

# **Business Conduct Standards**

2023.05.15 Version 1.09

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# Excellence. Innovation. Simplicity. Commitment.

These core values underpin our company vision statement: to be the leader in energy-friendly solutions for a smarter, more connected world. Our values guide how we work as a team toward that vision; they inform the way we conduct ourselves within our industry and with our customers and stakeholders.

Silicon Labs' continued success is driven by our commitment to these values and by our ability to demonstrate excellence in every facet of our business. Our integrity is tested in every interaction we have and in every transaction we make. It is essential we always conduct our business affairs in accordance with the highest ethical standards in the industry.

Our Business Conduct Standards serve as a guide for ethical decision-making. This document applies to every employee, officer, director and contractor of Silicon Labs and its subsidiary companies throughout the world. It is your responsibility to read and understand the Standards along with any other Silicon Labs policies, manuals, or handbooks that apply to your job.

The Standards cannot cover every situation you will encounter, so please talk to your supervisor or our legal department when evaluating the best course of action in a particular situation. Regular review and discussion of our Standards helps us build our culture of open communication and active deliberation regarding ethical matters.

Thank you for your commitment to Silicon Labs, and to doing the right thing.

## **1.0 Values in action**

#### 1.1 Silicon Labs' values

Silicon Labs' reputation for integrity is one of our most valuable assets and is critical to our success. To safeguard our reputation and our brand, we hold ourselves to the highest standards of ethical conduct.

Our Business Conduct Standards (the "Standards") outline our expectations for our employees, officers, consultants and members of the Board of Directors. These expectations go well beyond minimum legal requirements. They are rooted in our values—the principles that define who we are and how we relate to each other, our customers and the community.

#### Our values:

- We hire, foster and empower great talent.
- We create customer value and commercial success through innovation and simplicity.
- We meet our commitments and hold ourselves accountable.
- We do the right thing!

### 1.2 Your responsibility

The Standards apply to all Silicon Labs employees, officers, consultants and members of the Board of Directors. Each of us has a responsibility to obey the law and act ethically at all times. This document provides rules you must follow as well as general guidance for resolving legal and ethical questions that may arise as you do your work.

#### Know all applicable policies

The Standards are one of many policies and guidelines for behavior at Silicon Labs. Some of our policies, such as our <u>Publicity and Disclosure Policy</u> and <u>Insider Trading</u> <u>Policy</u>, apply to all employees. In addition, you are expected to comply with all applicable Silicon Labs policies and procedures that are applicable to your position. In the event that any policy or procedure conflicts with the Standards, you should follow the Standards. All of our company policies can be found on our intranet, <u>The Circuit</u>.

#### Follow the law

The Standards do not attempt to summarize every law, rule or regulation applicable to Silicon Labs or its employees. Nevertheless, it is Silicon Labs' policy and your responsibility to comply with all laws and regulations that apply to our business. The Standards are subject to all applicable laws. If the Standards conflict with any law, you must comply with the law. Nothing in the Standards is intended (i) to amend the charter or bylaws of the Company, (ii) to change the legal duties imposed under state, federal and other applicable statutes, rules and regulations, (iii) to expand liabilities beyond applicable law, (iv) to create or imply an employment contract or term of employment or (v) to affect any rights available under state and other applicable law or the Company's charter or bylaws.

Specifically, you must comply with the laws of each country and jurisdiction in which Silicon Labs conducts its business. Significant areas of law that could apply to your job and our company's activities include: import/export controls; patent and trademark laws; anti-trust laws governing free and open competition; health, safety and environmental laws; and securities trading laws. You are expected to be familiar with the laws that affect you and your area of responsibility and to seek guidance from the Legal Department if you believe a legal issue exists.

#### Ask for help

Because no single set of guidelines or policies can anticipate and address every situation, we expect you to use sound judgment and ask for help when needed. If you have questions about interpreting or applying the Standards or any other Silicon Labs policies or guidelines, consult your manager or the Legal Department. You should also contact the Legal Department if you have questions on specific laws or regulations.

#### Know the consequences of violation

Violation of the policies described in the Standards will subject you to disciplinary action, up to and including termination of your employment. The penalties for failure to comply with laws can include fines, lawsuits, loss of business privileges and, in some cases, imprisonment.

#### Remember the Standards may change

The Standards may be amended or modified periodically. You will always be expected to comply with the most recent version of the Standards.

### 1.3 How to decide if something is ethical

Acting with integrity requires good judgment, but in many situations the best course of action is not immediately clear. If you face a difficult challenge that does not appear to be covered by the Standards, asking yourself the following questions can help you determine whether your proposed decision or action is ethical.

- Is it legal?
- Does it reflect Silicon Labs' values?
- Does it respect our employees, customers and the other people we serve?
- Do I feel comfortable with this decision?

- Would I feel proud if the outcome of this decision were reported in the news?
- What if everyone were to make this same choice?

We value an open, collaborative culture and encourage you to talk to your manager or the Legal Department when contemplating the best course of action in a particular situation.

#### 1.4 How to raise concerns

It is everyone's responsibility to help regulate and enforce the provisions of the Standards. You should be alert to possible violations and report them to supervisors, managers or other appropriate personnel. You may seek guidance from the Legal Department in unclear situations.

If you become aware of ethical issues involving the handling of actual or potential conflicts of interest, compliance with laws, accurate financial reporting and public disclosures, or violations of the Standards and wish to report violations anonymously, you may do so via <u>EthicsPoint</u>, located on the Legal page on <u>The Circuit</u>. Providing complete details of your particular situation will enable us to fully investigate the situation.

### 1.5 Retaliation Prohibited

Silicon Labs will not allow retaliation for reports, made in good faith, of actual or suspected violations of the Standards or other illegal or unethical conduct. Disciplinary action will be taken against anyone who retaliates directly or indirectly against you for making an appropriate report.

# 2.0 Conduct at work

### 2.1 Ensuring a positive workplace

Silicon Labs is committed to providing you with a healthy, safe and productive work environment where diverse viewpoints are welcomed and respected. We all have a responsibility to treat others as equals and to act in a way that enhances rather than detracts from our business.

Below is a summary of our key practices. This summary does not supersede or replace the more detailed policies found in our <u>Employee Handbook</u>, which can be found on The Circuit. Please refer to the Employee Handbook that is applicable to the geographic region in which you work.

#### Equal opportunity employment

We are an equal opportunity employer, which means each of us must base our employment-related decisions on company need and individual gualifications. Never discriminate against anyone-including employees, job applicants, customers, suppliers or partners-on the basis of age (40 or older), ancestry, color, religious creed (including religious dress and grooming practices), denial of family and medical care leave, disability (mental and physical), including HIV and AIDS, marital status, medical condition (including cancer history and genetic characteristics), genetic information, military and veteran status, national origin (including language use restrictions), race, sex (including pregnancy, child birth, breastfeeding and medical conditions related to pregnancy, child birth or breastfeeding), gender, gender identity and gender expression, sexual orientation, or any other protected status in accordance with all applicable federal, state and local laws.

#### **Preventing harassment**

You are expected to treat all employees, job applicants, customers, partners and suppliers with dignity and respect. We do not tolerate harassment of any kind, whether it occurs at the workplace or another work-

related setting (such as a business trip or Silicon Labssponsored event). Examples of prohibited harassment include but are not limited to:

- Sexual advances, actions or comments
- Negative treatment based on race, gender or other protected classifications
- Racial or religious slurs or jokes
- Any other comments or conduct that could create an offensive or intimidating work environment

#### Maintaining safety and security

A safe and harmonious workplace is essential for employees to focus on performing their jobs. Examples of conduct you are prohibited from engaging in while on Silicon Labs' property or otherwise conducting Silicon Labs business include:

- Engaging in threats or violent behavior
- Violating safety requirements or regulations
- Stealing or willfully damaging property belonging to Silicon Labs or any of our employees
- · Performing any type of illegal, immoral, or indecent act
- Falsifying verbal or written information
- Refusing to comply with a lawful request from a supervisor
- Using, distributing, selling or possessing illegal drugs or any other controlled substance, except for approved medical purposes
- Being under the influence of illegal drugs or controlled substances used for non-medical purposes
- Engaging in other actions that endanger the health or safety of your co-workers

Engaging in these activities or any other conduct, on or off the job, that adversely affects your performance, other employees' performance, or Silicon Labs' business interests will result in disciplinary action up to and including termination of employment. For more information about our hiring policies, prohibited workplace behaviors and consequences of violation, see our <u>Employee Handbook</u> on The Circuit. Please refer to the Employee Handbook that is applicable to the geographic region in which you work.

#### Diversity, equity and inclusion

Diversity, equity and inclusion is key to building a smarter, more connected world. Embracing diversity, encouraging open and respectful communications, and rejecting discrimination makes us better innovators and more accountable global citizens. We strive to foster an inclusive environment for everyone.

Every employee is expected to work smart, be considerate of their teammates, and contribute to a collaborative, positive, and healthy environment in which we can all succeed. Specifically, we:

- Hold ourselves accountable for driving change
- Encourage open and respectful communications
- Recognize different thoughts and diverse backgrounds
- Reject discrimination
- Foster a culture of inclusion and belonging
- Avoid using language in written and printed content that includes stereotypes, outdated metaphors and technically non-useful, offensive or inaccurate names or descriptions

# 2.2 Protecting Silicon Labs' data and assets

Intellectual property is what fuels our success at Silicon Labs. The products we create, the processes we develop and the knowledge we gain are our most valuable assets. These assets are considered confidential and proprietary to Silicon Labs. To create our intellectual property, we have also invested in valuable physical assets like computers, software and manufacturing equipment. The loss, theft, misuse or unauthorized disclosure of any of these assets jeopardizes our success.

You are personally responsible for protecting Silicon Labs' assets in general, as well as those specifically entrusted to you. This includes assets you have been authorized to provide to other employees, contract personnel, clients or other third parties. To protect these assets, you should know and understand our security controls, processes and practices. You should be aware of situations that could put our assets at risk of loss, theft, misuse or unauthorized disclosure, and report them to your manager right away.

#### Proprietary and confidential information

Every employee of Silicon Labs has executed a proprietary information agreement or nondisclosure agreement. Depending on when you joined Silicon Labs, which office you work in, or your particular job, your agreement may have a different title. Regardless of its title, the agreement you signed takes precedence over the general descriptions and guidelines provided in the Standards and you should refer to it if you have any particular concerns. Our <u>Employee Handbook</u> also contains procedures and guidelines to ensure that Silicon Labs' intellectual property assets are protected and utilized appropriately. Maintaining the confidentiality of our intellectual property and proprietary/confidential information is a specific condition of your employment with Silicon Labs. You may not use Silicon Labs' proprietary information for your own purposes or share it with any other party except when disclosure is authorized by Silicon Labs or is legally mandated. Please contact the Legal Department if you believe you have a legal obligation to disclose confidential information.

Unauthorized use or disclosure of Silicon Labs' intellectual property or proprietary/confidential information could subject you to disciplinary action up to and including termination of your employment.

#### Silicon Labs intellectual property

As a Silicon Labs employee, you will have access to and may develop intellectual property. All of this intellectual property is the property of Silicon Labs, regardless of whether you developed it alone or in conjunction with other employees.

You are required to disclose to Silicon Labs all intellectual property you create while performing your job, using our company's resources, or that relates to our products or business. You should seek advice and direction from the Legal Department if you believe you have developed intellectual property that does not belong to Silicon Labs or if you intend to file for a patent other than through Silicon Labs. You must also provide us with copies of any patents you have applied for or obtained.

Your rights and obligations regarding Silicon Labs' intellectual property are described in your proprietary information agreement or nondisclosure agreement. You are not permitted to bring intellectual property from prior employers to Silicon Labs. Similarly, if you leave Silicon Labs for any reason, including retirement, you must return all documents and media that contain proprietary information, and you may not disclose or use that information after your employment ends. After you leave the company, Silicon Labs continues to own the intellectual property you created as a Silicon Labs employee.

Violating Silicon Labs' policies on intellectual property ownership rights will result in disciplinary action, up to and including termination of your employment. If you misuse our intellectual property for your own benefit or for the benefit of a third party, Silicon Labs may bring legal action against you to enforce our rights or to recover our intellectual property.

#### **Trademarks**

Silicon Labs uses many trademarks—words, names, symbols and designs—to identify and distinguish our company and its products. It is imperative these be used in a consistent way to ensure maximum recognition in the marketplace. Silicon Labs' <u>Trademark Use Guidelines</u> provide guidance for use of our trademarks along with a current list of these trademarks including appropriate trademark symbols. You may use Silicon Labs' trademarks, product names and other names in text to refer to Silicon Labs' products, services and related technology only if you follow the Trademark Use Guidelines and your use is accurate, fair and not misleading. Consult with Corporate Marketing if you have any questions about the proper use of our trademarks.

#### Use of Silicon Labs assets and premises

We all have a responsibility to protect Silicon Labs' property as we would protect our personal possessions. Any theft, carelessness or waste could compromise confidential information, cause unnecessary expense, and ultimately affect our profitability.

## Examples of Silicon Labs' assets include our:

- Bank accounts
- Electronic equipment, including computers and laptops
- Computer network
- Email system
- Voicemail system
- Connection to the Internet
- Rented property (including rental cars)

All Silicon Labs-owned assets should be used only for legitimate business purposes. Incidental personal use of such property and systems-meaning use that is limited in duration, does not violate company policies, and does not interfere with doing your job-may be permitted by management. However, it is never permissible to use Silicon Labs equipment or systems for visiting Internet sites that feature sexual content or gambling, that advocate intolerance of others, or that are inconsistent with Silicon Labs' values and business interests. It is also inappropriate to use them in a manner that interferes with your productivity or the productivity of others. Use of Silicon Labs' assets for your personal financial benefit or profit is never permitted. You may not use Silicon Labs' resources to support secondary employment, outside business ventures or personal political activities.

# 2.3 Protecting co-workers' personal information

In your work you may have access to the personal information of your Silicon Labs co-workers. You have a responsibility to protect that information, using and disclosing it only as permitted by Silicon Labs' policies or practices.

# 2.4 Reporting, recording and retaining information

Every Silicon Labs employee records or reports information of some kind, and we are all responsible for doing so in an honest, accurate and thorough manner.

#### Integrity of public disclosures

Silicon Labs is committed to providing our shareholders with full, fair, accurate, timely and understandable information. We do so through the public disclosure documents we file with the U.S. Securities and Exchange Commission (SEC) and through other public communications. Employees who maintain and prepare our books, records and accounts are expected to record all transactions in a manner that is accurate, complete, and in compliance with required accounting principles and company policies. Although certain employees are more directly involved in preparing our public disclosure documents and public communications than others, we all have an ethical responsibility to ensure their completion by promptly and accurately responding to preparers' requests for related information.

You are prohibited from taking any action to improperly influence, coerce, manipulate or mislead the Company's internal or outside auditors or to prevent such persons from performing a diligent audit of the Company's financial statements.

#### Accurately reporting expenses and activities

You are expected to keep accurate, honest records of all business-related expenses you incur and all business activities you have been specifically requested to track and report. Reporting inaccurate or incomplete information, or reporting information in a way that is intended to mislead or misinform those who receive it, is strictly prohibited and could lead to disciplinary action up to and including termination of employment.

# Examples include of dishonest reporting include:

- Submitting an expense report for reimbursement of business expenses not actually incurred
- Misrepresenting personal expenses as reimbursable business expenses
- Over-reporting or under-reporting hours worked (if paid hourly)
- Making false or misleading statements in external financial reports, environmental reports, import/export documentation, or other documents submitted to or maintained for government agencies

#### **Retaining information**

When Silicon Labs is involved in litigation, you may receive a legal hold notice from a member of the Legal Department. This notice will include instructions to preserve evidence that may be used in the litigation. If you receive a legal hold notice, you must follow its instructions and must not change, delete, move or destroy any of the written or electronic documents or emails described in the notice. Failure to comply may adversely affect the litigation and subject both you and Silicon Labs to court-imposed sanctions. You may also be subject to disciplinary action up to and including termination of your employment.

# 3.0 Conduct in the market

### 3.1 Anti-bribery and anti-corruption

We are committed to competing fairly and winning business only on the merits of our products, services and people. We do not tolerate bribery or corruption in any form, as it severely harms the integrity of our company and the markets we serve.

#### Complying with the Foreign Corrupt Practices Act

Silicon Labs requires full compliance with all laws prohibiting corruption and bribery, including the U.S. Foreign Corrupt Practices Act (FCPA). The FCPA prohibits offering, promising or giving anything of value to any foreign official to help Silicon Labs keep or obtain business or gain some other improper business advantage.

The FCPA's accounting provisions also require us to keep accurate books and records that represent all of our financial activity, and to maintain a system of internal controls. This applies to all business activities, not just those involving foreign officials.

For additional information, please consult our <u>Anti-Bribery</u> and <u>Anti-Corruption Policy</u>. Report any suspicious activity to your manager or the Legal Department.

Every employee, officer and director of Silicon Labs and its subsidiaries, whether resident in the United States or in any other country, is required to comply with the FCPA and any other laws prohibiting corruption and bribery.

Compliance with the FCPA is only one part of Silicon Labs' policies on anti-bribery, fair competition and ethical conduct, as described in the Standards. Our own policies are not restricted to dealings with foreign officials, for example, and govern all of your interactions with customers, vendors, suppliers, local government officials and all other third parties that do business with Silicon Labs.

#### Working with suppliers

When making a purchase of any size, always choose suppliers based on impartial facts such as cost, quality and level of service. Whether you work in procurement or in another capacity, do not exert or attempt to exert influence to obtain special treatment for a particular supplier. Even appearing to do so can undermine the integrity of our established procedures.

Not only is seeking reciprocity contrary to Silicon Labs policy, but it may also be unlawful. Never tell a prospective supplier your decision to buy their goods or services is dependent upon the supplier's agreement to buy Silicon Labs' products or services. This does not mean a Silicon Labs customer cannot be a Silicon Labs supplier or that we can never consider our other relationships with a supplier when evaluating their merits. It simply means our decision to buy goods and services from a supplier must be made independently and apart from the supplier's decision to buy Silicon Labs' products and services.

#### Working with competitors

In many cases it is clear when Silicon Labs is directly competing with another company for business. However, sometimes a supplier, partner or other company we work with closely may also be a competitor. Be mindful of this dynamic when you talk to the competitor and avoid disclosing confidential information or other details that could erode Silicon Labs' competitive advantage.

### 3.2 Gifts and amenities

Gifts can help us express and receive gratitude, but in business it is sometimes difficult to judge which gifts are appropriate to exchange. Silicon Labs' general guideline is this: Employees should not give or accept gifts if doing so might compromise or appear to compromise the objectivity of business decisions.

#### Accepting gifts

Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on Silicon Labs. You may never accept gifts of cash, cash equivalents, stock or other securities. Gifts intended to benefit Silicon Labs rather than you personally must be turned over to Silicon Labs for appropriate disposition.

All business meals and entertainment must be customary, unsolicited, infrequent, in good taste, reasonable in value and provided for legitimate business reasons. You should politely decline gifts or entertainment that do not comply with Silicon Labs' policies. If that would be difficult or embarrassing to the giver, ask your manager or the Legal Department for advice.

#### **Giving gifts**

Many of the same general concepts and precautions relating to accepting gifts and entertainment also apply when providing gifts or entertainment to employees of commercial businesses. You must also comply with the gift and entertainment policies of the recipient's organization. If you expect to be reimbursed for the cost of the gift or entertainment, you must comply with Silicon Labs' <u>Travel Policy</u> and <u>Expense Reimbursement Policy</u>.

The rules relating to doing business with government entities and their employees are much more strict and complex. Employees must always comply with legal requirements and government rules relating to gifts, entertainment or other personal benefits provided to government employees or officials.

When dealing with governments outside the United States, always comply with local legal requirements and follow our <u>Anti-Bribery and Anti-Corruption Policy</u>, which applies to all Silicon Labs employees worldwide.

## 3.3 Competing fairly

You are expected to behave honestly and ethically when conducting Silicon Labs' business, and to deal fairly with our customers, suppliers, competitors and employees. You should avoid taking unfair advantage of these individuals through tactics such as:

- Manipulation
- Concealment
- Abuse of privileged information
- Misrepresentation of material facts

Any comparisons you make between Silicon Labs and our competitors must be substantiated by fair, unbiased, repeatable testing, and the results must be complete, accurate and not misleading. Certain countries prohibit comparative advertising. If you have questions about your marketing materials, seek the advice of the Legal Department or Corporate Marketing.

# 3.4 Acquiring and using the information of others

#### Personal information about individuals

As part of your work, you may have access to personal information about employees of our customers, suppliers, partners and other third parties. You may only use such information to the extent necessary to fulfill your assigned job responsibilities, and following instructions issued by management or applicable Silicon Labs policies, directives and guidelines. You may not use or alter the personal information inappropriately or disclose it to anyone who does not have a legitimate need for such information. If possible, make the information anonymous before its disclosure. If you suspect personal information has been lost or stolen, please report it immediately to the Legal Department.

# Proprietary and confidential information owned by others

The nature of our business often requires us to use, exchange or disclose information of others, and they may consider this information to be their trade secrets or intellectual property. If you receive another party's proprietary information, even inadvertently, be careful to prevent any accusation that Silicon Labs misappropriated or misused the information. Keep in mind this applies to confidential information you may have gained in your previous employment—you may be under an ongoing contractual obligation not to disclose that information.

You should receive or use confidential information owned by others only if you are clearly authorized to do so and if you have confirmed that a confidentiality agreement is in place between Silicon Labs and the other party.

The terms, restrictions and other conditions that apply to using confidential information can vary widely so it is important you understand and comply with the applicable obligations. Contact the Legal Department to request a confidentiality agreement or learn if a party already has one in place.

## 3.5 International trade compliance

The vast majority of Silicon Labs' revenue is generated internationally. To maintain this important revenue source and our international reputation, it is imperative we follow export compliance laws as well as our own related policies and procedures. If your position involves exporting or shipping our products internationally, contact your manager about receiving additional training on Silicon Labs' import/export policies and procedures.

## 3.6 Working conditions

Silicon Labs has adopted the Responsible Business Alliance <u>Code of Conduct</u>, which establishes standards to ensure that working conditions in the electronics industry are safe, that workers are treated with respect and dignity, and that business operation are environmentally responsible and conducted ethically. Silicon Labs adheres to this standard internally, and requires all of its suppliers in its supply chain to acknowledge and implement the RBA Code of Conduct or a similar industry-standard code of conduct.

# 4.0 Conduct outside of work

#### 4.1 Conflicts of interest

A conflict of interest exists when an individual's private financial interests in any way interfere—or even appear to interfere—with the interests of Silicon Labs. A conflict situation can arise when you take actions or have interests that make it difficult to perform your work for Silicon Labs objectively and effectively. Conflicts of interest also arise when you or a member of your family receives improper personal benefits, either directly from Silicon Labs or via a third party, because of your position at our company.

You are required to disclose any conflicts of interest, including any material transaction or relationship involving a potential conflict of interest. If you become aware of a potential or actual conflict of interest (whether or not it involves you), you should bring it to the attention of your supervisor and Silicon Labs' General Counsel.

Executive officers and their family members are prohibited from accepting any personal loans from the Company or allowing the Company to guarantee any of their personal obligations, except as may be permitted under federal law.

#### Working for competitors or suppliers

You may not work simultaneously for the Company and for any competitor, customer, supplier or business partner, whether as an employee, consultant or board member, without the prior written approval of the Company's Chief Financial Officer and General Counsel. To avoid any potential conflicts of interest, you are encouraged to avoid any direct or indirect business relationship with the Company's competitors, customers, suppliers or business partners, unless you have fully disclosed such relationship to the Company and obtained written approval from Silicon Labs' General Counsel.

#### **Personal financial interests**

You must disclose to Silicon Labs any financial interest you have that may conflict with Silicon Labs' business or give the appearance of a conflict of interest. This may include second jobs or significant investments or direct or indirect ownership in companies that are Silicon Labs' competitors, customers or suppliers. It may also include personal activities that require a significant amount of your time during normal working hours. If we determine that your outside employment or interests interfere with your performance or ability to meet your job requirements, we may require you to terminate the outside employment or interests if you wish to remain employed with Silicon Labs.

You are not permitted to receive income or other material gain (such as commissions, profit sharing or referral fees) from individuals or companies outside Silicon Labs for materials produced or services rendered while performing your job at Silicon Labs. If such a condition exists, report it to the Legal Department.

You are not permitted to refer Silicon Labs' business (such as the purchase of services, merchandise or supplies for internal use) to any person or company in which you or another Silicon Labs employee have a direct or indirect financial interest unless all of these conditions are met:

- You have disclosed that financial interest to the Legal Department;
- The person or company in question offers a competitive bid; and
- The Legal Department has given written approval.

### 4.2 Corporate opportunities

You owe a duty to the Company to advance its legitimate interests whenever the opportunity to do so arises. This means that you may not take for yourself, personally or through any family member, a business opportunity that properly belongs to the Company or that you discover through the use of the Company's property or proprietary information, or through your position with the Company. Similarly, you must not use such property, information or your position for improper personal gain or to compete with the Company in any way.

### 4.3 Inside information and insider trading

Silicon Labs is a publicly traded company and must strictly follow the United States' federal securities laws. To comply with insider trading regulations, we all have a responsibility to keep material nonpublic information confidential prior to its official public release.

Material nonpublic information is information about Silicon Labs that is not generally known to the public and would be considered influential to a shareholder's decision to buy or sell our stock. Examples may include yet-to-be-announced financial information, mergers or acquisitions, supplier or customer relationships, changes in senior executive management and new products.

As a Silicon Labs employee, you may have knowledge of such material nonpublic information. Federal securities laws prohibit you from using this information to gain profits or avoid losses in the stock market. Such activity is considered insider trading. Likewise, you must never share inside information with any other person, including friends and family members, who might use it to trade stock. Even if you don't intend for someone to act on the information, sharing it would violate your confidentiality obligations to Silicon Labs and could result in accusations of insider trading against you or our company. Insider trading violations can have serious consequences including imprisonment. For more information, see our Insider Trading Policy.

## 4.4 Speaking publicly and social media

Only the authorized spokespersons of Silicon Labs are permitted to speak publicly on behalf of Silicon Labs. See our <u>Publicity and Disclosure Policy</u> for more details and a list of these spokespersons. If you choose to speak on your own behalf, including on social media, concerning your personal opinions about Silicon Labs or its products, we request that you make sure your comments are fair, honest, accurate and in line with our <u>Social Media Policy</u> and <u>Brand Guidelines</u>. Use the same guidelines you would follow with any other type of communication, and avoid revealing any confidential information such as future product launches or trade secrets.