



Supplier Code of Conduct

The Solidigm Supplier Code of Conduct (SCoC) outlines the principles and requirements for establishing and maintaining a business relationship with Solidigm. All Solidigm Suppliers are expected to understand and comply, in addition to this SCoC, with the Solidigm Code of Conduct, the minimum standards of the [Responsible Business Alliance \(RBA\) Code of Conduct](#), and all applicable laws and regulations.

Suppliers are defined as all entities that provide goods or services, whether to or on behalf of Solidigm (“Suppliers”). This includes, but is not limited to, all Suppliers that manufacture Solidigm products, components, and/or materials (whether or not directly for Solidigm), or are involved in the process of manufacturing Solidigm products.

As a global company, Solidigm understands that there are different legal and cultural regulations that may govern Suppliers where they operate throughout the world. This SCoC outlines the minimum requirements that Suppliers must meet in addition to local laws and regulations. To ensure these standards are cascaded throughout Solidigm’s supply chain, Suppliers are expected to hold their suppliers and subcontractors to the requirements covered in the SCoC.

Solidigm will periodically assess Supplier compliance and will work with Suppliers, as needed, to meet the minimum requirements of the SCoC as we strive for continuous improvement within our supply chain. This assessment process may involve Solidigm requesting Suppliers to provide certifications, information, or data, to Solidigm directly or to an authorized third-party vendor designated by Solidigm. Solidigm expects Suppliers to comply with such requests in a complete and timely manner, as a requirement for continuing as a Solidigm Supplier.

For questions regarding the SCoC please contact your Solidigm Supply Chain or Procurement representative, or email at suppliers@solidigm.com. To report ethical concerns, contact AskEthics@solidigm.com.

A. Labor and Human Rights

Solidigm expects that all of Supplier’s workers are treated fairly, with dignity, respect, and be free from discrimination, harassment, and intimidation. This applies to all workers, including temporary, migrant, student, contract, or others. Suppliers must

comply with the [United Nations Declaration of Human Rights](#), United Nations' [Guiding Principles on Business and Human Rights](#), and the International Labor Organization's [Conventions](#), as well as applicable employment and labor laws in the jurisdictions where they operate.

In addition to the values, guidance and laws listed above, Suppliers are expected to follow the RBA labor standards, which include, but are not limited to, the following provisions:

- Forced, bonded, indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted under any circumstances.
- Child labor is not to be used in any stage of manufacturing.
- Working hours are not to exceed the maximum set by local law or 60 hours per week, whichever is less.
- Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.
- Workers shall be free from harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse.
- Supplier workplaces shall be free of harassment and unlawful discrimination.
- Workers shall have the right to form and join trade unions of their choosing, to bargain collectively, and to engage in peaceful assembly, as well as the right to refrain from such activities.

For additional details of the RBA labor standards, please review the [RBA Code of Conduct](#).

B. Environment

Suppliers must make concerted efforts to be wise stewards of the Earth's natural resources and develop environmentally-friendly products. At a minimum, Suppliers must:

- Comply with all applicable environmental laws (e.g., permitting, monitoring, approvals, etc.).
- Minimize emissions and discharges of pollutants.
- Ensure chemical waste and other materials posing a hazard to humans and the environment are identified, labeled, and managed to prevent danger to people or the environment.
- Implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste.
- Control, monitor, and treat ozone depleting substances and ensure they are managed in accordance with the Montreal Protocol and applicable regulations.
- Implement a water management program that documents, characterizes, and monitors water sources, use and discharge.

- Establish a corporate-wide greenhouse gas reduction goal and track all energy consumption along with relevant Scope 1, Scope 2, and significant categories of Scope 3 GHG emissions.

C. Conflict Minerals

Suppliers are expected to responsibly source minerals in an ethical and sustainable manner that safeguards the rights of all people in our global supply chain.

The mining, transport or sale of certain minerals and ores (e.g., tantalum, tin, tungsten, gold, and cobalt) sometimes directly or indirectly provides a material benefit to armed groups or finance conflicts that are characterized by extreme violence. These “conflict minerals” can make their way into the Solidigm supply chain. Our goal is to support responsible sourcing. We expect our Suppliers to implement policies (and to collaborate with others in the supply chain) to assure us that what we buy is “conflict free.”

Suppliers must comply with the [Responsible Business Alliance \(RBA\) Code of Conduct](#) and the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#). Solidigm will annually survey Suppliers for conflict minerals information. Suppliers must submit, upon request by Solidigm or our authorized agent, a timely and complete response to a questionnaire (the [Conflict Minerals Reporting Template – CMRT](#)). Suppliers may be required to undertake mitigation if the Supplier’s supply chain contains conflict minerals.

D. Health and Safety

All human beings have the right to work and live in a safe environment. Suppliers must understand and follow all applicable global health and safety rules, regulations, and laws. Additionally, Suppliers must also make concerted efforts to minimize harm to life, the environment, and property by identifying, assessing, and mitigating safety and health risks.

Suppliers must ensure that:

- Safety is given the highest priority and is designed into the workplace.
- Worksites, restrooms, break rooms, and dormitories are kept clean and safe, with adequate heating, cooling, lighting, ventilation, clean drinking water, and sufficient egress.
- Workers are provided with clear information on potential hazards and sufficient training on how to safely perform their associated tasks, in a language they understand.
- Workers are provided with adequate personal protective equipment for their tasks.

- Reasonable accommodations are provided for workers that are pregnant or nursing, including but not limited to gender-centered accommodations so that pregnant women or nursing mothers are not exposed to working conditions which could be hazardous them or their child.
- Reasonable accommodations are provided for workers who are disabled.
- Emergency planning, reporting, communication, and drill procedures are understood by all workers.
- Fire detection and mitigation devices are in working condition.
- Workers are free to voice their occupational safety and health concerns with management without fear of retaliation.

E. Ethics

As is set forth in the Solidigm Code of Conduct, Solidigm expects all its Suppliers, and sub-tier suppliers to uphold the highest level of ethics within their business operations. Specific ethical standards include:

- **Business Integrity:** Solidigm has a zero-tolerance policy for bribery, corruption, extortion, and embezzlement within the supply base. There must be no improper advantage provided through giving or accepting anything of value, either indirectly or through a third party, to obtain or retain business. Monitoring and record-keeping shall be implemented to ensure compliance with anti-corruption laws such as the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act.
- All business dealings must be transparently performed and accurately reflected on Supplier's books and records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records and/or misrepresentation of conditions or practices in the supply chain are unacceptable.
- Intellectual property rights must be respected and related information protected.
- Standards of fair business, advertising, and competition must be upheld.
- Programs that ensure the confidentiality, anonymity, and protection of Supplier's employee whistleblowers must be maintained, unless prohibited by law. Suppliers must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.
- Suppliers must commit to protecting the reasonable privacy expectations regarding personal information of everyone they do business with and must comply with data protection/privacy and information security laws and regulatory requirements.
- Suppliers must comply with the terms of its agreement with Solidigm, including ensuring that it uses materials and parts that are new, genuine and not counterfeit, and free from defects in materials and workmanship. All goods delivered by the Supplier to Solidigm must also follow specifications provided by Solidigm.

F. Business Continuity

We strive to assure our customers that we are evolving and maturing in our ability to mitigate, quickly manage, and recover from unexpected events. As a result of Solidigm's Business Continuity Practice requirements, we hold our Suppliers to the same business continuity expectations and expect our Suppliers to have disaster recovery plans in place that are effective and actionable.

To that end, we require Suppliers to immediately communicate any major operational disruption that may impact Solidigm. Solidigm or our authorized agent may periodically request Suppliers to submit their business continuity plans for our review.

G. Management System

Suppliers shall adopt or establish a management system with a scope that is related to the content of this SCoC. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and Solidigm requirements related to the Supplier's operations and products; (b) conformance with this SCoC; and (c) identification and mitigation of operational risks related to this SCoC. A method of review and continuous improvement should be developed.

Supplier Acknowledgement

I have read, understand, and agree to comply with all provisions of the Solidigm Supplier Code of Conduct (SCoC).

Signature

Name

Title

Date Signed

Company
