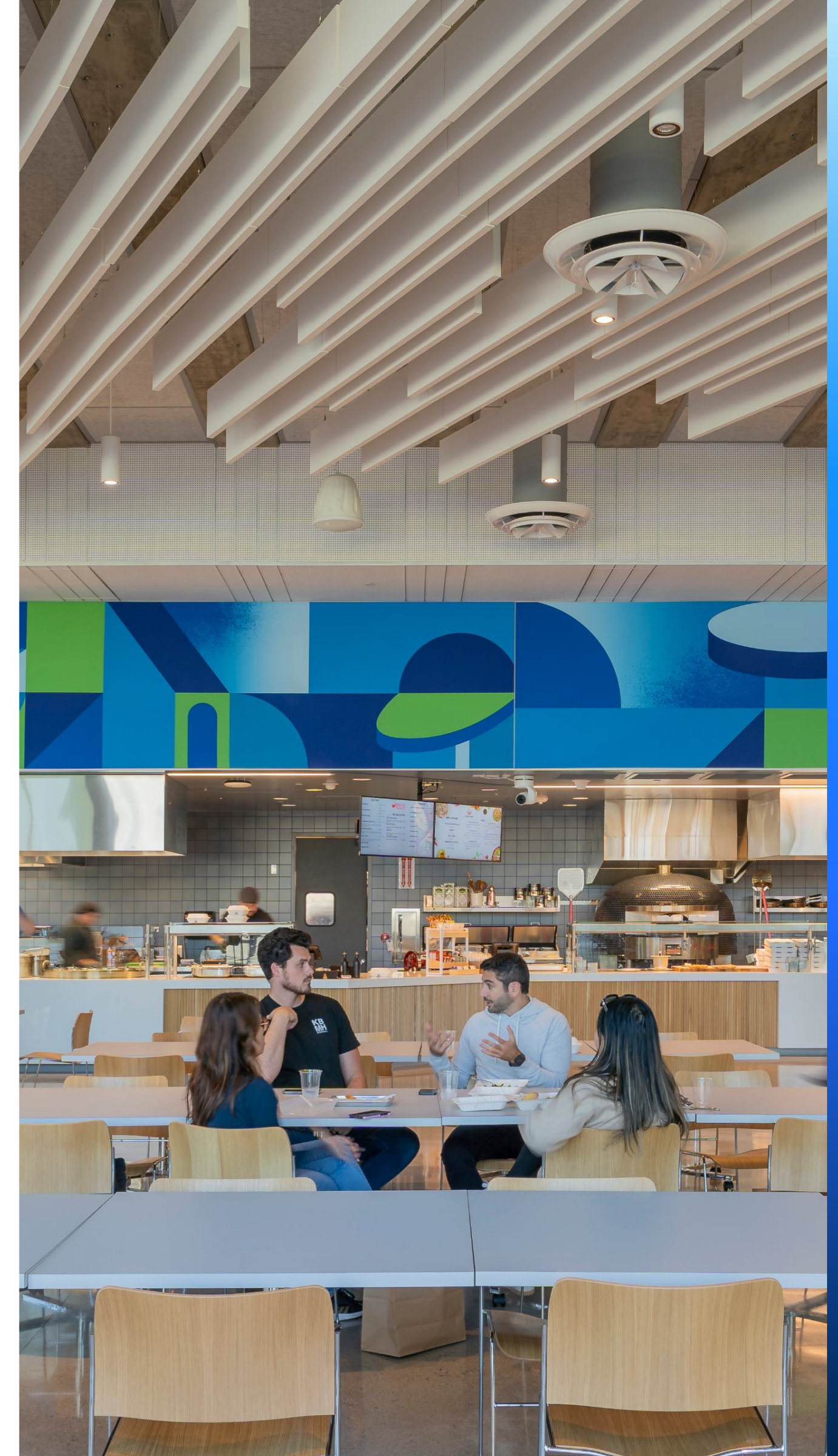
You must disclose conflicts of interest to Ask Ethics. You must also disclose the following situations to Ask Ethics for review and approval because they may create a conflict of interest:

- Joining the board of directors or an advisory board of a for-profit company or, if you are new to Intuit, continuing on any for-profit company boards.

- Working for, holding a position with, serving as an advisor for, or receiving any financial reward from another company: (a) with whom Intuit has a current or anticipated relationship, (b) which competes with Intuit's current or reasonably anticipated future business strategy, or (c) that is developing technology that potentially overlaps with Intuit's current or reasonably anticipated use of similar technology.
- Making any investments that might influence or appear to influence decisions you may make on Intuit's behalf, including investments in a company with whom Intuit has a current or anticipated relationship or which competes with Intuit's current or reasonably anticipated future business strategy. This restriction excludes ownership of stocks, bonds, or other securities of companies listed on a public securities exchange, if the amount of the interest is less than 1% of the value of the class of such securities. It also excludes investments in mutual funds, venture capital, or similar funds that invest in a broad cross-section of companies and industries that may include Intuit competitors, partners, or vendors, as long as you are only a passive investor.

As a general rule, membership on boards of nonprofit organizations or industry associations do not create a conflict of interest. However, always disclose nonprofit memberships to your manager. If you or your manager believes 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 an actual, potential, or perceived conflict of interest, contact Ask Ethics for guidance.**



# Gifts and Entertainment

Gifts or entertainment must not be given or received by you, your family members, or anyone acting on Intuit's behalf, if it interferes or appears to interfere with the ability to make objective business decisions.

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

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

Gifts must be:

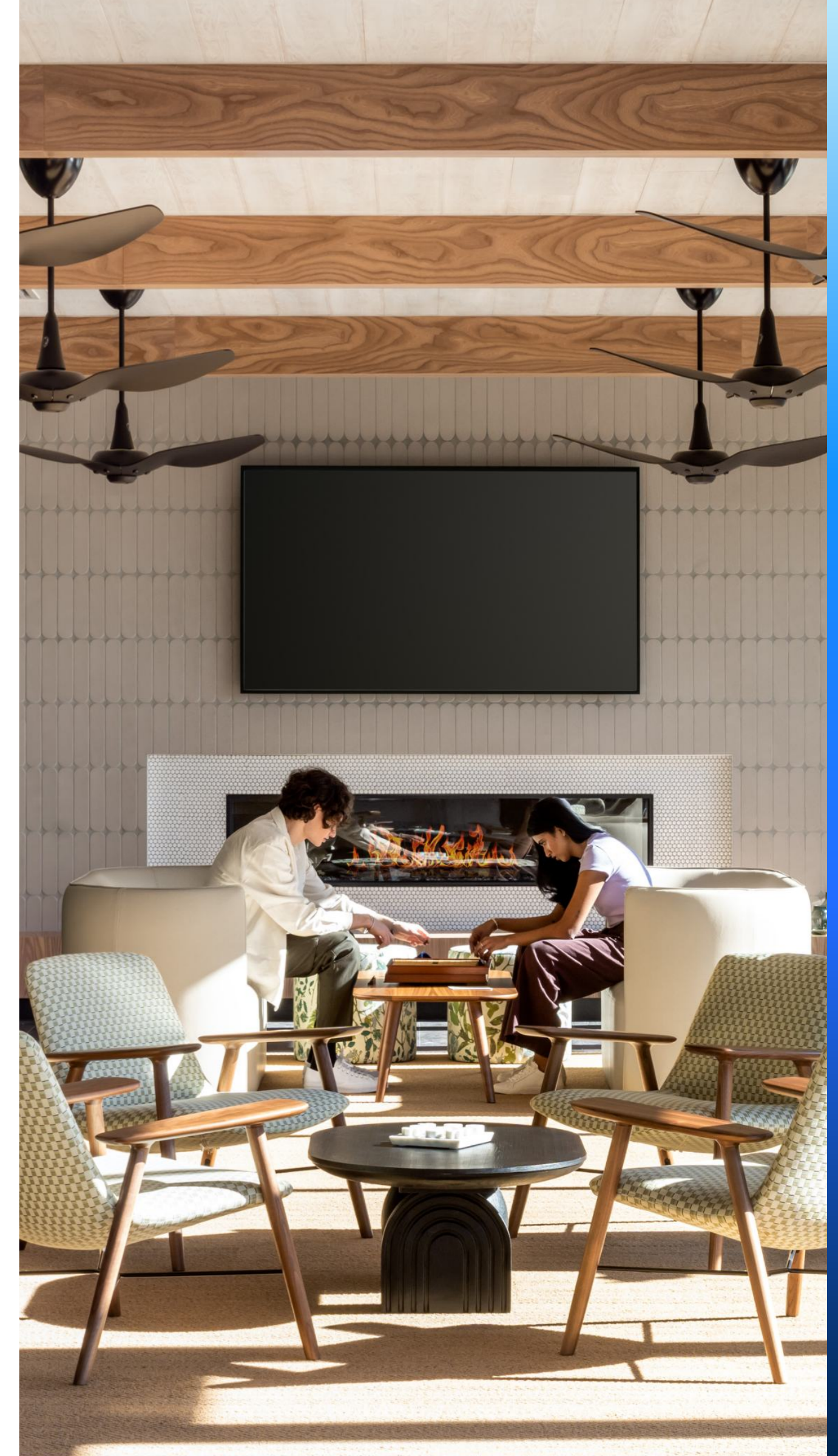
- Given and received openly and directly, without an expectation of anything in return
- Unsolicited
- Not in the form of cash or a cash equivalent (for example, a gift or cash card)
- Less than Intuit's gift limits
- Not a regular occurrence
- Not given or accepted as part of or during a business negotiation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

Additional guidance on gift giving between Intuit workers can be found in the guidelines for internal employee gifts within the global travel and expense policy.

**ENTERTAINMENT.** Building and cultivating strong business relationships with partners and other stakeholders is important to the work we do at Intuit. All entertainment provided or accepted must have a legitimate business purpose and be reasonable in value, using Intuit's gift limits as a guide. Some examples of entertainment include non-working meals or tickets to an event where the giver and recipient attend together.

Like gifts, entertainment must be provided and accepted openly and directly, unsolicited, not as a regular occurrence, and must be consistent with all applicable laws and policies as well as Intuit's Values.

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



We follow  
the law and  
our policies.



## We do not allow bribery or corruption

A bribe is any benefit offered, given, or received to encourage someone to do something dishonest, improper, or inconsistent with their duties. The term “corruption” includes any abuse of power for personal gain, and can include a wide range of unethical or potentially illegal conduct. Bribery and corruption can come in various forms beyond just cash. These could include offers of internships or employment to relatives, gifts, hospitality, entertainment, or even a donation, sponsorship, or grant, as these could be misused or perceived as avenues for corrupt practices.

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

While the risk of bribery and corruption is possible in any transaction, bribery is a particular risk when dealing with government agencies and officials. Never offer, promise, or give any benefit or gift to a government official or public employee – directly or indirectly through a third party or their family – without prior approval from Ask Ethics. Remember that a “benefit” can be anything of value and “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.

Accurate records of all business transactions and appropriate internal controls to track expenses must be maintained to comply with the law and Intuit policy.

To ensure Intuit’s funds are spent in a way that is aligned with our [Values](#), charitable donations, sponsorships, or grants made on behalf of Intuit must be pre-approved, as outlined in the Corporate Charitable Giving Guidelines.

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

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

While we encourage employees to be active participants in their communities, interacting with governments can be complex. In addition to laws governing gifts and hospitality to government officials, there are many laws restricting political contributions. Intuit’s Global Corporate Affairs and Public Policy team must review and approve all political contributions made on behalf of the company. If you make personal political contributions, the law may require you to report Intuit as your employer, but you should not otherwise link or imply a connection of personal

political donations or actions to Intuit. Personal political contributions will not be reimbursed by the company.

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

Contracts and engagements with, or sponsorships to, any government agencies or state-owned entities are subject to additional rules and regulations. They also require additional coordination to ensure there is no conflict of interest. You must contact Ask Ethics before moving forward with any contract or engagement with (i.e. research partnerships, events) with, or sponsorship of, government agencies or state-owned entities.

[Review our global political accountability policy and global anti-bribery and anti-corruption policy for more information.](#)

## We always act with integrity in financial and accounting practices and business records

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, are expected to ensure the completeness and accuracy of Intuit's business and financial records, and 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.

## We comply with global trade laws

We, and anyone acting on our behalf, follow all applicable global laws and regulations about (a) importing and exporting products, services, and technology, and (b) sanctions prohibiting business or interactions with certain countries, regions, individuals, or entities. We comply with applicable laws and regulations concerning who we do business with, where we do business, and the export of applicable products, services, software, and technology.

[Review our global trade compliance policy for more information.](#)

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

We are committed to complying with all applicable laws and regulations related to anti-money laundering and counter terrorist financing. We ensure that Intuit's products and services are used only by legitimate merchants for legitimate business purposes, and our program protects Intuit against misuse of Intuit's assets or services by money launderers or terrorists.

[Review our anti-money laundering & counter terrorist financing policy for more information.](#)



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

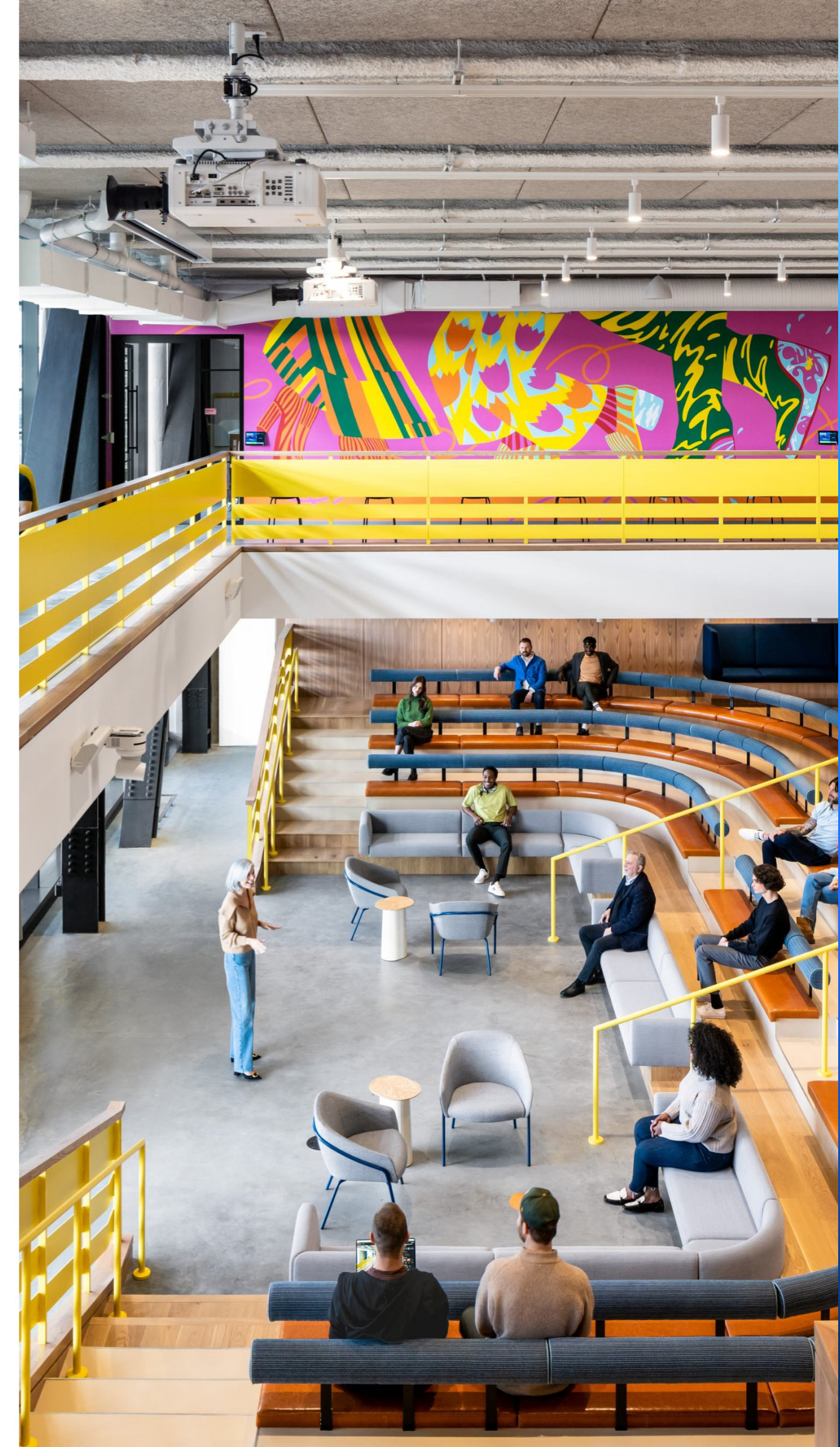
Trading in Intuit's stock – or the stock of vendors, partners, or any other company – based on material nonpublic information violates many laws and Intuit policy. "Material nonpublic information" means information not publicly announced by Intuit that a reasonable investor would consider important in deciding whether to buy or sell shares of stock. You should never share material non-public information with anyone outside of Intuit, or anyone within Intuit who does not have a need to know it.

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, and you cannot sell Intuit shares acquired through the Employee Stock Purchase Plan (ESPP), the vesting of RSUs, or the exercise of stock options. Acquiring shares through the ESPP, stock option exercises or RSU vesting are not prohibited when the window is closed, but you cannot sell any of those shares. And even if we are in an open trading window, you cannot trade if you have material nonpublic information. These rules also apply to:

- Your spouse, dependents
- Anyone living in your household (except employees of the household)
- Anyone for whom you make or influence investment decisions, such as parents or children who consult with you before they buy or sell stock
- Any entities or organizations that you or any of the individuals mentioned above manage or influence, such as an investment management company or brokerage firm.

[Review our 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 protect customer and worker privacy, confidential information, and property

Your role is to ensure we remain a responsible steward of information, data, and property that comes within our control and you must:

- Act responsibly and follow all applicable policies, supporting standards, and controls related to the collection, use and sharing, and storage or deletion of personal data.
- Empower customer-centered privacy decisions by leveraging principles of transparency and choice when evaluating how personal data powers your role, product, or service.
- Complete your annual privacy awareness training and any supplemental training specific to your function or role.
- Make sure Intuit has a contract or nondisclosure agreement in place with any third parties before sharing confidential or personal information, or trade secrets.
- Treat confidential information from third parties with the same care that you treat Intuit's confidential information and trade secrets.
- Keep confidential information, data, and property safe and secure at all times.
- Protect Intuit's assets and use them only for the benefit of the company, its customers, and its shareholders.

- Do not allow or encourage inappropriate, dishonest, or illegal use of Intuit's property.
- Comply with any agreements that you signed addressing Intuit's confidential and proprietary information.
- Use your resources on the Legal Privacy and Enterprise Security teams, or contact Ask Ethics, to help when questions arise.

[Review our global corporate privacy policy, global privacy statement, data classification and handling policy, and global confidential information policy for more information.](#)



## We follow all antitrust and competition laws

We believe competition makes us better and allows us to offer our customers better products and services by helping lower prices, increase quality, and promote innovation. 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.
- Limit artificial intelligence research and development or innovations.
- Prohibit, restrict, or limit hiring and recruiting of workers.

When interacting with competitors or accessing information about competitors:

- Always act in an independent manner.
- Do not misrepresent your role with Intuit when attempting to collect competitive information.

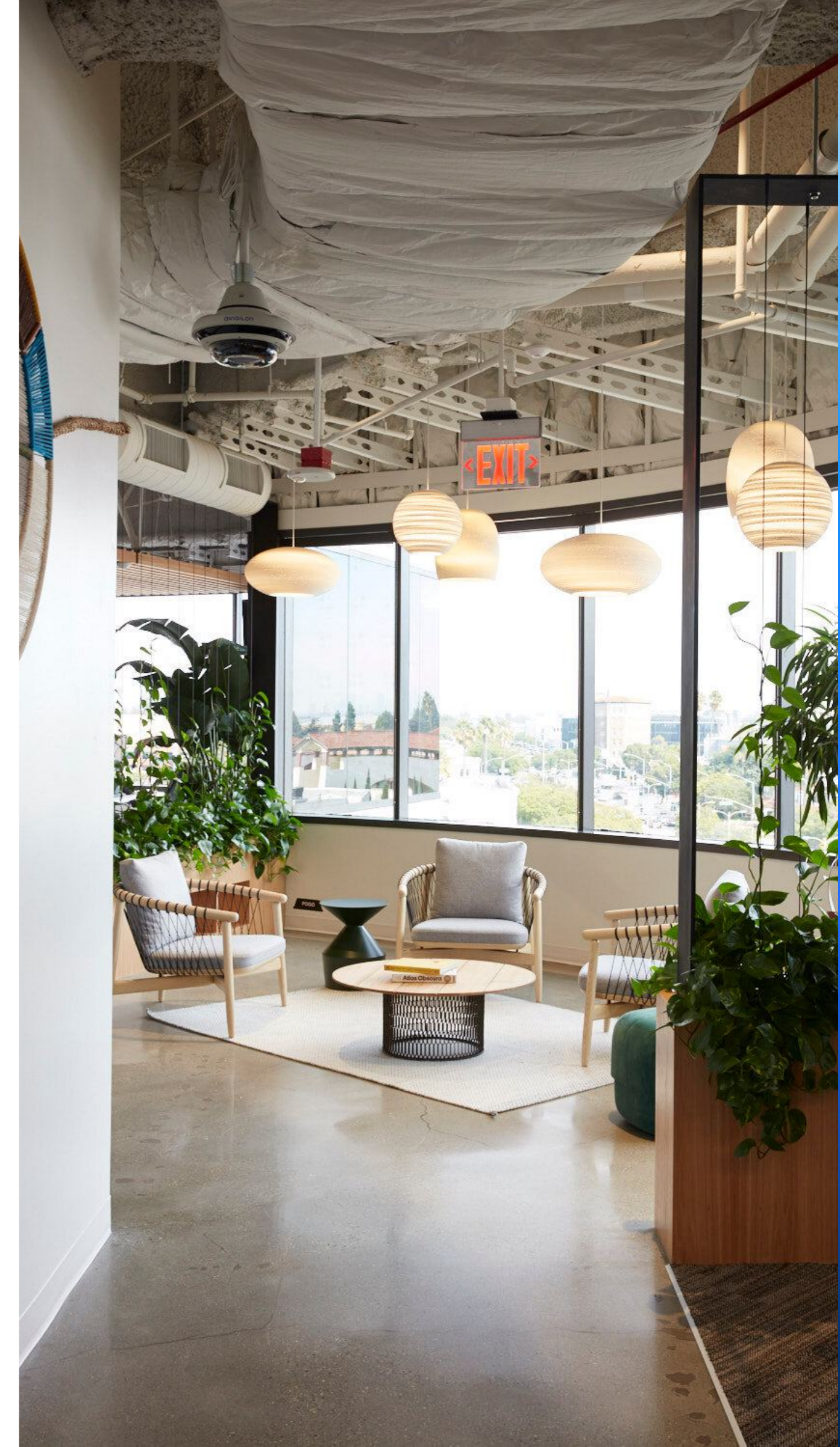
- Do not obtain or share commercially sensitive or proprietary information with or belonging to competitors (for example, information about pricing, contract terms, or profit margins). This is also true for less traditional forms of confidential information exchanges such as trade associations, integrations and artificial intelligence / machine learning collaborations.
- Do not share sensitive information about your former employer or ask an employee for information about a current or former employer if that employer is a competitor.
- Always obtain market information from legitimate sources, such as publications, public studies, articles, or newspapers.

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

[Review our global antitrust policy for more information.](#)

## We respect intellectual property and copyright laws

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



We act with  
integrity.



## We speak honestly, transparently, and respectfully in public communications

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

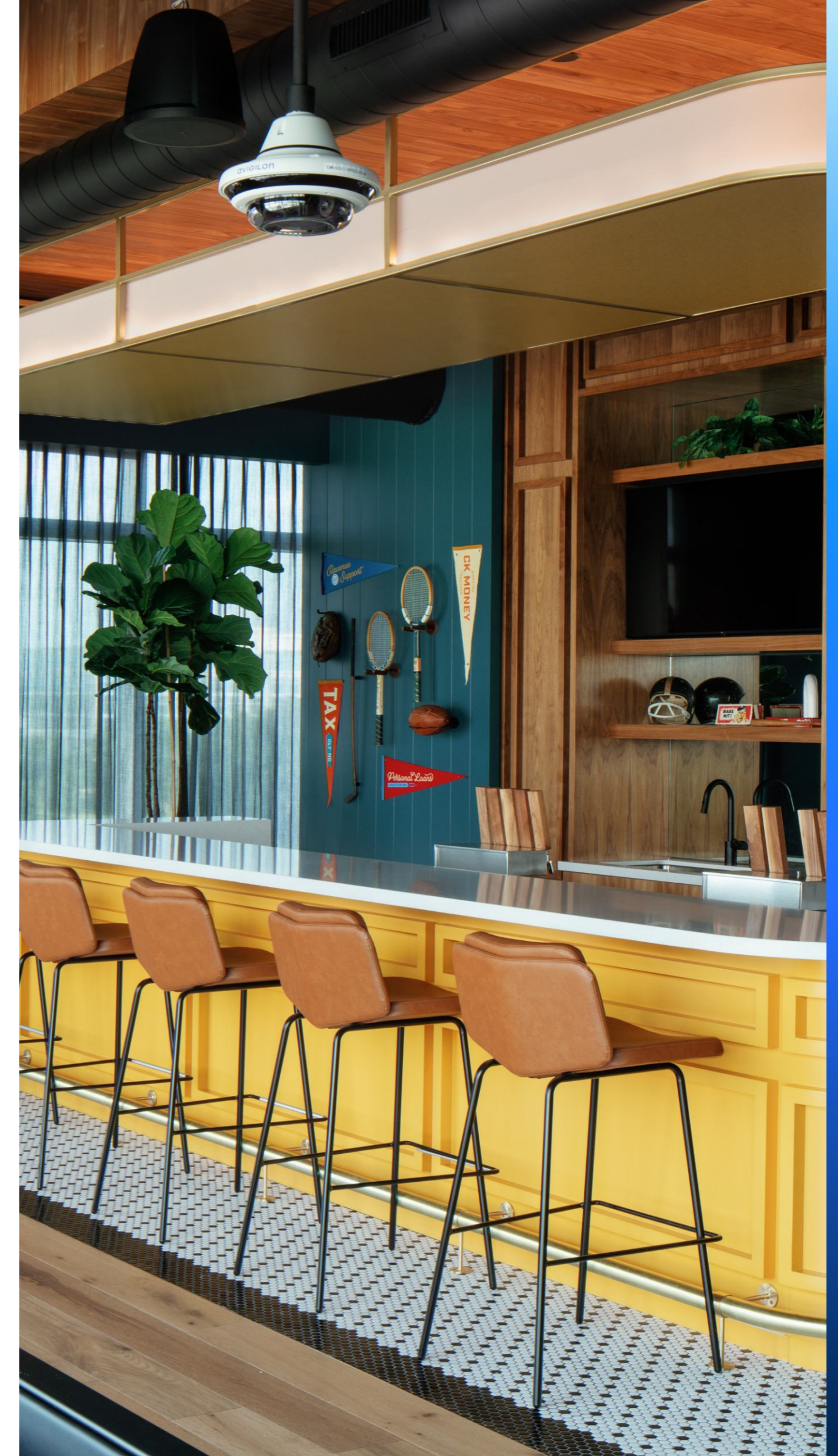
We have designated spokespeople authorized to represent Intuit by publicly discussing our strategy, financial information, policy positions, and company news in external communications channels including traditional and social media and external events. Intuit employees should refer all inquiries from the media, social channels, shareholders, industry influencers or analysts, and financial analysts to Corporate Communications or Investor Relations.

Other external speaking or communications on Intuit's behalf or using Intuit's name require proper approvals, aligned to Intuit's employee external communications guidelines. External speaking or communications done using Credit Karma's name require a manager's approval and must be sent to the Credit Karma communications and legal teams prior to agreeing to speak.

When your personal social media can be tied to Intuit, you represent the company and this Code and Intuit's policies still apply. When using social media that could impact customers, partners, or other employees, do not:

- Use hurtful or disrespectful language.
- Share, post, or like content that may make others feel excluded, especially if it is linked to race, ethnicity, gender, sexual orientation, gender identity, age, religion or religious beliefs, different abilities, or other dimensions of diversity or create a perception of an intimidating, hostile, or offensive work environment.
- Endorse, promote, or sensationalize violence.
- Share Intuit confidential information or any information that is confidential, private, or sensitive information about former or current employees, partners, or customers.

[See our global social media communications policy and employee external communications guidelines or reach out to Ask Ethics for additional help or questions.](#)



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

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

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

INTUIT



turbotax



creditkarma



quickbooks



mailchimp