CORPORATE POLICY 117
Workforce diversity

Policy Letter
Number: 117O
Date: November 1, 2015

Subject: Workforce diversity

The employees of IBM represent a talented and diverse workforce. Achieving the full potential of this diversity is a business priority that is fundamental to our competitive success. A key element in our workforce diversity programs is IBM’s long-standing commitment to equal opportunity.

IBM's business activities and benefit plans comply with all applicable laws, including those addressing equal opportunity. Activities such as hiring, promotion and compensation of employees, are conducted without regard to race, color, religion, sex, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, or age. IBM makes reasonable accommodations available where the Company believes they are appropriate to enable employees with disabilities and others to effectively perform their jobs. IBM fosters a working environment that is free of all forms of harassment out of respect for our employees and all those with whom we do business.

This policy is based on sound business judgment and anchored in our IBM Values. Every manager in IBM is expected to abide by our policy, and all applicable laws on this subject, and to uphold IBM's commitment to workforce diversity.

Virginia M. Rometty
Chairman, President and Chief Executive Officer

Attachment A: Workforce diversity United States
IBM’s employees represent a talented and diverse workforce. Achieving the full potential of this diversity is a business priority that is fundamental to our competitive success. A key element in our workforce diversity programs is IBM’s long-standing commitment to equal opportunity, a commitment based on sound business judgment, and anchored in our IBM Values.

As Chief Executive Officer of IBM, I remain committed to the principles of Affirmative Action and Equal Opportunity as my predecessors have been throughout IBM’s history.

Business activities such as hiring, training, compensation, promotions, transfers, terminations and IBM-sponsored social and recreational activities are conducted without discrimination based on race, color, religion, sex, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age or status as a protected veteran under the law. IBM is also committed to fair employment practices regarding citizenship and immigration status.

These business activities and the design and administration of IBM benefit plans comply with all applicable federal, state and local laws, including those dealing with equal opportunity. IBM also makes reasonable accommodations for qualified individuals with a disability and religious observances.

In respecting and valuing the diversity among our employees and all those with whom we do business, managers are expected to foster a work environment free of all forms of discrimination and harassment.

To provide equal opportunity and affirmative action for applicants and employees, IBM carries out programs on behalf of women, minorities, people with disabilities, and protected veterans covered under the law. This includes outreach as well as human resource programs that ensure equity in compensation and opportunity for growth and development.

Effective management of our workforce diversity policy is an important strategic objective. Every IBM manager is expected to abide by this policy and uphold the company’s commitment to workforce diversity. If you have any questions or comments, or want to learn more about IBM’s commitment to diversity, please visit the IBM Global Diversity and Inclusion website https://www-03.ibm.com/employment/inclusion/

Virginia M. Rometty
Chairman, President and Chief Executive Officer