



## Cirrus Logic Supplier Code of Conduct

Cirrus Logic, Inc. and our wholly owned subsidiaries (collectively, “Cirrus Logic”) are committed to the highest standards of product quality and business integrity in all relationships with our third-party suppliers (“Suppliers”). Cirrus Logic also commits to ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible.

To ensure our relationships with Suppliers meet and support these expectations, Cirrus Logic has based its Supplier Code of Conduct (the “Code”) on the Code of Conduct issued by the **Responsible Business Alliance (the “RBA”)** and on internationally recognized human rights, as set out in the United Nations International Bill of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles for Business and Human Rights. In some instances, this Code goes further to incorporate our customers’ requirements. Additional customer-specific requirements may be notified to Supplier from time to time. Those requirements should be read as forming part of this Code insofar as they relate to products produced or services provided for that customer. As a condition of doing business with Cirrus Logic, we expect our Suppliers to conform to these requirements and communicate this Code to (at least their next tier) suppliers to acknowledge and implement its requirements. Cirrus Logic may visit Supplier facilities to assess compliance to these requirements and will consider Suppliers’ conformance when making sourcing and procurement decisions. Failure to comply with the standards and provisions set forth in this Code, or in such other customer-specific standards as may be notified to Supplier, may result in Supplier disqualification.

This Code requires Suppliers to commit, in all of their activities, to operate in full compliance with the laws, rules and regulations of the countries in which they and/or Cirrus Logic operate and it encourages, and in some cases requires, Suppliers to go further, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

This Code is made up of five sections. Sections A, B and C outline standards for **Labor, Health and Safety**, and the **Environment**, respectively. Section D includes standards relating to **Business Ethics**. Section E outlines the elements of an acceptable **Management System** to manage conformity to this Code.

### A. LABOR

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Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of worker. Several internationally recognized standards, referenced at the end of this policy, were also used in preparing this Code and may be useful sources of additional information.

The labor standards are:

**1) Prohibition of Forced Labor**

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, is not permitted, and slavery or trafficking of persons shall not be undertaken. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud, or payments to any person having control over another person for labor or services (including, but not limited to, for the purpose of exploitation). All work must be voluntary and workers shall be free to leave work at any time or terminate their employment without penalty with reasonable notice, which shall be clearly stated in the worker's contract and required by applicable laws and regulations. Suppliers shall maintain documentation on all leaving workers. Workers shall not be subject to unreasonable restrictions on movement within the workplace, including, if applicable, workers' dormitories or living quarters. Electronic devices to track the real-time movement of a worker are prohibited, unless for the monitoring of workplace health and safety or badges used for security access or clock-in. As part of the hiring process, Suppliers must provide their workers with a written employment agreement, in a language understood by the workers, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the workers departing their home country. No changes shall be made to that agreement, unless required to meet local legal requirements, and such changes are equivalent or better for the worker. Employers and agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents such as government-issued identification, passports or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time shall workers be denied access to their documents, and Suppliers shall work with related parties, including third-party employment agencies, to ensure timely return of all original identity documents to workers. Workers shall not be required to pay employers' agents' or sub-agents' recruitment fees or other related fees (including those for medical checkups, testing and vaccinations and quarantined accommodations if required) for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker. Suppliers shall ensure that any third-party recruitment agencies they use are compliant with the provisions of this Code and the law. Suppliers shall have regular training for foreign migrant workers to ensure they understand relevant laws and company regulations to follow, protections provided under this Code during their employment, and the reporting channel for any alleged violations.

**2) Young Workers**

Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace educational or training programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not be required to perform work that is likely to jeopardize the health or safety of young workers (including night shifts and overtime), and all use of workers under the age of 18 shall be consistent with ILO Minimum Age Convention No. 138. Suppliers shall ensure proper management of student programs at Supplier facilities through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations; student workers shall be free to terminate their agreements and there shall be no penalty paid for early termination with reasonable notice. Suppliers shall provide appropriate support and training to all students at Supplier facilities. Except as provided by applicable local law, the wage rate for student workers, interns and

apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.

**3) Working Hours**

Regular workweeks shall generally not exceed 48 hours, or 60 hours including overtime, except in emergency or unusual situations, or (if shorter), the maximum duration set by local law. Workers shall be allowed at least one day off per seven-day week and all overtime shall be voluntary. When preparing official working hour records, Suppliers shall include processes managed by the Supplier that require workers to be present at the Supplier or to perform any production-related work, including time on the production line (whether or not the line is running), mandatory meetings and administrative processes (including excessive waiting in line to clear security or other mandated checks prior to entry/exit).

**4) Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages (or payments by workers) as a disciplinary measure shall not be permitted, and wages must be paid accurately and on time. Suppliers shall communicate pay structure and pay periods to all workers. If Supplier becomes aware of any underpayment of wages, Supplier shall repay the amount due to workers. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of applicable local law.

**5) Non-Discrimination/Non-Harassment/Humane Treatment**

Suppliers shall commit to a workplace free of harassment, violence and unlawful discrimination. There shall be no harsh or inhumane treatment including any violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity, disability, pregnancy, religion, political affiliation, union membership, national origin, covered veteran status, protected genetic information, marital status, or any other status protected by applicable national or local law, in hiring and employment practices such as wages, promotions, rewards and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers shall not be subjected to medical tests (including pregnancy or virginity tests), or physical exams that could be used in a discriminatory way, except where required by applicable local laws or regulations or where prudent for workplace safety, and the results of any such tests undertaken in compliance with local laws shall not be used in a discriminatory way. To the extent such tests are performed, the original report of results should be provided to, and allowed to be retained by, the worker; Suppliers shall not retain copies of the report, unless required by law. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

**6) Freedom of Association and Collective Bargaining**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, bargain collectively (including through their chosen representatives), engage in peaceful

assembly, form and/or join - or to refrain from participating in - labor unions, seek representation, and join workers' councils in accordance with local laws shall be respected. Workers shall be able to openly communicate and share ideas, concerns and grievances with management regarding working conditions and management practices without fear of reprisal, discrimination, intimidation or harassment. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

## **B. HEALTH and SAFETY**

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Suppliers recognize that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker participation and training is essential to the continuous improvement of occupational health and safety in the workplace.

The health and safety standards are:

**1) Occupational Health and Safety**

Worker exposure to potential health and safety hazards (e.g., chemical, electrical and other energy sources, combustible dust, fire, vehicles and fall hazards) are to be identified and assessed, and mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women/nursing mothers in working conditions which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions, and shall be encouraged to raise safety concerns. Suppliers shall obtain, maintain and comply with all required health and safety permits.

**2) Emergency Preparedness**

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting; employee notification and evacuation procedures; worker training and drills. Emergency response drills and evacuation drills shall be executed at least semi-annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment; clearly marked and unobstructed egress; adequate exit facilities; contact information for emergency responders and recovery plans. These plans and procedures must focus on minimizing harm to life, the environment and property.

**3) Fire Safety**

Fire safety shall be considered during the full lifecycle of property buildings. Supplier shall develop and implement a program to ensure its fire safety during property design, construction, renovation, utilization, decommissioning processes, and perform fire risk assessment with proper emergency response plans to mitigate risks harm to life, environment, and property.

**4) Occupational Injury and Illness**

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses (and near-misses), including provisions to: encourage worker reporting;

classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

**5) Industrial Hygiene**

Worker exposure to chemical, biological and physical agents or combustible dust shall be identified, evaluated and controlled according to a documented Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained personal protective equipment free of charge. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to these workplace hazards.

**6) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks shall be identified, evaluated and controlled. Suppliers shall establish and implement a written program to properly manage the use of Powered Industrial Trucks, such as forklifts, powered hand trucks, etc. All Powered Industrial Trucks and associated operators must be authorized with necessary licenses before operation.

**7) Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers. Prior to start-up of new or modified equipment, guarding devices must be checked through safety review to ensure they can function properly and are safe for use; safe machine operation documentation (in a language understood by the worker) shall be provided. This safety review shall also consider risk assessment of routine and non-routine work on the machines as well as risk control/risk mitigation measures. Manufacturing specifications shall be sufficiently communicated to operators before operations.

**8) Sanitation, Food and Housing**

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. Suppliers shall conduct periodic risk assessments for worker dormitories and dining facilities. Worker dormitories provided by Suppliers or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency exits, hot water for bathing and showering, adequate lighting, adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

**9) Health and Safety Communication**

Suppliers shall provide workers with appropriate workplace health and safety information and training in their primary language or in a language the worker can understand (or pictorial) for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards. Health and safety related information shall be clearly posted in the work facility, or in an identifiable and accessible location. Health information and training shall include content on specific risks to relevant demographics, such as

gender and age, if applicable. Suppliers shall provide training to all workers prior to commencement of work, and regularly thereafter. Workers shall be encouraged to raise any health or safety concerns without retaliation. Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input on, and participation in, health and safety issues in the workplace.

**10) Infectious Disease Preparedness and Response**

Each supplier shall develop and implement a program to take reasonable steps to prepare for, prevent and respond to the potential for an infectious disease among its employees. Supplier shall ensure workers receive appropriate vaccinations and follow all applicable health and safety measures in accordance with local government requirements.

**11) Contractor Management**

Supplier shall establish and implement a procedure to manage and monitor contractor work onsite in accordance with all applicable health and safety laws and regulations. This includes but is not limited to training for emergency procedures, performing a risk assessment and reporting safety incidents.

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**C. ENVIRONMENT**

Suppliers must recognize that environmental responsibility is integral to producing world class products. Suppliers shall identify the actual and potential environmental impacts their operations may have. In manufacturing operations, adverse impacts on the community, environment and natural resources are to be minimized, while safeguarding the health and safety of the community and public.

The environmental standards are:

**1) Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring, water usage), approvals and registrations shall be obtained, maintained and kept current, and their operational and reporting requirements shall be followed.

**2) Pollution Prevention and Resource Conservation**

The use of resources and generation of pollutants and waste of all types, including water and energy, shall be minimized or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, shall be conserved, by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

**3) Hazardous Substances**

Chemicals, waste and other materials posing a hazard to humans or the environment if released to the environment, shall be identified, inventoried and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Hazardous waste data shall be tracked and documented.

**4) Solid Waste**

Suppliers shall implement a systematic approach to identify, manage, reduce and

responsibly dispose of or recycle solid waste (non-hazardous) to minimize waste to landfills from its operations. Waste data shall be tracked and documented.

**5) Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated from operations shall be characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.

**6) Materials Restrictions**

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

**7) Water and Wastewater Management**

Suppliers shall implement a water management program that documents, characterizes and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. Wastewater generated from operations, industrial processes and sanitation facilities shall be characterized, routinely monitored, controlled and treated as required prior to discharge or disposal. In addition, measures shall be implemented to reduce generation of wastewater. Suppliers shall conduct routine monitoring of the performance of their wastewater treatment and containment systems to ensure optimal performance and regulatory compliance. Suppliers shall implement a systematic approach to prevent contamination of storm water runoff. Suppliers shall prevent illegal discharges and spills from entering storm drains, the public water supply or public bodies of water.

**8) Energy Consumption and Greenhouse Gas Emissions**

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal (e.g. absolute reduction, intensity-based reduction, or both). Energy consumption and all Scope 1, Scope 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked and documented at the facility and corporate level, and publicly reported. Suppliers shall look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. Suppliers shall conduct routine monitoring of the performance of its emissions control systems and submit its GHG emissions, targets, reductions, and progress with supporting documentation (as applicable) for review at least annually, or upon request.

**9) Boundary Noise**

Suppliers shall identify, control, monitor and reduce noise generated by the facility that affects boundary noise levels.

**10) Resource Consumption Management**

Suppliers shall regularly quantify, set targets, monitor progress and reduce consumption of fossil fuel, water, hazardous substances and natural resources through conservation, re-use, recycling, substitution, or other measures.

## D. ETHICS

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To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

**1) Business Integrity**

The highest standards of integrity shall be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings shall be transparently performed and accurately reflected on Suppliers' business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws and regulations of the countries in which it and Cirrus Logic operates including, but not limited to, the U.K. Bribery Act and the U.S. Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

**2) No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value (including cash or cash equivalents such as entertainment, gift cards, product discounts and non-business activities), either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers shall have a process to investigate and report any violations. Monitoring, record-keeping and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

**3) Disclosure of Information**

All business dealings shall be transparently performed and accurately reflected in Suppliers' business books and records. Information regarding business activities, Suppliers' labor, health and safety, environmental practices, structure, financial situation and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

**4) Intellectual Property**

Intellectual property rights shall be respected. Transfer of technology and know-how is to be conducted in a manner that protects intellectual property rights, and customer information shall be safeguarded.

**5) Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition shall be upheld.

**6) Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers shall be maintained unless prohibited by law. Suppliers shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

**7) Responsible Sourcing of Minerals**

Suppliers shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Specifically, Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are



sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent (which include areas associated with conflict; worst forms of child labor, forced labor and human trafficking; indigenous peoples' and affected communities' rights impacts; gross human rights violations such as widespread sexual violence or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts; and retaliatory threats, intimidation or attacks against human rights and environmental defenders) and recognized due diligence framework. Suppliers shall make their due diligence measures available to customers upon customer request.

**8) Privacy**

Privacy is considered to be a fundamental human right. Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy, data protection, cybersecurity and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

**9) Information Security**

Supplier shall maintain a security program that aligns with an industry standard such as NIST CSF, NIST 800-53, or ISO 27001/2. The program shall include technical and organizational measures to prevent misuse, compromise, loss, alteration or unauthorized disclosure, or acquisition of, or access to, confidential proprietary or protected information.

**10) Community Engagement**

Suppliers are encouraged to help foster social and economic development and contribute to the sustainability of the communities in which they operate.

**11) C-TPAT and other Trusted Trader Programs**

To the extent that Suppliers transport goods into the United States, Suppliers shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at [www.cbp.gov](http://www.cbp.gov) or other website established for such purpose by the U.S. Government. To the extent that Supplier transports goods into countries other than the United States, Supplier shall comply with local programs and standards, as applicable, with the goal of facilitating compliant trade and securing the supply chain.

**12) Cross-border Legal Requirements and Sanctions**

Supplier shall comply with all applicable laws and regulations in performing its obligations, including all applicable employment, labor and human rights, health and safety, tax, export control and environmental laws and regulations. Without limiting this requirement Supplier shall not export, re-export, sell, resell or transfer any customer data or any export-controlled commodity, technical data or software: in violation of any law, regulation, order, policy or other limitation (including requirements for export licenses or equivalent) imposed by the United States (including the United States Export Administration Regulations) or any other government authority with jurisdiction. Any such exports must have the necessary export licenses or governmental approval. Supplier agrees to retain all documentation and other information reasonably necessary to support or confirm its compliance with this paragraph and to provide such evidence upon request. Prior to providing any information or materials to Cirrus Logic subject to the United States Export Administration Regulation, Supplier shall obtain Cirrus Logic's prior written consent. If there are changes to classifications, export licenses and any other determinations related to information or materials previously provided, Supplier

shall provide written notice, with supporting information and reason for such change.

## **E. MANAGEMENT SYSTEM**

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Suppliers shall adopt or establish a management system appropriate to the size, nature, and context of their operations, including, at a minimum, (a) a commitment to respect human rights and the environment; (b) a due diligence process and (c) access to remedy for internal and external stakeholders where a Supplier caused, or contributed to, adverse human rights and environmental impacts, whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations and products; (b) conformance with this Code and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

**1) Company Commitment**

Suppliers shall establish human rights, health and safety, environmental and ethics policy statements affirming Suppliers' commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

**2) Management Accountability and Responsibility**

Suppliers shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of their management systems and associated programs. Suppliers shall have a Corporate Social Responsibility or Sustainability representative that reports directly to executive management and has the responsibility and authority to manage social and environmental compliance requirements for their business. Suppliers' senior management shall review the status of the management system on a regular basis.

**3) Legal and Customer Requirements**

Suppliers shall have a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

**4) Risk Assessment and Risk Management**

Suppliers shall have a process: to identify the legal compliance, environmental, health and safety and labor and human rights practice and business ethics risks, including the risks of severe human rights and environmental impacts, associated with Suppliers' operations. Suppliers shall determine the relative significance for each risk; and to implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

**5) Improvement Objectives**

Suppliers shall use written standards, performance objectives, targets and implementation plans to improve the Suppliers' social and environmental, and health and safety performance, including a periodic assessment of Suppliers' performance in achieving those objectives.

**6) Training**

Suppliers shall develop and maintain management and worker training programs to facilitate proper implementation of their policies and procedures, to fulfill Suppliers' improvement objectives and to meet applicable legal and regulatory requirements.

**7) Communication**

Suppliers shall have a process, including an effective grievance mechanism, for communicating clear and accurate information about Suppliers' policies, practices, expectations and performance to workers, sub-tier suppliers and customers.

**8) Worker/Stakeholder Engagement and Access to Remedy**

Suppliers shall have processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code (including in relation to wages and benefits, workplace conditions, healthcare, living conditions, health and safety, environment, and education and training), and to foster continuous improvement by taking action in response to feedback where appropriate. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

**9) Audits and Assessments**

Suppliers shall conduct periodic self-evaluations of their facilities and operations, and audit the operations of their subcontractors and next-tier suppliers to ensure conformity to legal and regulatory requirements, the content of this Code, and customer contractual requirements related to social and environmental responsibility.

Suppliers shall permit customers and a third party designated by a customer to periodically evaluate Suppliers' facilities and operations, and those of its subcontractors and next-tier suppliers, to the extent they are providing goods or services to a customer, for that customer's benefit, or for use in that customer's products.

Suppliers shall not have manufacturing operations in, recruit labor directly or indirectly from, or source materials, products, or services directly or indirectly from, regions where such customers or their third-party designates cannot access and conduct a comprehensive, independent evaluation of each Supplier's compliance with this Code.

**10) Corrective Action Process**

Suppliers shall have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

**11) Documentation and Records**

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

**12) Supplier Responsibility**

Suppliers shall have a process to communicate Code requirements to suppliers and to monitor supplier compliance to this Code.

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## REFERENCES

The following standards were used in preparing this Code and may be useful sources of additional information.

Dodd-Frank Wall Street Reform and Consumer Protection Act

[www.sec.gov/about/laws/wallstreetreform-cpa.pdf](http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)

Eco Management & Audit System

[https://ec.europa.eu/environment/emas/index\\_en.htm](https://ec.europa.eu/environment/emas/index_en.htm)

Ethical Trading Initiative

[www.ethicaltrade.org/](http://www.ethicaltrade.org/)

ILO Code of Practice in Safety and Health

[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO Declaration on Fundamental Principles and Rights at Work

<https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>

ILO International Labor Standards

[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

ISO 14001

[www.iso.org](http://www.iso.org)

National Fire Protection Association

<https://www.nfpa.org/>

OECD Due Diligence Guidance for Responsible Supply chains of Minerals from Conflict-Affected and High-Risk Areas

<https://www.oecd.org/daf/inv/mne/mining.htm>

OECD Guidelines for Multinational Enterprises

[www.oecd.org/investment/mne/1903291.pdf](http://www.oecd.org/investment/mne/1903291.pdf)

United Nations Guiding Principles on Business and Human Rights

[https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

Universal Declaration of Human Rights

<https://www.un.org/en/universal-declaration-human-rights/>

United Nations Convention Against Corruption

<https://www.unodc.org/unodc/en/treaties/CAC/>

United Nations Convention on the Rights of the Child  
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

United Nations Convention on the Elimination of all Forms of Discrimination Against Women  
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>

United Nations Global Compact  
[www.unglobalcompact.org](http://www.unglobalcompact.org)

United States Federal Acquisition Regulation  
[www.acquisition.gov/far](http://www.acquisition.gov/far)

SA 8000  
<https://sa-intl.org/programs/sa8000/>

Social Accountability International (SAI)  
[www.sa-intl.org](http://www.sa-intl.org)

United States Uyghur Forced Labor Prevention Act Resources  
<https://www.dhs.gov/uflpa>