

# SITIME CORPORATION

## SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS

It is the policy of SiTime Corporation (the “**Company**”) to conduct its business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable laws. In furtherance of this, the Company has adopted this Supplier Code of Business Conduct and Ethics (the “**Code**”). The Code applies to all of the suppliers of the Company. For purposes of this Code, a “supplier” is any entity or person that provides goods or services to the Company, including supplier’s directors, officers, employees, agents, and other representatives. Suppliers will be responsible for ensuring that any subcontractors or other third parties they employ in their provision of goods or services for the Company will act consistently with this Code.

Suppliers are required to promptly inform the Company when any situation develops that causes the Supplier to be in violation of this Code. Compliance with this Code is required in addition to any other obligations in any agreement Suppliers may have with the Company. The Company may require Suppliers to provide evidence of compliance with this Code, conduct audits of the operations of Suppliers to assess compliance with the Code, or require Suppliers to provide self-audit reports. Those Suppliers who violate the standards in this Code or who fail to cooperate with the Company to effect compliance with this Code may be subject to disciplinary action, possibly including termination of doing business with the Company.

### **1. Compliance with Laws**

All Suppliers shall comply with all applicable laws and regulations while conducting business with or on behalf of the Company. Suppliers shall comply with applicable privacy and information security laws and regulations regarding personal information. Suppliers shall also comply with all applicable export, import and economic sanctions laws and regulations.

Suppliers that provide raw materials, product components or manufacturing services to or on behalf of the Company shall align their business code of conduct with the RBA Code of Conduct available at <http://www.responsiblebusiness.org>, as updated from time to time.

### **2. Labor and Human Rights**

Suppliers shall uphold the human rights of workers and treat them with dignity and respect by applicable international standards. Suppliers must not engage in forced, prison, indentured or slave labor, human trafficking or the hiring of trafficking and debt bondage victims. Suppliers must ensure that: all work must be voluntary and such workers must not be required to surrender any identification materials as a condition of employment; no child labor will be used; working hours shall not exceed the maximum set by local law; wages shall be set in accordance with local laws; workers shall be provided all legally mandated benefits; workplaces are free of harassment and unlawful discrimination; in conformance with local law, employees shall enjoy the freedom of association; and all employees shall be treated humanely including without threat, coercion, verbal abuse, or physical discipline. Suppliers should refer to the International Labor Organization Conventions No. 29 and 105, the Supplementary Convention on the Abolition of Slavery, the Slave

Trade and Institutions and Practices, and the Protocol to Prevent, Suppress, and Punish Trafficking in Persons Especially Women and Children.

### **3. Health and Safety**

Suppliers will maintain a safe and healthy work environment that complies with all applicable health and safety laws. Suppliers are expected to: implement appropriate controls, procedures, and protective measures to mitigate health and safety risks; implement emergency plans and response procedures; adopt procedures and systems to prevent, manage, and report occupational injury and illness; minimize worker exposure to chemical, biological, and physical agents; minimize potential harm caused by physical work and hazardous equipment; ensure a sanitary working and living environment; and provide workplace health and safety information and training.

### **4. Environmental Protection**

The Company values environmental responsibility and requires Suppliers: comply with applicable environmental laws and regulations, obtain and maintain all required environmental permits and registrations that apply to their business; identify, manage, store, reduce and dispose of or recycle all hazardous waste in compliance with applicable law; monitor and minimize emissions and discharges of pollutants as well as generation of waste; monitor and treat all air emissions and wastewater discharges as required by law; prohibit or restrict the use of certain environmentally hazardous substances in process, operation and products pursuant to applicable laws and regulations; and establish a greenhouse gas reduction goal and minimize energy consumption and greenhouse gas emissions. Supplier is to provide product environmental documentations (such as EU RoHS, EU REACH) upon request.

### **5. Ethics**

Suppliers are expected to operate with the highest level of integrity and ethical standards and in accordance with all applicable laws, including but not limited to the following:

#### **a. Anti-Corruption or Bribes**

Suppliers shall not engage in corruption, bribery, extortion or embezzlement. Suppliers will act in accordance with local and international laws and regulations regarding anti-corruption. Suppliers shall not offer, promise, or give bribes or other means of obtaining undue or improper advantages. Suppliers shall not offer, promise or provide to any Company employee or agent a money, gift, favor, or anything of value that is perceived or intended, directly or indirectly, to influence any business decision of the Company or that is in violation of applicable laws. This prohibition does not include inexpensive gifts, infrequent business meals, celebratory events, or entertainment, in each case provided that they are not excessive, do not create an appearance of impropriety, and are appropriate to the circumstances.

#### **b. Conflicts of Interest**

Suppliers will avoid conflicts of interest and the appearance of conflicts of interest. Suppliers shall not enter into a financial or any other relationship with a Company employee that creates any

actual or potential conflict of interest for the Company. Suppliers understand that a conflict of interest arises when the material personal interests of the Company employee are inconsistent with the responsibilities of his/her position with the Company. All such conflicts and potential conflicts must be disclosed and corrected. As requested, suppliers are to provide information regarding the smelters/refineries in their supply chains as per RMI developed Conflict Minerals Reporting Template (CMRT)

#### **c. Unfair Business Practices**

Suppliers will uphold fair business, advertising, and competition standards, and otherwise comply with all applicable antitrust and competition laws and regulations.

#### **d. Business Records and Disclosure of Information**

All information and records regarding Supplier's business activities, environmental practices, structure, financial situation, and performance should be accurate and maintained and disclosed according to applicable regulations and prevailing industry practices.

#### **e. Whistleblowers**

Suppliers shall provide programs for the protection of whistleblower confidentiality in accordance with local laws and regulations and prohibit retaliation against workers who participate in such programs in good faith.

#### **f. Restrictions on Use of Inside Information**

If through working with the Company Supplier becomes aware of material, non-public information relating to the Company or another company, Supplier may not buy or sell Company securities or another company's securities or share such information with others. "Material information" includes any information that a reasonable investor would consider important in deciding whether to buy, hold or sell securities of the Company or any securities of any other company as to which the person receives information not available to investors generally. In short, "material information" includes any information that reasonably could affect the price of our securities or any other securities.

#### **g. Respect for Intellectual Property Rights**

Suppliers shall respect intellectual property rights worldwide and will utilize intellectual property of others only in accordance with the rights licensed to Suppliers by the respective owners. Suppliers will always safeguard and protect intellectual property of the Company, its customers, and other third parties. Supplier's transfer of technology and know-how will be done in a manner that protects intellectual property rights.

### **6. Avoiding Use of Conflict Minerals**

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of

custody of these minerals and make their due diligence measures available upon request.

## **7. Supply Chain Security**

Suppliers are encouraged to become familiar with Authorized Economic Operator C-TPAT (Customs-Trade Partnership Against Terrorism), or similar security programs designed to assist Customs officials in detecting and preventing terrorists and terrorist weapons from entering the country, while facilitating the orderly and efficient flow of legitimate trade.

## **8. Management System**

Suppliers will adopt and maintain a management system designed to ensure compliance with applicable laws, regulations, this Code, and customer requirements. Suppliers' management will identify, assess, monitor, and mitigate applicable laws and regulations, and compliance risks related to their business operations. Suppliers' management will implement and facilitate plans for continual improvement, including communications, training, and employee participation.

## **9. Contact Information**

Questions or inquiries regarding this Policy should be sent to [legal@sitime.com](mailto:legal@sitime.com).