

# Marvell's Global Human Rights Policy

Effective February 12, 2020

## Introduction

This Policy formalizes Marvell's commitment to the preservation and promotion of the fundamental rights of others and complies and is harmonious with one of Marvell's Core Behaviors; that is, to Act with Integrity and Treat Everyone with Respect.

## Scope

Marvell's Human Rights Policy applies to all Marvell employees worldwide, anyone doing business for or with Marvell, and others acting on Marvell's behalf. This Policy applies to all locations where Marvell conducts business. The following human rights (each a "Human Right" and collectively "Human Rights") are covered by this Policy:

- Diversity and Non-discrimination;
- Anti-harassment;
- Prevention of human trafficking and forced labor;
- Child labor prevention;
- Minimum wage and working hours;
- Freedom of association;
- Workplace safety;
- Environmental stewardship;
- Product responsibility;
- Anti-corruption; and
- Privacy.

## Policy Objectives

Marvell's Human Rights Policy exists to:

- Inform employees, third parties and customers of Marvell's commitment to Human Rights;
- Establish Marvell's commitment to "know and show" its respect for Human Rights through on-going Human Rights due diligence;
- Maintain Marvell's high ethical standards; and
- Contribute to the global realization of Human Rights,

as reflected in the Responsible Business Alliance (RBA) Code of Conduct (<http://www.responsiblebusiness.org/code-of-conduct>), the Universal Declaration of Human Rights (<https://www.un.org/en/universal-declaration-human-rights>), the United Nations (UN) Guiding Principles on Business and Human Rights

([https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)), and the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>).

This Policy should be read in conjunction with Marvell's Code of Business Conduct (<https://www.marvell.com/company/assets/Marvell-Code-of-Ethics.pdf>) for employees, Marvell's Supplier Code of Conduct for third parties (<https://investor.marvell.com/static-files/7d7336f3-c392-4c67-8c6a-b26a353ff959>), and other Company policies and procedures.

## **Definition**

Human Rights are basic rights inherent to all human beings, regardless of race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation or preference, political affiliation, union membership, or veteran status.

## **Guidelines**

Marvell conducts its business in a manner that respects the rights and dignity of all people; complying with all applicable rules and regulations. Our policies reflect our commitment to respect and protection internationally recognized Human Rights.

- All employment with Marvell is voluntary. We do not use child or forced labor in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to, the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing minimum age for employment, in order to support the effect abolition of child labor worldwide.
- Marvell abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- Marvell respects its employees' right to choose to join or not join a trade union, or to have recognized employee representation in accordance with local law.
- Diversity is embraced at Marvell. Marvell recognizes that a diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides it with a sustained competitive advantage.
- Marvell believes that everyone should be treated with respect regardless of their background. Marvell is committed to the elimination of discrimination based on race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation or preference, political affiliation, union membership, or veteran status, or any other protected class.
- Marvell requires third parties with which it does business, including but not limited to, suppliers, vendors, contractors, consultants, agents, business partners, to adhere to Marvell's Supplier Code of Conduct.

In addition, Marvell is committed to the following principles:

- Marvell respects all Human Rights.
- Marvell commits to conducting on-going Human Rights due diligence to assess, mitigate and remediate any potential Human Rights infringements.
- Marvell expects those with which it does business or who do business on its behalf, to respect all Human Rights.

## **Responsibility**

Marvell's Human Rights Policy is owned and maintained by Marvell's Chief Compliance Officer. The Ethics and Compliance Team is responsible for the creation, administration, updating and communication of the Policy.

## **Compliance**

Marvell's employees and third parties are expected to comply with this and all applicable Marvell policies. Violation of this Policy or the refusal to cooperate will result in disciplinary action up to and including termination, subject to local laws. Where Marvell has sound reason to believe a third party has infringed this Policy, Marvell, in its sole discretion, may end its relationship with the third party as warranted, pursuant to law and applicable contract provisions.

Specific to this Policy, employees and third parties are expected to:

- Not infringe on Human Rights; and
- Be alert to any evidence of Human Rights infringements and report any situation in which there is a good faith belief that a Human Rights infringement is suspected.

## **Training**

All employees, the Board of Directors, and third parties with access to Marvell's assets are required to complete training on and reaffirm their commitment to each of the Human Rights listed above through relevant training provided which includes, but is not limited to, Code of Business Conduct, Workplace Harassment Training, Security Compliance Requirements, Confidentiality Requirements, and Supplier Code of Conduct.

## **Taking Action**

Marvell provides several resources for anyone to ask questions or raise concerns. Persons are encouraged to speak up if they have any concerns regarding compliance with the Code of Business Conduct, any Marvell policy, or the law, and may choose the resource and avenue with which they feel most comfortable, including:

- An executive or other manager they trust;
- Human Resources;
- The Compliance Team at [compliance@marvell.com](mailto:compliance@marvell.com)
- The Legal Department;

- The Concern Line which may be used anonymously and is available 24 hours per day every day at <http://concernline.marvell.com> or the local phone numbers listed on the Concern Line.

### **Due Diligence**

Marvell's Ethics and Compliance Committee shall be renamed the Ethics, Compliance and Human Rights Committee and responsible for managing this Policy and conducting due diligence on Human Rights risks. This Policy shall be reviewed on an annual basis and updated as necessary.

### **References**

Marvell's Human Rights Policy reinforces other relevant policies, including but not limited to:

- Marvell's Code of Business Conduct
- Supplier Code of Conduct
- Universal Declaration of Human Rights
- International Labor Organization's Core Conventions
- The United Nations (UN) Guiding Principles on Business and Human Rights
- Responsible Business Alliance (RBA) Code of Conduct
- UN Global Compact