



Supplier Code of Conduct

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

Solidigm Suppliers are defined as all entities that provide goods or services, whether to or on behalf of Solidigm ("Suppliers"). This includes all Suppliers that manufacture our products, components, materials, or are involved in the process of manufacturing, including any suppliers providing services to or on behalf of Solidigm. As a Supplier, you are expected to understand and meet these requirements. 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 regardless of local guidelines or 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.

For questions regarding the SCoC please contact your Solidigm Supply Chain or Procurement representative or suppliers@solidigm.com. Utilize this [link](#) for reporting any ethical concerns.

A. Labor and Human Rights

Solidigm expects that all workers within its supply chain 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 all applicable employment and labor laws in the regions where they operate, the [United Nations Declaration of Human Rights](#), United Nations' [Guiding Principles on Business and Human Rights](#), and the International Labor Organization's [Conventions](#).

In addition to the laws listed above, **Solidigm Suppliers are expected to follow the RBA labor standards which include:**

- 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.

- Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.
- There is to be no 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 of workers.
- Suppliers must be committed to a workplace free of harassment and unlawful discrimination.
- Suppliers will respect the right of all workers to form and join trade unions of their choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers 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. 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. Track all energy consumption along with relevant Scopes 1 and 2 GHG emissions.

C. Conflict Materials

While Solidigm does not procure minerals directly, our 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. Minerals and other materials (for example, tantalum, tin, tungsten and gold) are sometimes mined and sold under the control of armed groups to finance conflicts that are characterized by extreme violence. These minerals can make their way into the supply chain. Our goal is to use minerals and other materials that do not directly or indirectly finance or help such groups, and more generally 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." We expect our Suppliers to 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. Suppliers must notify Solidigm immediately if it is determined that minerals in our supply chain have not been ethically sourced.



D. Health and Safety

All human beings have the right to work and live in a safe environment. Suppliers must make concerted efforts to minimize harm to life, the environment, and property by identifying, assessing and mitigating safety and health risks following the [Hierarchy of Controls](#) framework.

Suppliers must ensure that:

- Safety is given the highest priority by company and is designed into the work.
- Worksites, restrooms, break rooms and dormitories are kept clean and safe, with adequate heating, cooling, lighting, ventilation, and drinking water and sufficient egress.
- Workers are provided with clear information on potential hazards and sufficient training on how to safely perform the associated tasks in a language they understand.
- Workers are provided with adequate personal protective equipment for their tasks.
- Reasonable accommodations are provided for those that are pregnant, nursing or 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 Solidigm's Code of Conduct, Solidigm expects all its Suppliers, and sub tier suppliers to uphold the highest level of ethics within 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 should 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.
- Business dealings should 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.
- Standards of fair business, advertising, and competition are to be upheld.
- Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should 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 of personal information of everyone they do business with and must comply with privacy and information security laws including regulatory requirements.



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 have the same business continuity expectations and disaster recovery plans in place, effective, and actionable.

To that end, you will be required to immediately communicate any major operational disruption that may impact Solidigm. Periodically, you will be required to submit your business continuity plans to Solidigm 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 code. 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 Code; and (c) identification and mitigation of operational risks related to this Code. A method of review and continuous improvement should be developed.

H. Revision History

Revision Number	Date	Summary of modifications
Rev0	9/01/2022	

