CREDO TECHNOLOGY GROUP HOLDING LTD

Supplier Code of Conduct

Last Updated November 11, 2024 by James Laufman

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Overview

Credo Technology Group Holding Ltd. and its subsidiaries and affiliates (collectively referred to herein as "Credo" or "Company") is committed to the highest possible standards of ethical and legal business conduct on a global level, and expects its Suppliers (defined herein) to conduct business in accordance with the principles set forth in this Supplier Code of Conduct (the "Code").

This Code formalizes the business and labor practices that Credo's suppliers and their employees, agents, representatives, and subcontractors (collectively "Suppliers") must adhere to when conducting any type of business with Credo or when conducting business on behalf of Credo. Suppliers may also be subject to contractual obligations with Credo in addition to this Code which may require Suppliers to represent and warrant that they will comply with the standards of this Code and all applicable laws, regulations, and ordinances.

Credo has adopted a Code of Business Conduct and Ethics, a Salient Human Rights Policy, and a Conflict Minerals Policy. These policies are publicly available on the Company's website, and Credo expects its Suppliers to comply with these policies. Such compliance is a requirement of this Code. In addition to Credo's standards and policies, Credo expects Suppliers to comply with the Responsible Business Alliance (RBA) Code of Conduct available at http://www.responsiblebusiness.org.

Credo shall review this Code at least annually. The current Code shall be publicly available on Credo's website.

Content

1. POLICY STATEMENT

Suppliers must fully comply with applicable laws and regulations while conducting business with or on behalf of Credo, including, without limitation, the following:

2. LABOR

2.1 Suppliers must conduct business in full compliance with applicable labor laws. In addition, to the extent less stringent than those set forth in this Section 2, Suppliers must comply with the following minimum labor standards:

a. No Forced Labor. All employment must be voluntary. Suppliers may not use any form of trafficked workers, slave, indentured, prison, or other forced labor.

b. A Workplace Free From Harassment. Suppliers must provide a workplace that is free from harassment including unwelcome verbal, visual or physical conduct creating an intimidating, offensive or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays or emails) or physical conduct (including physically threatening another, blocking someone's way, etc.) that denigrates or shows hostility or aversion towards an individual because of any Protected Characteristic. "Protected Characteristics" are race or ethnicity, color, national origin or ancestry, gender, gender identity, or gender expression, sexual orientation, age (if 40 or older), religion or creed, disability (physical or mental), medical condition (e.g., cancer or genetic characteristics), pregnancy or childbirth, marital status, military or veteran status, and genetic information, as well as any characteristics protected under applicable laws, Sexual harassment can include all of the foregoing actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal or physical conduct of a sexual nature. Such conduct violates this Code, even if it is not unlawful.

c. No Discrimination in Employment Decisions. Suppliers must not treat individuals differently or deny a benefit to an individual because of a Protected Characteristic.

d. No Underage Labor. Suppliers may not employ children who are less than 15 years old or, as applicable, under the age of compulsory education, or who are under the minimum age for employment in the location of employment, whichever is more restrictive. Persons who are under the age of 18 may not perform hazardous activities, work overtime, or provide nighttime work.

e. Working Hours, Wages and Benefits. Suppliers must adhere to all applicable local laws and regulations concerning working hours, days of rest and wages, including paying at least minimum wage and providing all legally mandated benefits relevant to where the work is being performed. Suppliers must communicate the terms and conditions of workers' employment to all workers in writing and in a clear and understandable manner.

f. Freedom of Association. In conformance with local law, the rights of workers to freely form and join trade unions of their choosing, to bargain collectively, and to engage in peaceful assembly must be respected. Equally, the right of workers to abstain from such activities must also be upheld. Supplier shall not retaliate or discriminate against, intimidate, or harass any worker for openly communicating with management regarding working conditions.

g. Workplace Diversity. Credo encourages its Suppliers to commit to diversity in the workplace, including the employment of a variety of backgrounds and demographics.

3. HEALTH AND SAFETY

3.1 Hygiene and Sanitation. Suppliers must ensure that all work environments maintain high standards of hygiene and sanitation. Suppliers are responsible for ensuring that all work areas comply with local health and safety regulations, thereby promoting a safe and healthy workplace for all employees.

3.2 Illness and Injury. Suppliers must implement policies and procedures to prevent and manage workplace injuries and illnesses, adhering to all applicable health and safety regulations and providing a safe working environment. Clear protocols for reporting and responding to workplace injuries and illnesses should be established.

3.3 Personal Protective Equipment (PPE). Suppliers must ensure that all employees are provided with the appropriate PPE necessary for their specific job functions and in compliance with applicable health and safety regulations. Compliance with all relevant safety standards and regulations is mandatory to protect the health and safety of all employees.

3.4 Business Continuity Plan (BCP). Suppliers must develop and maintain a comprehensive BCP to ensure operational resilience in the event of disasters or significant disruptions.

4. ENVIRONMENT

4.1 Sustainable Sourcing. Suppliers must comply with the Company Conflict Minerals Policy, publicly available on the Company website, and adhere to RBA's Responsible Minerals Initiative (RMI) standards. Suppliers are required to prepare the Conflict Minerals Report on an annual basis and provide it at the Company's request.

4.2 Initiatives. Suppliers must adhere to all applicable environmental laws and regulations, including the proper handling and disposal of hazardous waste, controlling gas emissions, mitigating noise pollution, and minimizing water consumption. Suppliers should establish and maintain environmental management systems to monitor and improve their environmental performance.

5. ETHICS

5.1 Insider Trading. No one shall trade in Credo securities when in possession of material non public information (MNPI) about the Company or another company, obtained through working with Credo. Credo's Insider Trading Policy is disclosed annually and attached to Credo's annual 10-K filing.

5.2 Protection of Intellectual Property. Suppliers must respect all third-party intellectual property rights. Suppliers must comply with all contractual obligations, policies, and laws which protect Credo's intellectual property rights, including, without limitation, Credo patents, trademarks, copyrights, trade secrets, and know how.

5.3 Anti-Corruption. Corruption means paying bribes or kickbacks, including cash, gifts, discounts, job offers, entertainment opportunities, political contributions, or anything else of value that is given to obtain an improper business advantage. No one may offer or accept, directly or indirectly, anything of value that may influence, or even appear to influence, business decisions involving Credo whether in the private or public sector. No one should ever ask anyone else to engage in bribery on their behalf. We expect all Suppliers to understand and comply with this Code and with all applicable anti-corruption and anti-bribery laws.

5.4 Conflicts of Interest. Suppliers must refrain from intentionally or unintentionally engaging in activities that create a conflict of interest or an appearance of a conflict of interest. In general, Suppliers should avoid any activity or personal interest in a transaction or relationship that creates or appears to create a conflict between private interests and Credo's interests, or that might impair the Company's ability to perform its duties and responsibilities honestly, objectively, and effectively. Credo's property, information, or business opportunities shall never be used for personal gain or benefit, or that of anyone else.

5.5 Anti-Retaliation. Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this Code, opposed practices prohibited by this Code, or participated in a reporting and investigation process. Suppliers may not retaliate against employees, customers, subcontractors or others who make a good faith report of a violation of this Code.

5.6 Distribution of Credo Products. Distribution of Credo products should be conducted in a legal and ethical manner, strictly adhering to all applicable laws and regulations. Products must be distributed only for the purposes predetermined in written contractual agreements, and any deviation from these specified purposes is prohibited. Distribution practices should align with contractual obligations and ethical standards, avoiding any activities that could compromise the integrity or intended use of Credo's products.

5.7 Privacy Protection. Suppliers must maintain adequate data privacy measures to protect the personal information of Credo employees, customers, and partners, including all Credo confidential information. Suppliers must comply with all applicable data protection laws and regulations and must implement adequate policies for the collection, storage, processing, and sharing of personal data. Suppliers must deploy appropriate technical and organizational measures to prevent unauthorized access, disclosure, alteration, or destruction of personal data. Suppliers must conduct periodic audits and assessments to identify and address potential privacy risks and vulnerabilities. Any data breaches or security incidents must be promptly reported in accordance with applicable law and managed in accordance with legal requirements and company policies. Suppliers must notify Credo immediately of any data breach impacting Credo's information.

6. COMPLIANCE

6.1 Suppliers must maintain a reporting mechanism for employees, suppliers, and subcontractors to report any violations of this Code or applicable local law. Supplier shall protect whistleblower confidentiality and shall not retaliate against any whistleblower. If a Supplier fails to rectify identified violations of this Code or applicable law in an appropriate manner and within an appropriate time frame, Credo reserves the right to enforce any of the measures described below under the heading "Violations of this Policy" at Credo's sole discretion.

6.2 Suppliers must promptly inform the Company of any ongoing investigations related to a violation of this Code or applicable law.

6.3 Suppliers are responsible for monitoring their own compliance with this Code and applicable law. Credo reserves the right to conduct audits of the Supplier's facilities to ensure compliance with legal requirements, the Code, and contractual obligations, or to engage a third-party to conduct any such audit. Supplier is expected to fully cooperate and provide all records relevant to its compliance with this Code. Suppliers shall have a process for the timely correction of any violations or deficiencies identified by an internal or external audit, assessment, inspection, investigation or review.

6.4 Suppliers should communicate the requirements of this Code to its employees, agents, representatives, suppliers, and subcontractors,

Violations of This Policy

The Company reserves the right to address any behavior of its Suppliers that is unlawful or unethical; or which violates this Code or any other Credo policy that is either published or furnished to Supplier by Credo. If a Supplier or an individual representing or acting on behalf of a Supplier violates this Code, Credo, in its sole discretion, shall be entitled to suspend business activities with such Supplier until the Supplier successfully addresses, terminate the business relationship with the Supplier in violation without liability, require that a Supplier terminate its relationship with any individual representative, employee, or subcontractor who behaves unlawfully or in violation of this Code, or take any other appropriate action to address the violation and ensure compliance with this Code and applicable law.

Reporting of Non-compliance

Supplier must immediately report to Credo any actual or suspected violations of this Code or of applicable law. Serious concerns regarding a non-compliant Supplier should be reported through Credo's Ethics Hotline via any of the methods set forth below. Reporters can remain anonymous if they choose, and Credo shall protect the anonymity of the reporter to the extent possible under applicable law.

1. Online Submission at: www.lighthouse-services.com/credosemi
2. Telephone Direct Dial:
   - English-speaking USA and Canada: 855-222-3801
   - Spanish-speaking USA and Canada: 800-216-1288
   - French-speaking Canada: 855-725-0002
   - Spanish-speaking Mexico: 01-800-681-5340
3. AT&T USA Direct
   - All other countries: 800-603-2869 (must dial country access code first)
4. E-mail: reports@lighthouse-services.com (must include Credo's name with report)
5. Fax: (215) 689-3885 (must include Credo's name with report)

Amendments

Credo reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules and regulations, and with or without notice, although it will attempt to provide notice in advance of any change. Unless otherwise permitted by this Code, any amendments must be approved by the Chief Legal Officer of Credo.

About Credo

Credo's mission is to advance high-speed connectivity solutions that deliver optimized performance, reliability, energy efficiency, and security for the next generation of AI driven applications, cloud computing, and hyperscale networks.

Optimized for both optical and electrical applications, our solutions support port speeds up to 1.6Tb. At the core of our technology is our proprietary Serializer/Deserializer (SerDes) IP. Our diverse solutions portfolio includes system-level products such as Active Electrical Cables (AECs), a range of Integrated Circuits, including Retimers, Optical DSPs, SerDes chipsets, and SerDes IP Licensing.