

## **Marvell's Investigations and Reporting Policy (Germany Supplement)**

Marvell is committed to doing business with uncompromising ethics and integrity every day. To encourage speaking up, implement sound governance for consistent, fair, and effective internal investigations, and prevent retaliation, Marvell has adopted its Investigations and Reporting Policy (the "Investigations Policy") which can be found [here](#). Please carefully review the Investigations Policy. It describes when and how to raise concerns and Marvell's process for investigating and resolving them.

This is a supplement to the Investigations Policy and describes the procedures that apply when concerns are raised under the German Whistleblower Protection Act.

### **REPORTS UNDER THE GERMAN WHISTLEBLOWER PROTECTION ACT**

The German Whistleblower Protection Act ("GWPA") provides protections to employees and certain third-parties that raise concerns covered by the GWPA ("Covered Concerns"). Covered Concerns include the following:

- Violations that are subject to criminal liability (*Verstöße, die strafbewehrt sind*);
- Violations which are subject to administrative fines (*Verstöße, die bußgeldbewehrt sind*) provided the violated regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies;
- Offenses of state legislation as well as directly applicable legal acts of the EU and the European Atomic Energy Community related to: (i) public procurement; (ii) financial services, products and markets, and/or prevention of money laundering and/or terrorist financing; (iii) product safety and/or compliance; (iv) transportation safety; (v) environmental protection; (vi) radiation protection and/or nuclear safety; (vii) food and/or food safety, animal health and animal welfare; (viii) public health; (ix) consumer protection; (x) protection of privacy and/or personal data and/or the security of networks and/or network and information systems;
- Offenses affecting the financial interests of the European Union, such as breaches of the relevant anti-fraud or anti-corruption legislation; or
- Offenses relating to the internal market, in particular breaches of the rules on competition and/or State aid.

For a detailed description of all Covered Concerns, please refer to Sec. 2 of the GWPA, which can be found [here](#).

### **WHO MAY RAISE A COVERED CONCERN?**

Employees of Marvell Semiconductor Germany GmbH ("Marvell Germany"), vocational trainees, persons who are to be regarded as equivalent to employees ("*arbeitnehmerähnliche Personen*"), temporary workers (*Leiharbeitnehmer*), and individuals who have acquired information about Covered Concerns in the context of a working or professional relationship with Marvell Germany or any other Marvell entity may raise a Covered Concern. Individuals who became aware of Covered Concerns during a recruitment process or pre-contractual negotiations may also raise Covered Concerns.

## HOW TO RAISE A COVERED CONCERN

If you have a Covered Concern, you may raise it by using Marvell's Concern Line, which can be found via web at <http://concernline.marvell.com>. The Concern Line allows you to submit concerns 24 hours a day through a web-based portal (in writing). During your submission to the Concern Line, you may also request a face-to-face meeting, either in person or by videoconference. Unless you explicitly request otherwise, your local HR representative may be responsible for following up on the report.

## PROCEDURES FOR HANDLING COVERED CONCERNS

### 1. Anonymity and Confidentiality

You may raise your concerns anonymously, or you may choose to identify yourself. We encourage you to identify yourself, since anonymous reporting may limit our ability to fully investigate and resolve your concerns.

Your identity will be kept confidential, consistent with legal requirements. We handle all investigations discretely.

### 2. Non-Retaliation

Marvell is committed to a workplace culture where we feel safe to raise concerns at any time without fear of retaliation. Marvell will not tolerate retaliation against anyone who participates in an investigation. Our anti-retaliation policy protects anyone who files a report or cooperates in an investigation. If you are concerned, include a note in your report or directly notify the investigator.

### 3. Investigation

Once you raise a Covered Concern, the Reporting Channel Team (*interne Meldestelle*) will acknowledge receipt within seven (7) days.

The Reporting Channel Team will carry out an assessment to determine the scope of any investigation. The Reporting Channel Team will then carry out any required investigation. You may be asked to provide further information in connection with the investigation.

If you raise a concern that you believe is covered by the GWPA, the Reporting Channel Team will notify you if it determines that the GWPA does not apply. In such event, you may choose to withdraw your concern or proceed under Marvell's Investigations Policy. Marvell encourages you to raise all integrity concerns, regardless of whether they arise under the GWPA. Marvell's Investigations Policy provides protections to individuals who raise good-faith concerns or participate in internal investigations.

### 4. External Reporting

We strongly encourage reports to be made internally to Marvell. This allows us to use our investigative resources to quickly investigate and resolve issues.

Marvell also recognizes your right to raise concerns externally. You may report concerns externally to competent authorities set out in the Whistleblower Protection Act (*Gesetz für*

*einen besseren Schutz hinweisgebender Personen sowie zur Umsetzung der Richtlinie zum Schutz von Personen, die Verstöße gegen das Unionsrecht melden*), which can be found [here](#). You may also raise your concerns to institutions, bodies, offices, or agencies of the European Union, such as the European Commission, the European Anti-Fraud Office (OLAF), the European Maritime Safety Agency (EMSA), European Union Aviation Safety Agency (EASA), European Medicines Agency (EMA), or the European Securities and Markets Authority (ESMA).