

MACOM HUMAN RIGHTS POLICY

MACOM Technology Solutions Holdings, Inc. and each of its subsidiaries (collectively, “MACOM”) is committed to upholding and respecting human rights for all people by conducting business with the highest ethical standards and in compliance with applicable laws and Company policy.

This MACOM Human Rights Policy (this “Policy”) establishes standards for global business conduct related to human rights and labor and provides a cornerstone for MACOM to identify and manage its human rights impacts and mitigate applicable risks. We welcome collaborative and transparent engagement with our investors, customers, employees, partners, contractors, vendors and other stakeholders in the implementation of this Policy and the evaluation of its effectiveness.

Human rights are the fundamental rights, freedoms and standards of treatment recognized by a majority of governments, businesses and individuals around the world as belonging to all human beings by virtue of being human. MACOM seeks to uphold these rights in accordance with international frameworks and guidance such as the [United Nations International Bill of Human Rights](#), the [OECD Guidelines for Multinational Enterprises](#), the [United Nations Guiding Principles on Business and Human Rights](#) (“UN Guiding Principles”) and the [International Labour Organization’s Declaration on Fundamental Principles and Rights at Work](#).

Respect for human rights, including vulnerable groups such as children, women and members of minority groups including indigenous peoples, is integrated into how MACOM carries out its business operations and managed across many different initiatives. As a values-based company, we believe it is important to formalize our approach in a single policy which details our commitment.

MACOM’s approach to human rights is anchored in the UN Guiding Principles, which states that business enterprises should have policies and processes in place to meet their responsibility to respect human rights. This includes the following:

- a. A policy outlining a commitment to respect human rights;
- b. A due-diligence process to identify, prevent, mitigate and account for how adverse human rights impacts are addressed; and
- c. Processes that enables the remediation of any adverse human rights impacts that may be caused or contributed to by business operations.

Policy Scope

MACOM expects all employees and partners, contractors, subcontractors, vendors, suppliers, recruiters, and others with or through whom MACOM conducts business (collectively, “business partners”) to comply with each of the following, as applicable, regardless of geographical location:

- this Policy;
- MACOM Policy Against Modern Slavery;
- MACOM Code of Business Conduct and Ethics;
- MACOM Supply Chain Code of Conduct; and

- relevant laws, regulations and international frameworks upholding human rights, including those listed in this Policy.

MACOM complies with United States laws and the laws of each market in which we conduct business. This Policy goes beyond mere compliance with law. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

Policy Principles & Commitments

All business partners are expected to educate their relevant employees and commercial partners to ensure they understand and comply with this Policy. **MACOM business partners also are expected to take appropriate action, including the adoption of policies and procedures, to ensure their MACOM-related activities and value chains meet compliance expectations comparable to those in this Policy, even if the Policy does not expressly state that an expectation applies to MACOM business partners.**

Any violation of this Policy could result in remedial action, including termination of a business relationship or employment.

Commitment to Diversity: MACOM values diversity, equity, inclusion and belonging. We strive to advance principles of diversity, equity, inclusion and belonging in the workplace.

Nondiscrimination and Anti-Harassment: We are committed to equal opportunity for all applicants and employees. We strive to provide an inclusive environment free from all forms of discrimination and harassment on the basis of race, color, creed, national origin, ancestry, religion (including religious dress and grooming), sex, pregnancy (including perceived pregnancy) and childbirth or related medical condition, sexual orientation, gender (including gender identity and gender expression), marital status, registered domestic partner status, age, physical or mental disability, medical condition, genetic information, genetic characteristics, veteran status, uniform service member status or any other characteristics protected by applicable law. MACOM employees are expected to treat co-workers, customers, and business partners with dignity and respect. We are committed to providing a workplace free of sexual harassment as well as harassment based on any of the factors described above. Harassment or abuse of employees by managers, co-workers, customers or business partners is prohibited. Refer to MACOM's Policy Against Unlawful Discrimination, Harassment and Retaliation for additional information on these matters.

Workplace Safety: MACOM is committed to providing a healthy and safe workplace for our employees and contractors, along with protecting the communities in which we operate. MACOM will seek to provide a secure work environment for the protection of our employees, product, materials, equipment, systems and information. We expect our employees to comply with all applicable safety and health laws, and we seek to implement programs and processes to achieve greater protection, where appropriate. We expect MACOM employees and contractors to, as applicable: (1) ensure that all employees and contractors are qualified and equipped to perform activities safely; (2) promptly inform MACOM of any health and safety incidents that occur while performing services for or on behalf of, or delivering goods to, MACOM or its clients; and (3) provide adequate resources to manage workplace safety and to ensure that all personnel understand and properly exercise safety practices and procedures.

Fair Wages, Work Hours and Benefits: We compensate employees competitively relative to our industry and local labor markets and operate in full compliance with applicable wage, work hours, overtime and benefits requirements. Workers may not be required to work more than the maximum hours of daily labor set by applicable law.

Prohibition Against Modern Slavery; Child Labor: MACOM prohibits the use of all forms of forced labor (including indentured labor and bonded labor), modern slavery and human trafficking in our business and value chain. Refer to MACOM’s Policy Against Modern Slavery and our [Supply Chain Code of Conduct](#) for additional information on these matters. MACOM prohibits the use of child labor to be used in any stage in its value chain. We require that all employees of MACOM and its business partners be of the appropriate age as defined by applicable local and national laws. Workers under the age of 18 should not perform hazardous work, overtime or night shift work.

Freedom of Association/Collective Bargaining: MACOM recognizes that employees have the right to freely associate or not associate with third party organizations such as labor organizations, along with the right to bargain or not bargain collectively in accordance with relevant laws. MACOM respects those rights and fosters an environment of open communication, where employees can speak with their managers and team about their ideas, concerns or workplace issues. We encourage our employees to share their ideas, concerns or suggestions through an environment of cooperation and teamwork.

Product Responsibility: Most MACOM products are general-purpose semiconductor products that can be incorporated into countless systems and applications and that are sold to end users by distributors, system manufacturers, and others, and not directly by MACOM. While we do not always know nor can we control what products our customers create or the applications end-users may develop, MACOM does not support and, where feasible, may seek to pursue remedial action for, our products being used in connection with the violation of human rights.

Privacy and Freedom of Expression: MACOM is committed to the right of privacy and freedom of expression, and we seek to protect those rights against unauthorized access, use, destruction, modification, or disclosure of personal information and data. We have a company-wide Global Internal Privacy Policy. We also have an [External Privacy Policy](#) on our website concerning the data we collect in connection with our business operations.

Environmental Stewardship: We seek to ensure the environmental integrity of our processes and facilities at all time and take a precautionary approach to the materials used in our products. As part of these efforts, we strive to conserve energy, water, and other natural resources and work to reduce the environmental impact of waste generation and emissions to the air, water, and land. MACOM recognizes that water is a critical natural resource that is of strategic importance to our business and the communities in which we operate. MACOM is committed to respecting the human right to water.

Supplier Responsibility: As explained more fully in our [Supply Chain Code of Conduct](#), MACOM is committed to ensuring that working conditions are safe, workers are treated with respect and dignity and that business operations are environmentally responsible and conducted ethically. In order to be successful in this commitment, it is imperative that our suppliers are committed to supporting our efforts and comply with our Supply Chain Code of Conduct, which is aligned with the Responsible Business Alliance (RBA) Code of Conduct. In addition, MACOM expects its suppliers to operate in full compliance with all applicable laws, rules and regulations.

MACOM is also committed to the responsible sourcing of minerals. We have developed strong management systems and a due diligence framework in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. MACOM expects its suppliers to use responsibly sourced tin, tantalum, tungsten and gold in the products they sell to MACOM, and to put in place policies and procedures that support responsible sourcing and are consistent with our [Conflict Minerals Policy](#).

MACOM Information Requests

MACOM may from time to time request information from applicable business partners in connection with assessing their and MACOM's value chain's compliance with this Policy. Business partners are expected to provide MACOM with all information requested, on a timely basis.

Grievance Reporting & Remediation

MACOM employees should report any suspected violations of this Policy, or human rights generally, to their supervisor, the MACOM Legal Department or by following the "Whistleblower Procedures" set forth on our Intranet. Our employees receive training on this Policy and other related policies and procedures, as appropriate.

Other persons may report suspected violations of this Policy, or human rights generally, to MACOM at the email: humanrights@macom.com.

We will promptly investigate allegations and seek to pursue appropriate action to mitigate and remediate any adverse human rights impacts. MACOM does not tolerate retaliation or threats of retaliation against anyone who in good faith reports possible violations of law, this Policy, MACOM's Code of Conduct and Business Ethics, MACOM's Supply Chain Code of Conduct or other MACOM policies or procedures, questions on-going or proposed conduct, or participates in an internal investigation or governmental audit or investigation.