



Marvell Technology Group Ltd. and its subsidiaries and affiliates (“Marvell”) would like to take this opportunity to express appreciation for the services you provide us and to thank you for conducting business in accordance with Marvell’s ethics and compliance policies. Marvell is committed to conducting its business in accordance with applicable laws and regulations and strives to be a socially and environmentally responsible partner in the supply chain drawing upon internationally recognized standards and best practices. This commitment enables Marvell to advance social and environmental responsibility and business ethics, and extends to Marvell’s supply chain to which you provide a valuable role.

This Supplier Code of Conduct¹ (“Code”) sets forth basic standards that Marvell expects its Suppliers² to adopt and implement, regardless of local business practices or social customs. Marvell Suppliers and their employees are expected to conduct themselves in a professional manner, and to treat others with respect, fairness and dignity. Marvell does not tolerate harassment or discrimination. Every business decision must demonstrate the highest standards of ethical business conduct. This commitment is unwavering and applies to all Suppliers through Marvell’s supply chain.

A. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Any work done for Marvell must be performed in full compliance with all applicable laws and regulations in each country in which the Supplier operates, including without limitation those relating to:

- (i) the import, export and re-export of commodities, materials, technical data and software;
- (ii) health and safety;
- (iii) labor and employment;
- (iv) illegal payments to improperly influence any business decision and bribery (including the Foreign Corrupt Practices Act, the U.S. Federal Procurement Integrity Act or the U.K.’s Bribery Act of 2010);
- (v) the environment; and
- (vi) the use, treatment, disposal and handling of hazardous chemicals and materials.

Where applicable, Marvell expects its Suppliers to comply with California Transparency in Supply Chains Act (SB 657) that requires efforts to eradicate slavery and human trafficking from their direct supply chains. SB 657 requires disclosures regarding verification, auditing, certification, internal accountability and training.

B. ADOPTION AND IMPLEMENTATION OF ELECTRONICS INDUSTRY CITIZENSHIP COALITION CODE OF CONDUCT (THE “EICC CODE”)

Marvell Suppliers and their own respective suppliers are expected to comply with the latest version of the EICC Code available at <http://www.eicc.info/index.shtml>. Suppliers shall provide Marvell with the certificate of compliance to the EICC Code, when requested. Marvell will assess conformance to these requirements and may consider Supplier’s conformance in making sourcing and procurement decisions.

Marvell Suppliers must also comply with Marvell’s Policy Statement on Conflict Minerals, which is posted on the Marvell website at www.marvell.com.

C. COMPLIANCE WITH MARVELL CODE OF ETHICS

Our commitment to the highest ethical standards is documented in the Marvell Code of Ethics, which is available on the Marvell website at www.marvell.com. Marvell requires its Suppliers to implement the entire Marvell Code of Ethics as set forth therein.

¹ Marvell’s Supplier Code of Conduct may be amended from time to time by Marvell.

² For the purposes of this document “Suppliers” means any company, corporation or other entity that sells or seeks to sell goods or services to Marvell, including the Supplier’s employees, agents, service providers, manufacturers, contractors, subcontractors and other representatives.

D. SUPPLIER RESPONSIBILITY

1. Self Assessment

Marvell uses the EICC-ON tool to identify and manage supply chain risk, and improve performance related to labor practices, health and safety, ethics and environmental activity. At the time of becoming a Supplier, and again on an annual basis, Supplier will have an authorized representative register with EICC-ON and complete, submit and share the Self Assessment Questionnaire (“SAQ”). A Corporate SAQ will be completed along with a Facility SAQ for each manufacturing facility that supplies Marvell. If the Supplier fails to completely, accurately and timely fulfill this requirement, Marvell may initiate Business Action (as described in D.3 below). Results of the SAQ will be used by Marvell to risk assess and identify Suppliers for further engagement, including onsite audits.

2. Audit

Marvell may assess Supplier’s compliance with this Code from time to time as considered necessary. Marvell may, or partner with third parties to, conduct onsite audits or issue-based reviews of Supplier’s conformance with this Code without notice, notwithstanding any term in the Supplier’s agreements with Marvell. Supplier will make reasonable efforts to pass through the audit requirement to its Suppliers and will delegate such authority to Marvell upon request. Any audit will be conducted at Supplier’s expense.

The audit results will be categorized using EICC standards and communicated through a written report transmitted via an email to the Supplier. The Supplier will have fourteen (14) days to submit an acceptable corrective action plan for each finding identified (7 days for priority findings). Marvell may accept or reject any action plan at its sole discretion based upon best practices and industry standards for resolution of such findings.

3. Business Action

If Supplier refuses to allow or fails to cooperate with an audit, fails to meet the requirements of this Code, or has audit findings that are not resolved, then Marvell may initiate a Business Action that may include, at Marvell’s discretion, escalated meetings with Supplier’s management, a termination of existing business and/or a determination not to award future business (“Business Action”).

E. REPORTING

If you have questions/concerns about compliance or ethics issues while supporting the Marvell supply chain and operations, please discuss them with your Marvell liaison or business contact. In addition, Marvell has a toll-free confidential Concern Line, managed by EthicsPoints, an independent firm specializing in handling anonymous telephone reports. You can call the Marvell Concern Line with questions on compliance, ethics issues, or to report illegal or unethical activities. Also, the Marvell Concern Line can be used to raise complaints regarding accounting, auditing matters or internal controls, and for reports about questionable accounting and auditing matters. The Marvell Concern Line is available 24 hours a day, 7 days a week, on a worldwide basis and is confidential. Callers in the United States should call 1-888-366-6024. Callers outside the United States should visit <http://concernline.marvell.com> for international dialing instructions.

Thank you for being a valuable partner in Marvell’s commitment to demonstrate corporate social responsibility, robust legal compliance and strong business ethics.

Revision 1.0 February 2014

CONTACT US: For additional information, please visit our website at www.marvell.com.



Marvell Technology Group

Copyright © 2014. Marvell. All rights reserved. Marvell and the Marvell logo are registered trademarks of Marvell. All other trademarks are the property of their respective owners