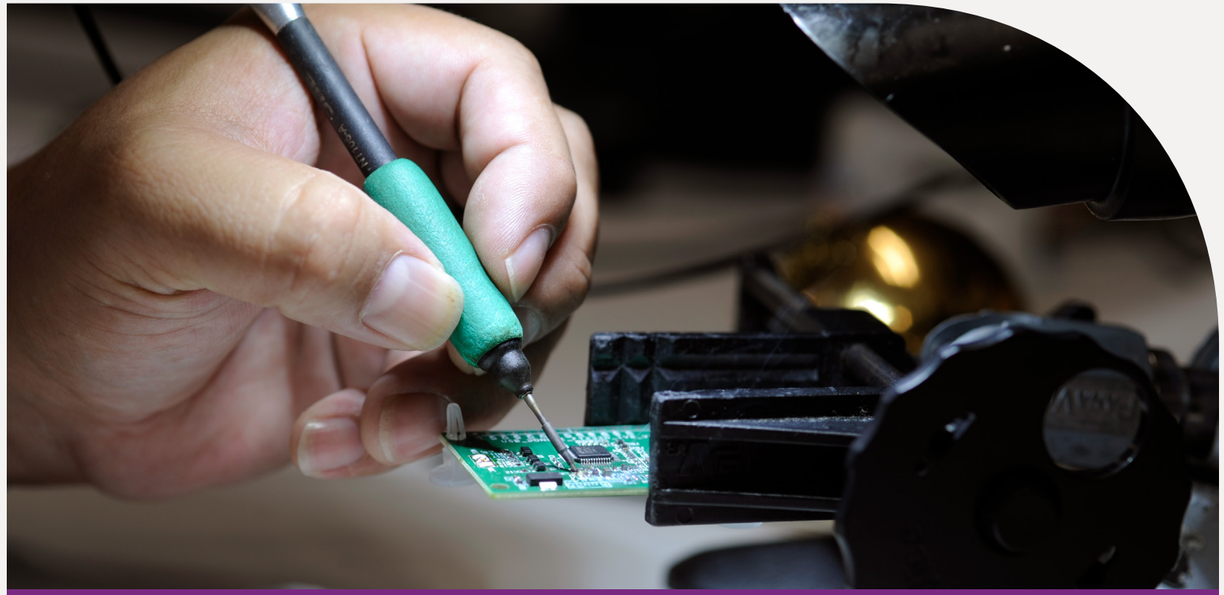
CREDO

Code of Business Conduct and Ethics



A Message From Our CEO

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A Message From Our CEO

Dear Colleagues,

As an innovator in providing secure, high-speed networking solutions, connectivity is at the core of everything we do. Our mission defines the impact we strive to make for our customers and the markets we serve, and our vision sets the direction for the future we are building together. As we continue to grow and innovate, it's important that we uphold integrity in how we conduct ourselves and connect with one another. We are introducing our newly revised Code of Business Conduct and Ethics to support this goal.

Our Code is a guide to the high standards and expectations that we uphold at Credo. It covers the key principles that govern our work and our relationships with colleagues, customers, vendors, and partners. The Code is designed to provide clarity on what is expected, helping each of us navigate challenges with confidence and consistency.

Please take the time to review our Code and make it a part of your everyday work. You'll find the Code to be an invaluable tool, not only as a guide for making good decisions, but also for empowering you whenever difficulties might arise in your work.

Our people are the foundation of all we do. I thank you for your continued commitment to Credo and our bright future.

Sincerely,

Bill Brennan
CEO, Credo

Mission and Vision

At Credo, our mission, vision, and core values connect us to our Company and each other. Together, they guide our actions and provide a strong foundation for growth, innovation, and delivering our best.

Our Mission

To transform connectivity at scale through fast, reliable, and energy-efficient system solutions.

Our Vision

To connect the systems that connect the world.

Our Core Values

Keep learning. Keep innovating.

We believe curiosity fuels progress. We embrace change, think critically, and push technology – and ourselves – forward.

Own the start. Own the finish.

We believe in doing what we say we will do. We take challenges head-on, solve with integrity, and learn from every outcome.

Stay humble. Stay focused.

We believe in building with purpose, not ego. We let data guide us, results define us, and progress speak for itself.

Lead with connection. Lead with care.

We believe collaboration, respect, and fun is how great work gets done. When we operate across departments, time zones, and diverse ideas, then we operate as Team Credo.



Our Code

Purpose and Overview

Credo is dedicated to delivering high-speed connectivity solutions for the next generation of AI-driven applications, cloud computing, and hyper-scale networks in an increasingly connected world. We foster those connections by serving our customers while building an organization we can all be proud of. How we accomplish that work is just as important as the work itself.

Our every action, and interaction, reflects on our Company. Every decision made must be informed, careful, and considerate. The right way forward is often clear, but we know that our work is complex. Understanding which rules and laws apply to us and how to navigate them can sometimes be challenging, especially when seeking the right guidance or support.

Our Code of Business Conduct and Ethics ("Code") is your most important resource in this effort. It is designed with you in mind – it is a vital resource that will help you:

- *Comply with applicable laws, regulations, and Company policies.*
- *Promote integrity and the highest standards of ethical conduct.*
- *Address common ethical situations you could encounter in your work.*
- *Avoid even the appearance of anything improper in connection with our Company's business activities.*

Who Must Follow This Code

All employees of Credo and its subsidiaries, including executives, corporate officers, and members of our Board of Directors, are required to read, understand, and follow our Code.

Consultants, contractors, agents, suppliers, vendors, and temporary employees ("business partners") who serve as an extension of Credo are also expected to follow our Code, as well as our **Supplier Code of Conduct** and any applicable contractual provisions.

If you supervise any of our business partners, you are responsible for communicating our standards and ensuring they are understood. If a business partner fails to meet our ethics and compliance expectations or their contractual obligations, it may result in the termination of their contract.



Our Responsibilities

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation helps us succeed and grow.

Employee Responsibilities

Each of us has a responsibility to:

- *Act professionally, honestly, and ethically when conducting business on behalf of Credo.*
- *Know the information in our Code and Company policies, paying particular attention to the topics that apply to your specific job responsibilities.*
- *Complete all required employee training on time and stay up to date on current standards and expectations.*
- *Report concerns about possible violations of our Code, our policies, or the law to your manager, an executive, or any of the resources listed in this Code.*
- *Cooperate and tell the truth when responding to an investigation or audit and never alter or destroy records in response to an investigation or when an investigation is anticipated.*

Additional Responsibilities of Managers

Credo managers are expected to:

- *Lead by example. Model high standards of ethical business conduct, and help create a work environment that values mutual respect and open communication.*
- *Be a resource for others. Communicate often with employees and business partners about how our Code and other policies apply to their daily work.*
- *Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.*
- *Respond quickly and effectively. When a concern is brought to your attention, treat it seriously and respectfully for everyone involved.*
- *Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what is not), discuss the matter with your manager or the People Team.*

Waivers: Any waiver of the provisions in this Code for executive officers or directors may only be granted by the Board of Directors and will be disclosed to the Company's shareholders. Any waiver of this Code for other employees may only be granted by the Legal Department.

Our Code

CONSIDER THIS

I'm a manager and not clear about what my obligations are if someone comes to me with an accusation – and what if it involves a senior manager?

No matter who the allegation involves, you must report it. Credo provides several options for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code.

I observed misconduct in an area not under my supervision. Am I still required to report the issue?

You are chiefly responsible for employees and business partners under your supervision, but all Credo employees are required to report misconduct. As a leader, you have a special obligation to be proactive. The best approach would be to talk first with the manager who oversees the area where the problem is occurring, but if this isn't feasible or effective, you should contact another resource described in our Code.

Making the Right Choice – Our Guidelines for Ethical Decision-making

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you are not alone. There are resources available to help you.

Facing A Difficult Decision? It may help to ask yourself:

Is it legal?

Is it consistent with our Code and our core values?

Would I feel comfortable if senior management and others in my Company knew about it?

Would I feel comfortable if my decision or my actions were made public?

If the answer to all of these questions is "**yes**," the decision to move forward is probably okay, but if the answer to any question is "**no**" or "**I am not sure**," stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

One More Thing...

No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law. Violations of our Code, our policies, or the law can result in disciplinary action, up to and including termination of employment.

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Our Code

Speaking Up and Reporting Concerns

If you see or suspect a violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your manager.

If you are uncomfortable speaking with your manager, there are other resources available to help you:

- *Contact another member of management*
- *Contact the People Team*
- *Contact the Legal Department*
- *Contact the Ethics Hotline*

Online:
https://report.syntrio.com/credosemi

Toll-Free Telephone:
USA and Canada:
(855) 222-3801 (English)
(800) 216-1288 (Spanish)
(855) 725-0002 (French)

Mexico:
01-800-681-5340 (Spanish)

All other countries:
800 31 26 4002
*(**toll-free dialing guide here**)*

Email: standard-reports@mitratech.com
(must include Credo's name with report)

Fax: *(215) 689-3885*
(must include Credo's name with report)

Credo will make every reasonable attempt to ensure that your concerns are addressed appropriately.

What to Expect When You Use the Ethics Hotline

The Ethics Hotline web portal and phone line are available 24 hours a day, seven days a week. You can also submit a complaint via email or fax. Operated by an independent third-party provider of corporate compliance services, the Ethics Hotline will document your concerns in detail and forward them to Credo for further investigation.

When you contact the Ethics Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive a Personal Identification Number ("PIN") so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information to conduct an effective investigation. This PIN will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Credo will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.

CONSIDER THIS

I believe someone misused the Ethics Hotline by making an anonymous call to falsely accuse someone of wrongdoing. What should I do?

Report your concern immediately. History shows that the Ethics Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on reports, and anyone who uses the Ethics Hotline in bad faith to spread falsehoods or threaten others, or with the intent to damage another person's reputation, will be subject to disciplinary action.



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Our Code

Our Commitment to Non-Retaliation

We will not tolerate any retaliation against any employee who, in good faith, asks a question, reports conduct that may be inconsistent with our Code, our policies, or the law, or assists in an investigation of suspected wrongdoing.

What Does Reporting "in Good Faith" Mean?

It means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

LEARN MORE

Ethics Hotline Policy

CONSIDER THIS

I suspect there may be some unethical behavior going on in my department involving my manager. I know I should report my suspicions, and I am thinking about using the Ethics Hotline, but I am concerned about retaliation.

You are required to report misconduct, and in your situation, we recommend discussing your concern with the People Team, however, using the Ethics Hotline is also a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, report it. Credo takes claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, any individual who engages in retaliation will be disciplined.



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Promoting a Safe and Inclusive Workplace

Respectful Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Credo does not tolerate verbal, visual, or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment.

If you see, suspect, or feel you have been the victim of harassment (including sexual harassment), report it immediately. This will help to preserve a respectful and productive workplace.

Belonging and Inclusion

If you are responsible for making employment decisions on behalf of Credo, base your decision-making on qualifications, demonstrated skills, and achievements – and never on race, color, religion, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), sexual orientation, gender identity, gender expression, national origin, ethnicity, citizenship status, ancestry, marital status, age, disability, genetic information, military or veteran status, or any other characteristic protected by law.

CONSIDER THIS

While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Was that harassment?

It could be. We expect our employees to practice respect, not only during working hours but in all work-related situations, including business trips. If you feel okay doing so, tell your colleague you are uncomfortable with these actions and ask them to stop. If you prefer not to speak to your colleague or if they continue, report your concerns.

I frequently hear a colleague making derogatory comments to another coworker. These comments make me feel uncomfortable, but I feel like it's none of my business, and the person they're directed at will speak up if they are offended. Should I ignore this?

No, you shouldn't. It's up to each of us to help maintain a work environment where people feel welcome, valued, and included. Since you're aware of this situation, you have a responsibility to speak up about it. If you feel you can, speak to your colleague and ask that this behavior stop. If you feel you can't or the comments continue, talk to your manager or another resource.

DO THE RIGHT THING

- *Promote a positive attitude – support policies designed to build a safe, ethical, and respectful workplace.*
- *Help each other – speak out when a coworker's conduct makes others uncomfortable.*
- *Be professional – avoid telling jokes, making comments, or viewing and sharing materials that could be considered disrespectful, discriminatory, or otherwise inappropriate.*
- **Speak up** *– report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.*

LEARN MORE

Discrimination, Harassment and Retaliation Prevention Policy (U.S.)

Discrimination, Harassment and Retaliation Prevention Policy (APAC)

Workplace Discrimination, Harassment and Violence Prevention Policy (Canada)

Prevention of Sexual Harassment Policy (Israel)

WATCH OUT FOR

- *Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.*
- *The display of sexually explicit or offensive pictures or other materials.*
- *Sexual or offensive jokes or comments.*
- *Verbal abuse, threats, or taunting.*
- *Threatening remarks, stalking, or any other form of harassment.*
- *Inappropriate bias when judging others. Ensure your decisions are fair and free from unrelated considerations.*

Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome – such as repeated requests for a date, a sexual favor, or other similar conduct of a sexual nature – are made a condition of employment or used as the basis for employment decisions.
- An intimidating, offensive, or hostile environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal, visual or physical behavior of a sexual nature.

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Promoting a Safe and Inclusive Workplace

Health and Safety

Ensuring safety, health, and well-being is an integral part of everything we do. Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for our Company, and for every employee on the job, every day.

Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on you to actively promote a safe and healthy workplace and report any situations that may pose a health, safety, or security risk. Do your part to keep everyone in the Credo family injury-free.



Alcohol and Drugs

While at work or on Credo business:

- **Always be ready to carry out your work duties – you should never be impaired by a controlled substance or alcohol.**
- **Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment.**
- **Use good judgment and exercise moderation.**

Workplace Violence

Violence of any kind has no place at Credo. We won't tolerate:

- **Intimidating, threatening, or hostile behavior.**
- **Causing physical injury to another person.**
- **Acts of vandalism, arson, sabotage, or other criminal activities.**
- **The presence of firearms or other weapons on Company property or at Credo-sponsored events.**

DO THE RIGHT THING

- *Follow the safety, security, and health rules and practices that apply to your job.*
- *Maintain a neat, safe working environment by keeping cubicles, labs, aisles, and other workspaces free from obstacles and other potential hazards.*
- *Be aware that Credo is also committed to good mental health and provides both professional development and mental health resources for our team.*
- *Notify your manager immediately about any unsafe equipment or any situation that could pose a threat to health or safety or the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.*
- *Cooperate with any investigations into incidents.*

WATCH OUT FOR

- *Unsafe practices or work conditions.*
- *Carelessness in enforcing security standards, such as facility entry procedures and password protocols.*

CONSIDER THIS

I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.

Discuss your concerns with your manager, the People Team, or Facilities. There may be very good reasons for the practices, or you may be bringing to light an issue that needs to be addressed. In either case, raising a concern about safety does not make you a troublemaker. It makes you a responsible employee who is concerned about the safety of others.

A subcontractor commits a violation of our standards. Are subcontractors expected to follow the same health, safety, and security policies and procedures as employees?

Absolutely. Managers are responsible for ensuring that subcontractors and other business partners at work on Credo premises understand and comply with all applicable laws and regulations, as well as additional requirements Credo has in place.

Protecting Information and Assets

Accurate Recordkeeping

The accuracy and completeness of our business records and financial disclosures are essential to making informed decisions and supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that any information you record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

Records Management

Documents should only be disposed of in compliance with Credo policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about managing corporate records, please contact the Legal Department.

DO THE RIGHT THING

- *Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.*
- *Write carefully in all business communications. Write as though someday the records you create may become public documents.*

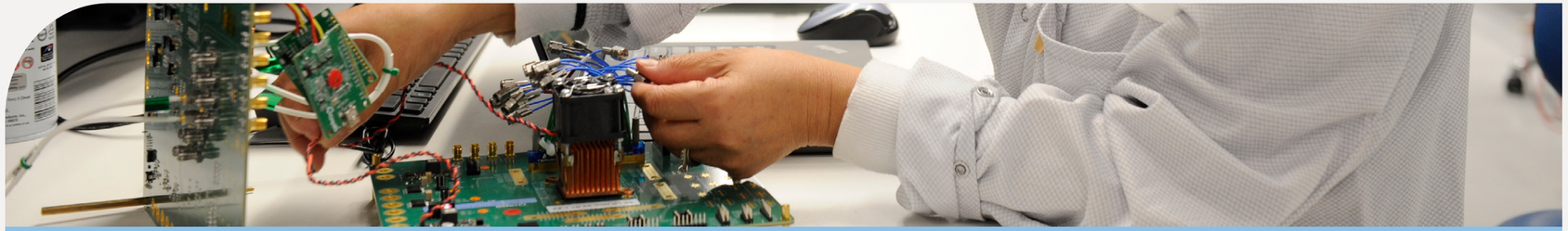
WATCH OUT FOR

- *Records that are not clear and complete or that obscure the true nature of any action.*
- *Undisclosed or unrecorded funds, assets, or liabilities.*
- *Improper destruction of documents.*

CONSIDER THIS

At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.





Protecting Information and Assets

Physical and Electronic Assets

Credo entrusts employees with assets (both tangible and intangible) that enable us to operate. Physical assets include Credo facilities, materials, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files and records are also company assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Each of us is personally responsible for using these assets with care and protecting them from fraud, waste, and abuse. Your personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment. Be aware that any information you create, share, or download onto Company systems belongs to Credo, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.

WATCH OUT FOR

- *Requests to borrow or use Credo equipment without approval.*
- *Excessive use of Credo resources for personal purposes.*
- *Unknown individuals without proper credentials entering our facilities.*

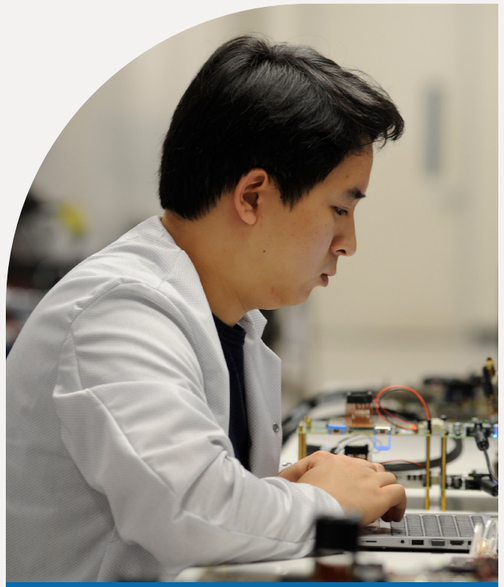
DO THE RIGHT THING

- *Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.*
- *Observe good physical security practices, especially those related to badging in and out of our facilities.*
- *Be a good steward of our electronic resources and systems, and practice good cybersecurity:*
  - *Do not share passwords or allow other people, including friends and family, to use Credo assets.*
  - *Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on company computers or other equipment to conduct company business is prohibited. If you have any questions about whether a particular use of software is licensed, contact the IT Department.*
  - *Lock your workstation when you step away and log off our systems when you complete your work for the day.*
  - *Beware of phishing attempts – use caution in opening email attachments from unknown senders or clicking on suspicious links.*
  - *Stay informed about IT policies and updates.*

Artificial Intelligence

We embrace new technologies, including artificial intelligence ("AI"), which is rapidly changing the way Credo collects, uses, and analyzes data. AI is also empowering us to give customers more efficient and personalized experiences.

Because AI learns and operates in a human-like way, issues involving discrimination, equity, and privacy can arise. That's why it's critical for us to use, design, and develop these tools ethically from the start. Falling short in this effort can expose us to regulatory, legal, and reputational risks. If your work involves AI, data analytics, or other digital technologies, be sure to follow all applicable laws and regulations and build new technologies ethically, fairly, and transparently.



DO THE RIGHT THING

- *Use Credo-approved AI applications for all Company-related activities.*
- *Reach out to IT to evaluate the security of any AI tool before using it for business purposes.*
- *Maintain human oversight at all stages of AI use.*
- *Avoid AI tools and uses that could create or spread bias, discrimination, or unfair outcomes.*
- *Verify the accuracy of AI outputs and reference source material to minimize outdated or unreliable information.*
- *Protect intellectual property, confidential information, customer data, and the security of our systems, and never input proprietary or confidential data into an AI tool without prior approval from the Legal Department.*

LEARN MORE

IT Access Policy

Software Usage and Installation Policy

Artificial Intelligence Policy

Protecting Information and Assets

Confidential Information and Intellectual Property

Credo relies on employees to be vigilant and protect confidential information and intellectual property ("IP"), which are some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

If it is necessary to share Credo confidential information with a third party, such as a potential customer or supplier, it is essential to enter into a non-disclosure agreement ("NDA") prior to disclosing such information as it helps us protect our confidential information, without compromising our competitiveness or risking our intellectual assets.

Do your part to safeguard confidential information. Be aware that this obligation continues even after your employment at Credo ends.

Intellectual Property

Examples of intellectual property include:

- Business and marketing plans
- Company initiatives (existing, planned, proposed, or developing)
- Customer lists
- Trade secrets and discoveries
- Methods, know-how, and techniques
- Innovations and designs
- Systems, software and technology
- Patents, trademarks, and copyrights

Credo commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact the Legal Department if you receive questions regarding:

- The scope of our intellectual property rights
- How Credo rights apply to another company's products
- How a third party's intellectual property rights apply to Credo's intellectual property rights or products



DO THE RIGHT THING

- *Document and disclose to Company management and the Legal Department any inventions or other IP that you create while you are employed by Credo.*
- *Properly label confidential information to indicate how it should be handled, distributed, and destroyed.*
- *Use and disclose confidential information only for legitimate business purposes.*
- *Protect our IP and confidential information by sharing it only with authorized parties.*
- *Only store or communicate Company information using Credo information systems.*

WATCH OUT FOR

- *Discussions of Credo confidential information in places where others might be able to overhear – for example, on planes and elevators, in restaurants, and when using your phone.*
- *Sending confidential information to unattended devices or printers.*

LEARN MORE

Legal Contracts Page

Protecting Information and Assets

Confidential Information: Third Parties

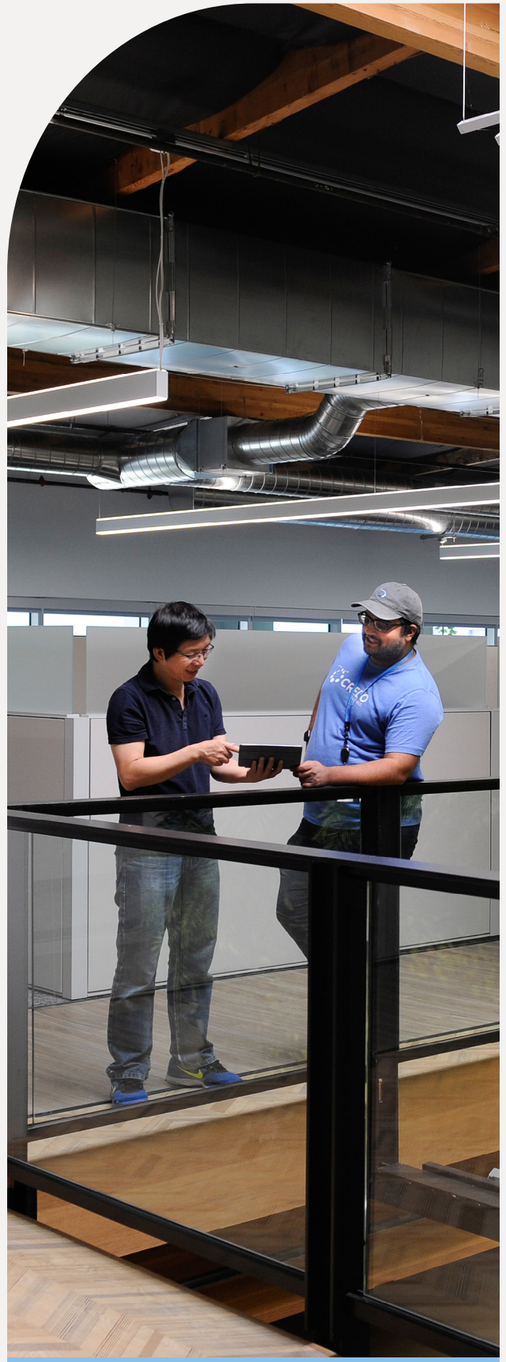
Our customers and business partners place their trust in us. We must protect their confidential information just as we protect our own. Make sure you understand the expectations of our customers and business partners regarding the protection, use, and disclosure of the confidential information that they provide to us.

DO THE RIGHT THING

- *Limit any access to third-party confidential information to only those individuals who have IT's permission, a need to know in order to do their job, and an authorized purpose.*
- *Immediately report any loss or theft of confidential information to your manager, IT Security, and the Legal Department.*

WATCH OUT FOR

- *Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.*
- *Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.*



Data Privacy

We respect the personal information of others. We follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing, and disposing of sensitive information.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number. Only use and share personal information with others outside of Credo for legitimate business purposes.

CONSIDER THIS

If I use an external service provider to process data, do I still need to be concerned?

Yes, if we provide a third party with data, we remain responsible for the protection of this data under privacy laws. Remember, there is no disclosure of any Credo confidential information without an NDA. External vendors who handle personal information, Credo resources or sensitive information and/or host services on behalf of Credo must be assessed by IT Security, and contracts put in place to meet our legal obligations.

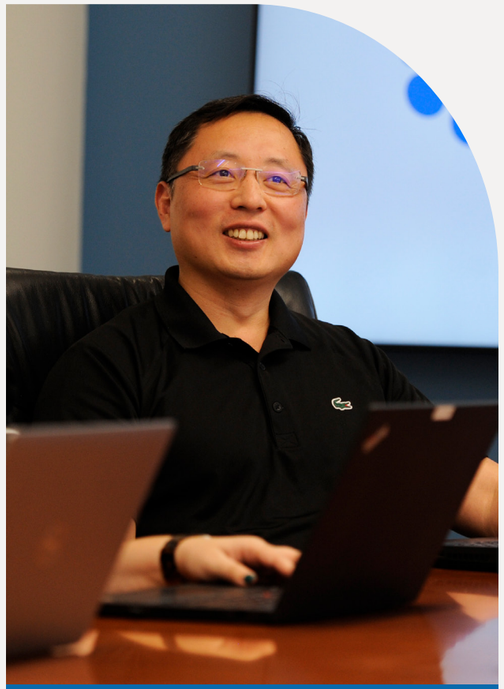
WATCH OUT FOR

- *Failing to shred or securely dispose of sensitive information.*
- *Using "free" or individually purchased internet hosting, collaboration, or cloud services that could put personal information at risk.*

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Security Incident Management Policy

Vendor Management Policy



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Protecting Information and Assets

Communicating with the Public

Credo is committed to maintaining honest, professional, and lawful internal and public communications. We need a consistent voice when making disclosures or providing information to the public and must ensure that only authorized persons speak on behalf of Credo.

Refer any communications with the media, investors, analysts, and members of the financial community to Marketing Communications or Investor Relations.

Full, Fair, and Timely Disclosures

Credo is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results, and other public communications.

WATCH OUT FOR

- *Requests to give public presentations, write articles for professional journals, appear on podcasts or other public communications vehicles that relate to Credo without appropriate approval.*
- *The temptation to use your work title or affiliation with Credo for non-work matters.*
- *Invitations to speak "off the record" to journalists or analysts who ask you for information about Credo, its customers or business partners.*

Social Media

Every communication about Credo affects our reputation and our brand, so we take care online. We must never post anything that would be considered harassing or discriminatory, and we must never breach confidential information about our Company, our employees, or our business partners.

If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Credo. If you believe a false statement about our Company has been posted, do not respond, even if your intent is to "set the record straight." Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact Marketing Communications for further guidance.

LEARN MORE

IT Resources and Communications Systems Policy



Working with Customers, Vendors, and Business Partners

Supplier Relations

We hold our business partners to the highest standards and ensure they operate ethically, legally and in compliance with our **Supplier Code of Conduct**, our policies and our core values. If your work involves selecting, onboarding, or managing business partners, follow Credo's due diligence and contracting processes and raise concerns if a business partner's conduct or performance falls short of our expectations.

Conflict Minerals

Revenue from conflict minerals has been linked to funding for groups engaged in violence and human rights atrocities. We work closely with suppliers of parts and components and expect them to follow all applicable laws, including those aimed at providing conflict-free minerals. See Credo's *Conflict Minerals Policy* to learn more.

DO THE RIGHT THING

- *Choose business partners on objective criteria, such as business needs, cost, technical requirements, safety, and record of quality and reliability.*
- *Use Credo's approved onboarding, contracting, and vendor management processes.*
- *Follow both our Company's policies and applicable partner requirements provided they don't conflict with our standards.*
- *Protect **confidential information and intellectual property** of our suppliers and business partners.*
- *Treat trade partners, vendors, and suppliers fairly, respectfully and professionally. Only ask them to do things that are legal and allowed by our policies.*
- ***Speak up** if you're aware of possible misconduct involving a business partner.*

LEARN MORE

Supplier Code of Conduct

ESG Report

Conflict Minerals Policy

Product Quality and Safety

Credo is dedicated to earning and maintaining customers by ensuring the quality, safety, and performance of our products. At the heart of our commitment is a documented quality management system that includes a robust set of processes, procedures, and responsibilities. We believe responsible partnerships are essential to long-term value creation. We work with customers, vendors, and business partners who share our commitment to ethical conduct, product quality and safety, respect for human rights, and responsible environmental practices.

Anti-counterfeit Efforts

Counterfeit products are becoming more prevalent in the marketplace, putting our customers and our Company at risk. It's up to each of us to help identify counterfeit, pirated, or unlicensed products and keep them out of our supply chain. That means following our protocols and procedures to detect counterfeiting, including monitoring customer feedback and conducting product tracking, inspections, and authentication.

DO THE RIGHT THING

- *Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality or safety of our products. Never sacrifice quality to meet Company deadlines or targets.*
- *Do your part to ensure complete and accurate quality testing and performance reporting.*
- *Routinely check equipment and processes to ensure they conform to specifications and expectations – work toward continuous improvement.*
- *If you believe there is a safety issue or defect that might endanger a customer, or if you suspect counterfeiting, report the issue to your manager immediately.*

LEARN MORE

EHSQ Policy



Working with Customers, Vendors, and Business Partners

Conflicts of Interest

A conflict of interest can occur whenever an employee has an interest or activity that may interfere with their ability to make an objective decision on behalf of Credo. Conflicts of interest may be actual, potential, or even just a matter of perception.

Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation. Conflict of interest situations are not always clear-cut, so fully disclose them to your manager, the People Team, or the Legal Department so they can be properly evaluated, monitored, and managed.



Potential Conflicts of Interest

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to Credo first. This means that you should not take that opportunity for yourself unless you get approval.

Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor, or even Credo. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to determine if any precautions need to be taken.

Outside employment

To ensure that there are no conflicts and that potential issues are addressed, always disclose and discuss outside employment or side businesses with the Company. Any additional, employment, consulting, or other business activity (whether full-time or part-time) must be pre-approved in writing. If approved, make sure the outside activity does not interfere or compete with your work at Credo. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved.

Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner, or customer. Make sure you know what's permitted – and what's not – by our policies and seek help with any questions.

Outside board or advisory roles

Advisory roles or board seat participation may create a conflict of interest. Please seek pre-approval for all such roles as required by our policies.

DO THE RIGHT THING

- *Avoid conflict of interest situations whenever possible.*
- *Always make business decisions in the best interest of Credo.*
- *Think ahead and proactively address situations that may put your interests or those of a family member in conflict with Credo.*
- *Discuss with your manager, the People Team, or the Legal Department full details of any situation that could be perceived as a potential conflict of interest.*

CONSIDER THIS

My spouse works for a third party that's in the running to become a Credo vendor. Since my spouse doesn't own this company, do I need to disclose this?

Yes, you do. It's important that our selection process is unbiased and based on sound business principles. Report the conflict of interest so it can be reviewed by our Legal Department, and guidance can be offered. If needed, we will engage your manager or the People Team to make an appropriate plan.

LEARN MORE

Conflict of Interest Policy

Working with Customers, Vendors, and Business Partners

Gifts and Entertainment

A modest gift may be a thoughtful "thank you," or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Only offer and accept gifts and entertainment that comply with our policies, and make sure that anything you give or receive is accurately reported. You must seek approval of all gifts to external parties as set forth in Credo's policies.

Government Officials

Be aware that the rules for what we may give to – or accept from – government officials are much more strict. Don't offer anything of value to a government official without obtaining approval, in advance, from the Legal Department. And remember: We do not accept or provide gifts, favors, or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision.

DO THE RIGHT THING

- *Only provide and accept gifts and entertainment that are reasonable complements to business relationships.*
- *Never seek personal gain through your position at Credo.*
- *Make sure anything given or received complies with Company policies.*
- *Never give or accept cash or cash equivalents.*
- *Do not request or solicit personal gifts, favors, entertainment, or services.*
- *Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.*

WATCH OUT FOR

- *Situations that could embarrass you or our Company.*
- *Gifts, favors, or entertainment that may be reasonable for a privately owned company but not for a government official or agency.*

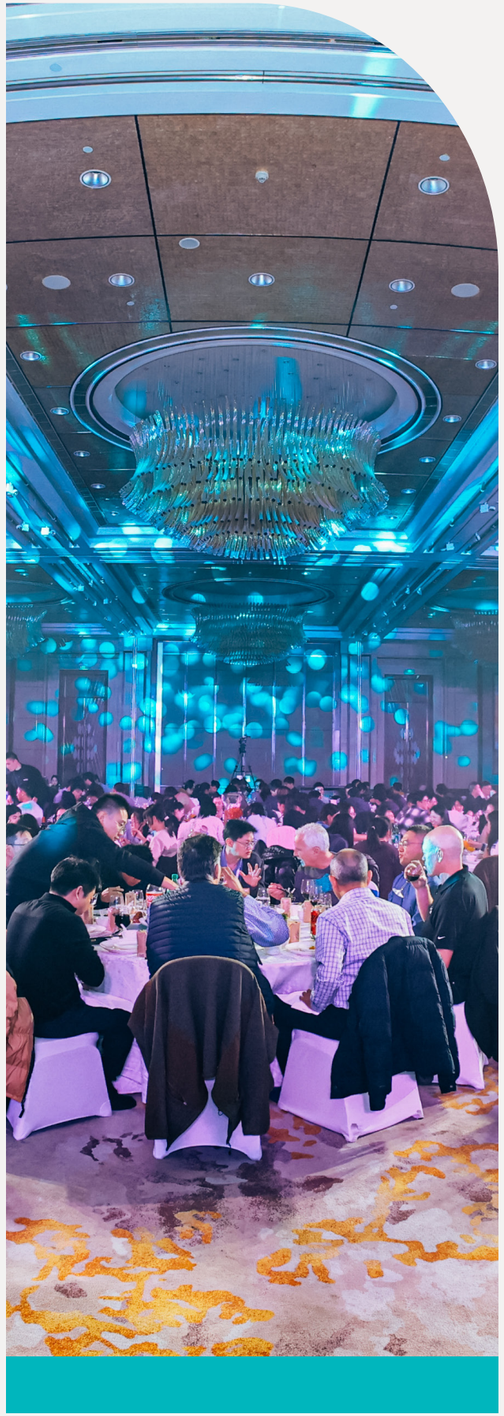
CONSIDER THIS

When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

You need to let your manager or the T&E Team know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

LEARN MORE

Global Travel and Expense Policy



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Following the Law

Anti-Corruption and Bribery

Credo is committed to complying with all applicable anti-corruption laws. We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs.

Do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or company representing our Company. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. Never ask them to do something that we are prohibited from doing ourselves.

DO THE RIGHT THING

- *Understand the standards set forth under anti-bribery laws which apply to your role at Credo.*
- *Never directly or indirectly give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.*
- *Exercise due diligence and carefully monitor third parties acting on our behalf, particularly when dealing in countries with high corruption rates and in situations where "red flags" would indicate further screening is needed.*
- *Accurately and completely record all payments to third parties.*

WATCH OUT FOR

- *Apparent violations of anti-bribery laws by our business partners.*
- *Agents who do not wish to have all terms of their engagement with Credo clearly documented in writing.*

Key Definitions

Bribery **means giving or receiving anything of value (or offering to do so) to obtain a business, financial, or commercial advantage.**

Corruption **is the abuse of an entrusted power for private gain.**

Facilitation payments **are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.**

Government officials **include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities.**

CONSIDER THIS

I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay this agent goes toward making payments or bribes to government officials. What should I do?

This should be reported to the Legal Department for investigation. If there is bribery and we fail to act, both you and Credo could be liable. Investigating these kinds of situations can be culturally difficult in some countries, but anyone doing business with us should understand the necessity of these measures. It is important and appropriate to remind them of this policy.

LEARN MORE

Corruption and Bribery Prevention Policy

Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose our Company and the individuals involved to severe sanctions. We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate.

Be alert to the warning signs of money laundering. Report any suspicious financial transactions and activities to the Legal Department, and, if required, to appropriate government agencies.

WATCH OUT FOR

- *Attempts to pay in cash or in a different currency than shown on the invoice.*
- *Requests to ship to a country that differs from where payment originated.*
- *Avoidance of recordkeeping requirements.*
- *Payments made by someone who is not a party to the transaction.*
- *Unusual changes to a customer's normal pattern of transactions.*

Following the Law

Antitrust and Fair Competition

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices.

Do not engage in conversations with competitors about competitively sensitive information or engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.

WATCH OUT FOR

- **Collusion –** *when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.*
- **Bid-rigging –** *when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.*
- **Tying –** *when a company with market power forces customers to agree to services or products that they do not want or need.*
- **Predatory pricing –** *when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.*

Be Alert to Anti-Competition Warning Signs

In general, the following activities are red flags, should be avoided, and, if detected, reported to the Legal Department:

- **Sharing our Company's competitively sensitive information with a competitor.**
- **Sharing competitively sensitive information of business partners or other third parties with their competitors.**
- **Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.**

CONSIDER THIS

I received sensitive pricing information from one of our competitors. What should I do?

You should contact the Legal Department without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-by-case basis and may include sending a letter to the competitor.



Following the Law

Insider Trading

We respect every company's right to protect its material nonpublic ("inside") information, and we comply with insider trading laws.

In the course of business, you may learn confidential information about Credo or about other publicly traded companies that is not available to the public. Trading securities while aware of inside information, or disclosing it to others who then trade ("tipping"), is prohibited by various laws and our policies.

Material Information

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- **A proposed acquisition or sale of a business**
- **A significant expansion or cutback of operations**
- **A significant product development or important information about a product**
- **Extraordinary management or business developments**
- **Changes in strategic direction such as entering new markets**



DO THE RIGHT THING

- *Do not buy or sell securities of any company when you have material nonpublic information about that company.*
- *Protect material nonpublic information, in both electronic form and in paper copy, from the general public.*
- *Discuss any questions or concerns about insider trading with the Legal Department.*

WATCH OUT FOR

- *Requests from friends or family for information about companies we do business with or have confidential information about. Even casual conversations could be viewed as illegal sharing of inside information.*
- *Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for Credo-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered "tipping" and is against the law regardless of whether you benefit from the outcome of their trading.*

LEARN MORE

Insider Trading Policy

Following the Law

Conducting Business Around the Globe

Credo has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import, export, and re-export of our products and also with the laws of the countries where our products are manufactured, repaired, or used. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

If your job duties include exporting or re-exporting products, software, or technology or otherwise engaging in activities regulated by trade controls or receiving imported products, you are responsible for working with the Legal Department to ensure that we comply with all applicable export and import requirements.

Anti-Boycott Regulations

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support, or furnish information concerning a non-U.S.-sanctioned boycott.

DO THE RIGHT THING

- *Work with the Legal Department to determine and obtain any necessary licenses before the export or re-export of products, services, or technology.*
- *Report complete, accurate, and detailed information regarding every imported product, including its place(s) of manufacture and its full cost.*
- *Direct any questions you have regarding imports, exports or re-exports of our products, software, parts, or technology to the Legal Department.*

WATCH OUT FOR

- *Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, or database access. This restriction applies to sharing information with coworkers, as well as non-employees.*
- *Transporting Company assets across borders is subject to export regulations and the importing country's customs laws and regulations, which apply regardless of the mode of transportation (for example, shipments or sharing samples or evaluation items with customers or potential customers).*

CONSIDER THIS

My work requires regular interaction with Customs officials. As part of my job, I am routinely asked to provide the Customs Service with information about our imports and exports. Do I really need to contact the Legal Department prior to each and every submission of information to the government?

The right approach here would be to discuss the types of requests your department routinely receives from Customs with the Legal Department. These routine requests, once understood, might be handled without any legal review. Extraordinary requests would still require review from the Legal Department to ensure that you are responding accurately, fully, and in accordance with the law.

LEARN MORE

Trade Controls Compliance Policy



Engaging with Our Communities

Environmental Stewardship

We recognize our environmental responsibilities and are committed to operating our business in a way that minimizes environmental impact and protects the health and safety of our employees, customers, and communities. We comply with applicable environmental laws and regulations and support responsible and sustainable business practices across our operations.

Protecting the environment is a shared responsibility. Read and understand all information and policies provided by our Company that are relevant to your job, complete training and operate in full compliance with environmental, health, and safety laws and regulations.



DO THE RIGHT THING

- *Fully cooperate with our Company's periodic compliance reviews of our products and operations.*
- *Stop work and report any situation that you believe could result in unsafe working conditions, environmental harm, or regulatory noncompliance.*
- *Provide complete and accurate information in response to environmental, health, and safety laws, regulations, and permits.*
- *Adhere to recycling and waste management procedures specific to your office location.*
- *Be proactive and look for ways we can minimize waste, energy use, and resource consumption in your daily work.*
- *Contact the Legal Department if you have any questions about compliance with environmental, health, and safety laws and policies.*

Human Rights

Credo is committed to conducting business in a manner that respects the human rights and dignity of all people. We support internationally recognized human rights principles and do not tolerate human rights abuses within our Company, our operations, or our supply chain.

We oppose all forms of forced labor, child labor, human trafficking, discrimination, harassment, and modern slavery. We expect our employees and business partners to uphold these principles and comply with applicable labor and human rights laws, including standards reflected in the Responsible Business Alliance Code of Conduct. We also expect suppliers and other partners to operate in accordance with our **Supplier Code of Conduct**.

If you become aware of conduct that may violate these principles, speak up and report the concern so it can be reviewed and addressed.

LEARN MORE

Salient Human Rights Policy



Engaging with Our Communities

Political Activities

Everyone has the right to voluntarily participate in the political process, including making personal political contributions. However, as employees, we must always make it clear that our personal views and actions are not those of Credo.

Make it clear that your political views and activities are your own. You don't represent Credo.



DO THE RIGHT THING

- *Ensure that your personal political views and activities are not viewed as those of the Company.*
- *Do not use our resources or facilities to support your personal political activities.*
- *Follow all federal, state, local, and foreign election laws, rules, and regulations as they relate to Company contributions or expenditures.*

WATCH OUT FOR

- **Lobbying.** *Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the Legal Department.*
- **Pressure.** *Never apply direct or indirect pressure on another employee to contribute to, support, or oppose any political candidate or party.*
- **Improper influence.** *Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.*
- **Conflicts of interest.** *Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Credo.*

LEARN MORE

Political Contributions and Activities Policy

CONSIDER THIS

I will be attending a fundraiser for a candidate running for local office. Is it okay to mention my position at Credo as long as I don't use any Company funds or resources?

No. It would be improper to associate our name in any way with your personal political activities.

I would like to invite an elected official to speak at an upcoming Company event. Would that be a problem?

You must get approval from Marketing Communications before inviting an elected official or other government official to attend a Company event. If the invitee is in the midst of a reelection campaign, the Company event could be viewed as an endorsement of the candidate. Depending on local laws, any food, drink, or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.

Charitable Activities

Corporate social responsibility is an integral part of Credo's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time, and talent to support Company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

Credo also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you're participating on your own time and at your own expense.

WATCH OUT FOR

- *Putting pressure on colleagues to participate in personal charitable or volunteer activities.*
- *Using Credo funds, assets, or the Credo name to further your personal volunteer activities unless you receive approval in advance.*

Helpful Resources

Do you need additional guidance? Credo has a variety of resources to contact for help:

Issue or concern	Contact
To ask questions, report potential misconduct, or other ethical concerns	Your manager or a member of senior management People Team Legal Department The Ethics Hotline, accessible at https://report.syntrio.com/credosemi
For legal questions	Legal Department
For media inquiries	Marketing Communications
For communications with investors, stock analysts, and other members of the financial community	Investor Relations
To report information security incidents	IT Security Department
For general safety and security concerns	Facilities
Feedback and comments	People Team Legal Department

