

Export Compliance Policy

Release Date 10-19-2023 | Rev K

This policy outlines Silicon Labs' commitment to trade compliance.

1.0 Commitment

The United States, Singapore and other countries have statutory and regulatory systems for controlling and monitoring the movement of certain goods, information, and technologies. Among other things, these systems are designed to minimize the risk of diverting such items to locations to entities or countries identified as problematic. Accordingly, Silicon Labs and the executive team are committed to following applicable trade compliance laws and regulations, including those set forth by the U.S. Export Administration Act and the Export Administration Regulations ("EAR"), the International Traffic in Arms Regulations ("ITAR"), Singapore's Strategic Goods (Control) Act (Cap. 300) ("SGCA") and Regulation of Imports and Exports Act (Cap. 272A) ("RIEA"), and any other applicable laws and regulations (collectively, the "Export Control Regulations"). Failure to follow the Export Control Regulations could damage our business reputation and, even worse, prevent us from exporting our products to our customers.

Key Points of the Document:

- Compliance with export regulations and laws is paramount for the company's operation.
- If in doubt about an export, please contact the Corporate Compliance Team.
- Failure to comply may lead to severe consequences.

To ensure compliance with the Export Control Regulations, the Corporate Compliance Team monitors, advises, develops policies and procedures, and provides training.

2.0 Background

All employees, contractors, consultants, and our domestic and international subsidiaries and affiliates ("Team Members") should be aware that the Export Control Regulations vary by technology, entity, and destination. Technology that may be exported to one country or entity is not necessarily permitted for export to another country or entity. Further, the Export Control Regulations may apply not only to the export of physical items (such as semiconductor devices) but also to intangibles such as technology (design rules, design files, software, etc.). An item may be "exported" not only through shipment of a physical thing such as a database tape but also through electronic mail, database transfer, fax, and even verbal communication. Under EAR, an export may also be "deemed" to have occurred via the transfer of either a tangible item or intangible technology or software to an individual physically located in the United States but not a permanent resident or citizen. Meanwhile, ITAR establishes controls for exporting and importing defense-related items and services. Similarly, SGCA regulates the trade in strategic goods—i.e., technology that can be used to produce weapons of mass destruction. Lastly, RIEA regulates exports and imports in Singapore.

3.0 Expectations

It is of the utmost importance to Silicon Labs that Team Members follow the Export Control Regulations governing the movement of these goods, information, and technologies. This will allow Silicon Labs to maintain its good corporate citizenship status and avoid inadvertent violations and possible business disruption.

Accordingly, Team Members are responsible for this area and are expected to follow the Export Control Regulations and the Company's policies and procedures. Under no circumstances shall any person representing Silicon Labs engage in exports that contravene the Export Control Regulations.

4.0 Reporting

We urge Team Members to take this matter seriously and support us in this effort. If there are any questions concerning an export or potential violations, please contact the Corporate Compliance Team, led by our Chief Legal Officer, at dl.corptransport@silabs.com. Team Members may also report a concern by filing an anonymous "Violation of Policy" report at <https://silabs.ethicspoint.com/>.

5.0 Consequences

Non-compliance with the Export Control Regulations may lead to severe repercussions, including criminal and civil penalties. Team Members found in violation will also be subject to disciplinary measures, up to and including termination of employment.

If in doubt about an export, please get in touch with the Corporate Compliance Team. Team Members may also report a concern by filing a "Violation of Policy" report via EthicsPoint.

6.0 Annual Review & Policy Updates

Team Members shall review and acknowledge this policy of corporate commitment to trade compliance annually. Further, this policy will be reviewed on an annual basis or, if necessitated by personnel changes, changes in management, or regulatory changes.



Néstor Ho, Chief Legal Officer

Document Revision History

Rev	Date	Initiator	Description of Changes
A	18-Mar-09	Chris Gray	Initial Release of document
	16-Sep-10	Chris Gray	Document content reviewed – no changes necessary
	22-Aug-11	Chris Gray	Document content reviewed – no changes necessary.
	9-Aug-12	Chris Gray	Document content reviewed – no changes necessary.
B	1-Aug-13	Chris Gray	Document content reviewed – no changes necessary.
C	24-Jul-14	Chris Gray	Document content reviewed – no changes necessary.
D	30-Jun-15	Chris Gray	Document content reviewed – no changes necessary.
E	07-Jul-16	Chris Gray	Document content reviewed – no changes necessary.
F	13-Jun-17	Chris Gray	Document content reviewed – no changes necessary.
G	16-May-18	Chris Gray	Document content reviewed – no changes necessary.
H	15-May-19	Chris Gray	Document content reviewed – no changes necessary.
I	28-Apr-20	Chris Gray	Document content reviewed – no changes necessary
J	2021-04-06	Chris Gray	Document content reviewed – no changes necessary
K	2023-10-19	Efrén Garcia	Modified the document pursuant to BIS' guidance.