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## Business Conduct Requirements for Representatives and Channel Partners

Qorvo, Inc. and its affiliates (“Qorvo”) are committed to the highest standards of business conduct and ethics and expect the same commitment from our representatives and channel partners (collectively “Representatives”). The management of Qorvo believes that ethical conduct plays a fundamental role in producing good business results. Every action we take as a company, and every action our Representatives take on behalf of Qorvo, should conform to the highest ethical, moral and legal standards.

Qorvo bases its Representative relationships on lawful, efficient and fair practices. Qorvo expects its Representatives to adhere to applicable legal and regulatory requirements in their business relationships, including those with their employees, their local communities and Qorvo.

To help Representatives understand both: (1) Qorvo’s commitment to the highest standards of business conduct and ethics and (2) the standards of business conduct that all Representatives must meet, Qorvo has prepared these Business Conduct Requirements for Representatives and Channel Partners.

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These Business Conduct Requirements are divided into three sections:

- Qorvo Code of Business Conduct and Ethics
- Responsibilities of Representatives
- How to Raise a Compliance Concern

Representatives should carefully review these requirements. Representatives are responsible for ensuring that they and their employees, independent contractors, consultants and all others who do business for or on their behalf comply with these standards. Please contact the Qorvo employee that you work with or any of the following Qorvo Compliance Resources if you have any questions about these requirements.

### IDP

**Chris Lepiane**  
VP of Global Sales – IDP

**Tim Schamberger**  
Sr. Director, Sales – America

### Mobile Products

**David Fullwood**  
VP Sales & Cust. Apps. - Mobile Products

**Gary Chen**  
Sr. Manager, Mobile Products Global  
Distribution Management

## **Qorvo Code of Business Conduct and Ethics**

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Qorvo's commitment to the highest standards of business conduct and ethics is set forth in Qorvo's Code of Business Conduct and Ethics. The policies in the Code of Business Conduct and Ethics govern the conduct of all Qorvo employees and are supplemented by compliance procedures and guidelines adopted by Qorvo business units. Each Qorvo employee has made the following personal commitments to adhere to the Qorvo Code of Business Conduct and Ethics:

- To be honest and fair in all their business dealings, with both fellow employees and people outside the organization.
- To focus on customer service and to promote excellent relationships with our customers and our Representatives.
- To understand our company goals and work hard to achieve them.
- To meet the highest ethical standards in all company activities.
- To comply with the Foreign Corrupt Practices Act and similar foreign laws governing trade practices.

Qorvo's Code of Business Conduct and Ethics is available at [www.Qorvo.com](http://www.Qorvo.com) under the Investors tab, under Corporate Governance.

## **Responsibilities of Representatives**

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Today's regulatory environment is becoming more challenging, exposing Qorvo and its Representatives to a growing number of regulations and enforcement actions around the world. This environment necessitates that Qorvo and its Representatives continue to be knowledgeable about and compliant with all relevant regulations and dedicated to regulatory excellence. Representatives that conduct business with Qorvo are also required to comply with their contractual obligations under any agreement with Qorvo and to adhere to the standards of business conduct set forth herein. A Representative's commitment to full compliance with these standards and all applicable laws and regulations is essential to a mutually beneficial business relationship with Qorvo. In addition to compliance with all applicable laws and regulations in each country in which a Representative operates, Qorvo expects its Representatives to commit to the highest standards of business practices and ethics. To meet that standard, Representatives are expected to refrain from any of the following conduct, practices or activities:

### **ETHICS AND LEGAL COMPLIANCE**

- **Bribes and Gifts:** Failure to maintain and enforce Qorvo policies requiring adherence to lawful business practices, including a prohibition against any and all forms of bribery, corruption, extortion, money laundering and embezzlement. This includes offering or providing, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, to any Qorvo employee or customer or to any government official in order to influence his or her decision in connection with any Qorvo transaction or business dealing. Such prohibition includes the offering or providing of any consulting, employment or similar position by a Representative to any Qorvo employee (or his or her family member or significant other) involved in Representative's business relationship with Qorvo. Qorvo also prohibits any Representative from offering or providing Qorvo employees or customers or any government officials with any gifts, other than non-cash gifts of nominal value and permissible business entertainment. In particular, a Representative shall not offer, invite or permit Qorvo employees to participate in any Representative or Representative-sponsored contest, game or promotion.

- **Money Laundering:** Engaging in or assisting others in concealing illicit funds or money laundering activities. The following are sample indicators of money laundering that merit further investigation by Representatives:
  - Attempts to make large payments in cash
  - Payments by or to someone who is not a party to the contract
  - Requests to pay more than provided for in the contract
  - Payments made in currencies other than those specified in the contract
  - Payments from an unusual, non-business account
- **Business Entertainment of Qorvo Employees:** Failure to respect and comply with the business entertainment (including travel and living) policies established by Qorvo and governing Qorvo employees. A Representative is expected to understand the business entertainment policies of Qorvo before offering or providing any Qorvo employee any business entertainment. Meals and business entertainment should be of moderate value, infrequent and limited to those individuals directly involved in the business relationship and should never be offered to a Qorvo employee by a Representative under circumstances that create the appearance of an impropriety.
- **Doing Business with Governments:** Failure to be truthful and accurate when dealing with government officials and agencies and to strictly comply with applicable laws and regulations governing dealings with government employees and public officials, including both the letter and the spirit of ethics, procurement integrity and confidentiality rules applicable to government contracts and subcontracts awarded to Qorvo.
- **Trade Controls and Customs Matters:** Failure to comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology or technical data ,including any restrictions on access or use by unauthorized persons or entities, and failure to ensure that all invoices and any customs or similar documentation submitted to Qorvo or governmental authorities in connection with transactions involving Qorvo accurately describe the goods and services provided or delivered and the applicable prices.

#### **FAIR BUSINESS, ADVERTISING AND COMPETITION PRACTICES**

- **Fair Business, Advertising and Competition:** Failure to uphold standards of fair business, advertising and competition, including (1) sharing or exchanging any price, cost or other competitive information or proposing or entering into any agreement with a competitor to fix prices or terms or conditions of sale, or undertaking any other collusive conduct with any third party with respect to any Qorvo products, or (2) taking advantage of Qorvo or its customers, employees, suppliers or competitors through manipulation, deception, concealment, misuse of confidential information, misrepresentation of material facts or any other unlawful or unethical practice.
- **Use of Qorvo Name:** Use of Qorvo's name, trademarks or logos to advertise or promote Representative's business or for any other purpose without Qorvo's prior written consent. Purporting to act on behalf of or in the name of Qorvo, including making any donation or any gift in the name of Qorvo.

#### **RECORDS ACCURACY AND INFORMATION PROTECTION**

- **Intellectual Property and Other Data and Security Requirements:** Failure to respect the intellectual and other property rights of others, especially Qorvo. In that regard, a Representative shall:
  - Only use Qorvo information and property (including drawings and specifications) for the purpose for which they are provided to the Representative and for no other purposes.

- Take appropriate steps to safeguard and maintain the confidentiality of proprietary information of Qorvo, its customers and other third parties, including maintaining it in confidence and in secure work areas and not disclosing it to third parties (including other customers, subcontractors, etc.) without the prior written permission of Qorvo.
  - If requested by Qorvo, only transmit information over the Internet on an encrypted basis.
  - Observe and respect all Qorvo patents, trademarks and copyrights and comply with such restrictions or prohibitions on their use as Qorvo may from time to time establish.
  - Comply with all applicable rules concerning cross-border data transfers and obtain the express written consent of Qorvo to the transfer of any confidential technical data to a third party.
- **Disclosure of Information:** Failure to disclose to Qorvo, in accordance with applicable regulations and prevailing industry practices, accurate information regarding Representative's business activities, any actual and potential conflicts of interest (including family relationships with Qorvo employees), corporate structure, financial condition and performance of contractual obligations to Qorvo.
  - **Use of Subcontractors or Third Parties to Evade Requirements:** The use of subcontractors or other third parties to evade legal requirements applicable to the Representative or any of the standards set forth in this document.
  - **Privacy:** Failure to protect the reasonable privacy expectations regarding the sensitive and personal information of everyone they do business with, including customers, employees, suppliers, and consumers. Failure to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

## **LABOR AND HUMAN RIGHTS**

- **Health and Safety:** Failure to protect the health and safety of employees by creating safe working conditions and a healthy working environment and obeying all applicable health and safety laws and regulations.
- **Child Labor:** Failure to comply with all applicable child labor laws, including the minimum age for employment in all countries where Representative does business.
- **Forced Labor:** The use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons.
- **Discrimination:** Discrimination against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination and retirement.
- **Reasonable Terms and Conditions of Work:** Failure to afford Representative's employees regular working hours that correspond with the statutory or collectively agreed minimum pay and industry standards. Failure to provide pay and benefits that comply with all applicable local laws and regulations including those relating to minimum wages, overtime hours and other elements of compensation. Failure to only allow disciplinary measures which are necessary, legitimate and fully transparent and which are proportional to the offense committed. Representative must not use nor condone the use of bodily punishment, physical or mental compulsion or verbal abuse and/or threats.

## **ENVIRONMENTAL STANDARDS**

- **Environmental Standards:** Failure to comply with all applicable environmental laws and regulations related to its business' impact on the environment.

## **NON-RETALIATION**

- **Non-Retaliation Against Whistleblowers:** Failure to have a communicated program or policy that ensures the confidentiality and protection from retaliation of any Representative personnel who make a disclosure about improper conduct by an officer or employee of Qorvo, Representative or another company, or by a public official or official body.

The foregoing standards are subject to modification at the discretion of Qorvo. Please contact the Qorvo employee you work with or any Qorvo Compliance Resource if you have any questions about these standards and/or their application to particular circumstances. Each Representative is responsible for ensuring that their employees, independent contractors, consultants and all others who do business on their behalf understand and comply with these standards. Qorvo will only do business with those Representatives that comply with applicable legal and regulatory requirements and reserves the right, based on its assessment of information available to it, to terminate, without liability to Qorvo, any pending or existing purchase order or contract with any Representative that does not comply with these standards.

## **How to Raise a Compliance Concern**

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Subject to local laws and any legal restrictions applicable to such reporting, each Representative is expected to promptly inform Qorvo of any integrity concern involving or affecting Qorvo, whether or not the concern involves the Representative, as soon as the Representative has knowledge of such integrity concern. A Representative shall also take such steps as Qorvo may reasonably request to assist Qorvo in the investigation of any integrity concern involving Qorvo and the Representative. To raise a compliance concern:

- **Define your concern:** Who or what is the concern? When did it arise? What are the relevant facts?
- **Report your concern promptly:** Any compliance concern should be raised as soon as practical and may be raised by a Representative as follows:

— By discussing it with the Qorvo Manager responsible for the Representative relationship or with any of the following Qorvo senior managers:

### **IDP**

**Chris Lepiane**  
VP of Global Sales – IDP

**Tim Schamberger**  
Sr. Director, Sales – America

### **Mobile Products**

**David Fullwood**  
VP Sales & Cust. Apps. - Mobile Products

**Gary Chen**  
Sr. Manager, Mobile Products Global  
Distribution Management

or

— By contacting the Qorvo Compliance Officer, by mail at 7628 Thorndike Road, Greensboro, NC 27409-9421, by telephone at (336) 678-7119 or by email at [ComplianceOfficer@Qorvo.com](mailto:ComplianceOfficer@Qorvo.com).

We will take reasonable steps to safeguard the confidentiality of statements or information provided unless it is not practicable to do so.