

# Supplier Code of Conduct

## Introduction

Micron is committed to conducting all business with uncompromising integrity and professionalism and expects all Suppliers to do the same.

This Supplier Code of Conduct ("Code") establishes Micron's expectations for its Suppliers, including ethical business practices, social responsibility, and environmental sustainability. Micron requires Suppliers to demonstrate compliance with this code of conduct, as well as any laws and regulations that apply in the countries in which Suppliers are located. When differences arise between the standards set out in this code of conduct and applicable legal requirements, the stricter standards shall apply, in compliance with applicable laws.

If you have any questions regarding the Code or its application to a particular circumstance, please contact your Micron representative. If you have reason to believe that the Code has been violated, please do not hesitate to contact Micron via [Micron's Compliance Helpline](#) to make an anonymous and confidential report. The helpline is maintained by a third-party vendor with processes in place to enable anonymous submissions and to manage potential conflicts of interest.

Thank you for your partnership with Micron and for your commitment to all aspects of the Code.

## Scope

The Supplier Code of Conduct outlines the expectations and standards that Micron Technology, Inc. requires from its Suppliers to ensure ethical, sustainable, and responsible business practices throughout the supply chain. This document covers the following key topics:

- Human Rights
- Business Ethics
- Environmental, Health, and Safety
- Diversity and Inclusion
- Management System

Additionally, as outlined in the [Micron Supplier Requirements Standard \(SRS\)](#), Suppliers shall adhere to stringent quality, business process, and compliance requirements. This includes maintaining accurate records, providing necessary documentation, and complying with all applicable laws and regulations. By adhering to this Code and the SRS, Suppliers help us promote ethical, sustainable, and responsible business practices across our supply chain.

## 1.0 Human Rights

Micron is committed to conducting all business with uncompromising integrity and in compliance with applicable laws and regulations everywhere we operate. In addition, Micron supports the advancement of human rights along our entire value chain and expects our supplier to do the same. We continue to perform due diligence to confirm that items and materials being imported into the U.S. comply with applicable U.S. law. As such, Micron expects its Suppliers to uphold the highest standards of human rights as outlined in our [Human Rights Policy](#) and [Slavery and Human Trafficking Statement](#). Suppliers shall ensure freely chosen employment, prohibit child labor, comply with working hours and wage laws, and maintain a safe, non-discriminatory workplace.

### 1.1 Freely Chosen Employment/ Prevention of Human Trafficking and Forced Labor.

Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of their exploitation.

Suppliers shall ensure that all work is voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, as per the workers' employment contracts.

Suppliers shall not withhold worker's original government-issued identification and travel documents. Suppliers shall ensure that worker's employment agreements clearly convey the conditions of employment in a language understood by the workers. Suppliers shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

Workers shall not be required to pay employers' or their agents' recruitment fees, or other similar fees, to obtain employment. If such fees are found to have been paid by workers, such fees shall be repaid to the workers.

### 1.2 No Child Labor; Young Worker Protections.

Suppliers shall not employ child labor and shall support the elimination of exploitive child labor. Micron defines "child" as any worker who is under 16 years of age, or below the minimum age for completing compulsory education or employment in any country, whichever is the highest.

Young workers, who meet the legal minimum age requirement but are under the age of 18, shall not engage in activities that are likely to jeopardize their health or safety, including night shifts and/or overtime. Suppliers shall also comply with all other applicable laws and regulations regarding the employment of minors. If child labor is identified, assistance/remediation shall be provided.

### 1.3 Working Hours.

A workweek shall be restricted to a maximum of 60 hours, including overtime, except in emergencies or unusual situations, and workers shall be allowed at least one day off every seven days. Suppliers shall adhere to all relevant laws and regulations regarding working times and rest days, and all overtime must be voluntary.

## 1.4 Fair Wages and Benefits.

Suppliers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Suppliers shall pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure.

## 1.5 Non-Discrimination/Anti-Harassment/Humane Treatment.

Suppliers shall commit to a workforce free of harassment and unlawful discrimination. 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 is prohibited; nor is there to be the threat of any such treatment. Suppliers shall recruit workers based on their capacity to perform their duties and shall not discriminate against any worker based on race, color, ethnicity, religion, gender, sexual orientation, gender identity and/or expression, age, national origin, disability, veteran status, marital status, and/or other classifications protected under law, in hiring and other employment practices such as promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. Suppliers shall not require pregnancy or medical testing, except in accordance with applicable laws or regulations, or to ensure workplace safety, and shall not improperly discriminate based on test results.

## 1.6 Freedom of Association.

In conformance with local laws, Suppliers shall respect the rights of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, as well as respect the rights of workers to refrain from such activities.

# 2.0 Business Ethics

Micron expects its Suppliers to conduct their business operations with the highest standards of integrity, fairness, and impartiality, in an ethical and proper manner.

## 2.1 Business Integrity.

Micron expects its Suppliers to adhere to all applicable anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act and UK Bribery Act. Suppliers shall have a zero-tolerance policy that prohibits all forms of bribery, corruption, extortion, embezzlement (covering promising, offering, giving, or accepting any bribes). Micron strictly prohibits making Facilitation Payments to Government or Public Officials either directly or indirectly through a third party, including, but not limited to, anything of value, typically a small payment or gift, offered or provided to facilitate or expedite routine clerical or administrative, non-discretionary actions such as inspecting goods in transit, issuing permits and/or licenses, processing visas, or providing police protection.

## 2.2 Gifts, Entertainment, and Meals.

Suppliers should not provide any gift, entertainment, or meal to a Micron employee in any situation in which it might influence, or appear to influence, any employee decision in relation to the Supplier. Suppliers shall have a policy covering this requirement and a process to investigate and report any violations of the policy. When offering gifts, entertainment, and/or meals to Micron employees, Suppliers must ensure they are:

- Not to exceed \$150 per person
- Unsolicited
- Infrequent
- Customary and tasteful
- Reasonable in value
- Not cash or cash equivalents (such as gift cards or vouchers)
- For a business purpose
- In compliance with applicable agreements, laws, and regulations
- Acceptable under Micron's and the Supplier's gift policy or known company standards.

### **2.3 Conflicts of Interest.**

As part of Micron's commitment to integrity, Suppliers shall disclose any potential or actual conflict of interest with Micron. Conflicts of interest arise in many ways and can include scenarios such as family or personal relationships with Micron employees, as well as business interests or activities, that might conflict – or appear to conflict – with the best interests of Micron.

### **2.4 Disclosure of Information.**

Suppliers shall accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance in accordance with applicable regulations and prevailing industry practices. All records shall be created, retained, and disposed of in compliance with all applicable legal and regulatory requirements. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable and a violation of this Code.

### **2.5 Intellectual Property.**

Suppliers shall take all steps to adhere to the intellectual property rights of Micron, including, but not limited to, Micron's copyrights, patents, trade secrets and trademarks. Suppliers shall not use Micron's brand name, logo, or other trademarks without Micron's express written consent.

### **2.6 Confidentiality.**

Suppliers shall safeguard, protect, and maintain the confidentiality of all non-public information, materials, and/or data received from Micron, whether in written, oral, visual, or electronic form, and any unauthorized disclosure of such information, materials, or data by Suppliers shall be deemed a material breach of this Code. Without limiting the foregoing, all Micron operational data (e.g., yield data, throughput data, quality metrics, etc.), business award information, and/or contractual terms between Micron and Suppliers shall be deemed non-public, confidential information of Micron subject to the obligations described in this Section.

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

Suppliers shall uphold standards of fair business, advertising, and competition. Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of applicable antitrust laws.

## 2.8 Responsible Sourcing of Minerals.

Suppliers shall assure that any tantalum, tin, tungsten, gold, and cobalt in products that they manufacture do not directly or indirectly benefit armed groups that commit human rights abuses in the Democratic Republic of Congo (DRC), its adjoining countries, or other Conflict-Affected and High-Risk Areas (CAHRAs). Suppliers shall adopt a policy and exercise due diligence on the source and chain of the minerals in the products they manufacturer to reasonably assure that they source from smelters or refiners validated as conformant by the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP), London Bullion Market Association (LBMA), or the Responsible Jewelry Council (RJC). Suppliers must comply with Micron's "[Responsible Minerals Policy](#)", as may be updated from time to time, which is accessible on Micron's website.

## 2.9 Privacy and Data Protection.

Suppliers shall fully comply with the Personal Data Protection and Handling Requirements (Section 5) of Micron's [Information Security Control Requirements](#), which is accessible on Micron's website.

## 2.10 Trade Compliance & Export Controls.

Suppliers shall comply with all applicable international trade laws, including laws relating to the import, export, or re-export of goods and services. Suppliers shall implement and maintain due diligence processes to screen their employees, customers, suppliers, vendors, and other business associates, to ensure compliance with applicable laws relating to trade sanctions and embargoes.

# 3.0 Environmental, Health, and Safety

Micron is committed to safeguarding the environment, including the prevention of pollution, and to providing an incident-free and injury-free environment for our team members, contractors, and visitors. [Micron's Environmental, Health, and Safety Policy](#) defines how we prioritize and maintain our high standards of operational health, safety, and environmental excellence. Suppliers shall adhere to all relevant environmental, health, and safety laws, rules, and regulations.

## 3.1 Health and Safety.

Suppliers shall establish and manage health and safety procedures for every aspect of their business operations, including the standards outlined in the [RBA Code of Conduct](#). Suppliers shall meet the RBA's standards for occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, housing and health and safety communication. Suppliers shall take adequate steps to minimize the causes of hazards inherent in the working environment and shall address the issue of substance abuse, including prohibiting the use, possession, distribution, or sale of illegal drugs in the supply chain.

## 3.2 Environmental.

Suppliers shall comply with all applicable laws and take reasonable measures to manage their impact on the environment, including the standards outlined in the [RBA Code of Conduct](#). Suppliers shall meet the environmental compliance requirements and related permits/licenses applicable to their operation and any additional requirements set in the RBA's standards for environmental permits and reporting, pollution prevention and resource

reduction, hazardous substances, solid waste, air emissions, materials restrictions, water management, energy consumption, and greenhouse gas emissions.

Suppliers shall support Micron's Greenhouse Gas (GHG) reduction efforts by identifying opportunities to accelerate decarbonization efforts within Micron's supply chain. Suppliers are encouraged to set and publicly disclose a meaningful GHG reduction target. Suppliers shall report GHG emissions data, progress to targets, and emissions allocation to Micron, as well as water data and progress to targets via the CDP platform (f.k.a. Carbon Disclosure Project) when requested.

In line with Micron's commitment to responsible business practices that support social and environmental conditions throughout our supply chain, applicable Suppliers are also expected to comply with and report on the following:

- Provide REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) compliance evidence every 6 months or when there are any product changes.
- Provide RoHS (Restriction of Hazardous Substances) compliance evidence annually or when there are any product changes.
- Provide full chemical disclosure substances upon Micron's request.

## 4.0 Diversity and Inclusion

Micron is committed to advancing opportunities and building mutually beneficial partnerships with small businesses and businesses that are majority owned by women, people with disabilities, members of the LGBTQ+ community, veterans, and other historically underrepresented communities. Suppliers shall share Micron's commitment to promoting diversity and inclusion throughout the supply chain by supporting [Micron's Supplier Diversity Program](#) initiatives. Micron expects its Suppliers to make reasonable efforts to engage small and diverse businesses, maintain records of these efforts, and report expenditures with small and diverse businesses upon Micron's request.

## 5.0 Management System

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations outlined in this Supplier Code of Conduct. This includes the following aspects:

### 5.1 Company Commitment, Management Accountability and Responsibility.

Suppliers shall develop a company statement that affirms their commitment to high standards of social and environmental responsibility, ethical conduct, and continuous improvement. The statement shall be endorsed by Supplier's executive management and posted at all their facilities in the local primary language. Suppliers shall clearly identify the senior management and company representative(s) responsible for the implementation of the management systems and related programs and regularly monitor the status of the management systems.

### 5.2 Legal and Customer Requirements.

Suppliers shall establish a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

### **5.3 Risk Assessment and Management.**

Suppliers shall develop and maintain a process to identify labor and human rights, health, and safety, environmental, business ethics, and legal compliance risks associated with its operations. Suppliers shall determine the relative significance of each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### **5.4 Improvement Objectives and Corrective Action Process.**

Suppliers shall have written standards, performance objectives, targets, and implementation plans, including periodic assessments of the performance against those objectives. Suppliers shall develop a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

### **5.5 Training and Communication.**

Suppliers shall conduct training programs for managers and employees to implement the company's policies, procedures, and improvement objectives and to comply with legal and regulatory requirements. Suppliers are expected to complete the Supplier Responsibility and Compliance Training, which is available in several languages.

Suppliers shall establish procedures to communicate policies, practices, expectations and performance clearly and accurately to their employees, subsidiaries, business partners and subcontractors involved in providing goods or services to Micron in the language known to them and that they abide by the same.

### **5.6 Worker Feedback, Grievance Mechanism and Non-retaliation.**

Suppliers are expected to permit workers to openly communicate. Suppliers shall have an effective mechanism for employees to submit their grievances anonymously and without fear of retaliation, unless prohibited by law. Suppliers shall develop a program to continuously monitor these reporting processes, record issues raised, investigate as appropriate, and take appropriate action. Suppliers shall prohibit unlawful retaliation, including, but not limited to, threats, intimidation, and attacks, against individuals who report a compliance or ethical issue, who cooperate in good faith with the investigation of a complaint, or who defend environmental or human rights.

### **5.7 Audits and Assessments.**

Suppliers shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and sub-tier Suppliers that provide goods or services to Micron to ensure compliance with this Code and the law. Micron reserves the right to conduct audits of Suppliers, including, but not limited to, Environmental, Social, and Governance (ESG) related assessments.

### **5.8 Documentation and Records.**

Suppliers shall maintain appropriate documents and records to ensure regulatory compliance.