

## Investigations Policy

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The Marvell Investigations Policy governs the investigation by Marvell (the “Company”) of reports made to the Company alleging possible violations of the Marvell Code of Business Conduct and Ethics (“the Code”), the law, or other company policy or standards of behavior (“Reports”).

- A. Purpose.** The purpose of this Policy is to ensure that Reports are investigated appropriately.
  
- B. Applicability.** The Policy applies to all employees, officers, directors and contractors engaged by or performing work on behalf of any Marvell entities (collectively, “Marvell Personnel”).
  
- C. Policy Statement.** As part of its commitment to an ethical workplace, and to ensure that Marvell meets its legal obligations, the Company requires that Marvell Personnel report possible violations of the Code, the law, other company policies or standards of behavior, even when personally involved in the violation. The Company is committed to ensuring that all company-initiated investigations of such Reports are conducted in a fair, impartial, thoughtful manner and in compliance with all applicable laws.
  
- D. Role of the Compliance Office.** The Compliance Office (“Compliance”) is responsible for ensuring that an appropriate investigation of all Reports has occurred and relies on its colleagues in key internal departments to notify it when these matters arise, to ensure not only that an appropriate investigation occurs, but to track and monitor investigations, and ensure that the Audit Committee of the Board of Directors is provided with regular updates and information about Reports.

**E. Receipt of Reports and Investigation.** Reports are typically received through the Company's Ethics Point Concern Line<sup>1</sup>, verbally or in written form to Compliance, Legal, Human Resources, a manager, a Company executive or other person(s) associated with the Company, including members of the Board of Directors. Upon the Company's receipt of a Report it will promptly conduct an investigation appropriate to the allegations. Investigators conducting the investigations will use their professional judgment with respect to a particular investigation, consistent with local legal requirements. Marvell Personnel are prohibited from conducting any investigation on his or her own without the proper pre-authorization from the Chief Compliance Officer or his or her designee, and must bring all Reports to the attention of the Chief Compliance Officer promptly.

**F. Retaliation.** Marvell prohibits retaliation against anyone who makes a good-faith report of actual or possible wrongdoing, whether such report is made internally or to an applicable regulatory agency, including the SEC. Marvell also prohibits retaliation against anyone who participates in the investigation of such a report. Retaliation includes but is not limited to making threatening communication by verbal, written or electronic means against any individual who reports or provides any information concerning unlawful discrimination, harassment or other violations of company policies, rules and standards of conduct. Any employee found to be engaging in retaliation will be subject to disciplinary action up to and including termination.

**G. Investigative Timeline.** Marvell will make all reasonable efforts to initiate an investigation into the allegation(s) and conclude the investigation in a timely manner, as appropriate.

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<sup>1</sup> Marvell's confidential Concern Line is administered by a third-party service provider, Ethics Point, and is available 24 hours per day, 7 days per week. The [Marvell Concern Line](http://concernline.marvell.com) may be accessed at <http://concernline.marvell.com> or by phone using the numbers listed on the Concern Line website. Reports to the Concern Line may be made anonymously, local law permitting.



**H. Conclusion and findings.** Once an investigation is concluded and findings are made, they shall be communicated as appropriate to the relevant parties.