



The Marvell Code

INTEGRITY, DONE RIGHT



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**“Act with integrity
and treat everyone
with respect.”**



Marvell
Concern Line

A Message From Our Chairman and CEO

At Marvell, we not only measure our impact by our corporate and individual success, but also by how we enable our customers to succeed and enhance the lives of people around the world. In other words, it’s not just about what we achieve, but how we achieve it. It’s not just about what we do, but who we are.

We understand that earning the trust of our stakeholders is fundamental to our business success and personal career fulfillment. Our code of business conduct and ethics, known as “The Marvell Code,” provides practical and indispensable advice for our employees to build and safeguard this trust with customers, partners, investors, and fellow team members.

It’s been wisely said that it can take years to build a good reputation and just a few minutes to destroy it, so a lot is at stake. The purpose of The Marvell Code is to help our team understand the laws, regulations, and principles that we need to adhere to and bring to life. By providing a decision-making framework, it also helps us recognize potential pitfalls and avoid them.

The first of our four Core Behaviors at Marvell is “Act with integrity and treat everyone with respect.” This principle summarizes The Marvell Code, and our team members bring it to life every day.

I am proud of our employees’ steadfast commitment to the highest standards of professional conduct and excellence.

Sincerely,

Matt Murphy

Chairman and Chief Executive Officer, Marvell

Our Core Behaviors

Our core behaviors define who we are and how we conduct business. We strive to demonstrate our core behaviors every day and in every interaction with each other, our customers and suppliers, and other business partners.



Act with integrity and treat everyone with respect

- We say what we mean and do what we say
- We are inclusive and embrace our diversity of people and opinion
- Lying and arrogance are unacceptable



Innovate to solve customer needs

- We understand our customers' needs and focus innovation to make them successful
- We are creative, take calculated risks and learn from our failures
- We build close and trusted customer relationships



Execute with thoroughness and rigor

- We make decisions objectively based on data
- We strive for excellence and minimize waste, delays and inconsistency
- We deliver superior quality on time



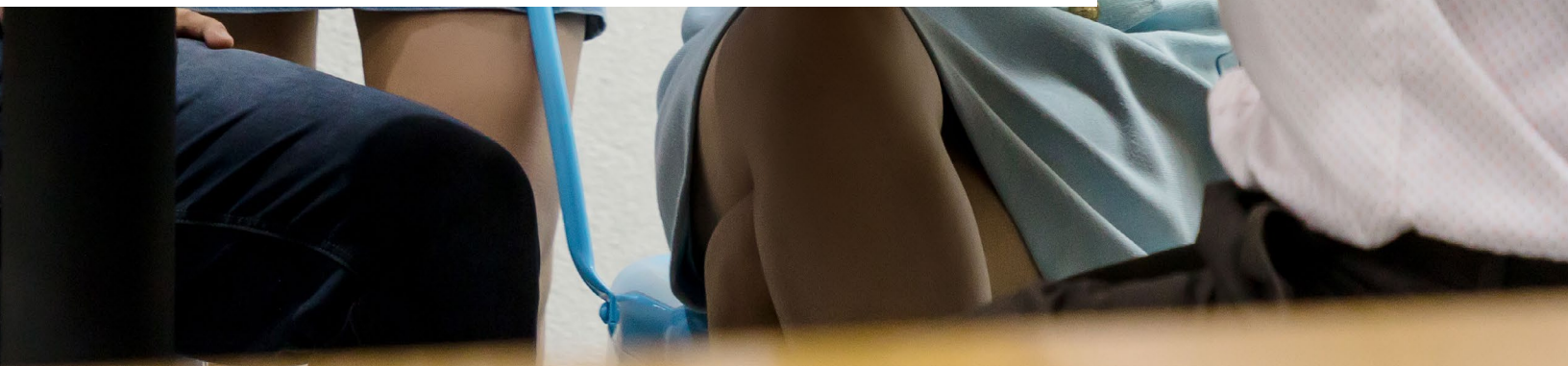
Help others achieve their objectives

- We are One Marvell. We put Marvell objectives ahead of individual or team objectives
- We act like owners of the entire business
- We share information, resources, technology, and opportunities across the organization



We Follow Our Code

We are driven by the belief that how we do things matters just as much as what we do, and execution is as essential as innovation. Our Code is an important expression of our values and helps us make decisions that earn our customers' trust, loyalty, and respect. By following our Code, we protect one of our most valuable assets – our reputation.



About Our Code

Integrity is the foundation of our culture at Marvell. This means being honest, honoring our commitments, and doing what's lawful and right. The Marvell Code is a statement of our shared values that helps us operate openly, honestly, and ethically. As we apply these values, we always exercise common sense and good judgment and act responsibly, irrespective of the existence of a policy that prohibits specific behavior.

What Is Our Code?

The Marvell Code is a clear set of standards for our business conduct. It provides the framework for decisions we make every day. Our Code helps us to make good decisions that will earn the trust of each other, our customers, and the communities where we work around the globe. Our Code is the cornerstone of our compliance program and guides us to win business with integrity. Though it doesn't offer an answer for every situation, it provides the resources we need to make ethical decisions. Refer to it often in your work, use good judgment, and always seek guidance if you are unsure.

Who Does It Apply To?

The Marvell Code applies to everyone in our company, at every level, including employees, managers, board members, executive officers, and subsidiaries Marvell controls. We expect our third parties, including suppliers, contractors and other contingent workers, distributors, and business partners, to act in a way that is consistent with the principles and values of our Code.

We comply with applicable local laws and our Code. As a global company there may be limited circumstances where local law or other legal requirements differ from the standards set forth in our Code. If you become aware of a conflict between our Code and other legal requirements, please contact a member of our Legal or Ethics and Compliance team.

Employees who violate the law, The Marvell Code, or our policies may be subject to disciplinary action, up to and including termination of employment. Know that certain violations may have additional consequences, such as fines, criminal prosecution, and jail time.

What Does It Mean to Be Accountable?

At Marvell, we do what is right even when no one is looking. We exercise extreme ownership, owning mistakes and owning solutions. And we share a commitment to being the best and delivering results, with integrity. This means:

- Doing what we say we will do
- Being transparent, honest, and direct
- Consistently doing our best to help our team and Marvell succeed
- Proactively seeking to resolve problems

Our Responsibilities

We expect everyone at Marvell to strive for excellence and bring the values that drive our company to success. This means upholding The Marvell Code, Marvell policies, and the law. By doing our part, we can protect our company and our most valuable asset, our reputation.



Review The Marvell Code

Consult The Marvell Code often in your work. Use it to help make ethical decisions. If you need more information about a specific policy, review our detailed policies linked throughout our Code.



Understand the rules

Laws are complex and can change. Know the rules that apply to your work so you can address issues that arise and recognize when to get advice. If you ever need assistance with a legal issue that may affect your job, contact a member of the Legal team.



Be truthful and cooperate fully

Ensure misconduct allegations are quickly reported to the appropriate resource. If you receive requests as part of a misconduct investigation or internal audit, be forthcoming and provide complete and accurate information.



Share questions, concerns, and ideas

Whenever you have questions or need advice, contact your manager or seek guidance from another internal resource. Take action and report suspected violations of the law, our Code and our policies. Provide feedback on problem areas and suggest ways we can improve.



Act with integrity

Always use good judgment and comply with the law, our Code, and our policies. Honor our commitment to high integrity in everything you do. Listen and respond to the concerns of customers, co-workers, and suppliers.



Complete training

Timely complete training on The Marvell Code and other mandatory training as assigned.

Manager's Responsibilities

If you are a people manager, you have additional responsibilities for setting the right ethical culture and reporting potential misconduct that comes to your attention. Managers are leaders and must set the right tone and create an open environment for discussing and reinforcing ethical behaviors and compliance with our Code, Marvell policies and the law. Managers must also promptly report employee concerns to HR or the Ethics and Compliance team, as appropriate. Leading by example is the best way to inspire ethical behavior in others.



Be a role model

Set a good example for your team and demonstrate our values through your words and actions.



Get advice

If you learn of or encounter a situation where you're unsure of the proper course of action, seek guidance.



Build an ethical culture

Encourage employees to review our Code, complete their compliance training, and help them to understand their responsibilities. Communicate regularly the importance of ethics and integrity to your team and be clear that you expect work to be done ethically.



Speak up

If you suspect behavior that is unethical or violates the law, our Code, or our policies, report it immediately. You should not investigate allegations yourself, regardless of your role or function, but instead report them immediately so our investigation process can be followed.



Listen and offer guidance

Be available and listen when employees come to you with questions or concerns. Discuss issues with them and assist them in making ethical decisions. Make sure your team knows you will listen, even if they have something difficult to say.

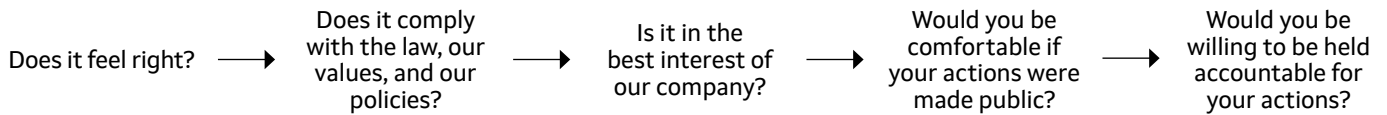


Prevent retaliation

Take action to prevent retaliation against any employee who reports a concern or violation of the law, our Code, or our policies in good faith. Ask Human Resources for guidance in preventing retaliation.

Making Good Decisions

When making decisions, we should always keep our values and The Marvell Code in mind, even when it is difficult to decide on the best course of action. When you consider a decision, ask yourself the following:



If you answered "no" to any of these questions, then stop and seek help. The action can have serious consequences.



If you're not sure, ask your manager, another internal resource, or the Ethics and Compliance team for guidance.



If you answered "yes" to all of these questions, then the decision to move forward is probably okay.

Stay alert to warning signs. If you hear comments like these, take a step back and reevaluate the situation:

“Don’t worry about it. Who’s going to know?”

“Two of our large competitors have already agreed to this, what’s the big deal?”

“It’s XYZ country, don’t you know how it works over there?”

“We’ve always done it this way, and no one has gotten in trouble yet.”

INTEGRITY, DONE RIGHT



I told my employees that we need to do “whatever it takes” to meet our numbers this quarter. After all, when we hit our numbers, we all win. Did I send the right message?



No. Though encouraging your team to reach a company goal is important, we need to do so with integrity and ensure our messages don’t encourage unethical behavior. You should send the message that we achieve our goals the right way, by living our values and following the law, our Code, and our policies.

“Trust your good judgment, and remember, “if it seems too good to be true, it probably is.”

– Matt Murphy

Speaking Up, Sharing Concerns

We have an obligation to speak up if we see something that doesn't look right. By speaking up, we bring issues to light so that we can identify and solve problems quickly. Take action when you believe the law, our Code, or our policies may have been violated or are about to be violated. You do not have to be an expert. If you think that the law, our Code or our policies may have been violated but you are not sure, ask your manager, Human Resources or the Ethics and Compliance team. Raising problems before they become bigger issues is essential to operating with integrity and ensuring our success over the long term.

How to Make a Report

There are many ways to speak up:

Let your manager know. Share your concern with your manager first, if possible. Often, he or she will be able to offer guidance and answer any questions.

Report it to another internal resource. If you're not comfortable discussing the situation with your manager, you can go to another manager you trust or any of the following resources:

- Any leader
- Human Resources at myHR@marvell.com
- Ethics and Compliance at compliance@marvell.com
- The Legal Department

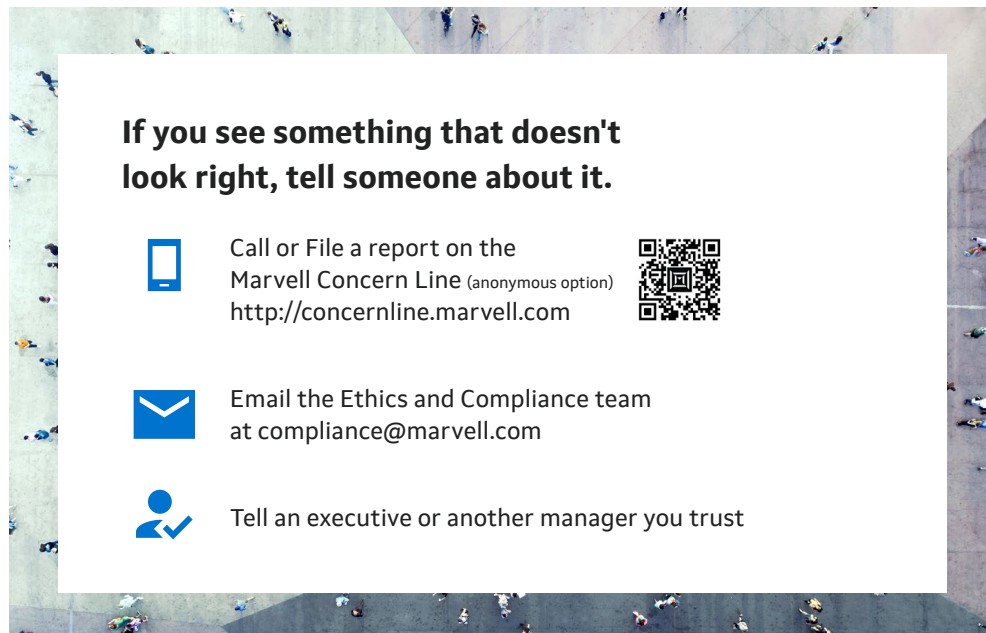
Contact the Concern Line. [The Concern Line](#) is another resource through which we can all raise concerns. It's operated by an independent third party and is available 24/7 from any location around the globe.

You may report your concern anonymously, where permitted by law. We will exercise discretion to avoid disclosing the sources of information we receive and try to keep information as confidential as possible given Marvell's need to investigate and follow up on any concerns. Any concern raised will be taken seriously, investigated, and responded to appropriately.





Because of legal requirements, the policies governing Speaking Up and Concern Line programs in parts of Europe are different from other countries. Employees in Germany, Italy, and Romania should visit the [Reporting and Investigations Policy](#) specific to their country for more information.

“Let's make
Marvell a
place where
bad news
travels fast.”

– Matt Murphy



If you see something that doesn't look right, tell someone about it.

-  Call or File a report on the Marvell Concern Line (anonymous option) <http://concernline.marvell.com> 
-  Email the Ethics and Compliance team at compliance@marvell.com
-  Tell an executive or another manager you trust

After a Report Is Received

We thoroughly investigate all reports of suspected misconduct. We encourage you to provide your name and contact information to assist our investigation. You will be contacted directly by the assigned investigator, and you may also receive feedback on the investigation results, as appropriate.

We Never Tolerate Retaliation

We are committed to maintaining a culture where employees feel safe raising concerns. As such, we never tolerate retaliation against anyone for raising a concern in good faith. Acting in good faith means that your report is sincere and honest, regardless of the outcome. It does not matter whether your concern turns out to be true, but you must believe the facts you provide are true. If you feel you have been retaliated against or suspect retaliation against someone else, report it. We will investigate the matter and take corrective action.

Although we prefer that employees raise concerns internally, we comply with laws that prohibit retaliation, for example, raising concerns or complaints through government officials or through courts.



[Reporting and Investigations Policy](#)



[Concern Line](#)

We have an obligation to speak up if we see something that doesn't look right.



We Act With Integrity

At Marvell, it's not just the results that matter – how we deliver those results is equally important. We would rather sacrifice short-term performance to ensure that we're doing business the right way every day. We operate our business ethically, with integrity and respect for others. We follow the law and avoid conflicts of interest.

Avoid Bribery and Corruption

Corruption can harm communities, cause damage to our reputation, and disrupt markets. That's why we're committed to doing business legally and ethically. We never accept or offer a bribe to anyone. And we ensure that third parties who act on our behalf follow the same standards, as we are responsible for their actions as well as our own.

Recognizing and Avoiding Bribery

Often, we picture a bribe as an envelope filled with a stack of cash. But a bribe can take many forms – a gift, a trip, “free” products, tickets to an event, even an internship offer. A bribe is basically anything of value offered in exchange for a favorable business advantage or decision. Remember, no matter what form it takes, a bribe is always wrong, whether you are offering one or accepting one.

Anti-bribery laws prohibit anyone, including government officials and private individuals, from offering, accepting, receiving, or giving bribes. In some countries, facilitation payments (small payments to secure permits or approvals or to speed up a routine government process) are a common business practice, but we prohibit them too. Violating these laws can have serious consequences, including damage to our reputation, fines, and jail time.

Some anti-corruption laws focus on bribery of government officials. Our commitment to doing business fairly and transparently goes further. It applies to our business relationships, whether we are interacting with government officials or commercial partners.

**Our policy is simple:
We prohibit bribery –
in all forms, in all places.
Don't offer, promise, give
or accept a bribe, and don't
authorize anyone else to
offer or accept one for you.**

INTEGRITY, DONE RIGHT

- Q** I've been working to close a design win for a large customer. Getting this win would give us a huge revenue boost. Last week, the customer asked if we would hire his daughter as an intern for the summer. He implied that offering her the position might help Marvell get the design win and get other wins in the future. Would it be okay if I offered her a position or recommended her to another department for a position?
- A** No. Offering someone's daughter a position or ensuring she receives special consideration in the hiring process could be considered a form of bribery and may violate anti-bribery laws. Even if it wouldn't violate the law, it would still violate our policies. You should report the offer to the Ethics and Compliance team.

To protect our reputation and keep us safe:

We keep an eye on our business partners.

We choose partners who share our high standards and monitor their performance to make sure they comply with our policies and the law. Never ignore warning signs that a third party may be engaging in illegal or unethical activities. Remember, we can be held accountable for bribes our business partners make on our behalf. It is never okay to turn a blind eye to bribery or corruption.

We exercise special care with government officials or third parties that will interact with the government on our behalf.

Strict rules apply when working with the government, so be careful not to provide anything of value to a government official without checking and following our policies. Government officials not only include elected and appointed officials, but also anyone who works for a government agency or a state-owned or controlled entity. Pay attention to warning signs and report any concerns right away.

We are transparent and keep accurate records.

We each have a responsibility to accurately record transactions. Record transactions promptly and honestly in accordance with our internal controls. Follow our policies and keep accurate records of every business transaction. In any deal, avoid hidden terms or arrangements, because transparent transactions reduce the risk of a bribe or kickback.

While accepting or providing gifts, entertainment, and hospitality can strengthen business relationships, it can also create conflicts of interest. We protect our reputation by ensuring that gifts are legal, appropriate, and reasonable.



Gifts, Entertainment, and Hospitality

While accepting or providing gifts, entertainment, and hospitality can strengthen business relationships, it can also create conflicts of interest. We protect our reputation by ensuring that gifts are legal, appropriate, and reasonable.

Responsible Giving and Receiving

We never accept or provide anything of value that may create a conflict of interest or suggest something improper. Inappropriate gifts include those that create an obligation, are in the form of cash, or appear to be lavish or extravagant. Timing is important: we do not accept a gift if we are involved in any stage of a procurement process with the offeror of the gift.

Know the difference between what's acceptable and what's not. Never solicit gifts or favors and refuse any gift that doesn't comply with the law, our Code, or our policies.

Gifts and Hospitality General Principles:

We always:

- ✔ Promote positive relationships free of corruption and commercial bribery.
- ✔ Ensure gifts, hospitality, or travel offered or accepted is reasonable, appropriate, customary, consistent with our policies and those of the recipient, and has a legitimate business purpose.
- ✔ Ensure any gifts, hospitality, or travel offered or accepted is open and transparent, accurately recorded in our records, and receives approval, as required under our policies.

We never:

- ✘ Offer or accept any gift or entertainment that may influence, or even appear to influence, business decisions or judgment.
- ✘ Offer or accept gifts or entertainment that could reflect poorly on or be embarrassing to Marvell.
- ✘ Ask for gifts, hospitality, favors, or travel from third parties, or make them feel obligated to provide something to do business with us.
- ✘ Ask a representative, like a partner or supplier, to give gifts, favors, hospitality, or travel on our behalf.
- ✘ Give or accept cash or cash equivalents.
- ✘ Seek personal gain through our position with Marvell.

What is the difference between gifts and business entertainment?

A gift is anything that the recipient would consider valuable, including cash, gift certificates, vouchers, event tickets, reimbursement of expenses, discounts, use of vacation homes, personal loans or promises to do something in the future.

Entertainment includes meals, drinks, cultural or sporting events, and travel that we attend with a customer or business partner. Tickets for an event or vouchers for a meal or a drink are a gift if the provider of the tickets does not accompany the recipient. The same general principles above apply for both gifts and business entertainment.

Travel and Business Entertainment

If you travel or engage in business entertainment on behalf of Marvell be sure to follow Marvell's [Global Expense](#) and [Global Travel and Corporate Card Policies](#).

Gift Approval Threshold – Non-Government

Before offering or accepting anything of value to or from any non-government third party (e.g., a customer or supplier), make sure it complies with our [Gifts and Entertainment Policy](#) and the [Global Expense Policy](#). Use the following tool to help you determine when to get approval. Convert the values to your local currency. Please note there may be lower thresholds in some countries, which may be found in our [Gifts and Entertainment Policy](#).

Value	Approval Required
\$200 or Less	No approval required provided it meets the General Principles
Over \$200 (Individual gift or combination of gifts in a given calendar year)	Written pre-approval from the Ethics and Compliance team

To obtain required approvals, please submit [Gifts and Entertainment Pre-Approval Request Form](#).



Gift Approval Threshold – Government Officials

Government officials may be subject to ethics codes and laws that strictly regulate what they can accept from you and private companies like Marvell. In addition, laws prevent Marvell from offering payments or anything of value to government officials to induce their action or inaction. For this reason, you may not give anything of value to a government official (including meals or entertainment) without obtaining written approval from the Ethics and Compliance team, unless all of the following conditions are met:

1. The item is worth \$20 or less.
2. It is permissible under applicable law, regulations, rules, and ethics policies.
3. It is done infrequently.
4. It is not being done for an improper purpose and would have no appearance of impropriety (for example, to obtain or retain business or cause the official to take action or inaction in an official capacity, or thank the official for any action/inaction).

Please note there may be lower thresholds in some countries, which may be found in our Gifts and Entertainment Policy.

A U.S. government official means any elected or appointed official or any employee of the legislative, executive, or judicial branches of the U.S. federal government or a state or local government.

A non-U.S. government official includes any elected or appointed official, as well as any employee in the legislative, executive, or judicial branches of any non-U.S. government, from the local level to the national level.

The term also includes:

- Anyone acting in an official capacity on behalf of a non-U.S. governmental entity, even if that person is not a government employee or an elected or appointed official.
- Employees and officers of public international organizations, such as the United Nations, the Red Cross, and the World Bank.
- Non-U.S. political parties, officials, or candidates for office.
- Members of royal families.

Finally, business people who work for a non-U.S. state-owned or state-controlled company also constitute government officials.



To obtain prior approvals, please submit your request using the [Gifts and Entertainment Pre-Approval Request Form](#).



[Global Travel and Corporate Card Policy](#)



[Global Expense Policy](#)



[Gifts and Entertainment Policy](#)

Conflicts of Interest

We are loyal and always act in the best interest of our company. We avoid conflicts of interest and never use our position or company assets for personal gain.

Avoiding Conflicts

A conflict of interest arises when your personal interests interfere with your obligations to Marvell or ability to make objective decisions on behalf of our company. We work to avoid even the appearance of a conflict.

Although our Code does not list every situation that can present a conflict, there are a few instances where conflicts typically arise:

Personal relationships. Directly or indirectly supervising or involved in employment-related decisions regarding a friend, family member, or someone with whom you have a close personal or romantic relationship or receiving personal favors from someone in your direct or indirect reporting line. Family members include your spouse, domestic partner, significant other, parent, step-parent, child, step-child, siblings, in-laws, or anyone residing in your home.

Family members. Allowing a member of your family to receive improper personal benefits or business advantage because of your position with our company.

Outside activities. Allowing a second job or service to another organization to take away the loyalty, time, energy, or talent you bring to your position or present a conflict with your Marvell responsibilities.

Financial interests. Investing in a company that does business with or competes with Marvell (excluding public companies where you own less than 2% of the equity of the company).

Business opportunities. Taking an opportunity you learned about through your work at Marvell for yourself or starting a business that competes with our company.

Business relationships. Having personal financial business relationships with co-workers like selling certain outside products or services, partnering in an outside business endeavor, renting property, or loaning money to one another.

Promptly disclose potential or actual conflicts of interest to the Ethics and Compliance team as soon as you come to learn of them. New conflicts, or changes to existing conflicts, must be disclosed as soon as you become aware of them. If you're unsure whether a particular situation creates a conflict, seek guidance. By disclosing an actual or potential conflict of interest, you are not necessarily excluding yourself from pursuing that opportunity. Disclosure provides transparency, allows us to think through how the conflict can be mitigated, and provides you with clarity on whether the action is permitted.



You can disclose potential or actual Conflicts of Interests by submitting a [Conflict of Interest Disclosure Form](#).

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My boyfriend owns a company that we're evaluating to provide janitorial services. I work for the team in charge of selecting the vendor. What should I do?



This situation could create a conflict. Disclose it to your manager immediately, submit a conflict of interest disclosure, and remove yourself from the decision-making process.

Fair Competition and Antitrust

We comply with both the spirit and the letter of competition laws and are committed to doing business fairly, everywhere we operate.

Competing Fairly

Many countries have laws prohibiting companies from gaining an unfair advantage in the market. Violations can have serious consequences. Know and comply with our policies and all applicable laws and maintain ethical relationships with our competitors and third parties. Always use good judgment and avoid agreements and discussions about restricting competition. If you're ever unclear about the laws and regulations that apply to your work, seek guidance.

To compete fairly:

- Never make agreements that may create an unfair advantage in the market, such as those to fix prices, divide customers or market, or prevent competitors from entering the market.
- Don't discuss competitively sensitive topics with competitors, such as price, contract terms, or marketing plans.
- Understand that even casual conversations could be considered anti-competitive, so be mindful about what you discuss with others, especially competitors.
- Use public sources to research competitors.
- Never gain competitive information through improper means (e.g., through a customer, supplier, contractor or a former employee).

- Don't restrict customers or suppliers in ways that affect their ability to compete.
- If you receive competitor information that you believe is confidential or obtained unethically, speak up and contact the Ethics and Compliance team. Do not share this information with others.
- If someone raises topics with you that you think are anti-competitive, stop the conversation and report this exchange to the Ethics and Compliance team.

Gathering Competitive Information

Gathering competitive information is a normal part of doing business. However, we each have a responsibility to gather this information responsibly and in accordance with our policies.

Obtain information ethically:

- Use publicly available sources whenever possible.
- Don't ask for sensitive or confidential business information directly from a competitor.
- While it may be okay to ask customers and third parties about competitors, be sure to do so with integrity and never use our business relationships to obtain information improperly.
- Never ask current or former employees of competitors to share confidential business information.

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We just hired someone who used to work for one of our competitors. Is it okay if I ask him about some of the secret new products his company was developing before he left?



No. It's never appropriate to ask former employees of competitors to disclose confidential information.

International Trade

As a global semiconductor company, we are subject to many laws related to global trade. Global trade regulations govern the sale, shipment, and support of products, software, and technology. We honor our obligations under these laws and trade with integrity.

Export Controls and Economic Sanctions

Export controls and economic sanctions regulate where and with whom we can do business. These laws vary widely around the world. The laws of more than one country may govern a particular transaction. Failure to comply with these laws can seriously impact our business and reputation, lead to significant fines, and can even result in the loss of our export privileges.

An export occurs when items are moved across international borders and not only includes physical shipments of goods to other countries, but could also include transfers of software, data, and technological know-how via email, telephone, or shared drives. Some countries consider sharing technical information with a foreign national to be an export, even if the information never physically leaves the country.

When conducting business, ensure you:

- Comply with our policies and applicable law.
- Verify that the transactions do not involve restricted or sanctioned individuals, entities, regions, or countries.
- Review the export classifications of any hardware, software, technology, or services, and ensure any export licenses, importing country customs requirements, or any other authorizations are in place before proceeding.

- Document transactions completely and accurately.
- Contact Trade Compliance for assistance when needed.

If you have questions about the laws that apply to your work or your responsibilities or if you suspect a violation of export controls or other trade compliance laws has occurred or is about to occur, in any stages of transactions including resales by distributors or customers, contact Trade Compliance, Legal, or our Concern Line.



[Global Trade Compliance Policy](#)



Insider Trading

Trading Lawfully

Through your work, you may have access to material nonpublic information about Marvell or one of Marvell's customers, business partners, competitors, or other third parties. This information is considered Marvell's "inside" information. Trading company, business partner, competitor, or third-party securities while in possession of inside information you acquired because of your relationship with Marvell is considered "insider trading" and is illegal. This is true even if you are not in a "blackout period" where Marvell prevents you from trading.

Inside information can include information about:

- Financial earnings or losses, bookings and revenue
- Significant design wins or losses
- Potential significant business deals
- Budgets
- Changes in executive leadership
- Significant transactions
- New products or projects
- Significant cyber-security incidents

Passing Marvell's inside information along to anyone who may use it in a decision to invest, including family, friends, or third parties is also a form of insider trading known as "tipping." Be careful and avoid even the appearance of anything improper. If you have any questions regarding what is inside information, contact the Legal team.

Handling Consulting or Expert Network Opportunities

Other organizations may ask you to consult with them or give your opinion about technology, the semiconductor industry, or Marvell. It may sound like a great opportunity, but it's not. Participating is risky. You may feel pressured to reveal or may accidentally reveal Marvell's insider information, which could damage Marvell and may be illegal.

To avoid these risks, don't accept a consulting opportunity (even if you are not getting paid) that relates to the technology industry, the semiconductor industry, or Marvell without first disclosing the potential conflict to the Ethics and Compliance team and obtaining approval.



[Insider Trading Policy](#)

Preventing Financial Crimes

Money laundering is a process criminals, terrorists, and others use to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate. Use good judgment and pay close attention when working with customers and third parties, especially if the transaction involves cash payments. Always know who's behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities. Take action to prevent money laundering by reporting suspicious activity to the Legal team.

Working with the Government

As with everyone we do business with, we work to be a responsible partner to the government and adhere to the highest ethical standards. Very often, the laws that apply when working with the government may be stricter than those that apply when working with private companies.

Interacting with Integrity

We're committed to building open, honest, and transparent relationships with all of our third parties, including government agencies. We follow all applicable laws and interact honestly and fairly with government representatives.

When working with governments:

- Understand the rules that apply to your work.
- Follow the rules governing the procurement process and Marvell's ongoing compliance commitments.
- Submit complete, timely, and accurate information.
- Do not accept, offer, or give anything of value from or to a government official unless it is in compliance with applicable laws and our Code and, if the item is valued at over \$20 you have obtained written pre-approval as required under our Gifts and Entertainment policies.

With government inquiries, investigations and audits:

- Forward all requests to the Legal team immediately.
- Cooperate fully.
- Know that we prohibit retaliation for reporting misconduct or safety concerns in good faith.
- Provide truthful, complete, and accurate information.



Political Activities and Lobbying

Being involved in the political process is an important part of being a good citizen. We respect the rights of our employees to engage in the political process and encourage political participation outside of your work at Marvell.

Political Participation

While we respect your involvement in political activities, make sure they remain separate from your work at Marvell. We never reimburse anyone for political contributions or expenditures.

Always:

- Engage in political activities on your own time.
- Use your own resources to further political causes, candidates, or campaigns.
- Avoid speaking on behalf of Marvell without approval.
- Follow applicable laws and regulations.

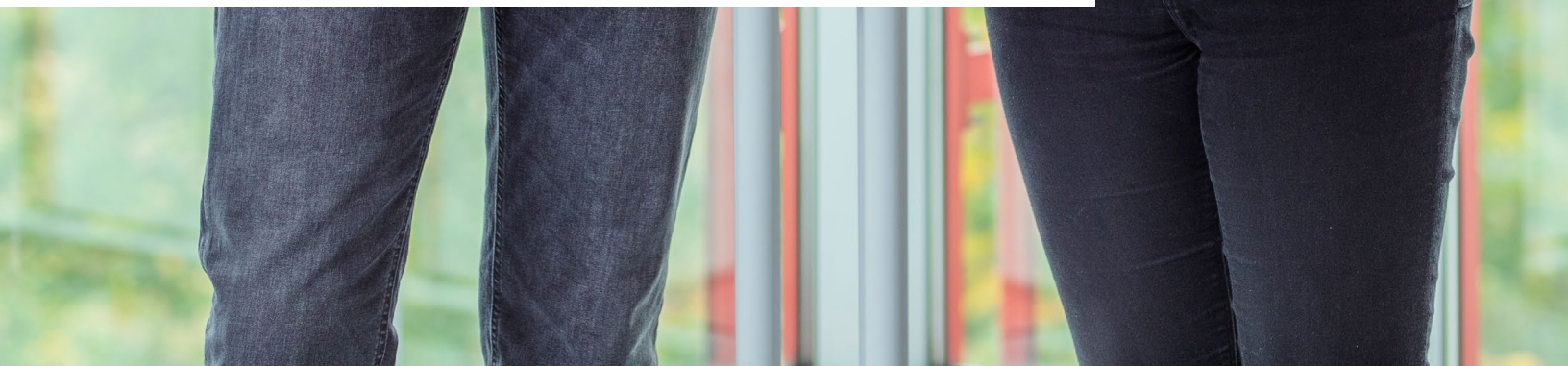


Any political contributions or lobbying activity on behalf of Marvell must be approved by Government Relations and our Nominating and Governance Committee.



We Treat Everyone with Respect

We strive to create a workplace where every employee, regardless of background, feels respected and valued for who they are as an individual. We protect against unlawful discrimination or any behavior that creates an offensive, hostile, or intimidating work environment. We work to create a positive workplace where employees can do their jobs without fear of harassment or discrimination, and we never tolerate retaliation against employees who report this activity in good faith or participate in an investigation.



Promoting a Respectful Workplace

Marvell prohibits harassment and discrimination. Speak up if you see or suspect it.

We avoid conduct that could adversely affect our reputation, distract from a professional work environment, or interfere with our ability to do our jobs.

Preventing Harassment

We don't tolerate any form of harassment, including sexual harassment. Harassment is any unwelcome verbal, visual, or physical conduct that creates an intimidating, offensive, or hostile working environment. We also don't tolerate harassment from our suppliers, visitors, customers, or any third party.

Some examples of harassment:

- Inappropriate or offensive language, joking, teasing, degrading nicknames, insults or slurs
- Gestures and physical threats
- Unwelcome touching or invasion of physical space
- Stereotyping
- Unwelcome sexual communication, behavior, or advances (whether verbal, non-verbal or physical)
- Other offensive materials, as perceived by an employee (e.g., pictures, cartoons or social media)

Managers who become aware of harassment must immediately report it to the Legal Department, the Ethics and Compliance team, or Human Resources.

Preventing Discrimination

We do not tolerate discrimination in any form in our hiring, promotion, or employment practices. Marvell prohibits discrimination based on race, color, religion, age, ancestry, national origin, social or ethnic origin, sex, sexual orientation, gender, gender identity, or gender expression, marital status, pregnancy, parental status, disability, medical condition, genetic information, military or veteran status, political affiliation, or other category under applicable law.

We have zero tolerance for harassment in any form. If we witness inappropriate behavior, we report it.



Inclusive Culture

We believe that an inclusive and diverse workplace brings unique value to the work we do, as individuals and as a company. We work hard every day to create an inclusive workplace where diverse views are valued. We are proud of our diverse community, and we continue to seek to find and develop the best and brightest talent from around the world.

Our Commitment to Inclusion

We are committed to fostering an accepting and inclusive work environment.

To this end, we are focused on:

- Embedding inclusivity in every function and in everything we do.
- Empowering all our employees to do their part toward creating a welcoming and inclusive environment.
- Adjusting our global strategic framework to meet specific regional and local site needs.

Ensuring Equal Opportunity

We are committed to equal employment opportunity. We base employment decisions regarding qualified applicants or employees only on relevant considerations, such as the individual's qualifications, experience, and abilities and never on the basis of protected characteristics.



Data Privacy and Protection

We are committed to respecting the privacy of our employees, customers, and others with whom we conduct business, and protecting their confidential and personal information with care. We follow globally recognized privacy principles and strive to implement reasonable and appropriate practices in our collection, use, storage, and sharing of personal information.

Personal information is any piece of data that can be used to identify a person including, but not limited to, name, phone number, an email address, physical address, IP address, employment history, age, ethnicity, payment card information, government identification number, biometric or medical data.

Follow our policies and protect any personal information that is entrusted to you. Use it only in the way it's meant to be used and don't share it with anyone inside or outside of the company in an unauthorized manner. Immediately report any potential improper access, handling or sharing of personal data to the [Data Privacy team](#).



[Privacy Policy](#)

INTEGRITY, DONE RIGHT



I am about to share a work document with some personal information of several employees. Is it OK?



Make sure you have permission from your manager. The document should be shared via secure methods, only with people who have a legitimate business need to know such information, and, if shared outside Marvell, with contractual safeguards in place. Any personal information contained in the document must be limited to what is necessary to the job you are performing.

Human Rights

We respect the human rights and dignity of people throughout our operations and global supply chain. We work to protect human rights across our direct operations and supply chain by upholding strong standards and policies, developing and implementing rights-respecting management practices, and by responding promptly to concerns and violations when they arise.

We comply and expect our suppliers to comply with laws that:

- promote safe working conditions and individual security
- prohibit forced labor
- prohibit the employment of underage children
- prohibit human trafficking, and
- ensure freedom of association

Holding Third Parties Accountable

If your work involves selecting or managing third parties, practice due diligence and know your supplier. Make sure they comply with our Code, the Supplier Code of Conduct, and the law and that they honor our commitment to respecting human rights. Monitor their activities and hold them accountable. If you suspect behavior that fails to meet our standards, you should notify your Manager or contact the Ethics and Compliance team.



We are careful to select third parties who are committed to treating all workers with dignity and respect.



[Global Human Rights Policy](#)



We Protect Our Company

We are building an enduring company with strong core values that will enable us to succeed over the long term, and a large measure of this success depends on how we safeguard our company, our assets, and each other.



Protecting Our Confidential Information

In today's highly competitive global marketplace, our confidential information is a key asset. Confidential information is any information that is not available to the public. It includes electronic files, paper documents, and even knowledge we have in our heads. Protecting our confidential information can mean the difference between success and failure.

Examples of confidential information:

- **Intellectual Property.** Our research and development, such as inventions, patent applications, and engineering and lab notebooks.
- **Proprietary Information.** Business plans, product development and marketing strategies.
- **Financial Information.** Company performance results, budgets and upcoming investments.
- **Customer or Supplier Data.** Non-public information specific to our customers or suppliers.
- **Work Product.** Any data or document you develop as part of your employment at Marvell.
- **Personal Information.** Any data or document that includes information that could identify an individual.

We each have an obligation to protect Marvell's confidential information. To safeguard our confidential information:

- Protect confidential information from theft, damage, unauthorized disclosure, and inappropriate use.
- Always store confidential information in a safe place and follow security procedures.

- Do not discuss confidential information with anyone unless they have a business need to know it.
- When dealing with a supplier, customer, or other business partner, never disclose confidential information unless a nondisclosure agreement is in place.
- Always store sensitive information on IT provisioned and managed devices. Never store confidential information on a personal cloud storage account or personal storage device unless that account or device has been approved for Marvell use, even if the purpose is simply to make a transfer into the Marvell network and the files will be deleted thereafter. If sensitive information is stored on non-IT managed devices, you are responsible for ensuring security best practices are applied or risks are mitigated by working with the Information Security team.
- Do not enter or upload confidential information to unapproved information systems or platforms, such as external AI chatbots, translation websites, and file conversion websites.
- Do not use a personal email account to transmit or store confidential information, unless instructed by the Information Security team.
- Use common sense to prevent accidental disclosure of confidential information.
- Be careful in public places such as airplanes, elevators, restaurants, and industry-related events such as trade shows.

Confidential Information of Others

We respect the confidential information and intellectual property of our customers, suppliers and other third parties. We must have a nondisclosure agreement with a third party in place before receiving any of that third party's confidential information and/or intellectual property. Once that information is in our care, we must comply with the terms of the nondisclosure agreement and limit our use of the information or intellectual property to the specific purpose for which it was provided to us. If you have a question as to whether third-party materials should be considered confidential or if a nondisclosure agreement is appropriate, please contact your Manager or the Legal team for assistance.

If you obtain the confidential information or intellectual property of a third party accidentally or from an unknown source, it may be unethical or illegal to use it. You must contact the Ethics and Compliance team to determine how to proceed.

Additionally, if you have confidential information or intellectual property from a prior employer or from a prior professional relationship, you may not bring it to Marvell in any form, disclose it to Marvell employees or use it for any Marvell-related purpose without prior authorization. Contact the Ethics and Compliance team to seek authorization.

INTEGRITY, DONE RIGHT



Know how to identify information.

We ensure all information is properly classified according to our [Data Classification Policy](#).



Protect our information.

All "inside," or non-public information is restricted to authorized parties only, so we never share such information with anyone outside Marvell.



Stay alert.

We safeguard against security threats (such as phishing attacks or fraudulent emails).



Safeguard our systems.

We do not install any unapproved applications or software.



Be smart.

We lock and securely store our PC or laptop when not in use. When traveling for business, we ensure that all our devices remain secure.



Be aware of your surroundings.

We protect against unintentional exposure of confidential information in public settings. For example, we lock computer screens and never discuss confidential information where others may overhear.

Accurate Recordkeeping and Financial Reporting

We maintain books and records that accurately reflect our business and its financial information. We record transactions honestly and handle our records with care.

Accurate Recordkeeping

Maintaining accurate and complete business records is critical to meeting Marvell's legal, financial and management obligations, and all business records and reports must be full, fair, accurate, timely and understandable. We must never misstate facts, omit important information, falsify a record, or attempt to hide or disguise the true nature of a transaction, and never assist others in doing so.

If you're responsible for preparing public financial disclosures, make sure that the information we report is clear, complete, and timely. Watch for and report signs of potential fraud, bribery, or money laundering activity.

Records Management

We manage our records properly and retain the records we need to support our tax, financial, and legal obligations. Always follow our records retention policies and securely dispose of records that are no longer needed. Remember to never dispose of any information that may be relevant to an investigation or subject to a litigation hold.

Records can include:

- Correspondence
- Software code
- Calendars
- Brochures
- Notes
- Charts
- Reports
- Notebooks
- Spreadsheets

How we manage our records:

- Ensure all records are current. We maintain records for the time periods set forth in the Data Retention Policy and Schedule.
- Know the retention rules. We destroy records after the retention period unless a Legal hold, or instructions to maintain, provide or defer destruction of records, is in place.



[Data Retention Policy](#)

Third Parties and Suppliers

We work with third parties and suppliers who share our commitment to integrity and are qualified to provide the goods and services for which they are selected. We choose our third parties carefully and take appropriate measures to ensure they meet contractual requirements and follow the law, our Code, and our policies.

To foster a healthy and safe supply chain:



Choose wisely. We perform due diligence reviews to ensure suppliers' practices align with our policies and meet our business needs.



Act responsibly. We follow our compliance and procurement processes to evaluate potential third parties based on risk and legitimate business criteria, such as: Marvell's business needs, cost, quality, services offered, availability, and reputation and integrity.



Be transparent. We disclose potential conflicts of interest involving a supplier or business partner.



Set expectations. We monitor our third parties and suppliers to make sure they are following the law, contractual commitments, and the Supplier Code of Conduct.



[Worldwide
Purchasing Policy](#)



[Supplier
Code of Conduct](#)

INTEGRITY, DONE RIGHT



We just learned one of our vendors is under investigation for bribery. Since the issue doesn't concern Marvell directly, we don't need to take any action, right?



No, that's not right. We expect everyone we work with to operate lawfully and ethically. The vendor's practices could impact their ability to service us and subject us to reputational harm. You should report the matter right away so that we can respond appropriately.

Protecting and Securing Our Assets

We prevent unauthorized access, use or modification of our systems, equipment, and other company assets.

To safeguard our assets:

- **Take care.** We take special care when using and managing Marvell assets, such as equipment, computers, mobile devices and supplies. We ensure that robust security measures are always in place to protect ourselves and our assets.
- **Follow procedures for physical assets.** We follow all security processes related to physical assets, including proper tagging, storage, disposal and offsite management.
- **Prevent unauthorized access.** We do not give building access to individuals without a Marvell badge. We also do not allow unauthorized access to Marvell devices. Contact Security or any manager if someone is trying to access buildings, devices or other assets without authorization.
- **Report it.** We contact the IT Helpdesk and/or report a security incident if our laptop or mobile device is stolen or lost.
- **Prioritize cybersecurity.** We follow all security processes, such as maintaining and not sharing passwords or network access.



[Information Security Policy](#)



[Acceptable Use Policy](#)

Health and Safety

We are committed to providing a safe and healthy workplace.

To keep our workplace safe:

- **Speak up.** We report suspected health and safety hazards to our manager and Environmental, Health and Safety (EHS).
- **Do our part.** We maintain a clean and orderly workplace free of hazards. We adhere to EHS policies, procedures, and work practices to prevent accidents and injuries. We are familiar with our emergency procedures and participate in emergency drills.
- **Look out for danger.** If we observe an unsafe situation, potential for an accident or other unsafe workplace condition, we report it to a manager.
- **Prevent unauthorized access.** We do not give building access to individuals without a Marvell badge. We swipe our badge every time we enter a building and do not permit others to tailgate behind us. Contact Security or any manager if someone is trying to access the building without authorization.



[Environmental, Health,
and Safety Policy](#)

Supporting Mental Health

Balancing work and life can be stressful, and we recognize the importance of mental health for our overall wellbeing. We have mental health resources available, including coaching, therapy, and education.



[Mental Health](#)

Workplace Violence

We are committed to the safety and security of our employees and site visitors. We take workplace violence seriously and never allow:

- Threats
- Stalking
- Acts of violence
- Possession of weapons on Marvell premises or at Marvell-sponsored events

Illegal Drugs or Impairment On the Job

For a safe and healthy workplace, we must not consume illegal drugs or be impaired by any controlled substance or alcohol while at work or during any business-related activity. When consuming alcohol at business-related events or functions, use good judgment and exercise moderation, avoid impairment, and never drive under the influence.



[Workplace Violence
Prevention Plan](#)



Use of Company Assets

Our assets are the tools and information we use in our work each day. We use our assets for legitimate business purposes, and we handle them with care and protect them from loss, theft, fraud, and misuse.

Preserving our Assets: Our assets include physical assets, technology and Marvell information. We always use our resources efficiently, responsibly, and in accordance with our policies.

Safeguard Our Assets:

- Keep valuable assets, such as laptops and mobile devices, physically and electronically secure.
- Let your manager know if any of our assets are damaged or in need of repair.

Use Technology Responsibly

Follow our policies when using technology. While we allow reasonable personal use of our technology resources, use good judgment. Keep in mind that anything you create, store, download, send, or receive using our systems is company property and can be reviewed at any time, as permitted by applicable law.

When using our technology:

- Never access, store, or transmit anything that's intimidating, offensive, obscene, or discriminatory.
- Use strong passwords and keep passwords safe.
- Keep your workstation clean when stepping away.
- Install security software and updates as directed by Marvell and do not interfere with automatic updates.
- Do not take any action to override encryption or security measures.



Speaking on Behalf of Our Company

What we communicate about our company can have an impact on our reputation, customers, and brand. We protect our reputation and trustworthiness by making sure the information we communicate is accurate, consistent, and reliable. For this reason, only certain people are authorized to speak on behalf of Marvell.

Communicate Responsibly

Unless you are authorized to speak on behalf of Marvell, it is important that you refrain from doing so. All media inquiries should be directed to the Public Relations team.

Notify the Public Relations team of any article, paper, presentation, or other publication you would like to publish or present that relates to your work at Marvell or its products. Seek legal approval under our [Publication and Speaking Authorization approval process](#) by clicking on the link to the form on this page.

Social Media

We want our employees to be proud of Marvell and to connect with family, friends, peers, clients and consumers via social media. When doing so, it's important to post responsibly.

To post responsibly:

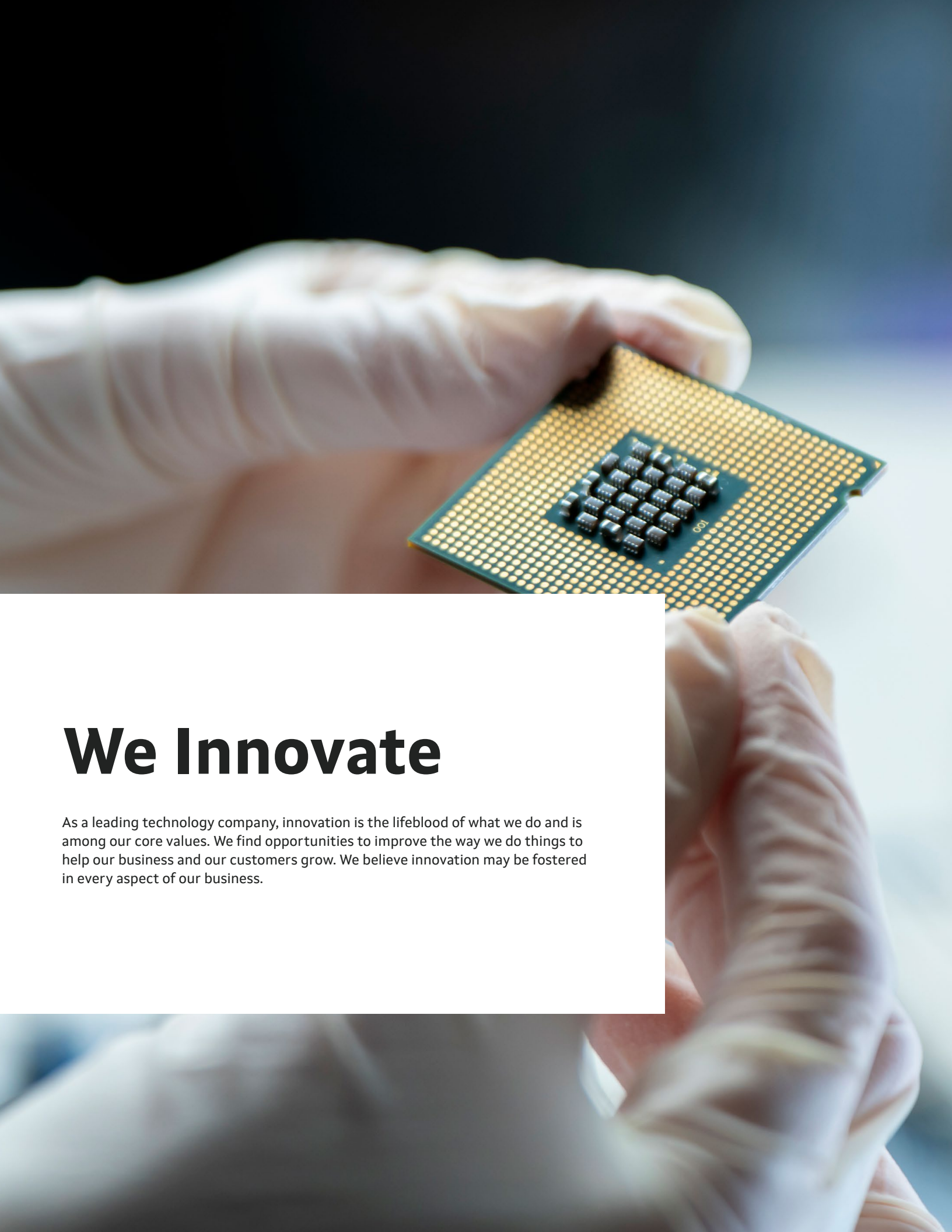
- Think before you post. Always use good judgment when posting online and on social media.
- Be respectful. Do not disparage, harass or discriminate against others.
- Protect our information. Be mindful not to disclose any confidential information.
- Follow our Code and our policies. Ensure that you understand and follow our social media policy.
- Know where to go. All media inquiries should be directed to the Public Relations team.
- Gain appropriate approvals. Never speak on behalf of Marvell on your personal accounts without approval from the Social Media team.



[Marvell Employee Social Media Engagement Guidelines](#)



[Publication and Speaking Authorization Form](#)



We Innovate

As a leading technology company, innovation is the lifeblood of what we do and is among our core values. We find opportunities to improve the way we do things to help our business and our customers grow. We believe innovation may be fostered in every aspect of our business.

Intellectual Property

We operate in a dynamic and rapidly evolving industry, and innovation is the core of our business. We protect our intellectual property and respect that of third parties.

Protecting Our Intellectual Property

Intellectual property (IP) refers to the innovative creations that drive technological advancements. This can encompass designs, inventions, documentation, and proprietary technologies.

To safeguard our Innovations:

- Document your innovations.
- Immediately submit an innovation disclosure to the Legal team as soon as you have a reasonably thought-out inventive concept.
- Do not hesitate to reach out to the Legal team should you have any questions regarding the protection of any innovations.



To safeguard third party IP:

- Do your due diligence: Before embarking on any project or partnership, identify and understand any relevant third party IP and agreements Marvell has with those third parties about that IP.
- Seek support from the Legal team: Always assume that third party IP is protected, whether by contract or law, and seek permission or licenses where needed.
- Be vigilant in your documentation: Maintain meticulous records of your research, work and design processes and ensure team members do the same.
- Report your concerns: If you encounter any potential infringement or issues related to third party IP, promptly report them.

Respecting the Intellectual Property Rights of Others

We respect the IP rights of others, including our customers, suppliers, competitors, and other third parties.

Business Partner Information

Customers, suppliers, and other business partners sometimes disclose confidential information to us for business purposes. We always treat this information with the same care we use for Marvell's confidential information. When necessary, the Legal team will help establish an IP Firewall around certain projects. An IP Firewall prevents us from inadvertently using business partner confidential information without authorization in our products and processes. Contact the Legal team if you think you need an IP Firewall for a project that you're working on.

Open Source Software

Open source software is software offered under a free software or open source license. Before using, modifying, or distributing any open source software for Marvell infrastructure or as part of a Marvell product or service development effort, ensure your plan complies with our [Open Source Software Policy](#).

Copyright-protected content

Do not use or copy software, music, images, videos, publications, or other copyright-protected content at work or for business purposes unless you or Marvell are legally permitted to do so. Do not use Marvell's facilities or equipment to make or store unauthorized copies.

Protecting Third Party Intellectual Property

We have a robust process to help ensure that Marvell safeguards the IP of other companies. This process ensures that we have the legal right to use anything created by a third party before incorporating it into our products. When handling third party IP, we comply with contractual obligations we have with third parties and with relevant laws and regulations, and act in ways that build trust and encourage collaboration within our industry.

We do not knowingly use third party intellectual property without permission or legal right.

If you're told or suspect that we may be infringing another's IP, including patents, copyrights, trademarks, or trade secrets, contact the Legal team.

If you come across information of a competitor or other third party that is potentially confidential and you're uncertain whether we have the right to obtain or use such information, refuse the information (if possible) and immediately contact the Legal team. If anyone provides you with a non-public competitor product or component, contact the Legal team immediately.

Publications

If you would like to write and/or publish an article, paper, or other publication in which the content relates to Marvell or its products or business, you must first obtain approval from Marvell's Publication Review Panel – which consists of a technical committee and members of the Legal team. Your proposed publication will be reviewed in order to avoid disclosure of confidential information to outside sources.

To submit a request for approval, [click here](#).



[Marvell
Publication Policy](#)

Artificial Intelligence

AI systems and tools are rapidly being developed to increase productivity and foster innovation. When used safely and responsibly, AI systems and tools can be a force multiplier to aid and accelerate tasks associated with our projects. However, AI also carries inherent risks that must be carefully considered and managed.

When using AI systems and tools for company-related activities:

- Use Marvell-authorized Enterprise AI applications whenever working with Marvell confidential or proprietary information.
- Use accounts created with Marvell email addresses/credentials.
- Marvell confidential or proprietary information, Customer Data (third party proprietary and confidential data), Personal Data, or any Marvell data may not be provided or disclosed to publicly-available AI systems and tools.
- Unauthorized AI system and tools should not be used to generate work product (output) that is to be included in a Marvell product or design or included as part of a Marvell product specification.



[Policy on Usage of Artificial Intelligence \(AI\) Systems](#)



[Enterprise AI at Marvell](#)



[Apply to Join a Standards Organization](#)



[Key Standards](#)

Technical Standards Groups

We participate in industry organizations that promote technical standards for wider adoption and interoperability. While participating in standards committees may have many benefits, it is important to follow guardrails to ensure Marvell’s IP and confidential information is protected.

Before beginning activities related to technical standards, including joining a standards organization or working group, or contributing technology to a standard, check with your Manager and the Standards Committee to determine if Marvell already participates in the organization. If not, apply for approval to join the standards or consortium group before proceeding.



We Help Others

We are dedicated to making a positive impact in the communities where we live and work. We encourage employees to get involved with causes they care about and support organizations working in our pillar areas.

Volunteering and Charitable Giving

We are committed to making a difference in the communities where we live and work. We support initiatives that strengthen communities and encourage employees to get involved.

Giving Back

Our global philanthropy program focuses on three key pillars: supporting humanitarian endeavors, investing in Science, Technology, Engineering, and Math (“STEM”) programs, and giving back to communities. Our employees volunteer in numerous projects to support our local communities.

We empower our employees through various volunteer and matching programs. Employees may participate by:

- Joining a company-sponsored volunteer event. Throughout the year Marvell hosts various events in which any employee may join.
- Volunteering time (in and outside of working hours) to a non-profit of our choice.
- Giving eligible donations and receiving company match benefits.

Be sure to track paid volunteer time and any additional volunteer time in the [Marvell Giving and Volunteer Portal](#).



[Philanthropy](#)



[Regional Community
Champions](#)

Environmental Protection and Sustainability

We are committed to advancing sustainability in our business operations, supply chain and our product ecosystem. We integrate environmental management across the company globally and expect our suppliers and other business partners to uphold these same principles and standards.

We strive to reduce our environmental footprint by integrating sustainability practices across our offices, R&D labs, supplier operations and product design. This includes responsible management of greenhouse gas emissions, energy use, water consumption, waste and hazardous materials



[Sustainability](#)



[Environmental,
Health & Safety Policy](#)



 MARVELL



**Any feedback and comments
can be sent to compliance@marvell.com**

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April 8, 2025

Key changes:

- Reorganized topics around pre-existing core behaviors
- Added new topics including AI, EH&S, Workplace Violence Prevention, and Manager Responsibilities
- Revised and updated Gifts and Entertainment policy