


Table of Contents

1	Purpose & Scope.....	2
2	Qorvo Code of Business Conduct and Ethics.....	2
3	Responsibilities of Qorvo Suppliers.....	3
4	How to Raise a Compliance Concern.....	6
5	Revision History.....	8

	Business Conduct Requirements for Suppliers, Contractors and Consultants	Page 2 of 8
	FOR-000428	Rev F

1 Purpose & Scope

Qorvo, Inc. and its affiliates (“Qorvo”) are committed to the highest standards of business conduct and ethics, and expect the same commitment from our suppliers, contractors and consultants (collectively “Suppliers”). 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 Suppliers take on behalf of Qorvo, should conform to the highest ethical, moral and legal standards.

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

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

These Business Conduct Requirements are divided into three sections:

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


Suppliers should carefully review these requirements. Suppliers are responsible for ensuring that they and their employees, workers, representatives and subcontractors 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.

Paul Fego	Corp V.P. Global Operations
Leah Giovan	Sr. Director, Global Sourcing
Angie Hitchings	Director, Supply Chain Architecture

2 Qorvo Code of Business Conduct and Ethics

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 suppliers.
- To understand our company goals and work hard to achieve them.
- To meet the highest ethical standards in all company activities.

	Business Conduct Requirements for Suppliers, Contractors and Consultants	Page 3 of 8
	FOR-000428	Rev F

- To comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, the China Anti-Unfair Competition Law, the Korea Improper Solicitation and Graft Act of 2016 and similar laws governing trade practices.

Qorvo's Code of Business Conduct and Ethics is available at www.Qorvo.com under the Investors tab, under Corporate Governance.

3 Responsibilities of Qorvo Suppliers


Qorvo will only do business with Suppliers that comply with all applicable legal and regulatory requirements, including the Responsible Business Alliance (RBA) Code of Conduct. The RBA Code of Conduct is a set of standards on social, environmental and ethical issues for the electronics industry supply chain. Today's regulatory environment is becoming more challenging, exposing Qorvo and its Suppliers to a growing number of regulations and enforcement actions around the world. This environment necessitates that Qorvo and its Suppliers continue to be knowledgeable about and compliant with all relevant regulations and dedicated to regulatory excellence. Suppliers that conduct business with Qorvo are also required to comply with their contractual obligations under any purchase order or agreement with Qorvo and to adhere to the standards of business conduct set forth herein. A Supplier's commitment to full compliance with these standards and all applicable laws and regulations is essential to a mutually beneficial business relationship with Qorvo.

As stated above, Qorvo requires and expects each Qorvo Supplier to comply with all applicable laws and regulations as well as the RBA Code of Conduct.

RBA's Code of Conduct is available at: <http://www.responsiblebusiness.org/> .


In addition to compliance with the RBA Code of Conduct and all applicable laws and regulations in each country in which a Supplier operates, Qorvo expects its Suppliers to commit to the highest standards of business practices and ethics. To meet that standard, Qorvo Suppliers are expected to refrain from any of the following conduct, practices or activities:

- **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, representative 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 Supplier to any Qorvo employee (or his or her family member or significant other) involved in Supplier's business relationship with Qorvo. Qorvo also prohibits any Qorvo Supplier from offering or providing Qorvo employees, representatives or customers or any government officials with any gifts, other than non-cash gifts of nominal value and permissible business entertainment. In particular, a Qorvo Supplier shall not offer, invite or permit Qorvo employees and representatives to participate in any Supplier or Supplier-sponsored contest, game or

	Business Conduct Requirements for Suppliers, Contractors and Consultants	Page 4 of 8
	FOR-000428	Rev F

promotion.


- **Business Entertainment of Qorvo Employees and Representatives:** Failure to respect and comply with the business entertainment (including travel and living) policies established by Qorvo and governing Qorvo employees and representatives. A Qorvo Supplier is expected to understand the business entertainment policies of Qorvo before offering or providing any Qorvo employee or representative 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 or representative by a Supplier under circumstances that create the appearance of an impropriety.
- **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 proposed, pending or current Qorvo procurement, 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 Supplier'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.
- **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 Qorvo Supplier shall:
 - Only use Qorvo information and property (including tools, drawings and specifications) for the purpose for which they are provided to the Supplier 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 technical data to a third party.
- **Disclosure of Information:** Failure to disclose to Qorvo, in accordance with applicable regulations and prevailing industry practices, information regarding Supplier's

	Business Conduct Requirements for Suppliers, Contractors and Consultants	Page 5 of 8
	FOR-000428	Rev F

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. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

- **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.
- **Use of Subcontractors or Third Parties to Evade Requirements:** The use of subcontractors or other third parties to evade legal requirements applicable to the Supplier or any of the standards set forth in this document.
- **Responsible Sourcing of Minerals:** Lack of a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Qorvo upon request.
- **Privacy:** Failure to protect the reasonable privacy expectations regarding the sensitive and personal information of everyone they do business with, including suppliers, customers, consumers and employees. Failure to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.
- **Non-Retaliation Against Whistleblowers:** Failure to have a communicated program or policy that ensures the confidentiality and protection from retaliation of any Supplier personnel who make a disclosure about improper conduct by an officer, employee or other representative of Qorvo, Supplier 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 Qorvo Supplier is responsible for ensuring that its employees and representatives understand and comply with these standards. Qorvo will only do business with those Suppliers that comply with applicable legal and regulatory requirements and reserves the

	Business Conduct Requirements for Suppliers, Contractors and Consultants	Page 6 of 8
	FOR-000428	Rev F

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 Supplier that does not comply with these standards.

4 How to Raise a Compliance Concern


Subject to local laws and any legal restrictions applicable to such reporting, each Qorvo Supplier is expected to promptly inform Qorvo of any integrity concern involving or affecting Qorvo, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such integrity concern. A Qorvo Supplier shall also take such steps as Qorvo may reasonably request to assist Qorvo in the investigation of any integrity concern involving Qorvo and the Supplier. 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 Qorvo Supplier as follows:
 - By discussing it with the Qorvo Manager responsible for the Supplier relationship or with any of the following Qorvo senior managers:

Paul Fego	Corp V.P. Global Operations
Leah Giovan	Sr. Director, Global Sourcing
Angie Hitchings	Director, Supply Chain Architecture

- By contacting J.K. Givens, 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.

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

	Business Conduct Requirements for Suppliers, Contractors and Consultants	Page 7 of 8
	FOR-000428	Rev F

QORVO SUPPLIER COMMITMENT ACKNOWLEDGEMENT

Supplier acknowledges and agrees for the benefit of Qorvo, Inc. and its affiliates:

- (1) Supplier has been provided a copy of the Business Conduct Requirements for Suppliers, Contractors, and Consultants.
- (2) Senior management of Supplier has carefully reviewed these requirements, especially the section, Responsibilities of Qorvo Suppliers.
- (3) Supplier has reviewed these requirements and hereby certifies that it has made copies of these requirements available to its employees, representatives, and suppliers and subcontractors (as applicable);

or

imposes substantially similar requirements on its employees, representatives, and suppliers and subcontractors (as applicable).

(4) Supplier and its employees and representatives are committed to unyielding integrity and agree to comply with the ethical standards set forth in the section entitled "Responsibilities of Qorvo Suppliers," including as they relate to Supplier's dealings with Qorvo, any goods or services being provided, conveyed or sold by Supplier to Qorvo or any work being performed by Supplier for or on behalf of Qorvo.

(5) These obligations and undertakings of Supplier are in addition to and do not modify or amend any obligations or commitments of Supplier in any Qorvo purchase order or other written agreement between the parties.

5 Revision History

Revision	Create Date (mm/dd/yyyy)	Description of Change	Initiator of Change
A	6.21.13	Initial Release	T. Keeler
B	8.21.13	Amended language	T. Keeler
C	1.25.18	Updated verbiage to match current code as found on external website. Changed "EICC" to "RBA". Changed Supplier Commitment Acknowledgement.	C. Susmilch
D	6.1.18	Updated names and titles for Qorvo contacts. Called out additional acts and laws under Section 2.	C. Susmilch
E	3.13.19	Updated names and titles for Qorvo contacts.	C. Susmilch
F	1.27.20	Updated Compliance Officer name	C. Susmilch

CONTROLLED DISTRIBUTION:

201, 202, 206, 208, 400, 403, 406, 407, 409, 411, 412, 413, 414, 500, 501, 502, 503, 505, 506, 507, 508, 509, 510, 512, 513, 514, 515, 516, 518, 519, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 605, 606, 607, 608, 609, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 772, 774, 776, 777, 778, 780, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 924, 925