



# BLACKBERRY CODE OF BUSINESS STANDARDS AND PRINCIPLES





# An Introduction from John Giamatteo

BlackBerry's business is based on trust. Since the early days of BlackBerry, customers have extended us the highest trust by allowing our solution inside their firewalled networks. They trust us to secure their most valuable information. They trust us to help them meet the range of demanding regulatory, compliance and legal requirements in sectors like finance, health and government. It has taken years to build this legacy of trust. We have earned it by delivering trustworthy products – and by conducting our business ethically and responsibly.

To maintain this trust, everyone at BlackBerry must continually demonstrate that we are an ethical company. We are judged by our collective and individual behavior. Whether our dealings are with government regulators and law enforcement or an increasingly socially conscious buying public – our stakeholders are watching us. That means, every day, we need to show that we are exemplary corporate citizens with a strong commitment to comply with, or exceed, all legal, regulatory, and ethical requirements.

To help every person who conducts business on behalf of BlackBerry understand what's expected of them, we have prepared a Code of Business Standards and Principles (BS&P). The BS&P sets forth the standards by which we conduct our operations. It is important to the

long term health of our business. That is why all of us, including members of the Board of Directors, officers, and employees are asked to acknowledge that we have read, understand and will comply with the BS&P.

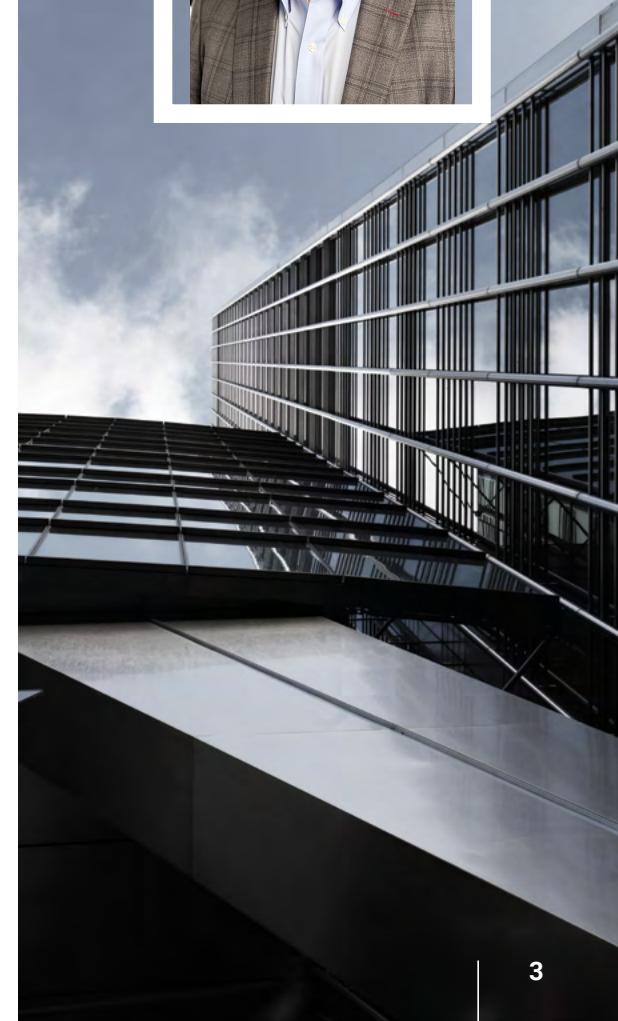
Ethical behavior is not just a set of dos and don'ts. The BS&P is no substitute for good judgment and cannot cover every situation we may encounter in our daily work. When in doubt, seek guidance from the resources referred to in the BS&P. And when you see something you believe to be in violation of or inconsistent with the BS&P, say something. You are the first line of defense in protecting BlackBerry from misconduct or ethical breakdowns.

I take business ethics very seriously, and that commitment is shared by the Board of Directors. Our standards and principles will be enforced fairly and consistently, keeping in mind that individuals with responsibility are held to higher standards.

The reputation and success of BlackBerry depends on maintaining a very high standard of conduct. Please review our BS&P and, more importantly, make sure they are reflected in your everyday behavior.

## **John J. Giamatteo**

Chief Executive Officer, BlackBerry



# TABLE OF CONTENTS

## Chapter 1

### Acting With Integrity: The Purpose Behind Our Code

- 6** Continuing Our Legacy of Trust / Live Our Code
  - 11** BlackBerry Managers Have Additional Responsibilities
- 

## Chapter 2

### Reporting and Investigating Ethics Issues

- 13** Actively Seek Guidance and Report Concerns

## Chapter 3

### Performing With Integrity for BlackBerry

- 17** Protect BlackBerry's Assets and Information
- 21** Do Not Disclose BlackBerry Confidential Information
- 23** Protect and Respect Intellectual Property Rights and Open Source Software
- 25** Avoid Conflict of Interest Situations

## Chapter 4

### Treating Our Customers and Business Partners With Integrity

- 29** Do Not Allow Bribes or Other Improper Payments
- 30** Adhere to Competition Laws
- 32** Participate in the Larger Security and Software Community
- 32** Market Our Products with Integrity
- 33** Comply with International Trade Control Laws and Regulations
- 35** Money Laundering or Terrorist Financing
- 36** Comply with All Government Contracting Requirements
- 38** Obtain and Use Third-Party Information Appropriately



## Chapter 5

### Respecting Our Colleagues

- 39** Create and Maintain a Positive Environment
- 40** Value Workplace Health and Safety

## Chapter 6

### Acting With Honesty and Transparency for Our Investors

- 42** Make Accurate and Timely Disclosures
- 43** Keep Accurate Financial Records and Support Robust Controls
- 45** Ensure Financial Integrity and Responsibility
- 47** Cooperate with Internal and External Audits, Investigations and Inquiries
- 48** Avoid Insider Trading and Tipping
- 50** Remember that We Speak with One Clear Voice

## Chapter 7

### Committing to Social Responsibility for Our World

- 52** Uphold Human Rights
- 52** Protect Our Environment
- 54** Give Back to Our Communities
- 56** Participate in the Political Process Responsibly
- 57** Choose Responsible Suppliers and Service Providers
- 58** Glossary of Defined Terms
- 62** Index

Click ➔ for BS&P Resource Guide

Click ➔ for Appendix – *Giving and Receiving Gifts and Entertainment Policy*

Click ➔ for Appendix – *Prevention of Improper Payments Policy*

# ACTING WITH INTEGRITY: THE PURPOSE BEHIND OUR CODE

BS&P SECTION	CONTACT(S)
<b>Continuing Our Legacy of Trust / Live Our Code</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Integrity &amp; Sustainability Office</li> </ul>

**From the start, BlackBerry showed the world that we could safeguard and securely deliver e-mail to our customers, and committed ourselves to conducting business with integrity. As a result, customers know us for secure communication and reliable business dealings marked by honesty and respect. It is why they choose BlackBerry. We do the right thing every day to build this reputation. It is our legacy of trust.**

We must all follow our Code of Business Standards and Principles (the "BS&P"). But it is more than just a set of rules and guidelines. It is a reflection of who we are as a company.

## Know What Is Expected of You

The BS&P is a statement of principles designed to help us do our jobs in a legal and ethical manner. You can rely on it for guidance about what it means to conduct BlackBerry business with integrity. The BS&P does not address every situation or rule; instead, it outlines expected behaviors and illustrates examples of how you must take personal responsibility. If you violate the BS&P or other policies, you are subject to disciplinary action up to and including termination of employment.

You must review, understand and comply with the BS&P and all relevant policies and procedures. You are required, as a condition of employment, to complete all assigned training and annually acknowledge that you will comply. If you have questions, you must seek clarification.

## Choose Integrity

Our success depends on your commitment to integrity. Be honest, fair and trustworthy. Select ethical business partners who share our commitment to integrity.

Never compromise on integrity. There is no excuse for cutting corners when it comes to this, no matter what the situation is. No one can make you act unethically, unlawfully, or in a way that contradicts the letter and spirit of the BS&P or our policies.

By committing to lawfulness and ethics, you contribute to the strength of the BlackBerry brand, protect us against financial loss, and avoid civil and criminal penalties that may result from wrongdoing.

### **Speak Up and Act**

As you weigh decisions day-to-day, consider the ethical dimensions of your options. Where appropriate, speak up and act. Be bold. BlackBerry supports you, and has access to internal and external professionals trained to assist with legal and ethical issues. Never let your conduct be influenced by rationalizations like "Our competitors do this," "This is the way business is done overseas," and "The Company can easily afford it."

You must promptly report any knowledge of or concerns regarding actual or potential violations of law or policy whether they occur inside BlackBerry or through external dealings. When asked to participate in any review of a compliance matter, you must cooperate.

BlackBerry offers many ways to report such as: BlackBerry EthicsLink  (which allows confidential, and in most countries anonymous reporting), your manager, HR Business Partner, Legal, Finance, and the Integrity & Sustainability Office.

**"Our success depends on your commitment to integrity. Be honest, fair and trustworthy."**



## Make Decisions with Integrity

It is your responsibility to exercise good judgment and act ethically. The diagram below provides guidance on ethical decision-making when you are unsure. If you can answer “no” to all the following questions, then the decision to move forward is probably appropriate. If you answer “yes” to any question or continue to be unsure, then stop and seek appropriate guidance from your manager, Human Resources, Legal, or the Integrity & Sustainability Office if you would like to proceed.

### Is it illegal?

Does it violate any applicable law or regulation?

### Is it unethical or in violation of the BS&P?

Is it dishonest or untrustworthy?

Is it otherwise inconsistent with BlackBerry's values, BS&P or other policies?

Would it be improper for me to act or fail to act?

### Could it harm the company or others?

Does it put BlackBerry or me in a compromised position?

Does it create a conflict of interest between BlackBerry and my personal affairs?

Does it jeopardize workplace safety or the environment?

Does it disrespect any work colleague, customer, business partner or community?

Does it misuse or improperly reveal confidential information of BlackBerry or a third party?

Will it make BlackBerry books and records inaccurate, or otherwise adversely affect shareholders?

Would I be concerned if it became a front page headline?

Are any of these close questions?

## **Comply with Applicable Laws**

BlackBerry does business all over the world. This means we must comply with the laws of many different countries. You are responsible for knowing and following the laws that apply where you work or do business. In addition, because a country's laws may apply outside its boundaries you may need to be familiar with and follow the laws of a country other than the one where you work or do business. If the BS&P or company policies are inconsistent with local law, you must follow local law. If, however, a custom or practice permitted by local law is inconsistent with the BS&P, you must follow the BS&P.

If you are not sure what to do or have any questions or concerns, you should talk to your manager, HR Business Partner, Legal or the Integrity & Sustainability Office. This is particularly important if you think your activities are subject to the laws of more than one country and those laws may conflict with each other or with the BS&P.

## **Be Aware of the Consequences**

Violations of law can have serious consequences for BlackBerry and you, including substantial monetary fines, imprisonment or employee discipline up to and including termination.

## **Waivers Must Be Provided in Writing**

If you would like to seek a waiver of the BS&P, you must make full disclosure of your particular circumstances in writing to the Integrity & Sustainability Office for approval in advance of any action.

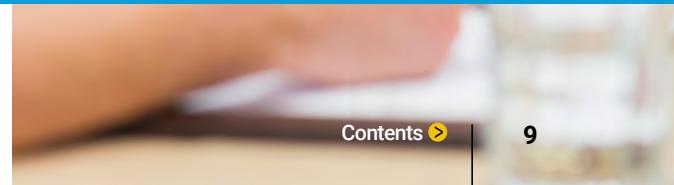
Board members and the BlackBerry CEO must seek such waivers from the Audit and Risk Management Committee of the Board of Directors. BlackBerry will disclose such waivers as required by law or applicable stock exchange rules.



### **Q: What law or rule should I follow?**

#### **A: You should:**

- Know and follow the laws of the country (or countries) where you do business.
- Know and follow our BS&P and policies as long as they do not conflict with applicable law.
- When in doubt, ask.



## **Q: How can I have a say in the Integrity & Compliance program?**

**A:** Here are a few ways that you can provide your ideas and suggestions:

- Discuss them with your manager, Human Resources or the Integrity & Sustainability Office.
- Comment on integrity messages posted to BlackBerry Square.
- Submit them on BlackBerry Ideas, a portal for providing ideas about all aspects of BlackBerry (go/ideas). ➤

## **Q: A vendor just called and claims that under a certain law we are responsible for a problem that must be remedied quickly. What do I do?**

**A:** Legal furnishes advice on all legal issues arising in the course of your BlackBerry work, including advising on legal claims that third parties make. Information on the various legal teams and contact information can be found at go/legal. ➤

## **Q: Why are certain written disclosures and approvals required?**

**A:** Written disclosure and approval is required for activities that are high risk and can often benefit from the guidance of someone with specialized expertise about the law or application of BlackBerry policies, in addition to a manager's oversight.

Disclosures provide documentation that is useful in any internal or external investigation that may occur later.

In addition, criminal sentencing guidelines and industry best practices dictate that we document our integrity and compliance activities.

Here are routine activities that require disclosure and proper written approval before they can proceed:

- Engaging in something that poses an actual or potential conflict of interest, such as starting a business, hiring a family member to do work for BlackBerry, or investing in a supplier BlackBerry uses. See **Avoid Conflict of Interest Situations** ➤
- Giving or receiving anything of value to or from a public official including giving a device or other BlackBerry product. ➤
- Retaining or hiring a third party to represent BlackBerry before any government or to distribute or sell BlackBerry products and

services. See **Do Not Allow Bribes or Other Improper Payments** ➤

- In addition, keep in mind, speaking publicly for BlackBerry is the job of individuals designated in our Corporate Disclosure Policy. ➤ You must not respond to questions about BlackBerry, even informally, from the investment community (including financial analysts and investors), regulators and the media, without proper authorization. See **Remember that We Speak with One Clear Voice** ➤
  - You have an obligation to disclose to BlackBerry in writing any development of IP. This includes any IP that you develop and believe should be considered an "excluded development" that does not belong to BlackBerry. See **Understand the Implications of Intellectual Property Rights and Developments** ➤
  - Requesting a waiver of BS&P requirements. See **Waivers Must Be Provided in Writing** ➤
- Please refer to the BS&P for more information about the requirements for engaging in these activities and others that require disclosures. Disclosures for written approval can be made as directed in the BS&P or at **integrity@blackberry.com**. ➤

## BS&P SECTION

### BlackBerry Managers Have Additional Responsibilities

Managers at all levels are expected to lead through example. As a manager, you have a special responsibility to lead with integrity. You must do more than behave legally and ethically yourself. Dedicate yourself to making sure that your team members do as well. This requires affirmative, visible steps on your part.

#### **Lead with Integrity**

Show your team lawful behavior. Show them ethics. Act with unyielding commitment to integrity day-in and day-out. Speak truthfully always. Never abandon our standards and principles. Stay faithful to our culture of integrity – our legacy of trust.

Set the right tone from the top. Listen to concerns and respond. Discuss how to make good choices in the face of the challenges your team faces. Instill in your team a belief that conducting business with integrity is our only path to success. Seek opportunities to explain the serious consequences that arise from cutting corners when it comes to integrity.

## CONTACT(S)

Access the Resource Guide for team info ➤

- Integrity & Sustainability Office

#### **Make Integrity Central to Your Leadership**

Make sure your team members are familiar with the BS&P and the laws and policies that apply to your team.

Complete required compliance training conscientiously and on time, and ensure that your team members do too.

#### **Cultivate Integrity**

An important part of maintaining an ethical culture is promoting an environment in which your team members are comfortable asking questions and raising concerns about potentially unethical behavior. Create this environment. Strive to have your team members regularly bring you their concerns. Answer their questions. Remediate or, as necessary, escalate identified issues. Ensure activities and disclosures receive the appropriate review and approvals.

Never retaliate or tolerate retaliation against anyone who in good faith reports a concern or cooperates

with a BlackBerry investigation or audit.

Keep ethical behaviors in mind when interviewing candidates. Seek individuals who exhibit a commitment to integrity.



## Reward Integrity

Recognize and encourage ethical conduct. Call out situations where integrity won the day – prevented financial loss, protected or built our reputation, or avoided other serious consequences.

## Do Not Tolerate Behavior Lacking Integrity

You have a special responsibility to report illegal behavior and violations of the BS&P. You must stop misconduct with quick, appropriate action. You must inform your manager or the appropriate representative of Legal, Human Resources, Finance or the Integrity & Sustainability Office of potential breaches that you observe or have reported to you.

## Closely Manage Spending

As a manager, you are responsible for the money spent and expenses incurred by your reports. You must fully understand MPOWER and assure your team does as well. You must carefully review such spend and expenses before approving. If you don't understand what you are approving or do not have complete information, don't approve. Get the information you need or seek help.

## Q: We have company-wide policies, so why do I have a managerial responsibility to implement my own processes and controls?

A: The requirement is that you manage the activities of your team to deliver against your team objectives and prevent fraud, corruption and other violations of the BS&P or the law.

The BS&P does not cover every situation or spell out each specific process or control your team must follow to promote lawfulness and integrity. Determine the legal and ethical risks your team faces and then develop ways to address them. Identify and capture the information and reporting that will allow you to monitor compliance with your requirements, and set aside a regular time to discuss the challenges that your team faces

as it conducts business with integrity, perhaps during a monthly team meeting.

Please contact the Integrity & Sustainability Office if you would like assistance or suggestions.

# REPORTING AND INVESTIGATING ETHICS ISSUES

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Actively Seek Guidance and Report Concerns</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Integrity &amp; Sustainability Office</li> </ul>	<ul style="list-style-type: none"> <li>• EthicsLink ➤</li> </ul>
<p><b>We Respect Confidentiality</b></p> <p>If you report a concern, we will keep your identity confidential to the extent possible consistent with law and the need to investigate.</p> <p><b>Retaliation Is Not Tolerated</b></p> <p>Retaliating against anyone who makes a good faith report of suspected unethical or illegal conduct is a violation of the BS&amp;P and will not be tolerated by BlackBerry. The same is true of anyone participating in the investigation of a report. It does not matter whether the specific circumstances reported actually amount to misconduct.</p> <p><b>There Are Multiple Ways to Raise Issues and Ask Questions</b></p> <p>You can turn to any of the following resources with questions or concerns:</p>	<ul style="list-style-type: none"> <li>• Your manager/team-lead or senior managers (usually the best place to start)</li> <li>• Your Human Resources Business Partner</li> <li>• Legal (<a href="mailto:legal@blackberry.com">legal@blackberry.com</a> ➤ or refer to go/legal ➤ for a resource)</li> <li>• Finance</li> <li>• Integrity &amp; Sustainability Office (<a href="mailto:integrity@blackberry.com">integrity@blackberry.com</a>) ➤</li> <li>• BlackBerry EthicsLink (see next below) ➤</li> </ul> <p>You should take care to not report a violation to someone that you believe may be involved in the matter.</p> <p><b>BlackBerry EthicsLink</b></p> <p>You can make reports of any type of ethics or compliance concern directly to the Audit Committee of the Board and the Integrity &amp; Sustainability Office using BlackBerry EthicsLink.</p>	<p>A team will conduct an investigation, using the portal to provide the reporter with updates on the case and to ask for further information. The reporter can access the case details at any time accessing BlackBerry EthicsLink and selecting "Follow-up on a report."</p> <p>BlackBerry EthicsLink is available 24 hours a day, seven days a week, and provides multiple ways to report concerns or questions:</p> <p><b>Online</b></p> <p>Concerns can be logged at <a href="http://www.BlackBerryEthicsLink.com">www.BlackBerryEthicsLink.com</a> ➤</p> <p><b>Phone</b></p> <p>Call <b>1 (877) 281-5509</b> if you prefer phone. This is a toll free number for Canada and the United States. For other countries, visit <a href="http://www.BlackBerryEthicsLink.com">www.BlackBerryEthicsLink.com</a> ➤ for toll free dialing instructions in your region. Translators are also available, when needed.</p>

**integrity@blackberry.com** ➔ Many countries, particularly in the European Union, have laws that restrict hotline functionality. Some countries may permit “confidential”, but not anonymous complaints; some limit the issues that may be reported; others may limit whether supervisory or non-supervisory employees may be the subject of a complaint. For these reasons, EthicsLink is not available in all countries. If you receive a message indicating that EthicsLink functionality is limited, you may discuss your concern with your supervisor, HR Business Partner, or report it to [Integrity@blackberry.com](mailto:integrity@blackberry.com)

#### **Regular mail**

You can also send concerns addressed as follows:

**Chief Compliance Officer  
2200 University Avenue East  
Waterloo, ON, Canada N2K 0A7**

This method does not use the interactive functionality.

#### **Confidentiality**

You are encouraged to share your identity when raising a complaint to assist with our investigation. If you identify yourself, and in countries where anonymous reporting is not permitted by law, BlackBerry will keep your identity as confidential as possible, consistent with the need to fully investigate.

#### **We Will Investigate Promptly and Fairly**

Upon completion of its review, the investigation team reaches a conclusion and may recommend appropriate disciplinary and/or remedial action. BlackBerry strives to respond to policy violations consistently, providing appropriate discipline given the circumstances and the individual's level of responsibility.

Depending on the type of issue, different organizations may be involved such as the Integrity & Sustainability, Legal, Human Resources or the Board of Directors.

Individuals who are the subject of the report will not be part of the review or investigation team.

When the investigation team completes their review, it reaches a conclusion and makes recommendations on how to fix any problems identified. A summary of the case is provided to senior managers who are independent from any misconduct, for review and action as required. For EthicsLink cases, we post an update to EthicsLink so the reporter can confirm that the matter has been addressed.

#### **Retaliation Is Not Tolerated**

BlackBerry strongly encourages prompt reporting of potential wrongdoing or violations of law or the BS&P. Retaliating against anyone who makes a good faith report of suspected unethical or illegal conduct is a violation of the BS&P and will not be tolerated by BlackBerry. The same is true of anyone participating in the investigation of a report. It does not matter whether the specific circumstances reported actually amount to misconduct.

Employees also have certain whistleblower rights under federal, state and provincial laws and regulations. Pursuant to US federal contacting statutes and regulations, including 41 U.S.C. 4712 and section 3.908 of the Federal Acquisition Regulation, BlackBerry is prohibited from firing, demoting or otherwise discriminating against an employee because the employee has reported information to appropriate government authorities or law enforcement agencies, supervisors or others within the Company with authority to investigate potential wrongdoing.

**Q: How can I learn more about the results of investigations?**

**A:** Follow messaging on BlackBerry Square about integrity and policies. Many of these messages are the result of investigation findings and recommendations. If you make a report and use BlackBerry EthicsLink, you will receive update information from the investigation team.

**Q: Confidentiality is protected "to the extent consistent with law and the need to investigate." What does that mean to me if I make a report?**

**A:** We will rigorously protect your confidentiality, only disclosing a reporter's identity when absolutely necessary, such as if we are compelled by law.

**Q: I have loyalty to my team. Won't making a report disrupt our work?**

**A:** You should not factor potential disruption into your decision of whether to report. Ask yourself whether a wrongdoer deserves that you turn a blind eye, sacrificing your and the Company's integrity. The financial losses, reputation damage, and serious legal consequences of ongoing wrongful behavior would be vastly more disruptive to BlackBerry and your team than a report and subsequent efforts to address ethical concerns and gaps in our procedures.

**Q: How can I find someone to help me with an issue I've never encountered before?**

**A:** The BS&P Resource Guide [↗](#) identifies internal stakeholders and experts in particular areas, as well as places to find procedure and policy information. But don't worry so much about finding the right person on your own; any of the resources identified here can help send you in the right direction, whether it is your manager, Human Resources, Legal, Finance or Integrity & Sustainability.



A professional man with dark hair and a beard, wearing glasses and a blue suit, is smiling and looking towards the camera. He is seated at a table with other people, indicated by the back of another person's head and shoulders visible on the left. A white coffee cup is on the table in front of him.

**“BlackBerry will investigate all reports promptly, thoroughly and fairly, and will take appropriate action when necessary”**

# PERFORMING WITH INTEGRITY FOR BLACKBERRY

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Protect BlackBerry's Assets and Information</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Security</li> <li>• Privacy</li> </ul>	<ul style="list-style-type: none"> <li>• BlackBerry Corporate Security Policy ➤</li> <li>• BlackBerry Acceptable Use Policy ➤</li> </ul>
<b>Make Appropriate Use of BlackBerry Assets</b>	<p>BlackBerry assets and information are valuable resources intended to make our performance more efficient. It is important that we protect these assets and never allow our personal use of them to interfere with our job responsibilities. BlackBerry assets include:</p> <ul style="list-style-type: none"> <li>• Intellectual property.</li> <li>• Confidential and proprietary information, including personal information or data of customers that was provided to BlackBerry in confidence.</li> <li>• Sales, marketing and other business strategies and plans.</li> <li>• Financial data.</li> <li>• Technology and software.</li> </ul> <p>Other trade secrets. Our assets also include physical property, like:</p> <ul style="list-style-type: none"> <li>• Cash.</li> <li>• Equipment.</li> <li>• Facilities.</li> <li>• Supplies.</li> <li>• Product inventory.</li> </ul>	<p>BlackBerry systems. This includes a prohibition on using BlackBerry assets in support of outside business, political or charitable interests. You must never use BlackBerry assets to access or share information inappropriate for a workplace setting. This includes content of a sexual nature, inappropriate or derogatory humor, or discriminatory or harassing comments. Intentional use of a BlackBerry asset to access material that is sexually explicit in nature will be handled in compliance with the Human Resources Policies.</p>

## **Expect Monitoring of BlackBerry Assets and Systems**

Where allowed by local law, our Company may monitor your use of any BlackBerry assets to ensure it is in line with the principles set forth in the BS&P. BlackBerry assets include computers, tablets, or company provided or subsidized mobile devices, and includes any e-mail, including personal e-mail, sent to or from a BlackBerry server.

## **Protect Against Misappropriation of Assets**

BlackBerry prohibits any form of misappropriation of company assets. Misappropriation can occur through words, through conduct or by concealing facts and actions from the Company.

You can do your part to protect against misappropriation by following security procedures, and reporting any indications of misuse, theft or waste of Company assets.

## **General Guideline for Use of Assets**

### **Approved Uses of BlackBerry Assets:**

- Legitimate business use.
- Limited personal use, so long as it does not interfere with your work or overburden BlackBerry systems

### **Prohibited Uses of BlackBerry Assets (Absent Authorization):**

- Non-BlackBerry purposes, including for an outside business.
- In a manner reflecting negatively on our Company.
- Unlawful or offensive activities.
- In support of political activities (Please see the more complete discussion at [Participate in the Political Process Responsibly](#)). ☀





**Q: Why does BlackBerry monitor telephones, printers, desktop or laptop computers, tablets and smartphones?**

**A:** Laws or legal processes may require BlackBerry to preserve, search or access information from BlackBerry systems (for example, to conduct compliance investigations, to address misconduct or misuse of BlackBerry systems, or to respond to court orders, warrants or other lawful requests or legal processes). BlackBerry systems may also be subject to ongoing maintenance and scanning to ensure they are operating properly, to promote safety and protect the integrity and security of the information, and to ensure continuity of business operations.

## Red Flags

The following "red flags" will help you identify possible instances of fraud and misuse of assets. Remember that red flags do not always indicate impropriety but rather provide possible warning signs of possible misuse.

1. Any financial transaction that does not make either common or business sense, such as transactions or events occurring at odd times, amounts that are too large or small, unusual deal structure, margins or discounts that are unusually high, cash payments or excessive upfront payments (e.g., Company assets sold under market value or in a manner that excludes other potential buyers from bidding).
2. Transactions with questionable government connections, involving people closely connected to a public official, political contributions or payments to a public official, use of a specific consultant or other business partner at the request of a public official, or requests for increased commission during a negotiation with a public official.
3. Service contracts that result in no apparent product or service, including payments to agents or other individuals where it is not clear what service or benefit they have provided.
4. Inconsistent or misleading statements

regarding transactions or relationships.

5. Information (whether or not involving BlackBerry) that comes to light regarding a bribe or misconduct by a party with whom BlackBerry has a direct or indirect relationship.
6. A suggestion that no one needs to know "specifics" or "details" about how a transaction will be completed or an objective attained
7. Reluctance to provide information to managers, auditors, legal, investigators or others who should have access.
8. Irregular, missing or questionable documents.
9. Efforts to document a transaction in a way that is inaccurate or incomplete, or that otherwise falsifies the transaction or supporting documentation.
10. Invoices that contain suspicious or unexplained items such as "miscellaneous payments," "business facilitation expenses" or "unforeseen expenses."
11. Refusal to take vacation and/or sick leave (if other red flags are present).
12. Involvement in a transaction of people who aren't normally involved, aren't qualified, are referred to cryptically or are not identified by name.
13. Suggestion that an undisclosed person must

be "kept happy" or words to that effect.

14. Any payment required to "get the business" or where there is a suggestion that an unusual payment is being dictated by an outside party.
15. Extravagant gifts or unexplained benefits such as expensive cars, jewelry, clothes or travel.
16. High employee turnover, especially in those areas that are more vulnerable to fraud.
17. Frequent changes in corporate bank accounts including unexpected overdrafts or declines in cash balances, inability to explain variances in invoices or account balances.
18. Frequent exceptions and overrides of corporate policies, procedures and controls.

If you see red flags or you have some other basis for suspecting fraud or misuse, you are obligated to raise your questions or concerns. Your best guide is often a feeling that something is wrong.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Do Not Disclose BlackBerry Confidential Information</b>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>• Security</li> <li>• Non-Disclosure Agreement Team</li> </ul>	<ul style="list-style-type: none"> <li>• BlackBerry Information Classification Policy ➔</li> </ul>

Much of the information available to you as a BlackBerry employee is confidential or proprietary. This is information not generally available to the public, which includes BlackBerry technical information, business and marketing data and plans, financial data, internal e-mail communications, information about customers, product information and any other information generally considered confidential in our industry. If you fail to properly protect and secure BlackBerry confidential or proprietary information, you could be subject to discipline up to and including termination. If you have any questions on whether information is confidential or proprietary, or how to protect it, you should consult your manager or Information Security.

**Note: Nothing in this BS&P, or any other BlackBerry policy, is meant to preclude or discourage you from lawfully reporting violations of law or instances of fraud, waste, or abuse, to appropriate government authorities or law enforcement agencies.**

#### Avoid Inadvertent Disclosure

You must be extremely careful to avoid disclosure of BlackBerry's confidential or proprietary information. You should not discuss such information in public places where others may overhear you, or on blogs or social media networks. You must never leave it unattended.

#### Intentional Disclosure Must Be Authorized

You must exercise extreme caution before intentionally disclosing any confidential or proprietary information. When disclosing such information within BlackBerry, you should be sure you are authorized to do so and then only share it with colleagues who truly need to know the information to do their jobs.

You should not disclose confidential or proprietary information to anyone outside of BlackBerry unless all of the following are met:

- You have obtained your manager's approval or already have the authority to do so.
- The disclosure is limited only to such information as is necessary to fulfill BlackBerry's particular business purpose.

- There is a signed and valid non-disclosure agreement in place (be sure to follow the instructions on go/nda for completing and then submitting the original signed copy of the agreement to the NDA Mailbox).
- You have marked the documents disclosed as "BlackBerry Confidential".

#### Report "Leaks" Immediately

You must immediately report any unauthorized disclosure of BlackBerry confidential or proprietary information – even inadvertent – and other security incidents to Information Security, as well as your manager.

#### This Is a Lasting Obligation

Your obligation to safeguard BlackBerry confidential or proprietary information continues after you are no longer a BlackBerry employee. You may never disclose BlackBerry confidential or proprietary information after you leave, unless you have BlackBerry's written consent to do so.

**Q: I travel frequently for my job. While at the airport awaiting a flight, I check my e-mail and return phone calls. My conversations are usually brief, but sometimes turn to detailed discussions of confidential BlackBerry protocols. Such in-depth calls are rare, and I believe that no one is listening to my conversations in the noisy terminal. As long as I limit the frequency of these calls, is it okay for me to discuss confidential matters in a public place?**

**A:** No. You have no way of confirming whether anyone is listening to your conversations, and whether you are compromising confidential BlackBerry information. You must not discuss confidential or proprietary information in such situations, and doing so could result in discipline, up to termination. Additionally, while it is acceptable for you to respond to e-mails , you must be cautious when

viewing sensitive materials. Even though it may seem that others around us are not paying attention to your work, you never know who may be looking or listening.



BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<h2 data-bbox="138 203 576 324"><b>Protect and Respect Intellectual Property Rights and Open Source Software</b></h2>	<p data-bbox="693 203 1134 230">Access the Resource Guide for team info ➔</p> <ul data-bbox="693 239 1134 370" style="list-style-type: none"> <li data-bbox="693 239 1134 297">• Integrity &amp; Sustainability Office (for excluded development disclosures)</li> <li data-bbox="693 306 1134 333">• Your Human Resources Business Partner</li> <li data-bbox="693 343 917 370">• Open Source Team</li> </ul>	<ul data-bbox="1242 203 1756 297" style="list-style-type: none"> <li data-bbox="1242 203 1756 261">• BlackBerry Employee/Consultant Confidentiality and Intellectual Property Agreement ➔</li> <li data-bbox="1242 270 1704 297">• BlackBerry Open Source Software Policy ➔</li> </ul>

### **Understand the Implications of Intellectual Property Rights and Developments**

Among our most valuable assets is our intellectual property ("IP")—inventions, patents, trade secrets, trademarks, copyrights, design rights, know-how and other proprietary information. You are accountable to establish, protect, maintain and defend BlackBerry's rights in all commercially significant intellectual property and to use those rights in responsible ways.

You must likewise respect the valid, exclusive IP rights or copyrighted materials of third parties.

#### **As part of the BlackBerry Employee/Consultant Confidentiality and Intellectual Property Agreement**

**Agreement** you previously signed or acknowledged, virtually all IP developed in the course of your employment belongs to BlackBerry. You also have an obligation to disclose to BlackBerry in writing any development of IP. This includes any IP that

you develop and believe should be considered an "excluded development" that does not belong to BlackBerry. If you would like to make a written disclosure, have any questions about the use and disclosure of BlackBerry's and third parties' IP or have questions relating to "excluded developments", contact the Integrity & Compliance Office.

#### **Be Compliant in Open Source Development**

Open source software is free of charge and made available as source code, but under licenses that impose certain legal obligations. Non-compliant use of open source software can have significant consequences for BlackBerry, our suppliers, our distributors and even our customers. Prior to using, modifying or distributing open source software, you must obtain approval in accordance with the BlackBerry Open Source Software Policy.

```
        if ( val )
            ret = val;
    }
    return ret;
},
functionArgs:function
{
    var l = fn.length;
    if ( !l ) return null;
    var args = [];
    while ( l-- > 0 ) args[l] = fn[args[l]];
    return args;
},
key:quote, //obfuscate
functionCode:[
attribute:quote,
```

```
336
337
338
339
340
341
342
343
344
345
```

**Q:** I am a BlackBerry developer, and am thinking about developing a smartphone application in my spare time. I have an innovative idea that I think could be very profitable. I would like to begin work right away. Is there anything I should do before starting development?

**A:** Yes. While it is tempting to begin work right away, you should disclose your intention to develop the application, **in writing**, before you start development, so that it can be discussed in light of your **BlackBerry Employee/Consultant Confidentiality and Intellectual Property Agreement**, and the BS&P. BlackBerry may even have an application development program that you can take advantage of. Contact the Integrity & Sustainability Office to make a disclosure or ask questions.

**Q:** I worked on developing some software for BlackBerry, but the Company has decided to abandon the project. I think the software has potential. May I continue to develop the software, on my own time, and sell it to businesses outside BlackBerry?

**A:** No. BlackBerry owns the intellectual property rights in any software you worked to develop during your employment with the Company. All BlackBerry IP is the property of the Company as a whole, and ultimate responsibility for its management resides with BlackBerry.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Avoid Conflict of Interest Situations</b>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>Integrity &amp; Sustainability Office (for conflict of interest disclosures)</li> <li>Your Human Resources Business Partner</li> </ul>	<ul style="list-style-type: none"> <li>Giving and Receiving Gifts and Entertainment Policy ➔</li> <li>Travel &amp; Expense Policy ➔</li> <li>Conflict of Interest Disclosure</li> </ul>

Performing with integrity for BlackBerry means acting in BlackBerry's best interests and avoiding any situation where you could be said to have divided loyalty or to be using your position at BlackBerry to obtain favorable treatment for yourself or someone close to you.

You must avoid any situation that creates even the appearance of a conflict of interest, unless and until you have made full written disclosure of all facts and circumstances, and obtained the written approval described below.

The following sections outline some of the more common situations where a conflict may arise, how to determine whether you need to disclose a potential conflict, and how to make a written disclosure. When in doubt, ask for guidance.

### **Outside Activities Cannot Compete or Interfere with Your Work**

Outside activities, such as participating on a board of directors or advisory board, conducting an outside business, or engaging in part-time employment while working in your current position at BlackBerry should not interfere with the work you do for BlackBerry.

You may not work or engage in business outside of BlackBerry – with or without compensation – unless you have disclosed such activities and received a properly authorized approval in writing. This requires you to submit a Conflict of Interest form to the Office of Integrity & Sustainability.

A volunteer role for a charitable organization only needs to be disclosed and approved through the submission of a Conflict of Interest form, if the activity will infringe on company time or pose any other conflict of interest (such as accepting a duty of loyalty to a board of directors for a non-profit organization).

In addition, even if you have disclosed the outside activity and received approval to proceed, you may not:

- Use BlackBerry assets, facilities, services or resources, including BlackBerry IP, confidential or proprietary information or your time during the work day, on your outside activities.
- Use your position at BlackBerry to gain an advantage in your outside activities.
- Place yourself in a position where your outside interests could place you or a product, service or business on which you are working in competition with BlackBerry.

### **Do Not Take Personal Advantage of Corporate Opportunities**

You must never take personal advantage of a business or investment opportunity that you become aware of that could benefit BlackBerry. You must obtain written approval as described below before acting on such an opportunity yourself. Unless and until BlackBerry has been able to

evaluate such an opportunity and has chosen not to pursue it, you must avoid it.

### Avoid Doing Business with Friends and Family

From time to time, your actions as a BlackBerry employee may directly or indirectly affect the interests of family members and friends. Such a situation can arise, for example, when a family member or friend becomes an employee of, or significant investor in, a supplier or customer you conduct business with on behalf of BlackBerry. Although not every such situation will be a conflict of interest, you must not conduct such business without making full disclosure of these relationships and obtaining written approval as described below whenever such a situation arises. Even where such activities are approved, you must not allow your personal relationships to influence, or appear to influence, your ability to act in BlackBerry's best interest.

In addition, you should never act as a direct or indirect supervisor, or influence any employment or contract related decisions, of any BlackBerry employee or outside contractor who is a family member or other person with whom you have a significant personal relationship. You must make full disclosure of these relationships and obtain written approval as described below whenever such a situation arises.

### Outside Financial Interests Can Create Conflicts

While some outside financial interests may actually influence or may be perceived by others to

improperly influence your performance of your job at BlackBerry, it is not typically a conflict of interest to make investments in BlackBerry competitors, customers, suppliers or other business partners so long as:

- The total value of the investment is less than 1% of the outstanding stock of the company; and
- The amount of the investment is not so significant to you that it would affect your business judgment on behalf of BlackBerry.

If you or a member of your immediate family who resides with you owns or seeks to own any such financial interest, promptly disclose the matter and obtain written approval as described below.

### Giving and Receiving Gifts and Entertainment

Business gifts and entertainment can be lawful and appropriate courtesies that build a strong business relationship between BlackBerry and those with whom we do business, but we must be cautious and moderate in their use. A conflict of interest can easily arise if business courtesies suggest that favorable treatment was given, received or is expected, or was otherwise used to improperly influence a business decision.

For more detailed guidance regarding the giving and receiving of gifts, entertainment and business courtesies, including applicable internal guidelines, value thresholds and approval protocols, refer to the **Giving and Receiving Gifts and Entertainment Policy.** ➤





## **Disclose Actual or Potential Conflicts and obtain Approval in Writing**

Simply having a conflict of interest is not a violation of the BS&P, but failure to disclose and obtain the appropriate approvals for the conflict is.

To determine if a conflict of interest exists or would appear to exist, you should consider:

- The nature of your responsibilities at BlackBerry and your ability to affect the outcome of a transaction;
- The interests of others who are or appear to be closely tied to you, such as family members and personal friends; and
- How the circumstances might appear to others within and outside BlackBerry absent full disclosure and approval to move forward.

If you are aware of a possible conflict of interest - or engage in any work or business outside of BlackBerry, with or without compensation - you must submit a **Conflict of Interest Disclosure Form** through the Integrity & Sustainability Office to obtain formal written approval before commencing or continuing the activity.

In addition, members of the Board of Directors and officers must obtain formal written approval from the Audit and Risk Management Committee of the Board of Directors.

**Q: I am a BlackBerry employee, and recently started a sideline business outside the company. From time to time during the work day, I take calls or send or receive e-mails relating to the business, do research related to it, or work on “side of the desk” projects in support of it. Is this permissible?**

**A:** No. While employees may handle personal calls or e-mails from time to time during the work day, or work on outside interests during breaks, you may not use company time or resources to work on outside activities.

We owe BlackBerry a duty to focus on our BlackBerry work obligations during the work day, and to use BlackBerry assets for BlackBerry business only. When outside interests interfere with those duties, there is

an impermissible conflict of interest. Further, unless you have disclosed your outside business and received approval to pursue it, you are in violation of the BS&P and could face disciplinary action.

**Q: I have worked for BlackBerry for many years in its procurement department. My wife and I have an investment in a company that is less than 1% of its outstanding stock, but that used up much of our savings. I am in charge of a project on which this company intends to bid for a role as a BlackBerry supplier. Do I have a responsibility to disclose this information to BlackBerry?**

**A:** Yes. Your substantial investment in a would-be supplier with which you could work creates a potential conflict of interest. BlackBerry employees cannot work on transactions or with companies where they or a family member have a substantial financial interest.



**“You need to avoid any situation that creates even the appearance of a conflict of interest”**

# TREATING OUR CUSTOMERS AND BUSINESS PARTNERS WITH INTEGRITY

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Do Not Allow Bribes or Other Improper Payments</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>Integrity &amp; Sustainability Office</li> </ul>	<ul style="list-style-type: none"> <li>Prevention of Improper Payments Policy ➤</li> <li>Giving and Receiving Gifts and Entertainment Policy ➤</li> <li>Providing BlackBerry Products to Public Officials Policy (covers device and software seeding) ➤</li> <li>Providing BlackBerry Products to a Third Party Who is Not a Public Official Policy (covers device and software seeding) ➤</li> </ul>

BlackBerry competes in the marketplace through the quality of our products, the skills of our people and our ability to provide goods and services at competitive prices. You must comply with all applicable anticorruption laws. You may never make, promise, offer, fund or authorize a bribe, kickback, facilitation payment or other improper payment in connection with BlackBerry's business with a public official, government entity or any other third party. A "public official" is interpreted broadly and includes anyone serving in or employed by a national, state, provincial or local government body or agency, such

as elected officials, appointed officials and civil servants.

Our retention and use of third parties who represent us or perform services on our behalf creates significant anticorruption risk, especially where the third party interacts with public officials. You must seek guidance and obtain written approval from the Integrity & Sustainability Office before retaining or hiring a third party to represent BlackBerry before any government or to distribute or sell BlackBerry products or services.

BlackBerry is required by relevant anticorruption

laws to maintain accurate books and records, as well as a system of internal controls designed to detect and prevent improper payments.

For more detailed information about BlackBerry's policy regarding anticorruption compliance, please refer to the Prevention of Improper Payments Policy.

## BS&P SECTION

### Adhere to Competition Laws

BlackBerry competes vigorously in the marketplace, but does so honestly, fairly and in accordance with all applicable competition laws (sometimes called "antitrust", "anti-monopoly" or "cartel" laws). These laws are aimed at prohibiting agreements or practices that restrict free trading and competition between businesses.

Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, not to mention severe penalties for BlackBerry. To comply with these laws, you should not:

- Discuss or exchange information with competitors regarding prices, price-related information or any other aspect of competitive strategy. This includes information about promotional spending or terms, costs, product supply, marketing, territories or other sensitive marketing information.
- Agree or discuss with a competitor the allocation of markets or customers, or not to serve certain markets, market segments or customers.
- Violate fair bidding practices by engaging in bid-rigging or other improper or collusive tendering or procurement practices

## CONTACT(S)

Access the Resource Guide for team info ➤

- Integrity & Sustainability Office



- Conduct yourself in any way that could be viewed as an attempt to exclude present or potential competitors or control markets.

You also should not seek to enter into agreements that unreasonably limit the freedom of a reseller, customer or supplier to sell a product or service however it sees fit, including establishing the resale price of a product or service, or improperly condition the sale of products or services on an agreement to buy BlackBerry products and services.

Although the principles of these laws are straightforward, their application to particular situations can be quite complex. If any BlackBerry

competitor or business partner discusses any of these topics – even indirectly or casually – stop the conversation immediately, and seek guidance from the Legal Department.

Be particularly careful when attending industry conferences or trade shows to avoid even the appearance that your business decisions reflect an improper influence or involve unfair business practices. If you find yourself involved in a conversation that turns to the sharing of business practices, even remotely, you should terminate the conversation.

If you suspect that anyone at the company is violating the competition laws, notify the Legal Department or the Integrity & Sustainability Office immediately.

**Q:** I am attending an industry conference on behalf of BlackBerry, and have met up with an old college friend who now works for a major competitor. My friend has told me that if BlackBerry charges a certain price for its newest Enterprise software product, she will ensure her company charges the same price for its competing product. I know I can't agree to this, but I am not sure what I should do in this situation. What actions should I take?

**A:** First, you must make it very clear to your friend that you will have nothing to do with this discussion. Price-fixing is an anti-competitive topic, even the discussion of which could lead to serious consequences for you and BlackBerry – as well as for your friend and her company. Then, you must promptly report the incident to the Legal Department or Integrity & Sustainability Office.



## BS&P SECTION

### Participate in the Larger Security and Software Community

As a security software technology leader, BlackBerry possesses a unique perspective and valuable expertise. We exchange ideas and knowledge with our stakeholders and other industry participants, where appropriate. This includes actively engaging with regulatory bodies and participating in industry

## CONTACT(S)

Access the Resource Guide for team info [➤](#)

- Integrity & Sustainability Office

associations and technology standards bodies that seek to drive innovation and promote access to our technologies for people across the globe. In doing so, we abide by competition laws. See **Adhere to Competition Laws** [➤](#)

## BS&P SECTION

### Market Our Products with Integrity

You must market our products and services based on their unique characteristics, innovation and quality. You may not engage in any false or misleading sales activity, or otherwise misrepresent our products and services.

## CONTACT(S)

Access the Resource Guide for team info [➤](#)

- Marketing



## BS&P SECTION

### Comply with International Trade Control Laws and Regulations

As a global company, BlackBerry is subject to and complies with numerous trade control laws and regulations governing the export and import of hardware, software, services and technology.

#### Export and Import Controls

Generally speaking, BlackBerry hardware, software and technology that contain or make use of encryption may be subject to export control unless an exclusion or exception applies.

An “export” can occur through physical delivery, e-mail, download or other transmission of a product, software or technology from one country to another. Transferring software, services or technology to a citizen of another country, regardless of where the person is located, may also be deemed an export. Where the item is subject to export control, BlackBerry must obtain a license or a permit or be able to rely on another export authorization prior to an export.

An “import” is the transfer of goods into a country through physical or intangible means from a foreign or external source, which can include

## CONTACT(S)

Access the Resource Guide for team info ➤

- International Trade Controls

another BlackBerry location. Imports may require the payment of duties and taxes, as well as the submission of certain filings and receipt of import authorizations such as a license, permit or other approval.

#### Economic Sanctions and Other Trade Restrictions

From time to time, governments use economic sanctions and other restrictions to further various foreign policy and national security objectives. Economic sanctions are directed towards specific countries and/or specific end-users. Any appropriate screening must be completed prior to an export.

Any requisite licenses and permits for items subject to export control must be obtained and any appropriate destination country and/or end-user screening must be completed prior to an export. If you are unsure whether a transaction is in compliance with all applicable trade control laws and regulations, contact the Legal Department by sending an email to

**ExportControls@blackberry.com** ➤ prior to export.



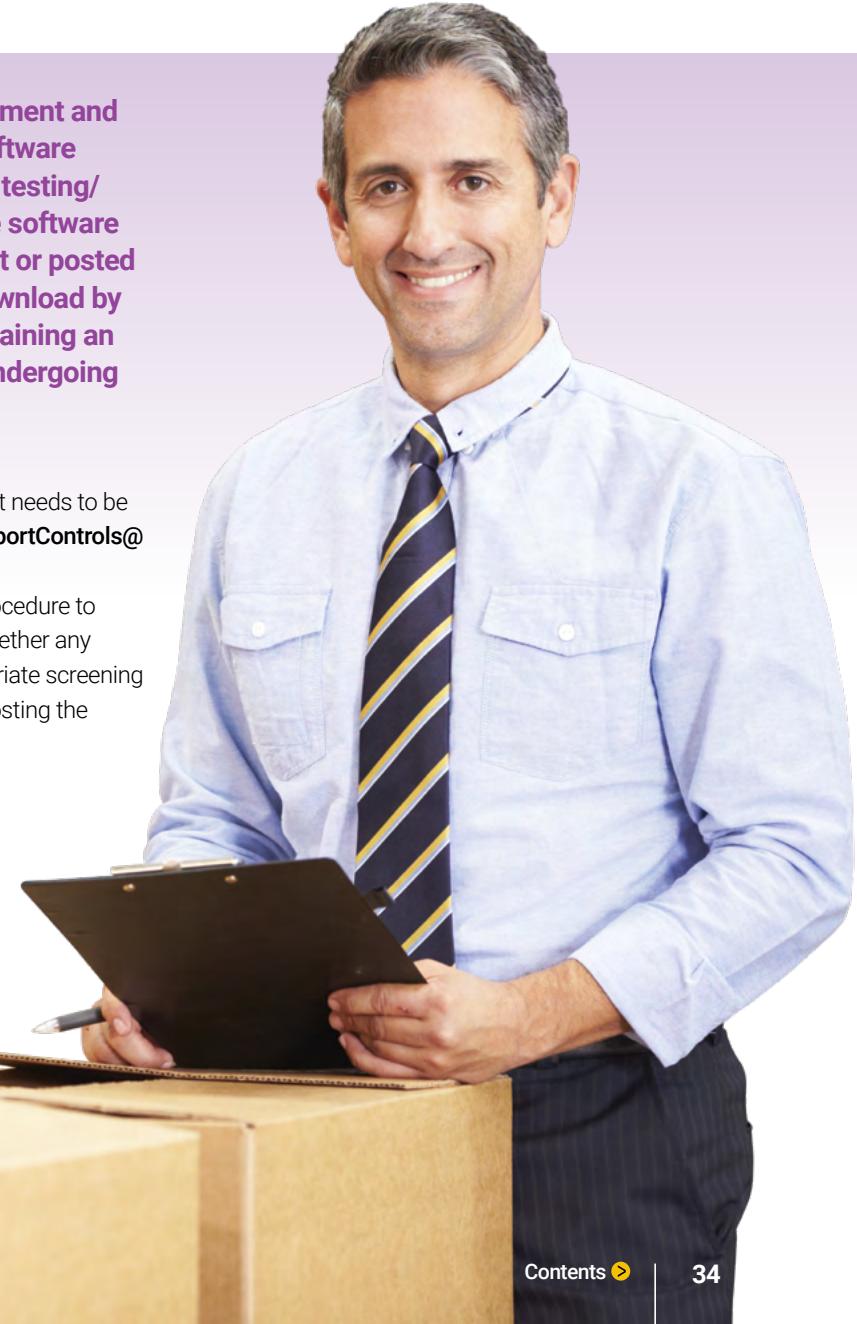
**Q:** I work in logistics, and have been asked by a BlackBerry sales manager to alter the product descriptions and valuations being entered into the documentation for a shipment of products to another country. It was explained that this will expedite customs clearance and result in a more favorable duty rate. Can I alter the documentation?

**A:** No. All documentation surrounding any shipment of BlackBerry products must be accurate and complete. It is never appropriate or justified to misclassify or mischaracterize products or transaction values, or to otherwise falsify documentation, which could result in violations of law and significant penalties for the Company and the individuals involved. You should contact BlackBerry's International Trade Controls and Compliance group of the Legal Department by sending an email to [ExportControls@blackberry.com](mailto:ExportControls@blackberry.com). ☺

**Q:** I work in software development and would like to transfer new software outside of North America for testing/evaluation purposes. Can the software be transferred to the recipient or posted to a BlackBerry server for download by the recipient without first obtaining an export permit or license or undergoing the appropriate screening?

**A:** It depends. The Legal Department needs to be consulted by sending an email to [ExportControls@blackberry.com](mailto:ExportControls@blackberry.com). ☺

You will be advised on the proper procedure to transfer or post the software and whether any export permits or licenses or appropriate screening are required before transferring or posting the software.



## BS&P SECTION

### Money Laundering and Terrorist Financing

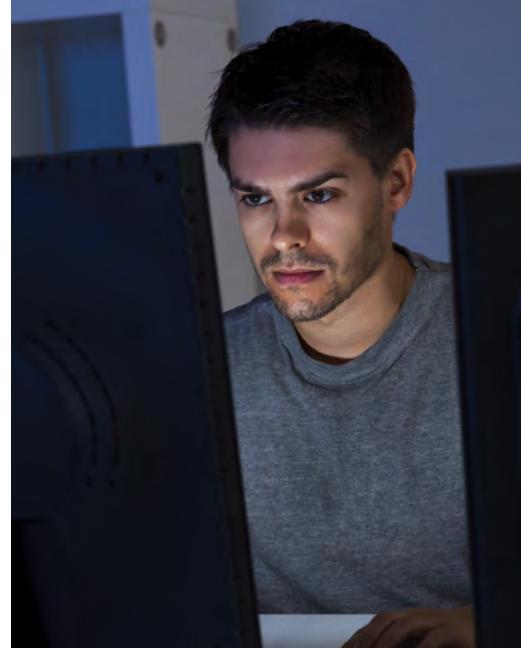
BlackBerry maintains contract review policies and procedures to guard against money laundering, a process whereby transactions with a legitimate business are used to conceal funds generated by illegal activities to make them appear to be legitimate. This may include: terrorist financing;

## CONTACT(S)

Access the Resource Guide for team info [↗](#)

- Integrity & Sustainability Office

and the potential use of our technology for illicit or illegal purposes. Only do business with reputable customers and vendors, and never provide inaccurate information about our business partner and potential business partners.



#### Red Flags

You have an obligation to report unusual or suspicious activities or transactions that could indicate improper conduct. Be on the lookout for the following, which could indicate a potential trade control, money laundering or improper financing issue:

- A customer or vendor seeking to make an abnormal payment such as a large payment in cash, through someone outside the transaction or via unusual accounts or sources of financing.
- A new customer with questionable

characteristics for the proposed transaction.

- Unusual transaction structure, including overly complex or unnecessary routing.
- Requests that an inaccurate monetary value or product description be applied to a shipment or provision of goods or services.
- Reluctance or refusal to respond to reasonable requests for information about the distribution chain, end users, intermediate consignees or delivery locations.
- Questionable requests surrounding

documentation or requests for information that does not seem related to the transaction.

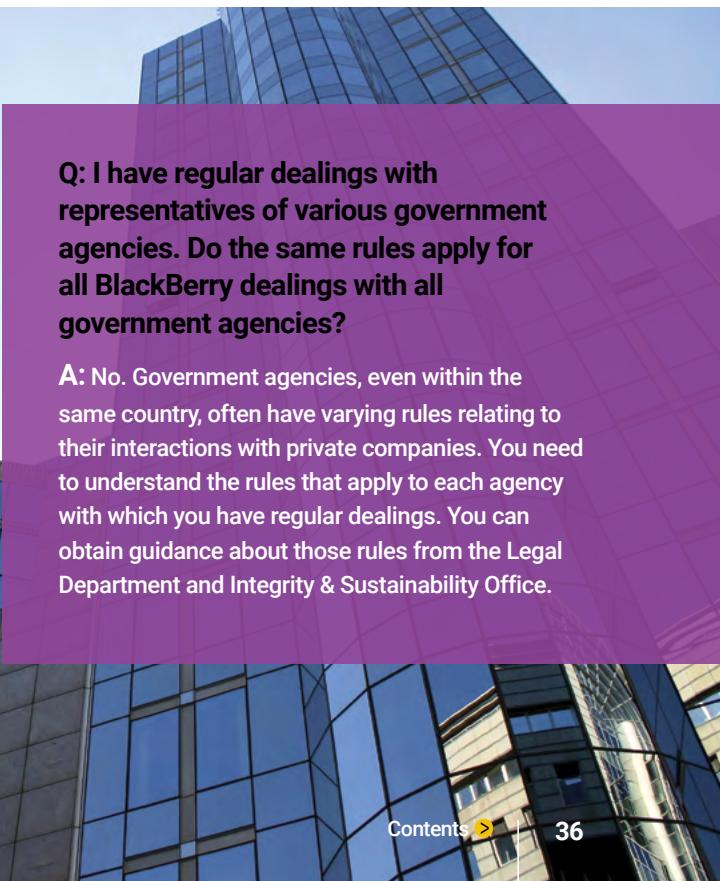
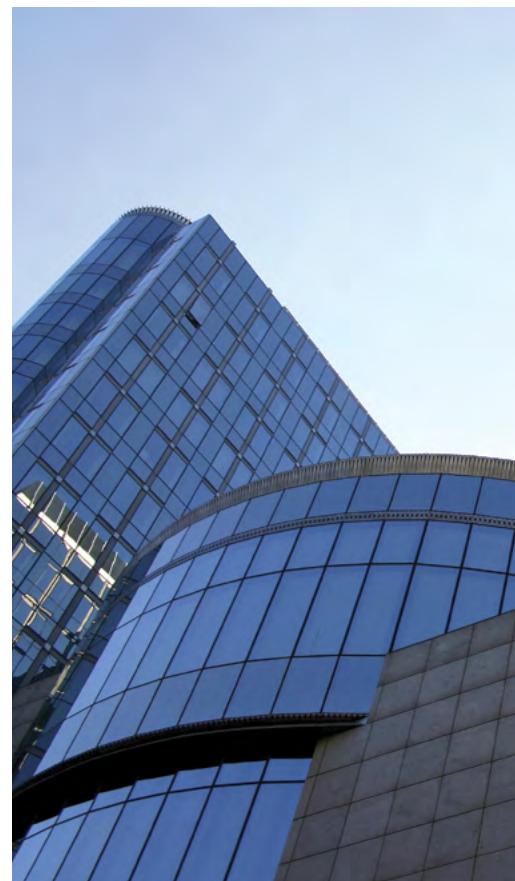
- Involvement of unnamed parties or undisclosed locations.
- Resistance to correcting inaccurate or incomplete documentation.

Seek guidance from the Legal Department or the Integrity & Sustainability Office if you encounter such "red flags."

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<h2 data-bbox="138 203 616 284">Comply with All Government Contracting Requirements</h2>	<p data-bbox="685 203 1134 230">Access the Resource Guide for team info ➤</p> <ul data-bbox="685 239 1032 266" style="list-style-type: none"> <li data-bbox="685 239 1032 266">• Integrity &amp; Sustainability Office</li> </ul>	<ul data-bbox="1234 203 1724 364" style="list-style-type: none"> <li data-bbox="1234 203 1724 230">• Prevention of Improper Payments Policy ➤</li> <li data-bbox="1234 239 1724 293">• Providing BlackBerry Products to Public Officials Policy ➤</li> <li data-bbox="1234 302 1724 356">• Giving and Receiving Gifts and Entertainment Policy ➤</li> </ul>

BlackBerry regularly sells products and services to government entities throughout the world. Government sales are heavily regulated and subject us to additional bidding, disclosure, and certification requirements, as well as limitations on provision of gifts and entertainment. Government contracting requirements may apply to government-owned or operated entities such as public utilities, health care facilities and universities. In some jurisdictions, sales activities may require registration with the government entity.

If you are involved in government-related sales or service activities, or the negotiation, administration or fulfillment of government contracts, you must understand and adhere to the additional rules and requirements applicable to those activities.



**Q: I have regular dealings with representatives of various government agencies. Do the same rules apply for all BlackBerry dealings with all government agencies?**

**A:** No. Government agencies, even within the same country, often have varying rules relating to their interactions with private companies. You need to understand the rules that apply to each agency with which you have regular dealings. You can obtain guidance about those rules from the Legal Department and Integrity & Sustainability Office.

**Q: During a recent meeting with my contact at a government customer, the agency representative offered to disclose information about a competitor's bid on an active procurement.**

**Can I obtain that information and use it to improve BlackBerry's bid on the same procurement?**

**A:** No. We cannot seek confidential information about a government procurement—or any other procurement for that matter—where we know or have reason to believe disclosure of the information is not authorized. This includes information internal to the government or relating to a competitor such as bid, proposal or pricing information. You must contact the Legal Department in circumstances where such an offer to disclose information is made to you, or where such information is inadvertently disclosed to you, whether the offer or disclosure is made by the government, a competitor or some other third party.

**Q: BlackBerry recently submitted a bid on a procurement by a government agency. Would it be permissible for the sales representative primarily responsible for the account to pay for a lunch with his counterpart at the agency?**

**A:** Even if the agency otherwise permits a vendor to pay for a business lunch, the agency's rules applicable to the bidding and vendor selection process may limit the type or amount of contact BlackBerry can have with agency representatives during the active procurement process. The fact that BlackBerry does have a bid pending with the agency heightens the risk that its provision of a thing of value such as a meal to an agency official

could be construed as an effort to improperly influence the bidding process. The sales representative must obtain advance approval from the Integrity & Sustainability Office before paying for any meal of, or providing any other thing of value such as a gift or entertainment to, any government official.

**Q: It appears that certain documentation submitted to a government customer by a subcontractor is not accurate. Do I have an obligation to report this matter internally, to the subcontractor or to the customer?**

**A:** Whether the inaccuracy is erroneous or purposeful, BlackBerry expects all documentation submitted by its employees and business partners to government customers to be accurate and complete. You should, at a minimum, report the matter internally so that appropriate steps can be taken to confirm whether there is an issue and if so to ensure that it is appropriately resolved.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Obtain and Use Third-Party Information Appropriately</b>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>• Integrity &amp; Sustainability Office</li> <li>• Privacy</li> </ul>	<ul style="list-style-type: none"> <li>• Privacy Policy ➔</li> </ul>

Just as we expect others to respect our Intellectual Property (IP) and confidential information, we have a similar obligation to respect the IP and confidential information of our customers, competitors, vendors, suppliers or any other third party. This means you should not accept such information unless you are sure the person providing it is authorized to do so. When you receive third-party IP or confidential information, you are responsible for determining if the information is subject to a non-disclosure agreement and, if it is, for knowing its requirements and complying with them. You must use such information only for the purpose it was provided, and limit any disclosure to others who have a need to know and are authorized to receive the information. Failure to protect third-party information could not only damage our relationships and harm our reputation, but it could also expose you and BlackBerry to potential liability.

If you obtain third-party IP or confidential information by accident, or if you are not sure if a disclosure is authorized, you should contact the Legal Department for guidance before you use the information or share it with anyone else.

#### **Protect the Privacy of Personal Information**

Protecting information is at the core of what we do. We earn our customers' and other third parties' trust by keeping their personal information secure. The same applies to confidential information concerning BlackBerry employees. You must never access anyone's personal information without a proper business reason. You should also be sure to keep the information safe and secure, store it in secure locations and systems only, and comply with the data protection and privacy laws of the country (or countries) where you work or do business.



# RESPECTING OUR COLLEAGUES

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Create and Maintain a Positive Environment</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Human Resources</li> </ul>	<ul style="list-style-type: none"> <li>• Equal Employment Opportunity ➤</li> <li>• Anti-Discrimination and Anti-Harassment Policy ➤</li> </ul>

## Respect and Foster Diversity

BlackBerry's success in capturing and maintaining a competitive global market share depends on our ability to understand and anticipate the needs of our existing and potential customers, partners, investors and suppliers. Our customers – as well as our own high standards – require that we have the best talent working together to innovate, make the right decisions, and deliver superior products and

services.

At BlackBerry, we recognize that the ever-changing requirements of a diverse market and customer base require us to cultivate an agile, inclusive culture where we can share a broad spectrum of perspectives and ideas. This environment enables a high level of employee engagement and satisfaction. Our inclusive culture also helps us attract and retain a workforce that understands the diverse range of

customers we serve and communities where we work and live. By fully utilizing the rich experience and skills of our diverse workforce, we deliver results for our diverse global customers.

## Do Not Tolerate Discrimination or Harassment

You may never make any employment-related decisions based upon a person's race, color, gender, national origin, age, religion, citizenship, disability,

**Q: I recently received a long-awaited promotion to a management position. My team members have been supportive through my transition; however, one of my colleagues has been treating me coldly since the promotion. I have even overheard him saying, "I know why she got promoted. It's only because she is a woman." What should I do?**

**A:** If you feel comfortable approaching your colleague, you should firmly tell him that his comments and behavior are making it difficult to do your job. If you do not feel comfortable addressing the issue yourself, you are encouraged to report the issue to your Human Resources Business Partner. None of us deserve to work in an environment that includes offensive remarks of this nature.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Value Workplace Health and Safety</b>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>• Global Environment, Health &amp; Safety</li> <li>• Human Resources</li> </ul>	<ul style="list-style-type: none"> <li>• Environment, Health, Safety and Sustainability Policy ➔</li> <li>• Workplace Violence Prevention Policy ➔</li> </ul>

medical condition, sexual orientation, gender identity, gender expression, marital status or any other basis protected by law.

You must also help ensure that our workplace is free from harassment. While the definition of harassment varies by location, at BlackBerry it includes any unwelcome conduct that has the purpose (or can be reasonably construed to have the effect) of creating an intimidating, offensive or hostile work environment. Unwelcome conduct can take the form of physical, written or spoken remarks, videos or pictures. Sexual harassment can include such acts as unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature. No matter what form the harassment takes, it negatively affects work performance and morale, and is a violation of the BS&P.

If you experience or become aware of any act of discrimination or harassment, you must report it to your manager, HR Business Partner or to HR Employee Relations ([hremployeerelations@blackberry.com](mailto:hremployeerelations@blackberry.com) ➔) so that BlackBerry may address it. Rest assured that as long as your report is made in good faith, you will not face any retaliation.

### Do Not Tolerate Bullying or Violence

None of us should ever feel threatened by anyone, regardless of our tenure or position within BlackBerry. BlackBerry makes every effort to foster an environment of responsible, respectful communication. We strive to create a workplace in which all team members have the opportunity to actively encourage and contribute new ideas by empowering each other to think, share and discuss our visions in an appropriate manner. With this in mind, it is never acceptable to belittle a BlackBerry colleague because of their ideas, beliefs or appearance or for any other reason. Our Company maintains a strict zero-tolerance policy in respect of any verbal or nonverbal attacks, intimidation or threats of violence.

If you feel that someone is acting in a threatening manner, you are strongly encouraged to bring all relevant information to the attention of your manager or your Human Resources Business Partner.

### Value Workplace Health and Safety

We are committed to maintaining an environment that is healthy and safe for everyone. Therefore, you must comply with the occupational health and safety laws that apply to BlackBerry. You must follow BlackBerry operational health and safety policies and procedures that apply to your work, which have been designed to prevent injuries and illnesses.

BlackBerry implemented the Health and Safety Policy and the Environment and Sustainability Policy to reflect our commitment to environmental protection and the health and safety of our people and communities. Know and adhere to this policy, as it forms the foundation of our Company's proactive approach to reducing injury and illness in the workplace, with the goal of optimizing employee health and safety.

### Report Your Concerns

If you experience, become aware of or have questions or concerns regarding actual or potential violations of the foregoing policies, you must report them so that BlackBerry can address them.



**“We are committed to maintaining an environment that is healthy and safe for everyone”**

# ACTING WITH HONESTY AND TRANSPARENCY FOR OUR INVESTORS

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Make Accurate and Timely Disclosures</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Corporate Secretary</li> <li>• Investor Relations</li> </ul>	<ul style="list-style-type: none"> <li>• Actively Seek Guidance and Report Concerns ➤</li> </ul>

As a publicly-traded company, we are required to make accurate and timely disclosures of information. The integrity of our financial reports and other public filings is critical to the successful operation of our business and to maintaining the confidence and trust of our shareholders, customers, business partners and other stakeholders.

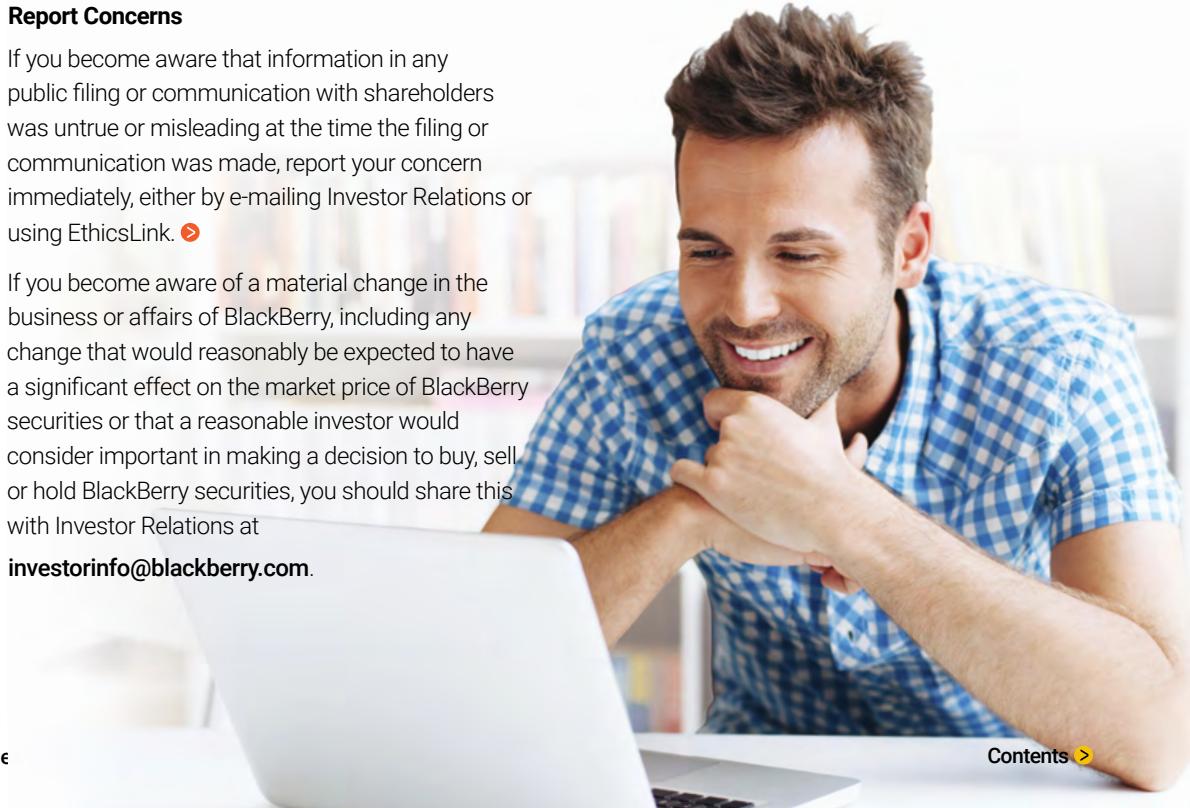
It is BlackBerry's policy to make full, fair, accurate, timely and understandable disclosures in its public filings with securities regulators and its communications with its shareholders. While BlackBerry's management has the general responsibility for preparing these filings and communications, we each have a role to play and must provide all necessary information to management.

## Report Concerns

If you become aware that information in any public filing or communication with shareholders was untrue or misleading at the time the filing or communication was made, report your concern immediately, either by e-mailing Investor Relations or using EthicsLink. ➤

If you become aware of a material change in the business or affairs of BlackBerry, including any change that would reasonably be expected to have a significant effect on the market price of BlackBerry securities or that a reasonable investor would consider important in making a decision to buy, sell or hold BlackBerry securities, you should share this with Investor Relations at

[investorinfo@blackberry.com](mailto:investorinfo@blackberry.com).



BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<h2>Keep Accurate Financial Records and Support Robust Controls</h2> <p>We rely on our accounting records for many reasons, including producing reports for management, shareholders, creditors, governmental agencies and others. Financial statements, and the books and records upon which they are based, must be accurate and complete, and must comply with applicable accounting principles and legal requirements. This includes the BlackBerry system of internal controls.</p> <p>If you are involved in BlackBerry's financial reporting process, make sure that all transactions and balances are timely and accurately recorded, classified and summarized in accordance with BlackBerry's financial and accounting practices. Even if you are not in a finance or accounting role, be mindful that everyday transactions such as recording expense reports and preparing sales invoices must be accurate and complete.</p>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>Integrity &amp; Sustainability Office</li> <li>Finance</li> </ul>	<ul style="list-style-type: none"> <li>Actively Seek Guidance and Report Concerns ➔</li> </ul>

### Adhere to Our Processes and Controls

You must follow all processes and controls designed to ensure the accuracy of BlackBerry's assessment and reporting of financial results. No one should ever override internal controls or procedures directly or indirectly related to financial reporting. If you believe that you need to deviate from these controls or procedures for legitimate reasons, you must first communicate the circumstances in writing to the Finance Department and obtain approval. Be sure to retain, protect and dispose of company financial records in accordance with applicable legal requirements and BlackBerry record retention policies.

### Always Be Cooperative, Forthcoming and Transparent

Always cooperate and communicate truthfully with members of BlackBerry's internal audit, accounting, ethics and compliance, and legal teams, as well as with BlackBerry's independent auditors, outside counsel and government investigators or regulators with respect to BlackBerry's accounting practices or financial statements. As part of our commitment to the accuracy of our publicly disclosed financial information, we must make sure that relevant information regarding the financial condition of BlackBerry and our internal controls is available to the Audit and Risk Management Committee of the Board of Directors.





**Q: What is an “internal control”? When would I be overriding or deviating from one?**

**A:** While you may think of internal controls as being primarily finance-related, the internal control environment is much broader and can include nearly any tool used to mitigate business and compliance risks, such as:

- The messaging, guidance and oversight from the leadership team – a.k.a., the “Tone From The Top.”
- Written policies and procedures.
- Risk assessments.
- Management oversight of key risk areas.
- Training.
- Internal reporting.
- Enforcement and disciplinary systems
- Third-party due diligence.
- M&A due diligence.
- Payment controls.
- Limitations on access to cash and checks.
- Monetary approval limits.

- Contract provisions, and contract review and approval.
- Guidelines on key compliance risk areas such as gifts, travel and entertainment, and charitable or political giving.
- IT system constraints.
- Accounting and finance controls, internal audits and reconciliations
- Documentation requirements.

Activities such as preapproving spending, splitting invoices, keeping a credit or account with a vendor or other third party, operating via “side letters” outside the formal contracting process, improperly overriding Company product pricing policies, procedures or decisions, or ignoring signing authority requirements are all examples of activities that deviate from or undermine our controls, and are therefore prohibited.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<h2>Ensure Financial Integrity and Responsibility</h2>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>• Integrity &amp; Sustainability Office</li> <li>• Business Affairs</li> <li>• Finance</li> </ul>	<ul style="list-style-type: none"> <li>• Management Approval Processes (MAP) ➔</li> <li>• Travel &amp; Expense Policy ➔</li> <li>• Approval levels: PO, Invoice &amp; Expenses ➔</li> </ul>

Conducting BlackBerry business with integrity includes making sure that all agreements and commitments are made in writing, and include all aspects of the transaction.

### **Understand and Respect Signing Authority**

BlackBerry has a defined process for line management to approve pricing and certain other contract terms and conditions. Only authorized individuals have the authority to make commitments on behalf of BlackBerry, as delegated by the Board of Directors. Commitments include contracts, purchase orders, statements of work, and other business obligations or promises to perform.

You must satisfy the following when having any commitment executed, modified or amended:

- Obtain all appropriate approvals in advance.
- Use written documentation approved by the Legal Department for agreements.

- Provide the finalized written documentation to the appropriate person for recording in our books and records.
- Ensure the written documentation contains a relevant terms to which the parties are agreeing.

Making business commitments outside of this process, such as through informal or oral agreements, is prohibited.

If you are entering into an NDA using a Legal Department-approved form, you don't need further approval from the Legal Department unless you have made changes to the form or are using it for other than its intended purpose.

### **Understand and Respect Spending Authority / Adhere to MPOWER**

To illustrate exactly what approvals are needed for various activities and expenditure levels, BlackBerry has compiled a list of mandatory guidelines known as MPOWER defining the

approvals necessary for all transactions at BlackBerry globally. You must adhere to MPOWER requirements.

Before acquiring any goods or services or committing to spending on behalf of BlackBerry, you must have appropriate spending authority for the total amount of the payments or concessions involved. If you do not, then you must obtain approval from the manager in your chain of management who does.

You must make all purchasing decisions in the best interests of BlackBerry. Seek assistance from Sourcing and Procurement to ensure BlackBerry is getting the best deal available given the circumstances and our requirements, especially by obtaining competing bids as required by procurement guidelines. All purchasing decisions must also be documented with supporting evidence that will allow other individuals to reach the same decision.



**Q: The procedures for commitments require that I obtain “all appropriate approvals in advance.” What are appropriate approvals?**

**A:** This depends on the type of commitment. Most approvals are addressed in MPOWER. If you are unsure or have questions please contact Business Support, Sourcing & Procurement or the Integrity & Sustainability Office.

**Q: An enterprise partner asked me to verbally agree over a handshake that BlackBerry will sponsor its annual conference, in exchange for a purchase order for a large number of BlackBerry software licenses. May I make this agreement?**

**A:** No, this is a prohibited verbal side deal. BlackBerry may want to support the annual conference and our customer may want to purchase software, but any related agreements need full business review and approval, and proper Legal Department-approved documentation. Be explicit in discussions with partners about when you are socializing a proposed deal and when you are extending an offer capable of acceptance.

#### **Expense Claims Must Be Valid**

BlackBerry requires that you submit only claims for reasonable expense costs, directly related to company business, and supported by appropriate documentation. Your claim must record the business purpose, full names and titles of everyone who participated, and comply with other submission requirements.

**Q: My team requires additional equipment to complete a high priority project. The equipment cost exceeds the approval limit of my manager. He thinks that waiting for approval from his higher-level manager will take too long. He has instructed me to acquire the equipment by submitting two purchase order requests that split the order. This way, he can approve the purchase on his own.**

**How should I proceed?**

**A:** Submit a purchase order request for the full amount that represents the complete transaction so that a manager with the right spending authority can approve. In addition, use an appropriate reporting channel to make a report describing the improper suggestion to split the purchase order.

BS&P SECTION	CONTACT(S)
<b>Cooperate with Internal and External Audits, Investigations and Inquiries</b>	Access the Resource Guide for team info ➔ • Integrity & Sustainability Office

You have an obligation to cooperate with any internal or external audits, investigations and inquiries. You must always provide truthful and accurate information to BlackBerry personnel conducting an investigation, as well as to government regulators and external auditors. It is important that you take special care to retain all documents that relate to any imminent or ongoing investigation, lawsuit, audit or examination involving BlackBerry. This means that you must never conceal, alter or destroy any documents or records related to any such inquiries. It also means you must follow

any specific instructions from the Legal Department to retain and preserve particular information. Failing to do so may expose BlackBerry and the individuals involved to criminal liability.

If a government regulator contacts you in connection with a standard inspection or routine audit, please notify your manager and follow established procedures. If a government investigator contacts you for any other matter, you must notify the Legal Department immediately.



BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<h2>Avoid Insider Trading and Tipping</h2>	<p>Access the Resource Guide for team info <a href="#">➤</a></p> <ul style="list-style-type: none"> <li>• Corporate Secretary</li> </ul>	<ul style="list-style-type: none"> <li>• Insider Trading Policy <a href="#">➤</a></li> </ul>

BlackBerry's directors, officers and employees are insiders of the Company. Consultants, contractors and even students may become insiders as well. Applicable laws and BlackBerry policy prohibit insiders from trading in BlackBerry securities while possessing material information that has not been made generally available to the public – a practice referred to as “insider trading”. Non-public information about the business or affairs of BlackBerry is material if it would reasonably be expected to have a significant effect on the market price or value of BlackBerry securities or if a reasonable investor would consider it important in making a decision to buy, sell or hold BlackBerry securities. Passing along material non-public information to friends or families – a practice known as “tipping” – is considered a form of insider trading and is also prohibited by securities laws and BlackBerry policy.

In addition, a BlackBerry insider may not buy or sell securities of another public company while in possession of material non-public information regarding that company, if the information was learned in the course of the insider’s work at, or via their affiliation with, BlackBerry.

**Honor Blackout Periods**

Some BlackBerry employees, because of their position in the Company and the potential access they have to material non-public information, may be advised from time to time that they are also not allowed to trade during specified “blackout periods.” If you are one of these employees, you must ensure that you comply with applicable blackout and pre-clearance requirements and take necessary precautions to ensure that material non-public information is not made available to others, including fellow BlackBerry employees who do not require access to the information.

Insider trading and tipping can result in civil or criminal penalties, and/or disciplinary actions including termination. If you have any doubt about a potential securities transaction or the use of certain non-public information, seek guidance from the Chief Financial Officer or Chief Legal Officer or their designates.

**“Insider trading and tipping can result in civil or criminal penalties”**



**Q:** I went out to lunch with my colleague and her son. We casually conversed during the first half of their meal, but later, the discussion turned to business. Although her son is not a BlackBerry employee, he is interested in smart investment opportunities, and pressed his mother for more information about important product developments. She knew she couldn't delve into specifics, but told us, "Let's just say that now would be a good time to invest in BlackBerry." Has she done anything wrong?

**A:** Yes. Your colleague may have the best of intentions, but encouraging her son and a coworker to purchase BlackBerry stock while in possession of such key information is "tipping." Tipping is a violation of insider trading laws, and can pose serious consequences for all three of you and for BlackBerry. You may not share confidential information with those outside our Company, including family members, or even with colleagues who do not have a business reason to know it. In addition, you have an obligation to report and should provide information about these circumstances via an appropriate reporting channel.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<p><b>Remember that We Speak with One Clear Voice</b></p>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Public Relations &amp; Social Media</li> <li>• Investor Relations</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate Disclosure Policy ➤</li> <li>• Social Media Policy ➤</li> </ul>

BlackBerry strives to provide clear and accurate information to both internal and external stakeholders. In addition to complying with important legal and regulatory requirements, this helps us maintain integrity in our relationships with the public and investors, which in turn strengthens our corporate reputation. The primary spokespersons for our Company are the Chief Executive Officer and other BlackBerry personnel designated in our Corporate Disclosure Policy ➤. From time to time, these individuals may designate others to serve as authorized spokespersons.

If you have not been designated as an authorized spokesperson, you must not respond to questions about BlackBerry from:

- The investment community (including financial analysts and investors). Refer inquiries received from a financial analyst or investors to the Investor Relations Department
- Regulators. Refer inquiries received from regulators to Legal or the Integrity & Sustainability Office; or

- The media, even informally. Refer inquiries received from the media to the Public Relations Department. If you otherwise have questions about whether it would be appropriate for you to speak publicly about BlackBerry or BlackBerry business, seek guidance. You must similarly refrain from participating in groups often referred to as “expert networks” to consult on matters relating to BlackBerry, absent advance approval to do so.

### Social Media

BlackBerry encourages employees to talk positively about BlackBerry in social situations and in social media, provided it is clear that you are a BlackBerry employee and not speaking on behalf of BlackBerry; the information shared is public and accurate; and your communication complies with BlackBerry's Social Media Policy. In short, we must never give the appearance of speaking or acting on BlackBerry's behalf unless we are authorized to do so.



**Q: A news reporter sent me a social media invite and asked to chat. What is the harm in accepting?**

**A:** The invite carries significant risk that what you say might be taken as your speaking on behalf of BlackBerry or as a BlackBerry representative. As a publicly-traded company in a high visibility industry, it is vital that we communicate to the media, the investment community and the general public in a consistent, considered manner, and only through those employees designated to act as BlackBerry spokespersons. You should respectfully decline the invite.

**Q: I read a tech news story with incorrect information about a rumored BlackBerry product. Can I post a comment?**

**A:** No, you should never comment about rumors about BlackBerry, or do anything else that would disclose confidential company information. Instead, share the story link with BlackBerry's Social Media or Public Relations team.



**Q: I post on social media channels using my personal account after work, sometimes about technology or telecommunications. Is that ok?**

**A:** Yes. BlackBerry encourages, but does not require, positive social media from its employees. If you post about or associate yourself with BlackBerry, you must comply with the BlackBerry Social Media policy. Note, in particular, the following requirements:

- a. Make sure your social media profile shows that you are a BlackBerry employee.
- b. If your post would lead the public to believe you are endorsing a BlackBerry service, disclose that you work for BlackBerry.
- c. Do not claim or imply your views represent BlackBerry unless you have authorization from the public relations team. If there is a possibility of confusion, make it clear that your opinions are your own.

# COMMITTING TO SOCIAL RESPONSIBILITY FOR OUR WORLD

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Uphold Human Rights</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Corporate Responsibility</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate Responsibility Report ➤</li> </ul>

As a progressive and socially responsible company, BlackBerry complies with international laws governing employment and labor standards. We do not permit child or forced labor or any form of physical abuse in any of our operations, or condone such practices among our suppliers and other business partners, and expect that they will

uphold these same standards. Failure to comply could result in the termination of that business relationship.

We also endeavor to comply with laws to accommodate the needs of each person at our Company – including religious and cultural

requirements – and offer acceptance and respect to all backgrounds and lifestyles.

For more information, please review BlackBerry's Human Rights Policy or seek guidance from your Human Resources Business Partner or the Legal Department.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Protect Our Environment</b>	<p>Access the Resource Guide for team info ➤</p> <ul style="list-style-type: none"> <li>• Global Environment, Health &amp; Safety</li> <li>• Environmental Programs</li> </ul>	<ul style="list-style-type: none"> <li>• Human Rights Policy ➤</li> <li>• Environmentand Sustainability Policy ➤</li> </ul>

BlackBerry supports inclusive and environmentally conscious product development through sustainable business operations and efforts to reduce the environmental impact of our business activities. BlackBerry supports protecting the environment within its internal operations and supply chain. You must comply with all applicable

environmental laws and regulations as well as our voluntary commitments to sustainable practices and environmental protection.

We strive to reduce the environmental impact of our business activities, and also to deliver environmentally conscious products and services.

Day-to-day operations have a number of direct and indirect impacts on the environment. BlackBerry has taken steps to mitigate these impacts by adopting policies, procedures and processes that address these matters.

## **Recycling and Resource Conservation**

We are committed to a supportive work environment, where employees practice recycling as available and take action to reduce consumption of water, energy and other resources. You must properly dispose of all electronic products and components including internal equipment, returned customer units or other inventory in compliance with applicable legal requirements and BlackBerry policies.

### **Take Care when Handling Materials that Can Hurt the Environment**

Many materials can have adverse environmental impacts if mishandled. If your job involves contact with any regulated materials or requires that you make decisions about how any materials are used, stored, transported or disposed of, you need to understand how they should be legally, responsibly and safely handled. This will prevent any releases as part of wastewater, air emissions or uncontained spills.

If you believe that an environmental hazard exists, that there has been a release of any hazardous substance or that environmental policies, procedures or processes are not being followed, you must immediately report the situation to your manager or Facilities.

## **Q: What else can I do to help protect the environment?**

**A:** Our environmental management system offers an opportunity to create enduring benefits for our shareholders, customers and employees. You are encouraged to bring any suggestions you have to improve BlackBerry's overall environmental footprint to the attention of your manager or any other resource listed in the BS&P or to [corporateresponsibility@blackberry.com](mailto:corporateresponsibility@blackberry.com).

We must each endeavor to implement environmentally sound practices in our work and reduce our environmental impact. We need to continue to assess the environmental effects of our products and operations and work actively to reduce BlackBerry's overall environmental footprint. Our environmental management system offers an opportunity to create enduring benefits for our shareholders, customers and employees.



BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Give Back to Our Communities</b>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>• Corporate Citizenship</li> </ul>	<ul style="list-style-type: none"> <li>• Prevention of Improper Payments Policy ➔</li> <li>• Corporate Citizenship Page ➔</li> </ul>

We strongly believe in giving back to the communities in which we operate by engaging the talents and resources of our people and partners. BlackBerry's Community Affairs efforts focus on identified priorities, including bettering the lives of disadvantaged youth and support for families of service members and veterans.

In addition, BlackBerry supports proactive team volunteering to support our communities, consistent with identified priorities.

Community Affairs manages corporate donations on behalf of BlackBerry. If your business unit needs to facilitate any type of donation, it must be for a business purpose consistent with the Prevention of Improper Payments Policy and receive advance written approval as required by MPOWER and our Giving and Receiving Gifts and Entertainment policy. The different types of donations are described in more detail below.

### **Donating BlackBerry Money**

Decisions to donate any monetary amount on behalf of BlackBerry must be made in partnership with Community Affairs and receive written pre-approval, as required by MPOWER. Community Affairs is responsible for engaging with charities and non-profits for BlackBerry and must be consulted prior to any direct engagement with the non-profit sector.

### **Donating BlackBerry Products & Services**

Donation of BlackBerry products and services is known as an "in-kind" donation. While this may seem like an easy donation to make, there are many questions that must be considered. Accordingly, Community Affairs makes in-kind investments based on a broader relationship with a non-profit or charity. As with the other types of donations, proper written pre-approval is required.



## **Donating BlackBerry Corporate Assets**

Corporate assets can be defined as anything owned by BlackBerry. This includes all IT assets (monitors, keyboards, laptops, printers, scanners, etc.), facilities assets (desks, office furnishings, office supplies, building space, etc.), and excess inventory of BlackBerry-branded promotional material etc.

All corporate assets must first be evaluated for potential sale or other cost-recovery before an in-kind donation proposal can be submitted to Community Affairs and Integrity & Sustainability Office for written approval.

**Q: I am a loyal supporter of several charitable causes. One such cause is not one that BlackBerry officially supports. Since BlackBerry is committed to giving back to the communities we serve, is it okay for me to use company time, and donate BlackBerry equipment, to this organization?**

**A:** While BlackBerry encourages you to support the charities of your choice, BlackBerry charitable donations are facilitated with approved budget by Community Affairs. In addition, you may not use company time, assets and resources to further your personal interests without prior written approval from your manager, Community Affairs, and the Integrity & Sustainability Office. You should continue supporting the charities of your choice regardless of whether they are sponsored by BlackBerry, but on your own time and with your own funds.

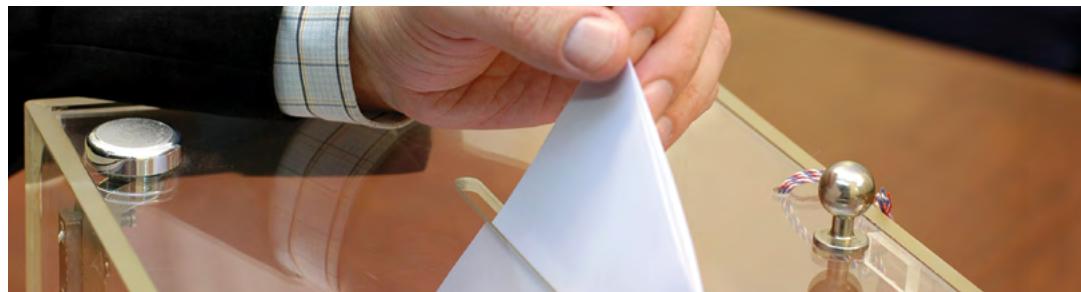


BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<b>Participate in the Political Process Responsibly</b>	<p>Access the Resource Guide for team info ➔</p> <ul style="list-style-type: none"> <li>• Integrity &amp; Sustainability Office</li> <li>• Government Relations</li> </ul>	<ul style="list-style-type: none"> <li>• Prevention of Improper Payments Policy ➔</li> </ul>

BlackBerry encourages you to participate in political activities, and support candidates and issues of your choice. However, you may not use BlackBerry property, equipment, personnel or other resources for political activities or endorsements. If you do engage in political activities, you must do so as a private citizen, on your own time and at your own expense. You must not give the impression that BlackBerry supports any candidate or issue you are involved with as a private citizen.

There are strict laws in most countries governing political contributions or activities by corporations.

BlackBerry does not make political contributions. The Government Relations team is responsible for coordinating our activities with government officials and policy makers. You should not communicate with public officials or policy makers on behalf of BlackBerry except as directed by the Government Relations team.



**Q: My next door neighbor is running for the local town council and has asked for my help. Can I be listed as one of his supporters? What about making phone calls from the office during my lunch break or using the copy machine to print up flyers?**

**A:** It is okay for you to be listed as a supporter as long as you are not identified as a BlackBerry employee. It is not okay for you to make phone calls using BlackBerry office or mobile phones, even on your break time, or use the office copy machine because these activities would involve the use of BlackBerry equipment and facilities in support of political activities.

BS&P SECTION	CONTACT(S)	POLICY OR PROCEDURE
<h2>Choose Responsible Suppliers</h2>	<p>Access the Resource Guide for team info <a href="#">➤</a></p> <ul style="list-style-type: none"> <li>Supply Chain Social Responsibility</li> </ul>	<ul style="list-style-type: none"> <li>BlackBerry Supplier Diversity Policy <a href="#">➤</a></li> <li>BlackBerry Supplier Code of Conduct <a href="#">➤</a></li> <li>BlackBerry Responsible Minerals Policy <a href="#">➤</a></li> </ul>

We seek out suppliers of goods and services who share our vision of doing business the right way, and hold them to the same standards to which we hold ourselves. We will not tolerate those whose actions might damage our reputation or brand. This means we expect our suppliers to fully comply with the applicable laws, rules and regulations of the countries in which they operate.

We also expect our employees to deal with suppliers fairly, and to select them based on the quality, reliability, capability and competitiveness of their products and services, their commitment to ethical business practices, and the value they can provide to BlackBerry. Through our Supplier Diversity Policy, we create BlackBerry business opportunities for small businesses owned by, minorities, women, LGBT's, veterans, service disabled veterans, and people with disabilities.

Our suppliers must conduct their operations in an ethically, socially and environmentally responsible manner consistent with the BlackBerry Supplier Code of Conduct and the BlackBerry Responsible

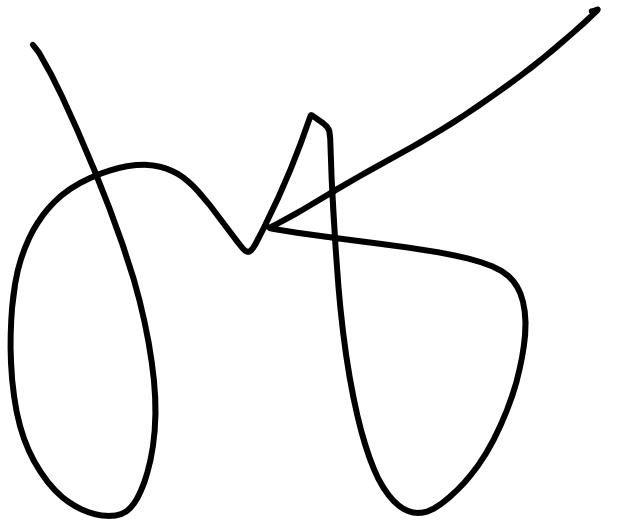
Minerals Policy. If a supplier is unwilling or unable to make such a commitment, or fails to improve unacceptable performance, we may suspend or terminate the relationship.



## Glossary of Defined Terms

- **Anticorruption laws.** Laws designed to prohibit the use of corrupt payments or other improper inducements in order to gain or maintain business or some other competitive advantage. Anticorruption laws may target official bribery (i.e., the bribery of government officials), commercial bribery (i.e., the bribery of non-governmental commercial parties) or both. They may also target the maintenance of accurate books and records, and of effective internal control environments.
- **Anything of value.** Nearly any form of benefit, including but not limited to:
  - cash or cash equivalents, loans, gifts or prizes
  - employment offers or promises of future employment (to an individual or any of their relatives)
  - favorable terms on a product or service or product discounts
  - entertainment or hospitality (payment of travel, hotel or restaurant bills, living expenses or costs of trips or resort stays)
  - use of vehicles or vacation homes
  - discounted or free tickets to events
  - services, personal favors or home improvements
  - political or charitable contributions
- **BlackBerry assets.** In addition to tangible assets such as cash, equipment, facilities, inventory and supplies, this includes intangible assets such as intellectual property, business strategies and plans, financial data, technology, other trade secrets and other forms of confidential and proprietary information. See also Confidential and proprietary information.
- **Bribe.** Promising, offering or giving anything of value to any person, where it is intended to improperly influence the recipient to misuse their position or to otherwise obtain an improper business advantage. See also Improper payment.
- **Business courtesy.** Gifts, travel, meals or other forms of entertainment provided or received in the course of business activities to or from a business partner or counterparty. So long as reasonable in nature, supported by a bona fide business purpose, consistent with relevant business customs and cultural traditions, and consistent with the BS&P and other BlackBerry policies and procedures, these are usually acceptable. See also Bribe; Gifts or entertainment.
- **Business partner.** Any number of third parties with which BlackBerry might work, including but not limited to agents, alliance partners, consortium partners, consultants, contractors, dealers, distributors, joint venture partners, promoters, resellers, retailers, sales representatives, service providers, subcontractors, suppliers or vendors. See also Third party.
- **Cash and cash equivalents.** In addition to cash, this includes anything that can be readily converted to or used in the same manner as cash, including money orders, traveler's checks, paper checks, investment securities, negotiable instruments, loans, stocks or stock options, and stored value products such as debit cards, gift certificates and gift cards.
- **Competition laws.** Laws designed to prohibit agreements or practices that restrict free trade and competition between businesses. Also known as antitrust, anti-monopoly or cartel laws, these often target practices such as price fixing, bid-rigging or other collusive tendering or procurement activities, market allocation, exclusion of competitors from markets or other efforts to control, monopolize or improperly divide markets.
- **Confidential and proprietary information.** Non-public information that is not approved for dissemination outside BlackBerry (other than pursuant to a duly executed non-disclosure agreement). See also BlackBerry assets
- **Conflict of interest.** A situation where an individual's personal, financial or other interests or relationships might reasonably be seen as interfering with an obligation the individual owes to act in the best interest of another, such as their employer.
- **Corporate opportunity.** A business or

- investment opportunity that could benefit BlackBerry.
- Discrimination.** Making employment-related decisions based upon a person's race, color, gender, national origin, age, religion, citizenship, disability, medical condition, sexual orientation, gender identity, gender expression, marital status, veteran status or other status protected by law.
- Economic sanction.** Penalties applied by a country or group of countries on another country, individual or entity, typically in an effort to force political or policy changes by causing negative economic impacts. Economic sanctions often take the form of embargoes or other trade barriers, restrictions on financial transactions, isolation from key markets or of key industries, asset freezes and travel restrictions. See also Trade control laws; trade embargo or restriction.
- Export.** Movement of a product, software or technology from one country to another, either through physical shipment, electronic transmission (e.g., via e-mail or download), or visual or oral disclosure (e.g., via telephone or an in-person meeting), either to a recipient located in another country or to a citizen of another country regardless of where they are located.
- Facilitation payment.** Payments made to a government official to secure or expedite the performance of a routine governmental action that involves nondiscretionary acts (i.e., acts one would be entitled to have performed in the due course absent the payment). Such actions may include obtaining permits, licenses or other official documents such as visas and work orders. These payments are also sometimes referred to as "grease" payments, and are illegal in all countries in which they are made. Legitimate expediting or other handling fees provided for under applicable local law, rule or regulation that are paid to a government entity rather than a government official are not considered facilitation payments.
- Family member.** A spouse, domestic partner (opposite or same sex), child, stepchild, adopted child or other child who lives with an individual in a regular parent-child relationship, parent, stepparent or relative who has filled the role of parent of the individual or individual's spouse or domestic partner, mother-in-law, father-in-law, brother, sister, grandparent or grandchild, niece, nephew, aunt and uncle, or any other family member who lives with an individual or who is otherwise financially dependent on the individual, or on whom the individual is financially dependent.
- Gifts or entertainment.** Nearly anything of value provided to or received from a third party other than a payment for goods or services duly received, or that is otherwise provided for as a matter of contract or of law, could be considered a gift or entertainment. This could include meals, travel, lodging, tickets to sporting or other events, reimbursements for the same, discounts or other similar benefits, prizes, loans, services, use of vehicles or vacation homes, or favorable terms on a product or service.
- Good faith.** A sincere, honest intention or belief, regardless of the outcome of an action.
- Government official.** See Public official
- Harassment.** Any unwelcome conduct that has the purpose (or can be reasonably construed to have the effect) of creating an intimidating, offensive or hostile work environment. This can include physical, written or spoken remarks, videos or pictures, or other unwelcome conduct that unreasonably interferes with an individual's work performance.
- Import.** The transfer of goods into a country through physical or intangible means from a foreign or external source.
- Improper payment.** Any payment made with corrupt intent, in an effort to obtain or retain business or some competitive advantage. "Payment" in this context should be construed broadly to include provision or offer to provide, or the funding, facilitation, approval of or acquiescence in any provision or offer to provide anything of value to a recipient. Such payments can take the form of cash or cash



- officers or employees of public international organizations, such as the United Nations or World Bank
  - officials and employees of political parties
  - candidates for foreign political office
  - any other private person acting in an official capacity for or on behalf of the government (e.g., a consultant hired by a government entity to work on its behalf).
- See also Government official.
- **Retaliation.** Depending on the facts and circumstances, this can include almost any adverse employment action taken against an individual in direct response to that individual having exercised a right or otherwise engaged in a protected activity in good faith. Examples of retaliatory conduct could include firing, demoting or reassigning someone, or refusing to provide them promotions, favorable work assignments or benefits to which they would typically be entitled in the due course.
- **Side agreement or side letter.** An agreement or addendum to an agreement that is outside a related contract or other agreement, or that has been negotiated and executed outside BlackBerry's formal contracting process.
- **Signing authority.** Thresholds defining the monetary limits below which BlackBerry employees have authority to execute an agreement on BlackBerry's behalf and bind the Company thereby as an authorized signatory, and above which they must have an employee with a higher level of approval authority execute the agreement. See also Monetary approval authority.
- **Third party.** Any person who is not a BlackBerry employee and any entity that is not a BlackBerry business. Examples include consultants, outside lawyers, customs brokers, sales representatives, brokers, distributors, agents, suppliers and vendors. See also Business partner.
- **Third-party information.** Non-public information provided or made available to BlackBerry by third parties, typically pursuant to a non-disclosure agreement or other means whereby BlackBerry has an obligation to maintain the confidentiality of the information.
- Confidential information about third parties that is known or made available to BlackBerry other than through a non-disclosure agreement or similar means (e.g., via a BlackBerry employee who previously worked for a third party) could also be considered third-party information for which BlackBerry or the individual in possession of the information has an obligation to maintain confidentiality.
- **Tipping.** Informing others of inside information. See also Inside information; insider trading
- **Trade control laws.** Laws, rules or regulations governing foreign trade activities, including import and export control laws, anti-boycott laws, trade embargoes or trade restrictions. See also Economic sanctions; export; import; trade embargo or trade restriction.
- **Trade embargo or trade restriction.** See Economic sanctions; see also trade control laws.

## No Rights Created

The BS&P is a statement of BlackBerry's fundamental business standards, principles, policies and procedures. It seeks to help us understand the ethical behavior expected of all of us. However, the BS&P is not intended to, and does not, create any rights for any employee, customer, supplier, competitor, shareholder or any other person or any entity other than BlackBerry.

The BS&P is subject to change. Changes can occur with or without prior notice.

## Index

Anonymity (reporting ethics issues)	7, 14	Diversity	39, 57
Anticorruption	29, 58, PIPP ➤, Gift Policy ➤	Donations	54, 56, 59
Anti-monopoly law	30, 58	Electronic communications, protection of	38, 40
Antitrust law	30, 58	Embargo	33, 59, 61
Assets, use or protection of	17, 18, 20, 23, 25, 28, 55, 58, 60	Entertainment	10, 25, 27, 29, 36, 37, 44, 58, 59
Audits, internal and external	13, 44, 47, 60	Environment	8, 11, 22, 39, 40, 44, 52, 53, 58, 59
BlackBerry assets	17, 18, 25, 28, 58, 60	Equipment, use of	17, 23, 47, 52, 56, 58
Blackout period	48	EthicsLink	7, 13, 14, 42
Boards, serving on	25, 27, 60	Exports	33, 34, 59, 61
Boycotts	33, 61	Financial interests, outside	26
Bribery	58, PIPP ➤, Gift Policy ➤	Financial records	43, PIPP ➤
Bullying	40	Financial reporting	43
Business courtesy	28, 58	Foreign Corrupt Practices Act (FCPA)	PIPP ➤
Cartel law	30, 58	Fraud	12, 18, 19, 20
Charitable donations	17, 25, 44, 54, 55, 58, 60	Gifts	10, 20, 25, 27, 29, 36, 37, 43, 58, 59, Gift Policy ➤
Competition law	30, 32, 58	Government, contracting with	3, 10, 20, 29, 33, 36, 37, 43, 47, 54, 56, 58, 59, 60
Compliance with laws	3, 7, 8, 9, 10, 11, 12, 13, 14, 15, 19, 23, 24, 27, 29, 30, 31, 33, 34, 35, 36, 37, 38, 43, 44, 46, 50, 52, 54, 55, 60	Guidance, seeking	3, 6, 8, 10, 12, 13, 15, 25, 27, 29, 30, 35, 36, 38, 42, 43, 44, 48, 50, 52
Confidential information	8, 21, 38, 49, 61	Harassment	39, 59
Confidentiality (reporting ethics issues)	13, 15, 23, 24, 61	Health and safety	40
Conflict of interest	8, 10, 20, 25, 26, 27, 28, 58	Hiring	10, 29
Cooperation	7, 11, 33, 42, 47	Human rights	52
Copyrighted materials	23	Imports	33, 59, 61
Corporate opportunity	25, 26	Improper payments	29, 36, 54, 56, PIPP ➤, Gift Policy ➤
Corporate social responsibility	52	Inadvertent disclosure	21, 22
Decision making (decision tree)	8	Information, inside	59, 60, 61
Disclosures	10, 11, 36, 42	Information, protection of	21, 38
Disclosures, corporate	10, 11, 36, 42	Information, third-party	38, 61
Discrimination	39, 59		

Insider trading	48, 59, 60, 61	Resources, conservation	52
Intellectual property	17, 21, 23, 24, 38, 58, 60	Resources, use of	3, 13, 15, 17, 25, 54, 55, 56
Internal controls	29, 43, 44, 60	Retaliation	11, 13, 39, 60
Investigations, internal and external	10, 11, 13, 14, 19, 47	Safety	8, 19, 40, 52, 57
Investor relations	42, 50	Sanctions	33, 59
Kickback	29, PIPP  , Gift Policy 	Signing authority	44, 45, 61
Legitimate business use	17, 18	Social media	21, 50, 51
Local laws, compliance with	60	Social responsibility, corporate	52
MPOWER	45, 46	Speaker, serving as	50, 51
Managers, additional responsibilities	11	Speaking up	7
Marketing	17, 21, 30, 32, 33, 54	Spending authority	45, 47
Misappropriation	17, 18	Suppliers	10, 23, 26, 38, 39, 52, 57, 58, 61
Monetary approval	44, 60	Supplier code of conduct	57
Money laundering	35, 60	Telecommunications community, participating in	32
Open source software	23	Third-party information	38
Outside activity	25, 28, 60	Threats or violent behavior	40
Outside employment	25, 60	Tipping	48, 49, 61
Outside financial interests	26	Trade control laws	33, 61
Personal information	17, 21, 32	Trade restrictions	33, 61
Political activities and contributions	17, 20, 56	Trading stocks	26, 28, 49, 58
Political process	18, 56	Training	6, 11, 44, 60
Public official	10, 20, 29, 56, 60, PIPP 	Travel	20, 22, 25, 44, 45, 58, 59
Public relations	50	Violence, workplace	40
Privacy, customer	38	Waivers	9, 10
Privacy, employee	38		
Proprietary information	17, 21, 22, 23, 25, 37, 58		
Quality	29, 32, 36, 58		
Recycling	52		
Red flags	15, 20, 35		
Reporting a concern	7, 11, 13, 14, 15, 20, 40, 42, 43		



[BlackBerry.com](http://BlackBerry.com)

Rev 09/2025

©2025 BlackBerry Limited.