



**SKYWORKS®**



**Supplier Sustainability Specification**

SQ03-0337

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## 1 Purpose

This specification establishes the minimum “Sustainability” requirements for suppliers to Skyworks, covering the elements of:

- Environmental
- Health & Safety
- Ethics
- Labor
- Supplier Management

This specification has been developed and deployed to:

- Communicate Sustainability requirements to our suppliers
- Promote sustainable business practices across our supply chain
- Provide our supply chain partners with useful information in building Sustainability programs

## 2 Scope

The provisions of this manual shall apply to all Skyworks suppliers unless otherwise noted herein.

Sections applicable to specific supplier types include:

- [Federal Contracts](#)
- [Materials Compliance](#)
- [Responsible Minerals Sourcing](#)
- [Level 1 – Supplier Risk Assessment](#)
- [Major Suppliers – Supplemental Requirements](#)

## 3 Acronyms and Definitions

**Fees:** Reference the [RBA Trafficked and Forced Labor – “Definition of Fees”](#) document

**Level 1 Material:** Goods used in the manufacture of finished product that directly affect the form, fit, function performance and/or durability of the Skyworks finished product.

**Major Supplier:** A supplier is considered a major supplier to Skyworks if the supplier is:

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- Ranked in the top 80 percent of direct suppliers by spending, AND
- Contracted to provide service or material input for Skyworks' finished goods or services, OR
- Under the control of Skyworks, even if services or materials are not directly conveyed to Skyworks
- Third-Party Employment Agencies (TPEA)

Skyworks reserves the right to further designate any additional suppliers as a major supplier regardless of the preceding criteria. Skyworks will periodically evaluate its supply chain to identify Major Suppliers. Major Suppliers will be notified of their status.

**TPEA:** Third Party Employment Agency - Private service enterprises, including sub-agents, carrying out, under contract and in exchange for financial compensation, operations on behalf of individuals or enterprises, whose role is to provide access to employment or career progression by filling employment vacancies.

**Sustainability:** Sustainability is the demonstrated ability to meet the needs of the present without compromising the ability of future generations to meet their own needs. For the purposes of this specification, Sustainability covers the elements of:

- Environment
- Health & Safety
- Ethics
- Labor
- Supply Chain Management

## 4 Associated Documents

Skyworks documents referenced herein can be access via the [Supplier Downloads](#) page. Specific document links are provided below.

### **Skyworks Documents**

- [SQ01-0002 - Sustainability Systems Manual](#)
- [SQ02-0020 - Supplier Quality Manual](#)
- [SQ04-0005 - Supplier Survey and Audit Questionnaire](#)
- [SQ03-0132 - Green Procurement](#)

### **National and International Standards and Databases**

- [RBA Code of Conduct](#)
- ISO 14001 - Environmental management systems - Requirements with guidance for use
- IFC - International Fire Code; as published by the International Code Council (ICC)
- [RBA-ONLINE](#) (database log-in)
- [RBA Self-Assessment Questionnaire](#)

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## 5 Skyworks Sustainability Policy

Skyworks is committed to operating under sustainable business practices that meet today's needs without compromising the ability of future generations to meet their own. We employ a management system approach to:

- Comply with applicable laws, regulations, and requirements
- Prevent pollution, conserve resources and minimize waste
- Cultivate safe, healthy and productive work environments
- Operate with integrity, honesty and accountability
- Foster continuous improvement
- Promote Sustainability throughout our supply chain

## 6 Supplier Requirements

Skyworks Sustainability Programs are developed and implemented to provide a structure for sustainable business practices in the areas of Environmental, Health & Safety, Ethics, Labor, and Supplier Management. Our supply chain plays a big part in our Sustainability initiatives. We believe in making great products, responsibly, and our Sustainable business practices help to enable this.

Suppliers are responsible to the provisions as prescribed within this specification. Where there is a difference between regulatory requirements, referenced Codes / Standards, and supplemental Skyworks requirements specified herein, the more stringent shall apply.

We encourage you to contact us with any questions you may have regarding this specification. It is our intent to partner with our supply chain to foster sustainable business practices across the industry. Refer to [Contacts](#) for more information.

### 6.1 Legal and Regulatory Compliance

Suppliers shall commit to compliance to all applicable legal and regulatory requirements and to maintaining management systems to support and demonstrate compliance. Violations shall be promptly addressed and reported to Skyworks.

### 6.2 Responsible Business Alliance Code of Conduct

Skyworks recognizes the Responsible Business Alliance (RBA) Code of Conduct (Code) as a total supply chain initiative.

Suppliers shall maintain Sustainability programs aligned with the requirements of the Code. The Code establishes requirements in the areas of Environment, Health & Safety, Ethics, Labor, and Supply Chain Management. The Code is available on the RBA homepage in multiple languages: <https://www.responsiblebusiness.org/code-of-conduct/>

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### 6.3 Federal Contracts

Suppliers shall abide by, only if applicable, the requirements of U.S. Executive Order 11246, 29 C.F.R. Part 471, Appendix A to Subpart A, and 41 C.F.R. Parts 60-1.4, 60-1.7, 60-4.3. Suppliers shall also abide by the requirements of 41 CFR 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified protected veterans and against qualified individuals on the basis of disability, and require affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans and qualified individuals with disabilities.

### 6.4 Skyworks Code of Business Conduct and Ethics

Skyworks seeks to foster and maintain a culture of compliance with applicable laws, rules, and regulations, and the highest standards of ethics and business conduct. Suppliers of on-site labor at Skyworks locations are expected to abide by the provisions of the [Skyworks Code of Business Conduct and Ethics](#). Suppliers shall also communicate the Code of Business Conduct and Ethics to any employees working at Skyworks' facilities. Refer to the [Whistleblower Concerns](#) section for information on reporting violations of the Code of Business Conduct and Ethics.

### 6.5 ISO14001

Suppliers shall maintain environmental management systems (EMS's) in alignment with the ISO14001 standard, as needed for their respective organizations. Subcons and foundries are required to maintain valid ISO14001 certifications.

### 6.6 Materials Compliance

Suppliers of level 1 materials used in Skyworks finished goods are required to provide Skyworks materials content information according to our requirements as referenced in the [Green Procurement – SQ03-0132](#). Here, you will find referenced Skyworks list of Regulated and other substances along with detailed requirements on how to provide Skyworks the materials information we require. We require that these suppliers maintain a documented system of data management to satisfy this requirement.

Refer to [Green Procurement – SQ03-0132](#) for specific materials reporting information and instructions. Suppliers must maintain systems in accordance with these requirements:

- An established process for materials evaluation of all materials supplied to you (as a supplier to Skyworks) for confirmation of materials content. This includes a supplier survey process and/or a laboratory analytical process.
- An established process for physical analysis of the finished good being supplied to Skyworks
- An established process to verify and confirm conformance to all applicable regulatory requirements such as EU RoHS, China RoHS, REACH, etc... (refer to SQ03-0132 for more details)
- An established process for proper marking of products and packaging to avoid mixing of compliant and non-compliant parts

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## 6.7 Responsible Minerals Sourcing

Requirements detailed in this section apply to all suppliers providing the below listed minerals/metals, either directly, or contained within components or other materials. The Responsible Minerals Sourcing Policy is made publicly available on the Skyworks [Sustainability page](#).

### Responsible Minerals Sourcing Policy:

*Skyworks Solutions, Inc. is committed to the responsible sourcing of minerals. We have established programs aligned with the internationally recognized OECD Due Diligence Framework<sup>1</sup> to regularly evaluate our supply chain, performing due diligence on the sources of identified minerals (currently 3TG) sourced from CAHRA's<sup>2</sup> to confirm they are responsibly sourced<sup>3</sup>. We require our suppliers to do the same. Suppliers are prohibited from supplying Skyworks with materials known to be derived from the DRC or adjoining countries or CAHRA's that have not been confirmed as "conformant" to a recognized and credible third-party process such as the Responsible Minerals Initiative's Responsible Minerals Assurance Process (RMAP).*

<sup>1</sup> "OECD Due Diligence Framework" refers to the Organization for Economic Co-Operation and Development's guidance titled "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas."

<sup>2</sup> CAHRA's – Conflict-Affected and High-Risk Areas: OECD definition: Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

<sup>3</sup> The company's policy takes into account the six main adverse impacts as per Table 7.2 – Annex II – Adverse Impact Indicators – found in the OECD Monitoring and Evaluation Framework (<https://mneguidelines.oecd.org/monitoring-and-evaluation-framework.pdf>).

### 6.7.1 Responsible Minerals Sourcing Requirements

Suppliers must work towards getting 100% of their conflict minerals supply from RMAP (or equivalent) program conformant smelters or refiners. Skyworks requires ALL supply chain smelters or refiners to be audited and deemed conformant via the RMI RMAP, LBMA Good Delivery List, and/or the Responsible Jewelry Council (RJC) Chain of Custody (CofC) program. Information on each can be referenced at:

- RMI RMAP Conformant Smelter & Refiner Lists:  
<http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/>
- LBMA Good Deliver List: <http://www.lbma.org.uk/good-delivery-list>
- RJC Chain of Custody (CofC) Program:  
<https://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/>
  - Smelters not conformant to RMAP, LBMA, or RJC shall be removed from the supply chain.

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- Suppliers shall have a policy in place that includes a commitment to DRC Conflict-Free sourcing
- Suppliers shall implement a system by which their supply chain is evaluated and monitored, designed and operated in accordance to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Suppliers shall identify 100% of the suppliers of 3TG in their supply chain, as well as identify 100% of the associated smelters / refiners from which the materials are sourced
- Suppliers shall report 100% of the smelters or refiners in their supply chain
- Suppliers shall complete and return to Skyworks, upon request, an up-to-date Conflict Minerals Reporting Template (CMRT) identifying ALL smelters and their countries of origin and satisfying all of the above referenced requirements

## 6.8 Freely Chosen Employment (Slavery and Human Trafficking Prevention)

As a member of the Responsible Business Alliance (RBA) we are committed to environmental and social responsibility. Since 2004, the RBA has promoted a Code of Conduct which prohibits the use of forced, bonded, indentured labor or involuntary prison labor. We require our suppliers to comply with the Code and take seriously all forms of non-conformance.

In addition to our work as a member of the RBA, Skyworks has internal policies and practices that are based on the Code and international labor and human rights standards. We partner with our supply chain to create an environment where workers have the right to freely choose employment, the right to associate freely, voluntarily join or not join labor unions and worker councils, and the right to bargain collectively if they choose.

In support of this policy, Skyworks (both Skyworks directly and all our supply chain partners) requires compliance with all labor and ethics laws as applicable to the country where work is being performed. Direct suppliers of materials incorporated into Skyworks finished goods (our products) certify that those materials comply with applicable slavery, human trafficking, and human rights laws (refer to sec. 4.4.1 – Product Compliance). We further prohibit the use of human trafficking or slavery, including involuntary or bonded labor, or indentured servitude. In addition, Skyworks' suppliers must ensure that the suppliers throughout their supply chains comply with applicable slavery, human trafficking, and human rights laws. Suppliers shall provide evidence of supply chain due diligence on request.

View Skyworks' statement on Slavery and Human Trafficking Prevention on the Skyworks [Sustainability page](#).

### 6.8.1 Uyghur Forced Labor Prevention Act (UFLPA)

On December 23, 2021, U.S. President Biden signed into law the Uyghur Forced Labor Prevention Act (UFLPA). The UFLPA creates a rebuttable presumption that goods mined, produced, or manufactured in whole or in part in the Xinjiang Uyghur Autonomous Region (XUAR) of China are done so using forced labor and are therefore prohibited from being imported into the U.S.

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Skyworks prohibits the use of forced labor and requires all suppliers to demonstrate conformance to the UFLPA. Suppliers shall provide evidence of supply chain due diligence on request.

More information on the UFLPA can be found at: <https://www.dhs.gov/uflpa>

## 6.9 Level 1 - Supplier Risk Assessment

Skyworks requires suppliers of **Level 1 materials** to complete a supplier risk assessment. Suppliers receive from Skyworks form [SQ04-0005 – “Supplier Survey and Audit Questionnaire.”](#) The form contains a tab titled “Sustainability.” Suppliers are required to complete this tab by responding to the questions and returning the completed form to Skyworks.

### 6.9.1 Scoring

The Sustainability tab must score “Green” (passing) to allow Skyworks to proceed with registering the supplier as qualified. Suppliers NOT scoring “Green” are considered deficient and the supplier may not be qualified until such time that actions are taken by the supplier resulting in a “Green” score. It is the supplier’s responsibility to take the necessary actions to improve their Sustainability programs in order to meet minimum requirements.

## 6.10 Major Suppliers – Supplemental Requirements

Periodically, Skyworks evaluates its supply chain to identify [Major Suppliers](#) for the purpose of this specification. Major suppliers are notified by Skyworks of their status, are evaluated using a Self-Assessment Questionnaire risk assessment tool, and are subject to audit based on risk and at Skyworks’ discretion.

### 6.10.1 Self-Assessment Questionnaire

Suppliers meeting the definition of a [Major Supplier](#) to Skyworks (see definitions section) shall be required to complete a Sustainability Self-Assessment Questionnaire (SAQ). This SAQ is a detailed questionnaire covering all applicable elements of Sustainability. It is intended to give Skyworks information on the status of your Sustainability Programs and to perform a risk assessment. Suppliers will be notified by Skyworks when SAQ’s are due. SAQ’s shall be updated annually.

**Materials, Subcon Assembly, and Wafer Foundry Suppliers:** Required to complete the RBA Facility Risk Self-Assessment Questionnaire (SAQ) using the RBA-ONLINE system. Information on the RBA SAQ can be access [here](#).

RBA-ONLINE is a subscriber-based survey system. Suppliers identified as “Major Suppliers” by Skyworks must follow these steps:

- Access the RBA-ONLINE system using the link provided [here](#)
- Subscribe to the system and pay associated user fees
- Complete a Facility Risk SAQ for each facility providing Skyworks with products

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- Grant Skyworks access to those SAQ’s in the system

Major suppliers already utilizing the RBA-ONLINE system may provide Skyworks with current SAQ’s available in the system. A benefit to utilizing this system is that completed SAQ’s can be provided to any other customers requesting them. No additional surveys need be completed.

**TPEA’s and On-Site Service Providers** (e.g.: contracted canteen services, hazardous waste handling services, security services, etc...): Required to complete the RBA SAQ in RBA-ONLINE or may complete an off-line survey in a format provided by Skyworks.

### 6.10.1.1 SAQ Scoring Requirements

The RBA Facility Risk SAQ is a (up-to) three-step process within RBA-ONLINE. With each subsequent step, more information and/or verification is required and there is an up-to 10 point overall score improvement opportunity (revised score) with each subsequent step. Refer to the scoring table below for the minimum SAQ steps required and the minimum Skyworks accepted risk scores (overall facility or revised).

Step	Overall Facility Risk Score or Revised Score		
	Low (≥80)	Medium (>60 and <80)	High (<60)
1) Risk Questions	Accepted	Step 2 required	Step 2 required
2) Control Questions	Accepted	Accepted	Step 3 required
3) Verification	Accepted	Accepted	Probation – VAP required

### 6.10.2 Audits

Suppliers with an overall facility risk or revised risk score of “high” which is not sufficiently mitigated by SAQ steps 2 (Control Questions) or step 3 (Verification) (verification) shall be subject to disqualification at the discretion of Skyworks. These suppliers scoring high risk shall be required to perform a facility audit using the RBA VAP process or Skyworks approved equivalent. Details on the VAP can be found [here](#). VAP’s shall be performed at the expense of the supplier.

Skyworks may also, at its discretion, require a VAP at any major supplier, regardless of SAQ risk score or supplier category designation. *Skyworks will notify those major suppliers for whom a VAP is required and shall provide reasonable time for supplier(s) to complete this requirement.* Suppliers may provide an existing and current (no more than 2 years old) VAP report if one already exists.

Suppliers shall perform root cause analysis and corrective actions for audit findings. Suppliers with “priority” level findings are required to take corrective actions AND to have a closure audit performed according to the RBA’s VAP program. Suppliers shall use the Corrective Action Plan (CAP) process in the RBA-ONLINE platform and shall provide Skyworks with visibility to the VAP’s and associated CAPs.

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### 6.10.3 Supporting Skyworks' Audits

From time-to-time, Skyworks undergoes third party or customer provided audits. Any suppliers of on-site labor at Skyworks' locations (includes TPEA's and dispatch workers) shall support reasonable requests for records and information to demonstrate suppliers' conformance to requirements associated with this specification and the RBA Code of Conduct. Confidentiality associated with any sensitive information provided shall be protected under established non-disclosure agreements (NDA's).

Requests for records and information may include, but are not limited to the following (associated with demonstrating SQ03-0337 and/or RBA Code of Conduct compliance):

- Employee interviews
- Employee paystubs
- Employee contracts
- Supplier policies
- Supplier employee handbooks

### 6.10.4 Greenhouse Gas Reduction and Reporting

Major suppliers to Skyworks who are *foundries* or subcontracted assembly facilities (*subcons*) shall have a process for tracking Greenhouse Gas emissions, target setting for emissions reduction, and reporting. Suppliers are recommended to align with an established target setting framework such as the Science Based Target Initiative (SBTi). Suppliers are also encouraged to pursue electricity sourcing from renewable sources (e.g. Wind, Solar) to reduce their CO2 equivalent (CO2e) emissions.

On request, suppliers shall provide to Skyworks CO2e emissions data.

Resources:

- Science Based Target Initiative: <https://sciencebasedtargets.org/>
- Greenhouse Gas Protocol: <https://ghgprotocol.org/corporate-standard>
- CDP: <https://www.cdp.net/en>

## 6.11 Third Party Employment Agencies and Dispatch Labor

### 6.11.1 Contracts

The applicable provisions of this specification are applied to all contracts with TPEAs and Dispatch Labor (vendors providing on-site labor services). In the absence of a contract, the purchase order and its reference to this specification, serves as a contract.

### 6.11.2 Legal and Regulatory Compliance

In addition to the legal and regulatory and RBA Code compliance requirements detailed in sections [6.1](#) and [6.2](#) of this specification, TPEA's and vendors providing dispatch labor shall comply with legal requirements in both home and sending country/region (if foreign and internal migrant labor is used). Service providers shall perform initial and ongoing due diligence of any agents or sub-agents it uses, including sending country recruiters. The service provider

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shall have an understanding of the risks associated with the jobs, industries, and countries for which they recruit or place workers.

### 6.11.3 Communication of Terms and Conditions of Employment

Terms and conditions of employment are to be provided to employees in writing and in their native language prior to employment (foreign and internal migrant workers: before leaving their home country/region) and the key terms and conditions of employment are to be explained verbally in their native language, so workers understand what the terms and conditions of employment state. During the job application and recruitment process, prospective employees shall be provided with an adequate and effective way to confidentially report ethics and other grievances without fear of reprisal or intimidation. This shall also be made available to all employees.

### 6.11.4 Training

It is the responsibility of the service provider to train staff to the requirements herein.

### 6.11.5 Policies

Adequate policies shall be in place for:

- a) Freely chosen employment:
  - i) no forced, bonded, involuntary or exploitative prison, trafficked or slave labor is used
  - ii) workers are not required to pay [Fees](#), deposits or incur debt as part of the employment. On discovery of fees paid, repayment within 90 days of discovery.
  - iii) when employment has been terminated voluntarily or involuntarily, worker will be paid appropriate amounts for all hours worked.
  - iv) no government issued identification or originals of personal records are held or stored.
    - (1) In some countries, the local law requires employers to hold foreign and internal migrant workers' personal records. In those cases:
      - (a) Process are in place for safe keeping of only those personal records required by law.
  - v) freedom of movement
- b) Child labor:
  - i) child labor prohibition
  - ii) not refuse the worker's job application after the "child" worker's age meets legal requirements
  - iii) If child labor is identified, assistance/remediation is provided
- c) Young workers / pregnant workers and nursing mothers
  - i) Health checks if required by law
  - ii) Identification and assignment of young workers to non-hazardous positions
  - iii) Restriction on time of day worked (Young workers are not allowed night work or overtime)
- d) Learners

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- i) If applicable, a written policy stating that the Auditee does not hire apprentices/interns/student workers.
  - ii) A commitment to only providing internships/student workers assignments and apprenticeships that complement their course of study field or learning of a new vocation.
  - iii) Maximum duration of apprenticeship (not more than 6 months if worker is paid below minimum wage).
  - iv) No agency or intermediary may be used in connection with the recruitment, hiring, arrangement, and management of student workers, interns or apprentices.
  - v) All work is voluntary (including choice of learning placement assignment).
  - vi) Prohibition of use of student workers, interns or apprentices to simply fill a labor shortage.
- e) Time off
- i) Hours worked, days off, sick leave, holidays, vacation and paternity/maternity leave.
  - ii) Mandated meal and rest breaks, leave periods, holidays, and vacation days
- f) Compensation:
- i) "Pay equals time worked" applies; this means any company-required activity
  - ii) All workers shall be paid no less than the agreed\* wage for all regular hours.
  - iii) overtime and other compensation and benefits are paid and are on top of agreed\* wage for regular hours
  - iv) Payment made to leavers (resigned workers).
- g) Disciplinary practices:
- i) Prohibition of disciplinary wage deductions are in place including "Pay equals time worked"
- h) Decent / Humane work
- i) Non-discrimination
- i) Decisions in hiring, employing (such as compensation, promotion, access to training, ...), or terminating workers are based solely on the candidate's ability to perform the job's requirements
  - ii) A commitment to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, accommodation, benefits, rewards, and access to training.
- j) Reasonable Religious accommodation
- i) reasonably accommodate for religious practices and adjustments to the work environment to allow a worker to comply with their religious beliefs while at work or job application.
- k) Freedom of Association

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- i) Respect of the right of workers to form or enroll in a trade union, or to refrain from doing so
- ii) Will not interfere with and will not finance a trade union
- l) Collective Bargaining
  - i) The recognition of the right of workers to bargain collectively, or refrain from doing so
- m) Peaceful Assembly
  - i) Respect of the right of workers; individually or collectively; to express, promote, pursue, and defend their concerns or ideas; or to refrain from doing so
- n) Termination of Contract
  - i) No penalty to workers for terminating their contracts early with appropriate notice (appropriate notice not to exceed 30 days)
- o) Banking Agreements / Contracts
  - i) Between employer and bank used for deposit of wages states that workers have exclusive access to their accounts and prohibition of savings programs other than direct with the bank

#### 6.11.6 Control Processes

- a) Each of the policy requirements has an effective implementation (control) process.
- b) Specific additional control requirements:
  - i) Freely chosen employment:
    - (1) Determine the specific amount of any [fees](#) and expenses paid by each individual foreign and internal migrant worker prior to commencement of work.
  - ii) Child labor:
    - (1) verify the reliability of age records. Age verification must include visual verification of a government recognized photographic identification record.
    - (2) reliable ID verification system to control the workers' access into the facility
    - (3) Child labor assistance/remediation process that is designed to provide for the welfare of the child
  - iii) Young workers
    - (1) Health checks if required by law
    - (2) Restriction on hours worked and time of day worked
    - (3) Identification and assignment of young workers to non-hazardous positions
    - (4) Young workers are not allowed night work or overtime
  - iv) Hours worked / days off
    - (1) Accurately determine
    - (2) Record
    - (3) Manage
    - (4) Control working hours including overtime and days off.
  - v) Contracts
    - (1) Service providers, Labor Agents and Labor Contractors have executed contracts with agreement requirements to ensure conformance with the policies/process.

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- (2) Employment contracts shall indicate appropriate protective restrictions and reasonable accommodations for vulnerable women (e.g. pregnant women, the physically and mentally challenged, young workers, etc.).
- vi) Record keeping
  - (1) appropriate retention (on and off site) and appropriate levels of access to ensure privacy conforming to legal and customer requirements
- vii) Risk assessment
  - (1) Any identified risk has an action plan to minimize such risk
  - (2) Effectiveness of controls is evaluated on a regular basis
  - (3) Procedural controls are recorded
  - (4) Where controls are not yet in place an implementation plan (with owners and due date) is in place and on track

## 7 Whistleblower Concerns

Skyworks is committed to fostering a culture of compliance with applicable laws, rules, and regulations, and the highest standards of ethics and business conduct. In order to promote this environment, you are encouraged to submit any questions, concerns or complaints you may have in accordance with the mechanics set forth in our [Code of Business Conduct and Ethics](#) or our [Code of Ethics For Principal Financial Officers and Executives](#).

### What to Report:

- Complaints, comments or concerns you may have regarding accounting, internal accounting controls or auditing matters, including any questionable accounting or auditing practices;
- Disclosure of, or complaints, comments or concerns about, conflicts of interest; or
- Any activity by a Skyworks employee, officer director, or contractor that is or is suspected of being in violation of applicable laws, rules, regulations, or Skyworks' [Code of Business Conduct and Ethics](#).

### Anonymous Submission:

To submit complaints, concerns or comments anonymously, including those regarding accounting, internal accounting controls or auditing matters, please submit your report using the Convercent reporting system, which enables you to submit an anonymous report via the Internet or by telephone 24 hours a day, seven days a week.

- To make a report via the Internet, go to <http://www.skyworksinc.com/whistleblower> and follow instructions provided there
- To make a report by telephone within the United States and Canada, dial 1-800-461-9330.
- To make a report by telephone from outside the United States and Canada, simply make a collect call to (720) 514-4400. The call center representatives at Convercent are trained to accept these collect calls and arrange for translation if necessary.

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Following submission, your confidential report will be forwarded anonymously to Skyworks' Compliance Officer, who has been designated to process reports. You will be able to receive responses pertaining to your report, send additional messages and, if you desire, participate in any follow-up. If you choose to identify yourself upon (or after) submitting a report, be assured that it is Skyworks' policy not to retaliate against, nor tolerate any retaliation against, anyone who, in good faith, submits a complaint, comment, or concern, or participates in any subsequent related investigation.

### Other Avenues

If you'd rather communicate with someone directly, any question, concern or comment you may have may be directed to any or all of the following contacts, and if you are not satisfied with the resolution, you may raise any such question or concern to one or more of the other contacts:

- Skyworks' company Compliance Officer, who is currently designated as Robert Terry;
- In-house legal counsel;
- A supervisor, department head, or human resources representative; or
- The Audit Committee of the Board of Directors.

Please note that for accounting or audit-related concerns, you are encouraged to communicate directly to the Compliance Officer or the Audit Committee or to use the Anonymous Submission mechanisms set forth above.

### For Your Protection:

Skyworks will not retaliate against, nor will it tolerate any retaliation against, anyone who raises any complaints, comments or concerns in good faith.

- All complaints will be held in confidence to the extent practicable;
- No employee will be adversely affected as a result of raising complaints, comments, concerns or suspected violations in good faith; and
- Any person who discriminates or retaliates against an individual for raising any such issues in good faith will be dealt with appropriately, which may include disciplinary action up to and including termination of employment.

## 8 **Contacts**

Skyworks recognizes that Sustainability improvements can best be made with open communication and cooperation throughout the supply chain. Please contact us if you have any questions regarding these program requirements, the associated surveys, or Sustainability best practices.

### **Green Supplier Surveys**

Juan Jesus Muñoz – Survey Administrator – [materials.compliance@skyworksinc.com](mailto:materials.compliance@skyworksinc.com)

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**Responsible Minerals Sourcing**

Juan Jesus Muñoz – Survey Administrator – [conflict.minerals@skyworksinc.com](mailto:conflict.minerals@skyworksinc.com)

**Sustainability Programs (Best Practices)**

Troy Schulze – Global Risk Management - [troy.schulze@skyworksinc.com](mailto:troy.schulze@skyworksinc.com)

**General Supplier Requirements**

Contact your Skyworks Supplier Quality or Sourcing Dept. representative

**9 Revision History**

Note: Complete revision history maintained in Skyworks’ document control system.

Rev	Name	Change	Date
26	Troy Schulze	New cover graphic  Complete document re-write and reformat  Audits – Added supplier requirements to support Skyworks’ audits  Whistleblower Concerns – Updates including addition of “conflicts of interest.”	8/3/2023
27	Troy Schulze	6.11 – NEW requirements added for Third Party Employment Agencies and Dispatch Labor	10/30/2023
28	Troy Schulze	Repaired hyperlinks	2/16/2024
29	Troy Schulze	Sec. 3: Added definition of "Fees" with hyperlink to RBA definition of fees document  Sec. 6.1 - Added requirement for prompt follow-up and reporting of legal and regulatory violations  Sec. 6.11 - Third Party Employment Agencies and Dispatch Labor - Changes throughout this section and sub-sections aligning with RBA VAP/SVAP requirements.	3/6/2024
30	Troy Schulze	6.10.1.1 – SAQ Scoring Requirements – New section added  6.10.2 – Audits – Minor wording changes to align with sec. 6.10.1.1	3/15/2024

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