

## Allegro MicroSystems Vendor Code of Conduct

### A. Our Mutual Commitments as Business Partners

Allegro MicroSystems is committed to innovation with purpose, with a vision to move technology and the world toward a safer, more sustainable future. Allegro fosters a values-based culture that places high importance on running our business in a manner that supports this vision. Allegro seeks to be a good corporate citizen in its dealings with customers, Vendors, employees, and the communities where Allegro is located throughout the world. To ensure alignment to this vision across the supply chain, Allegro expects its Vendors to adhere to its core business values and principles. To this end, Allegro shall continue to pursue business partnerships with those Vendors that are equally committed to acting ethically, responsibly and in compliance with applicable laws and regulations.

Allegro's vendors will pledge, in all their activities, to operate in full compliance with any and all applicable laws, rules, and regulations of the countries in which they operate. This includes recognized standards such as those of the Universal Declaration of Human Rights (UDHR), the International Labor Organization (ILO), the Social Accountability International (SAI), and the Ethical Trading Initiative (ETI),

This Allegro Vendor Code of Conduct incorporates many of the principles outlined in Allegro's Supplier Code of Conduct, as well as its Code of Business Conduct and Ethics, and its Policy on Global Citizenship, all of which can be found on Allegro's website: <https://www.allegromicro.com/en/design-support/quality-and-environment>.

It is Allegro's expectation that its Vendors comply with the requirements of this Vendor Code of Conduct, without exception, and require their own suppliers and vendors do the same. All Vendors of Allegro should expect periodic visits/audits by Allegro representatives for the purpose of assessing compliance with this Vendor Code of Conduct. Violation of this Vendor Code of Conduct may result in immediate termination of the business partnership with Allegro. Additionally, any such violation may result in legal action.

### B. Respecting Labor and Human Rights

Allegro is committed to upholding the human rights of all workers, including temporary, migrant, student, contract, and direct employees, and treating them with dignity and respect as understood by the international community.

To this end, Allegro and its Vendors shall maintain a work environment that complies with the following:

#### 1. Freely Chosen Employment and Prevention of Involuntary Labor and Human Trafficking

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of intimidation, threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided, in accordance with local laws, with a written employment agreement in a language understood by the worker that describes the terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change[s] allowed in the employment agreement upon arrival in the receiving country, unless these changes are made to meet local law and provide equal or better terms.

All work is voluntary, and workers shall be free to leave work at any time or terminate employment without any penalty if reasonable notice is given. Vendors may not withhold from employees or deny a access to employees (or otherwise destroy, conceal, or confiscate) their identity or immigration documentation (i.e. government-issued identification, passports or work permits), unless the withholding of work permits is required by local law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment, including expenses associated with recruitment, processing, or placement. If any such fees are found to have been paid by workers, Vendor shall be responsible for reimbursing such fees to the worker.

## **2. Child Labor Avoidance and Young Workers**

Child labor is impermissible. The term "child" refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greater. It is permissible to utilize legitimate workplace apprenticeship programs that comply with all relevant laws and regulations. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including nightshift and overtime. As it pertains to student workers, Vendors must ensure proper management of student records, continued, thorough diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Vendors shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

## **3. Working Hours**

A work week shall not consist of more than sixty (60) hours, including overtime, except in emergency or unusual situations, and only with the consent of the workers. Workers shall have at least one (1) scheduled day off every seven (7) days and not work more than six (6) consecutive days. All overtime shall be voluntary.

## **4. Wages and Benefits**

Worker compensation shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. It is impermissible to deduct from worker wages for disciplinary purposes. Vendors shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Vendors shall pay workers in a timely manner. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labor will be within the limits of the local law.

## **5. Humane Treatment**

The harsh or inhumane treatment of workers, including bullying, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers cannot be tolerated and is a violation of this Vendor Code of Conduct. Furthermore, it is also impermissible and a violation of this Vendor Code of Conduct to threaten workers with any such harsh or inhumane treatment. Workers shall be notified of and have access to clearly defined disciplinary policies.

## **6. Non-Discrimination**

All workers deserve to work in an environment free of harassment and unlawful discrimination. Vendors shall not discriminate workers based on race, skin color, age, gender, sexual orientation, gender identity and expression, ethnicity, national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status, whether as part of the Vendors' hiring process or while workers are employed by Vendors. Additionally, Vendors' employment practices, such as wages, commissions, bonuses, promotions, rewards, and access to training shall be free from discrimination. Workers shall be provided

with reasonable accommodations for religious practices. Current or potential workers should not be subjected to medical tests or physical exams in violation of local laws or regulations and that could be used in a discriminatory manner.

## **7. Freedom of Association and Collective Bargaining**

Vendors shall respect the rights of workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, as well as the rights of workers to refrain from such activities, all subject to local laws and regulations. Workers shall be permitted to openly communicate and express ideas, concerns, and grievances with management regarding the work environment without fear of reprisal, intimidation, or harassment by management.

If workers are lawfully represented by a labor union or other employee organization, Vendors shall respect the rights of those workers to be represented by such unions and other organizations in any negotiations or in the airing of any grievances concerning or relating to the work environment.

## **8. Workplace Diversity**

Allegro successfully fosters innovation with purpose through the utilization of inclusive teams of diverse employees. It has learned through many years of experience in developing new, innovative products that teams with varied backgrounds, experiences, and ideas are critical to Allegro's success. Vendors engaged by Allegro in recruiting employees for Allegro are therefore expected to make every reasonable effort to present a diverse list of candidates for each position, without regard to race, gender, age, or other factors unrelated to their ability to perform the required functions of the position. These Vendors will document their efforts and provide evidence to Allegro upon Allegro's request.

Furthermore, Allegro expects its vendors of goods and other services will also make every reasonable effort to employ a diverse workforce and provide equal opportunity of employment to any qualified candidate without regard to race, gender, age, or other factors unrelated to their ability to perform the required functions of the position.

## **9. Licenses and Permitting**

Vendors must acquire and maintain all legally required environmental permits and business operating licenses necessary for the operation of their businesses and facilities.

# **C. Valuing Business Ethics**

Vendors shall be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.

## **1. Business Integrity**

Allegro strives to uphold the highest standards of integrity in all business interactions and as such obligates its Vendors to do the same by having a zero-tolerance policy, prohibiting any and all forms of bribery, corruption, extortion, or embezzlement.

## **2. No Improper Advantage**

Vendors shall not accept, authorize, give or promise bribes or other means of obtaining undue or improper advantage. This prohibition includes accepting, authorizing, giving, or promising anything of value, either directly

or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### **3. Disclosure of Information**

All business dealings should be transparently performed and accurately reflected on Vendor's business books and records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, or performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

### **4. Intellectual Property**

Vendors shall respect the intellectual property rights of others, and the transfer of technology and know-how is to be performed in a manner that protects intellectual property rights. Customer and Vendor information is to be safeguarded.

### **5. Fair Business, Advertising and Competition**

Standards of fair business, advertising, and competition are to be upheld.

### **6. Protection of Identity and Non-Retaliation**

Vendors shall maintain programs to ensure the confidentiality, anonymity and protection of Vendor and worker whistleblowers, unless prohibited by law. Vendors shall prohibit retaliation against workers who participate in whistleblowing in good faith or who refuse an order that is in violation of the Allegro Vendor Code of Conduct. Vendors shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations. Vendors shall have a formal communication program to ensure that every employee is fully informed of and understands the policy of non-retaliation.

### **7. Privacy**

Vendors shall commit to protecting the reasonable privacy expectations for personal information of everyone they do business with, including Vendors, customers, consumers, and employees. Vendors are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **D. Standards for Management System**

Vendors shall adopt or establish a management system designed to ensure: (a) compliance with applicable laws, regulations, and customer requirements related to the Vendor's operations, services, and products; (b) conformance to this Allegro Vendor Code of Conduct; and (c) identification and mitigation of operational risks related to this Vendor Code of Conduct. It shall also facilitate continual improvement.

This Vendor management system should contain the following elements:

### **1. Company Commitment**

Vendors shall have corporate social and environmental responsibility policy statements, affirming Vendor's commitment to compliance and continual improvement, and endorsed by executive management and posted in the facility in the local language or language(s) understood by all employees.

## **2. Management Accountability and Responsibility**

Vendor shall clearly identify senior executive[s] and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management should review the status of the management system on a regular basis.

## **3. Legal and Allegro Requirements**

Vendors shall have a process to identify, monitor, and understand applicable laws, regulations and customer requirements, including the requirements of this Allegro Vendor Code of Conduct. This includes, but is not limited to, all applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act. Under no circumstances may a Vendor contracted to represent Allegro or to distribute Allegro products offer, promise or provide anything of value directly or indirectly to a government official for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage. Failure to comply with applicable anti-bribery or anti-corruption laws and regulations will be considered a breach of the Vendor's contract with Allegro and may result in termination of the business relationship.

## **4. Risk Assessment and Risk Management**

Vendors shall have a process to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks associated with Vendor's operations. Vendors shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

## **5. Improvement Objectives**

Vendors shall have written performance objectives, targets, and implementation plans to improve the Vendor's social and environmental performance, including a periodic assessment of Vendor's performance in achieving those objectives.

## **6. Training and Competencies**

Vendors shall have programs for training managers and workers to implement Vendor's policies, procedures, and improvement objectives, and to meet applicable legal and regulatory requirements.

## **7. Communication**

Vendors must establish a process for clearly and accurately communicating information about Vendor's policies, practices, expectations, and performance to workers, Vendors, and customers.

## **8. Worker Feedback, Participation, and Grievance**

Vendor shall have ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Allegro Vendor Code of Conduct with the goal of continuously improving any such processes.

## **9. Audits and Assessments**

Vendors shall perform periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Allegro Vendor Code of Conduct, as well as any customer contractual requirements relating to social and environmental responsibility.

## 10. Documentation and Records

Vendors shall create and maintain documents and records to ensure regulatory compliance and conformity to Vendors' requirements along with appropriate confidentiality to protect privacy.

## E. Global Trade and Security

It is the policy of Allegro to ensure compliance with all export, re-export, and import laws and regulations of the United States as well as those of each foreign country's regulations in which it conducts business or in which it is located.

As a result, Allegro requires its Vendors shall not, under any circumstance, export, re-export, or import any product in violation of any applicable U.S. or foreign regulations and laws. Failure to comply will be considered a breach of the Vendor's contract with Allegro and may result in termination of the business relationship.

## F. Reporting Misconduct or Violations

Vendors are expected to promptly report any known or suspected violation of law, regulation, or Allegro policy to Allegro's Legal Department ([legal@allegromicro.com](mailto:legal@allegromicro.com)), but reports may also be made anonymously through any of the following means:

1. Hotline for US calls: AT&T Direct Code +877-821-7508
2. Hotline for calls outside the US: AT&T Direct Code for a particular country can be obtained from accessing the following link: <http://www.business.att.com/bt/access.jsp>, and entering the AT&T Direct Code +877-821-7508 (2-step process for calls outside the US)
3. Website: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=77629](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=77629)

Vendors should not provide any contact information if they wish to remain anonymous. Allegro will handle inquiries discreetly and make every effort to maintain, within the limits allowed by the law, the confidentiality of any Vendor requesting guidance or reporting a possible violation.