

July 2023

**Code of  
Conduct**



“

We want to generate the best products, technologies, ideas, and innovations. Our permanent goal is to perform well or even excel, and to be a reliable business partner. We can only achieve this if we manage our business safely and responsibly and if our business partners know they can trust us. This, in turn, depends on people doing the right thing and making the right decisions, on a large and small scale, every day.

The Code of Conduct is binding for all of us at Ampleon and translates our corporate values into practical guidelines and advice on making responsible decisions, even in difficult situations. The Code of Conduct also reflects what is expected of our business partners. Please familiarize yourself with our Code of Conduct and act accordingly. If in doubt, in difficult or unclear situations, speak up and ask your manager or the relevant contact person for advice. Through integrity and correct behavior, each of us plays an important part in making Ampleon a company that is valued and trusted by our customers, our partners and society. Compliance with our Code of Conduct helps ensuring that we live our values in our day-to-day work.

Thank you very much for your support!

Ampleon Management Board

# Contents

## **We Care .....4**

Why is our Code of Conduct Important?.....	5
How to Make Decisions when the Issue is not Clear-Cut?.....	7
We Always Speak Up!.....	8
We Lead with Integrity.....	9
Our Values Guide our Actions.....	10

## **We Build Trust ..... 11**

We Abide by the Rules .....	12
Anti-Corruption .....	13
Trade Control.....	14
Anti-Money Laundering .....	15

## **We Play Fair ..... 16**

We Monitor Risks.....	18
Gifts and Entertainment.....	19
Conflicts of Interest .....	20

## **We Respect .....22**

Human and Social Rights, Labor Standards.....	23
Environmental Protection, Health and Safety.....	26

## **We Protect .....28**

Sensitive Company Information .....	29
Digital Responsibility .....	31
Appropriate Communication.....	32
Personal Data .....	33
Company Property .....	34
Accurate Books and Records .....	35

## **Contact Us .....36**



**We Care**

# Why is our Code of Conduct Important?

In a rapidly changing world, it is vital to stay focused on what really matters to us at Ampleon. Our values – Focus, Excellence, Velocity – help us do this. They remind us of what Ampleon stands for and serve as a benchmark for how we do business.

We are strictly committed to high standards of legal compliance and business ethics. Our Code of Conduct (hereinafter called “CoC”) defines the boundaries within which our Ampleon employees must act to comply with laws and internal policies. By doing so, our CoC protects Ampleon as a company and those working for and with us.

Our CoC guides us in putting our values and commitments into practice – throughout the company, and in everything we do. It helps us navigate through areas and situations where responsible conduct and ethical decision-making are critically important. Only by fully complying with our CoC, and all laws and regulations, we can achieve our aspiration to be *The Leading Global Partner in RF Power*, respected and trusted by our customers, investors, employees, and all other stakeholders.

The Code defines the way we live our core values every day. Whether you work for or with Ampleon, these are the responsibilities and behaviors we expect of you. It is a shared standard we can all be proud of, and an integral part of our rules and procedures.

## What does the CoC require?

Living up to our CoC means to adhere to:

- applicable laws and regulations,
- internal policies and guidelines, and
- ethical business practices

## Who is the CoC for?

Everyone who works for or with Ampleon must follow the CoC, whether they are an employee, a contractor, or a business partner.

## **What if the CoC is breached?**

Failing to follow the CoC may lead to disciplinary action, including dismissal. If you notice any breaches, raise them in a timely manner with the individual, your manager, or the Ethics Team. You can find further guidance at the end of this document and in our Speak Up & Non-Retaliation Policy.

## **What is the expectation?**

Everyone of us needs to understand the CoC, its related policies and how to behave as a result. While you may find it easier to apply some parts of the CoC to your specific role, it is important that you ask questions about any part you are unsure of. If you cannot find a clear answer to an issue, use good judgement, and discuss it with your manager if needed. And, if you are a manager, you are also a role model. Help your team understand how to live our values and hold them accountable for their behavior.

## **What if something is not covered in our CoC?**

Our CoC cannot cover in detail the wide variety of situations we may encounter. Each of us is responsible for ensuring we understand Ampleon's policies and procedures, and for maintaining the high ethical standards in every aspect of our work or cooperation – even when our CoC provides no direct guidance. Everyone is always expected to show both integrity and to apply common sense. When in doubt, speak up and ask for help.

## **Who has issued this CoC and how will this CoC be updated or amended?**

The Management Board of Ampleon is responsible for approving and issuing this CoC.

It will be regularly reviewed by Ampleon's Ethics Team together with the responsible experts who then decide on required revisions. Any changes to this CoC are subject to approval by the Ethics Team and the Management Board of Ampleon. The Ethics Team consists of the Ethics Office, the Ethics Committee and the Ethics Board, with members from different hierarchical levels and sites.

# How to Make Decisions when the Issue is not Clear-Cut?

Often, putting our CoC into practice, is straightforward. The issues are clear, and so is the correct decision. Sometimes, however, you might find yourself in a grey area. Either you know there is a potential problem, or you sense that something is not quite right. In any case, you may feel unsure about how to act, or react. In such situations, there is a three-step process to guide you.

## Listen to your inner voice, your “gut feeling”

We all know the feeling when something is not quite right, even though we may not be able to pin it down or put it into words. At Ampleon, we call this gut feeling (a feeling of “not-quite-rightness”) or emotional disturbance. To test what this inner voice is trying to tell you, ask yourself questions like these:

- What does my conscience tell me?
- Am I sure I will not regret the choice I am making now in the future?
- How would I feel if someone else made this decision, and I was affected by it?
- Would, what I am planning to do, be considered exemplary behavior within Ampleon?
- What would my family or friends say if they knew about the choice I am making?
- How would I feel if this became public, or appeared in the news?

## Stop and take time to reflect

It is always more important to make the right decision than to make a hasty decision. If you are unsure of what the right thing to do is, take time to think calmly and rationally, and to ask yourself questions like these:

- Do I have all the information I need to make a decision?
- What are the possible consequences of this decision or of not acting at all?
- What impact would the decision have on our company and its reputation?
- Is this course of action legally correct?
- Do I have a free choice, or am I being put under pressure?

## Speak up and get advice on what to do next

If, after having listened to your inner voice, stopped, and reflected, you are still in doubt about what the right thing to do is, never keep it to yourself.

It is time to act when you think of or see “red flags” such as:

- No one will find out.
- We have always done it this way.
- Do not worry now, we can fix things afterwards.
- No one checks or takes care of these things anyway.
- The official way simply takes too long.
- Everybody else is doing it, too.

Speak up, express your concerns, or address your uncertainties, and get advice on the planned decision from your manager or our Ethics Team.

# We Always Speak Up!

We are all personally responsible for bringing our company's values to life in everything we do. It is therefore essential that we all feel entirely free to ask questions, or raise concerns, if we are uncertain about what to do, or if something does not feel right. We always speak up.

Sometimes, doing the right thing may take courage. However, the earlier we speak up, the more likely we can prevent serious problems– or, at least, minimize their impact. Hence, however hard it may be, we speak up immediately when we become aware of an ethics or compliance concern. Speaking up is not optional. If we believe that our CoC, a company policy, or the law may be violated, we must raise our concerns in a timely manner.

## Raising concerns in confidence

You are free to choose whether to discuss such violations with your supervisor, the Ethics Team, our legal expert, or the Speak Up Line.

If you are unsure about your own conduct, or about how to best report any concern, you can always contact the Ethics Team for guidance.

Another option, available at Ampleon globally, is to call our Speak Up Line, which allows for anonymous reporting of concerns in one's own language. Every call is treated confidentially.

## Raising concerns without fear of retaliation

Ampleon will not tolerate any kind of retaliation against anyone who wants to do the right thing by raising a concern in good faith.

Any such retaliation would undermine the trust that is essential for our success, and would be treated as serious misconduct, resulting in disciplinary (or legal) action.

Of course, doing the right thing also means that we cooperate with involved individuals/partners in any investigation related to the CoC or compliance issues. We willingly play our part in ensuring that our company acts with complete integrity and lives up to the very high standards we set ourselves.



# We Lead with Integrity

Living up to what we want Ampleon to stand for, starts with leadership.

Leaders set the tone, and this is not just about following guidelines and abiding by rules. It is about taking responsibility, demonstrating trust, courage, and optimism even when it is not the easiest path to follow.

It is all about leading by example – through attitude and embodying our values in everything we say and do. And to be clear: the lowest standard we demonstrate as leaders will set the highest standard we can expect from our teams and our partners.

## Our leaders:

- Say “yes” to their responsibility to lead with integrity
- Act as a role model for compliance and ethical decision-making
- Stay alert for any conduct or decision-making not in line with our values
- Put specific risks on their agenda, to discuss and explore with their teams
- Speak up if something does not feel right
- Encourage their teams to speak up if they have questions or concerns

## Our leaders ask themselves:

- Do I know the main compliance risks in my specific area and how to manage them?
- Do I listen when members of my team have something difficult to say?
- Do I face ethical dilemmas when decision-making is not clear and do I discuss such situations with my team and with my manager?
- Do I know where to seek help on any issues relating to the CoC?

# Our Values Guide our Actions

We amplify our business by Focus, Excellence and Velocity.

A set of guiding principles and fundamental beliefs help us function together as a team and work toward our common business goals. Our values represent what we stand for as a company.

Focus



Excellence



Velocity



These values set the standards we all live by, and it is the responsibility of every employee and business partner to follow them.



# **We Build Trust**

# We Abide by the Rules

## Why do we care?

We do business with integrity, always, without exception.

## Ask yourself

- We compete in a fair and honest way
- We follow trade restrictions carefully
- We protect personal and confidential information
- We keep a clear line between business and personal interests
- We look after company property and use it appropriately
- We keep records in accordance with company policies
- We are alert to fraud and report suspicious activity
- We communicate in a professional way

At Ampleon, our reputation for doing business with absolute integrity is critical. Bribery and corruption are always wrong and have no place in our business. We are therefore committed to fighting any kind of them and refrain from getting involved in any form of them. We play to win, but strictly by the rules, treating all business partners fairly and competing for business based on the quality of our products and services. Naturally, we expect the same from those we do business with.

## Business relationships

As a global company, we understand that all business relationships with domestic and international partners may be subject to trade control laws. We also must take all necessary measures to prevent our company from being used as a means to launder money, even inadvertently, as this constitutes a criminal offense.

We wish to do business with partners whose ethical, social, and environmental standards are consistent with our own. We use these standards to decide on whether to enter or continue relationships with business partners. We expect our business partners to confirm that they conduct their business in accordance with our CoC.

# Anti-Corruption

## Why do we care?

Bribery and corruption lead to decisions which are not based on objective criteria and thus distort and damage the free and fair trade we believe in, and on which our business model is built. Only by eliminating corruption, we can ensure that everyone is treated fairly when, for example, it comes to obtaining a job, a permit, or a contract.

## Ask yourself

- Am I sure I am not trying to persuade someone to give us an unfair commercial advantage?
- Does this potential business partner have a reputation for questionable business practices?
- Could I get in trouble if, what I am about to do, were publicly reported or reviewed by an auditor?

We do not get involved in corruption, in any form whatsoever. Consequently, we do not offer or accept bribes, kickbacks, or any other form of improper payment or other benefits which are aimed at obtaining or retaining business or influencing a business decision. This rule applies to all our operations, regardless of the country in which we conduct business. We do everything we can to prevent bribery by others who act on our behalf, for example, by appropriately checking third parties with whom we do business or who provide services.

## Always vigilant against corruption

Corruption can take many forms, hence we are always vigilant against and on alert for any suspicious behavior, such as a business partner asking for unusually high commissions or payments in cash or refusing to accept anti-corruption contract requirements or our CoC.

We would rather lose a business opportunity than win by means of corruption. Bribery – whether of a governmental official or in the private sector – is always wrong and has no place in our business.

## Political activity and lobbying

We conduct our lobbying and political communications in accordance with transparent guidelines, our publicly stated positions, and all applicable laws. As a company, we engage in political lobbying to advance our company's interests, but we do this transparently and do not financially support political parties or organizations close to them.

# Trade Control

## Why do we care?

Trade control regulations exist to promote international stability and to prevent misuse of our products. We support these goals by ensuring that our products and our technology do not end up in the wrong hands. Only by doing so, we can ensure that Ampleon is perceived as a reliable business partner by our customers, suppliers, and the public.

## Ask yourself

- Did I take time to understand what would be considered as trade control compliant when doing imports and exports?
- Did I check whether there are export restrictions in place for the product, the destination country, the customer or on the product's intended use?
- Is there any reason to suspect our product may be used illegally, e.g. when a customer's request on labelling or transport routes appear to be suspicious and not plausible for the product?

We are a global company with activities and business partners all over the world. As such, we are aware that all business relationships with domestic and international partners may be subject to trade control laws. Overall, our goal is to prevent our products from the risk of them being misused. Therefore, we strictly adhere to all applicable laws, including trade control regulations, like embargoes, anti-terrorism laws and further regulations aimed at preventing misuse.

We do business globally which means our activities are subject to various national and international trade laws, restricting or prohibiting the import and export of our products or services. These restrictions can be based not only on the nature of the product, but sometimes also on the country of origin or destination, or even on the identity of the customer.

Export controls can take many forms. Besides restrictions on physical goods, software and services may also be controlled. Export controls can even apply to technology transfer, for instance the exchange of information relevant to the trade control law shared via electronic means, like email or online collaboration sites, or transported across borders on electronic devices.

Trade control regulations are a sensitive topic, but our Global Trade Control Team helps us navigate within the boundaries. Employees need to be familiar with, and sensitive to, the issues of export/import controls. Take advantage of their expert knowledge if you have any questions relating to trade control regulations.

# Anti-Money Laundering

## Why do we care?

Money laundering is a major crime, and any involvement in it could have serious consequences, not only for Ampleon as a whole, but also for individual employees. Legal liability under money laundering laws does not necessarily depend on the person involved being aware that a “dirty money” offense is actually being committed. Ampleon is particularly obligated to report to the authorities any suspicious transaction that becomes apparent to its employees.

## Ask yourself

- Does this transaction feel right to me? What does my gut feeling tell me?
- Have I done everything required of me to verify the identity of this business partner?
- Would I feel more comfortable if I referred this to my manager or Ampleon’s finance experts?

## We are always on guard against dirty money

At Ampleon, we do not allow dirty money to play any part in our business. While it is easy to claim this a fundamental principle, protecting our company against attempts by criminals to “clean” cash and other assets generated by illegal activities is a challenge that demands constant vigilance from us all. Eventually, being involved in money-laundering or terrorism financing – even inadvertently – is a criminal offense.

We are always keen on doing business, but only with reputable partners who operate within the law, using resources from legitimate sources. We carefully check the identity and credentials of potential customers, business partners and other third parties. And we take all reasonable measures to ensure transparent business relationships. Money laundering is the deliberate attempt to move cash or assets derived from criminal activities into legal and legitimate financial activities. At Ampleon, we take all reasonable measures to prevent our company being used as a means to launder money.

To protect our reputation and avoid any possible criminal liability, we need to be constantly vigilant about the activities of our business partners. It is essential to know who we are dealing with before contracts are signed or transactions occur and watch out for payment irregularities or suspicious behavior.

## Preventing fraud

We have a set of comprehensive business controls in place to prevent fraud. This includes following all internal approval processes as well as accounting and financial reporting principles to ensure that we properly record all transactions and that they are subject to review where appropriate. We abide by anti-money laundering laws to prevent any use of the company’s resources to conceal crimes. We are alert to threats of fraud, and we report any suspicious transactions or activity immediately.



# We Play Fair



# We Play Fair

## Why do we care?

Antitrust laws protect free and fair competition in open and transparent markets, offering customers access to a large variety of products and services at fair prices.

This is in the best interests of everyone, from multinational companies like Ampleon to individual consumers, as violations of competition law may result in heavy penalties for both the company concerned and for its individual employees.

## Ask yourself

- Have I discussed any potential antitrust issues, e.g. in a co-operation with a competitor, or reasons for declining a business opportunity with the legal experts?
- Am I sure that the proposed agreement or activity fully complies with antitrust laws?
- Am I hoping to use “I did not know it was illegal” as an excuse, if anything goes wrong?

## We compete to win, but always fairly

At Ampleon, our aspiration is to be the leading global partner in RF Power. To achieve this, we always act fairly as we know there are no short-cuts. For us, the only kind of success worth having depends on winning and maintaining the long-term trust of our customers and business partners.

## Antitrust laws

We support free and fair competition. We aim to meet our customers' needs faster, better and more distinctively than our competitors. So we compete hard, but fairly, within the framework of the competition laws. We maintain a policy of strict compliance with the competition laws and our own rules.

We know that it is vitally important to recognize and to disclose potential conflicts of interest because only decisions that are based on objective criteria are truly fair and create trust.

# We Monitor Risks

## **Agreements between competitors**

Any agreement between competitors entails risks of being unfair to customers. Therefore, we naturally comply with the law, and strictly forbid agreements with competitors that directly or indirectly fix prices or any other trading conditions, limit or control production, or share markets or sources of supply. This does not only apply to formal contractual agreements. We do not participate in any type of collusive behavior or concerted action, and we do not exchange or discuss sensitive business information, such as information on customers, pricing, costs, salaries, market shares, R&D efforts, or similar data with our competitors. If there is a legitimate need for communication with competitors, we ensure that we never give or accept any information that might permit any conclusions about the present or future market conduct of either party.

## **Interactions with customers and suppliers**

Transparency is vital for fair competition, thus we do not enter into any type of arrangement or agreement that places unfair limitations or restrictions on the market behavior of our customers, suppliers, patent-holders, or licensees. We are always careful and consult the legal experts when granting or asking for exclusive rights to customers or suppliers or entering into agreements that limit the way in which goods or services can be used, resold, or priced. We do not influence distributors to make them respect a minimum price when reselling our products.

## **Abuse of a dominant market position**

We never use our strength to give ourselves an unfair advantage by unlawfully eliminating competition, preventing others from entering a market, or manipulating prices. We never discriminate customers or refuse to supply or sell to certain customers without good cause, and we never impose inadequate purchase/sales prices, and conditions or tie-in arrangements, without justification.

# Gifts and Entertainment

## Why do we care?

While gifts and invitations are regarded as common business courtesies in many countries, there is always a risk that they may be viewed as a bribe or excessive and insensitive, unless we handle them with caution and common sense.

## Ask yourself

- Why would a potential business partner offer me this gift or invitation?
- Does a gift or invitation come with some kind of obligation?
- Could this gift or entertainment be interpreted as a bribe?
- Could this gift or entertainment be seen as excessive due to the circumstances, the overall situation or in the context of the latest business decisions?

## We build great relationships, but not through gifts

We handle gifts and entertainment with caution and common sense to avoid any possible misinterpretation of motives and reputational damage.

We are all in favor of doing business in a way that builds great relationships. However, gifts and entertainment need to be regarded with real caution. If there is any doubt, we ask questions, we talk to each other, we act with caution and make our actions transparent and inform the Ethics Office.

We do not consider it appropriate to accept or grant a personal benefit of any kind in connection with our professional activities. Nevertheless, in the course of good business relationships, a small gift or modest invitation may sometimes be offered based on what is considered reasonable and customary. In such situations, we need to exercise caution and common sense, to avoid any possible misinterpretation of motives and reputational damage.

We think carefully and only offer or accept gifts which have a moderate value and are understood to be simply business courtesies, and not an attempt to induce us to act unprofessionally, or to misuse our position. We attach the utmost importance to an impeccable reputation. We use the same standard when deciding whether to offer or accept a gift. We do not offer or accept cash or cash equivalents such as gift cards or shopping vouchers.

We act particularly cautious when dealing with public officials or government representatives because we adhere to the often very strict rules that govern in many countries.

# Conflict of Interest

## Why do we care?

All our business relationships are built on trust. Even though we might sometimes be tempted to do favors or pursue our personal interests, we know that only decisions that are based on objective criteria are truly fair and create trust. This can only be maintained by acting with unquestioned integrity in everything we do, bearing in mind that a perceived conflict of interest can be just as damaging to our reputation as a real one.

## Ask yourself

- Am I certain that my decision is based only on objective criteria like quality, price, or the reliability of supplier?
- Could others think I am personally benefitting from what I am planning to do?
- Do I owe the other person?
- Could others perceive my business decision as being influenced by my relationship with the other person?

## We take care of business, not of our personal interests

It may sound obvious that - when we are at work - all our actions and decisions should be based on what is best for the business. Still, conflicts of interest, namely situations in which personal gain may influence our professional judgment, can and do occur. It is vitally important that we know how to recognize potential conflicts of this kind, and that we disclose them before any damage is done to the trust our company's success is built upon.

We understand that our personal relationships and interests should never affect our business activities or influence our decision-making in any way. We must be careful to avoid situations in which a conflict between private and professional may arise. This means, for example, that we should not make any investment, or enter into any relationship that may cause others to doubt our fairness, integrity or ability to perform our duties objectively. It is important to point out that having a conflict of interest is not misconduct in itself but the way we handle it could be.

It is all about transparency: if you suspect a possible conflict, you need to raise it with our manager or contact person without delay.

Secondary positions/employment, business activities and investments need to be carefully considered and, in many cases, require permission from the company or notice needs to be given. Ampleon does not allow employees' friends or family members to influence their decision-making in relation to Ampleon. Taking decision must always be based on factors such as competencies, job performance and behavior in the work environment. Similarly, when we engage third parties, we use objective criteria such as price, quality, reliability, and ability to meet technical standards.

## **Personal relationships**

Conflicting loyalties may arise when our personal interests are inconsistent, or appear to be inconsistent, with those of Ampleon. Therefore, we shall not conduct any Ampleon business with family members or others with whom we have a significant personal relationship. Also, we shall not use our position within Ampleon to approve payment, promotion, compensation, or other favored treatment of family members or others with whom we have personal relationship.

## **Outside employment or business activities**

We must notify our manager and discuss with HR team of Ampleon before taking any other additional employment outside of Ampleon, including positions at a customer, distributor, supplier, or other Ampleon business partner or institutions while being employed by Ampleon. Any outside activity must be separated from and not interfere with the employment at Ampleon. In case of outside employment, we shall not use time while at work, any of Ampleon assets, or our position at Ampleon to perform another job or benefit another employer.



# We Respect

# Human and Social Rights, Labor Standards

## Why do we care?

Treating each other with respect and working together to create and maintain an environment in which everyone feels valued and encouraged to perform at their best, is fundamental to the way we do business, and to achieving our full potential as a company.

## Ask yourself

- How would I feel if someone treated me the same way?
- Do I have any unconscious beliefs or attitudes that might influence my judgment of people and situations?
- How can I contribute to creating a positive work environment?

We recognize the human rights of all people as outlined in the Universal Declaration on Human Rights, RBA Code of Conduct and the UN Guiding Principles on Business and Human Rights. We take responsibility for avoiding infringement of human rights and for remediating the impact on human rights resulting from our activities and our products and from the activities that our business partners conduct for us. We expect our business partners to apply equivalent values and actively support them in implementing them when needed. Our colleagues, business partners and people affected by our activities or products are encouraged to raise complaints about any potential human rights impact or breach of our CoC. These complaints will be addressed fairly, in confidence and in accordance with laws. We are committed to continuous improvement to remain an attractive employer, business partner and member of the communities in which we operate.

## Following the standards means for us that we

- Recognize human rights and treat people with dignity and respect
- Recruit and manage employees fairly
- Reduce the environmental impact of what we do
- Address the concerns of those affected by our operations
- Give back to communities we operate in
- Work with business partners who share our values

## **Diversity & non-discrimination**

Ampleon is committed to diversity in a working environment where mutual respect prevails. No form of 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, rewards, and access to training is allowed.

## **Child labor**

Ampleon will not use child labor and will always adhere to the legal age requirements in all countries in which we operate. We do not employ children under the age of 15 or under the age of completing compulsory education.

## **Working hours & work-life balance**

Workweeks are not to exceed the maximum set by local law. A workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Employees have the right to have at least one day off per seven-day period. Ampleon aims to increase the employability of its employees by, amongst others, focusing on flexibility: working practices that acknowledge and support employees to achieve a balance between their home and working lives in the different stages of their life.

## **Minimum wage standard & living wage (fair remuneration)**

Ampleon wants to build long-term, sustainable relationships with its employees. One way to achieve this is to pay fair and balanced salaries and benefits. Employee wages should comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

## **Harassment prohibition**

Ampleon does not tolerate any form of harassment of employees or co-workers, or the threat thereof.

## **Freely chosen employment**

Ampleon does not allow for any form of slave, forced, bonded, indentured, or involuntary prison labor, debt bondage or any form of forced child labor. All work must be voluntary and not subject to mental or physical oppression. Ampleon does not allow for human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation. Employees are free to leave work at any time or terminate their employment.



## **Human right in our supply chain**

Ampleon actively pursues adherence to the CoC by its suppliers by including compliance to this CoC in its supplier agreements and including the right to audit on CoC compliance. Should a case of non-compliance to CoC be identified, Ampleon then expects such supplier to act, in consultation with Ampleon.

## **Respect in the workplace**

Everyone at Ampleon should always feel valued and respected. Therefore, we expect everyone to avoid saying or doing anything to colleagues which is humiliating, condescending, offensive or otherwise disrespectful. Our team is built on talent, and we appreciate differences because they make us stronger and are essential to our success.

We promote an inclusive environment that embraces diversity of all kinds, including a wide variety of backgrounds, thoughts, perspectives, demographics, ethnicities, and origin. Therefore, we do not tolerate discrimination or harassment against anyone based on grounds such as age, race, color, sex, sexual orientation, gender identity/ expression, national origin, religion, disability, genetic information, or any other personality traits or preferences. This governs all our employment decisions such as recruiting, hiring, promotions, benefits, disciplinary actions, or terminations.

# Environmental Protection, Health and Safety

## Why do we care?

Our own future and that of future generations depend on protecting our environment. Nothing is more important than safeguarding people's health and safety, a responsibility which we all share, in pursuit of sustainable business success.

## Ask yourself

- Do I know what to do in a health or safety emergency?
- Do I sometimes perform tasks I am not properly trained for?
- Do I know the hazards of chemicals, so I can handle them safely?
- Do I ever take safety "shortcuts" because I feel under pressure to get work done?

## We value the health and safety of people above all else

Wherever we do business, we act responsibly, not just by complying with all relevant regulations but also by going the extra mile to reduce risks and minimize our environmental impact.

## Environment, community, and supply chain

Ampleon is committed to comply with all environmental laws and regulations in every country we operate in. Our focus is on reducing our environmental footprint by lowering our carbon emissions, using less energy, and creating less waste in our activities. We develop environmentally friendly technologies and work closely with our business partners to do more with less in an environmentally responsible way.

We fully understand our role and responsibilities in society and by contributing to the communities we operate in. Whenever possible, we make a positive difference to the world around us, engaging with people and organizations to help bringing the Ampleon brand to life while supporting deserving and sustainable projects and causes, using our products when appropriate. We are encouraged to get involved in community activities, as long it does not lead to a conflict of interest. We expect this commitment also from our business partners and therefore include it in the contract with our business partners.

If we are to leave a healthy planet for future generations, we must be more sustainable in everything we do. This also means working with customers and suppliers to develop leading solutions that do more with fewer resources. It also means continuously developing ourselves and our colleagues. We each play our part in creating an engaging place to work and contributing to the company's sustainability success.

## **Environmental protection, health and safety**

We are committed to energy efficiency and climate protection and are constantly developing sustainable solutions for our business operations and for our customers. Across all our operations and in close collaboration with our suppliers, we work to achieve the highest standards of health and safety, and to maintain the trust of our employees, customers, business partners and other stakeholders. In the event of any kind of incident or emergency, we are well prepared to take whatever action is necessary.

### **A business that demands taking extra care**

In terms of environmental protection, health, and safety, we are aware that the nature of our business demands that we take exceptionally good care to reduce risks and prevent accidents. Our core business, namely the development, production, processing, handling, and transportation of transistors, demands a responsible approach. We address risks with various tools and systems. We expect our employees and contractors to know the risks of working with our products, substances and plants and handle these responsibly. We continuously ensure that our products pose no risk to people or the environment when they are used responsibly and in the intended manner.

### **A commitment shared with our partners and suppliers**

We do not just set ourselves ambitious goals for safety and security, health, and environmental protection. We also expect our business partners to aim equally high. In particular, we count on our suppliers to be fully engaged with these goals, and work with them to improve their sustainability performance.

### **Creating a responsible risk-awareness culture**

Throughout Ampleon, we work continuously on preventing accidents and injuries and on protecting our environment. We do this by not only following regulations and procedures, but also by creating a culture in which everyone feels responsible for reducing risks and promoting safe working practices.

## **Stakeholder relationships**

We engage with our customers to understand their markets and needs. By having a transparent and unbiased dialog with our key financial, social, and environmental stakeholders, we use knowledge from this dialog to develop leading sustainability solutions.

A top-down view of several hands of different skin tones and sleeve colors (white, dark blue, light blue) reaching towards the center. They are holding a small, dark soil ball with a young green plant with three leaves. The background is a light-colored wooden surface. The entire image has a blue tint.

**We Protect**

# Sensitive Company Information

## Why do we care?

Our ideas, our innovations, and our technical know-how are the lifeblood of our business and are extremely valuable assets. Naturally, we do our best to protect our intellectual property, while treating confidential information belonging to others with the same respect. The same is true for non-public information. Using price sensitive non-public information when trading shares or unauthorized business communication could be gravely damaging to trust and confidence in us and the integrity of the markets.

## Ask yourself

- Who owns this information or knowledge, and am I free to share it with others?
- Has the term of my license expired?
- Do I use specific information I obtained from a previous job?
- Is someone infringing Ampleon's intellectual property rights, or could we potentially be infringing someone else's rights?

## We protect the information our success is built upon

Sharing information within Ampleon and with our partners enables us to create value for the company and our customers, and to benefit from the wealth of knowledge of our employees. To protect our know-how, we take every reasonable measure to prevent unauthorized disclosure or misuse, across all our business activities and every form of communication.

## Information protection and cyber security

We build on our intellectual property because confidential information and intellectual property of many kinds – from individual expertise to internationally protected patents – are some of our most valuable assets. Consequently, we take the greatest care to protect them and respect the intellectual property of others. We comply with all applicable policies, requirements and guidelines on information protection and cyber security, and regulate the sharing of confidential information accordingly.

We do not share confidential information on social media or in public places.

## Our key components of information protection are that we

- Regard information protection as part of our everyday work
- Share information to create value for Ampleon (need-to-share principle)
- Limit access to information worth protecting to authorized people (need-to-know principle)
- Transport and store information carriers securely and dispose of them properly
- Protect information when traveling or being off-site
- Use all information technologies securely

Sharing information is a vital everyday part of conducting our business. However, our success also depends on our ability to protect sensitive company information from any unauthorized disclosure or misuse. Dealing with tangible assets is equally important and hence we always handle company property with care. The same standards of honesty and integrity are applied in order to keep accurate books and records. We take advantage of digitalization and steer this transformation responsibly.

## **Company resources**

It is important to protect the company's property, resources and information systems and ensure that they are kept secure at all times. We use these assets appropriately and responsibly, and protect them against loss, damage or misuse. In parallel, we take care of using assets and resources for their intended business purpose.

## **Confidential information**

It is vital to safeguard the company's intellectual property and confidential information. This includes business strategies, technical know-how, financial information, customer lists and passwords. Confidential information is therefore protected against unauthorized disclosure to avoid destruction of the value of our assets and damage to our business operations and reputation. We also respect the intellectual property of others, protect confidential information provided to us and only use it if we have obtained permission to do so.

# Digital Responsibility

## Why do we care?

Digitalization enables us to create exciting new customer experiences which is why we make it a priority in the entire company. This way we want to continue leading the digital transformation in our industry.

## Ask yourself

- Does my digital solution enable exciting customer experiences without neglecting data protection and privacy?
- Are the benefits of our new digital solution adequately communicated, i.e. with full transparency on data usage as well as opportunities and borderlines?
- Have we developed new digital solutions in a collaborative, multidisciplinary and diverse way to better serve our customers' needs?

## We leverage digitalization across the company

It is no exaggeration to say that digital technology is changing almost every aspect of our lives. For companies like Ampleon, this constitutes some challenges, as traditional business models and norms are disrupted. Despite these challenges, we are excited about the amazing opportunities offered by digitalization as they create additional value for our customers, improve the efficiency of our processes, and strengthen our capacity for innovation.

## Digital responsibility

We are an innovation-driven and forward-thinking company. To ensure our long-term success and support the success of our customers, we take advantage of the chances of digitalization. We thoughtfully and efficiently integrate its benefits into the way we do business and leverage its potentials for our business conduct as well as for our products and customer solutions. Digitalization is crucial to staying competitive and is therefore one of our strategic action areas.

To stay ahead of competition, we need to accelerate the execution of digital projects and build strong digital capabilities throughout the company. Technologies, like augmented reality, machine learning, artificial intelligence or others, are often used to create exciting customer experiences, new digital business models or make processes more efficient. We also recognize the significant impact of digitalization on our employees, our customers, and the wider society and are committed to steering this transformation responsibly and ethically, for the benefit of all stakeholders, by, for example:

- Ensuring that developments and usage are driven by our values and the principles laid down in our CoC
- Developing digital solutions in a collaborative, multidisciplinary, and diverse way, and using them inclusively to empower our employees, customers, and other stakeholders
- Seeking to avoid the creation or reinforcement of unfair bias
- Acknowledging that many challenges will require broader discussions across industries, disciplines, and borders, and being an active voice in this debate

# Appropriate Communication

## Ask yourself

- Is this information I intend to share public knowledge or only for internal use?
- Could this information offer me or anyone else an unfair advantage when deciding whether to buy or sell securities?
- Am I sharing only the inside information this person really needs to do their job?

## We communicate facts in an adequate and reasonable manner

We are committed to communicating in an open, factual and timely way, while following all legal and business obligations. To be sure that we comply with the law and protect the company's interests, we refer media enquiries to people who are authorized to speak on behalf of the company. We carefully consider our business communications, regardless of the method used to communicate and ensure that they meet high standards.

### Social media

Social media are part of the business mainstream. In terms of responsible use, the rules that apply here are generally the same as those for traditional media. When communicating via social media, we use discretion and common sense and follow the relevant guidelines at all times.

### External communications

Of course, like every successful business, we are keen on communicating openly, clearly and accurately with everyone, from employees and customers to shareholders and suppliers. However, whatever form the communication takes, we think carefully about what we want to say. To ensure we comply with all legal requirements and protect our company's interests, we have specialists and teams responsible for communications. Unless we receive prior approval or use already published content, we do not speak on behalf of Ampleon when presenting our personal views at events, in the public, or on the internet, including social media. When we express personal views, we ensure they are clearly labeled as such, particularly in any situation where people may assume that we are representing the views of Ampleon.

In all our communications, we are always careful to ensure that what we say will not cause harm, or damage Ampleon's reputation.



# Personal Data

## Why do we care?

In a world in which we are increasingly using data and advanced information technologies, it is more important than ever to ensure our stakeholders trust how we treat their personal information. Therefore, we process personal data only to the extent necessary and handle it in a confidential and discrete manner. In case of any doubt, just consider how you would feel if the personal data were your own.

## Ask yourself

- Do I need access to this personal data and if so, am I handling it properly?
- Would I feel comfortable if it were my personal data being processed?
- Would it harm anyone if I lost this personal data or made it available to an unauthorized person? Have I done everything to prevent this?

## We take care of protecting personal data

In our everyday business activities, we collect and handle personal data relating to individuals, such as employees, customers, and business partners. We never forget that this data is private and must be treated with respect as not just because laws strictly demand it, but also because it is the right thing for a responsible business to do.

Our commitment is to respect the personal rights of everyone, thus we adhere to strict standards when handling personal data. All personal data collected by us will be processed fairly, transparently, carefully and in full compliance with the applicable legal requirements. Protecting this data is part of doing business with integrity. It is not only our responsibility or a legal obligation but also our license to operate in the digital world. Protecting personal data means preserving the trust our customers and business partners place in us. Putting the customer at the center is about more than meeting expectations. It is about continuing to earn and preserve their trust.

Remember that the protection of personal data is strongly enforced by laws and this protection is therefore a permanent task. We continuously apply checks to ensure the protection of personal data in our daily work, new developments and processes. If you become aware of an error in the processing, handling or securing of personal data, or if you have any doubts as to whether certain processing procedures comply with the legal requirements, speak up and contact your manager, the legal experts, your helpdesk or the Information Security Officer directly.

# Company Property

## Why do we care?

Just as we would all expect our personal property to be treated responsibly by others, we should invariably handle company assets with care and respect – not least when they belong to business partners, whose trust and good will are of vital importance to us.

## Ask yourself

- Am I treating this company asset like a reasonable and responsible person would do?
- Is this use of company property primarily for business purposes?
- Have I done whatever is necessary to prevent damage to, or misuse of company property or the property of our customers, business partners and other third parties?

## We take care of handling company assets responsibly

We regard it as fundamental that all of us at Ampleon handle company property with due care and respect. This does not only concern physical assets, as it is equally important to be responsible for the way we deal with intangible assets, such as intellectual property rights, copyrighted material, financial records, and our brand reputation.

Our facilities, production lines, processes, and materials are highly valuable assets for which we all share responsibility. We handle them with care, and ensure they are not damaged, wasted or misused. Company computers and other equipment are for work and not personal use, unless explicitly stated, for example regarding the use of mobile phones or internet use on the premises. Different rules may apply in different countries, hence keep yourself informed or ask for advice. We all commit to the relevant corporate policies covering the protection of company property.

From stationery and office furniture to computers and other goods, there are many kinds of company property that enable us all to do our jobs to the best of our ability.

Naturally, we treat all such assets responsibly, protecting them against loss, damage, theft or misuse. Exactly the same applies of course when we handle property belonging to any of our customers, business partners or other third parties.

# Accurate Books and Records

## Why do we care?

Accurate and reliable information about our company's activities and financial performance is not just a legal obligation. It is critical for our decision-making and for maintaining the trust and confidence of our customers, business partners, investors and other stakeholders.

## Ask yourself

- Have I documented this business transaction or activity accurately?
- Have I asked questions about the reliability of the information recorded?
- Would someone who is not familiar with this transaction or activity be able to understand it?
- Have I stored all relevant information?

## We build trust by being reliable and transparent

For our company to be regarded as trustworthy by all our stakeholders, the accuracy and integrity of our books as well as financial and non-financial records must be beyond question. In addition, of course, any irregularities in accounting or reporting can have serious consequences, for the company and the responsible individuals. Our internal control systems are essential to ensure that the numbers and records always comply with the relevant legal requirements.

It is our duty to ensure that the records we keep related to our business activities are accurate, complete and up to date. Efficient and accurate records management is essential for the protection of the company's business interests. We follow internal rules and guidelines when creating documents and ensure that we keep records safely or destroy them in accordance with relevant document retention policies.

We are convinced that keeping accurate records which give a fair, transparent and complete picture of our business is a critically important responsibility that lies in our hands. We expect the same standards of honesty and integrity to apply across all business records, from research results to expense claims.

We strictly comply with all statutory requirements for proper accounting and financial reporting as well as tax laws and regulations. We further place the highest importance on creating records that reflect the true nature of the transactions and activities they document.



# Contact Us

To raise a concern, talk to your manager,  
or contact Ampleon Ethics Team  
[ethicsteam@ampleon.com](mailto:ethicsteam@ampleon.com)

# AMPLEON

The Leading Global Partner in RF Power

© Ampleon Netherlands B.V. 2023

All rights reserved. Reproduction in whole or in part is prohibited without the prior written consent of the copyright owner. The information presented in this document does not form part of any quotation or contract, is believed to be accurate and reliable and may be changed without notice. No liability will be accepted by the publisher for any consequence of its use. Publication thereof does not convey nor imply any license under patent- or other industrial or intellectual property rights.

[www.ampleon.com](http://www.ampleon.com)

Date of release: July 26, 2023  
Document identifier: AM1-00025  
Printed in the Netherlands