



Norwegian Transparency Act Statement 2023

May 16, 2024

This Statement has been prepared in line with the requirements of the Norwegian Transparency Act. The registered office of Silicon Laboratories Norway AS ("**Silicon Labs Norway**" or the "**Company**") is Sandakerveien 118, 0484 Oslo, Norway. The ultimate parent company of Silicon Labs Norway is Silicon Laboratories Inc.

Silicon Labs Norway is committed to respecting human rights and decent working conditions ("human rights") as a fundamental principle in our operations.

Structure, operations and supply chain

Silicon Labs Norway is a private limited liability company incorporated under the Norwegian legislation. Silicon Labs Norway is a wholly owned subsidiary of Silicon Laboratories International Pte. Ltd., ("**Silicon Labs Singapore**") headquartered in Singapore, which in turn is a wholly owned subsidiary of Silicon Laboratories Inc., incorporated in Delaware with its primary place of business in Austin, Texas. Together, the Company, Silicon Laboratories International Pte. Ltd., Silicon Laboratories Inc. and all other subsidiaries make up the Silicon Labs group of companies ("**Silicon Labs**").

Silicon Labs is a fabless global technology company that designs and manufactures semiconductors, other silicon devices and software, primarily in the secure, intelligent wireless technology sphere. Silicon Labs has operations, sales, and design activities worldwide.

Operations

Under contract with Silicon Labs Singapore, Silicon Labs Norway performs engineering services such as semiconductor hardware and software development, product prototyping, improvement of existing products and technical support. In addition, Silicon Labs Norway performs limited support activities as part of the global Silicon Labs marketing function. Silicon Labs Norway does not offer or sell goods or services to the public.

Silicon Labs Norway's business partners involves third party suppliers of goods and services such as IT hardware and accessories, facility management and services (e.g. janitorial, catering, landscaping), branded material, travel and shipping. Goods and services to support Silicon Labs Norway's operations were purchased from third parties located in Norway as well as from other countries.

Supply Chain

Silicon Labs' operations require a wide variety of goods and services to operate, the majority of which are produced with higher-skilled and trained labour, including engineering and technical services, as well as specialized equipment.

Silicon Labs' supply chain includes the manufacturing, testing, assembly and distribution of semiconductors. These tasks generally require technical and professional skills and use of capital-intensive assets.

Silicon Labs is committed to the highest standard of product quality and business integrity in its dealings with suppliers and ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible. Silicon Labs is a member of the Responsible Business Alliance and has adopted the [Responsible Business Alliance® \(RBA®\) Code of Conduct](#). Silicon Labs requires all major suppliers involved in the manufacture of Silicon Labs' products to comply with the [Silicon Labs Supplier Code of Conduct](#) and maintain ISO 9001:2015 and ISO 14001:2015 certification (or be on the path to certification). The Supplier Code of Conduct is reviewed periodically, and updated if needed, in response to regulatory updates, customer requirements or expectations, industry best practices, and inputs from internal and supplier audits.

Human rights risks

Assessment and description of the human rights risks

For the purposes of preparing this statement, an analysis was undertaken of human rights risks in Silicon Labs Norway's operations and Silicon Labs' supply chains.

Silicon Labs Norway does not utilize forced or compulsory labour. All employees are above the legal employment age in Norway and are recruited and provided with working conditions and the payment of wages and benefits that comply with applicable laws and regulations. Silicon Labs Norway's operations require deep technical skills. Most employees are higher-skilled professionals and trained labour with technical degrees, including from scientific and engineering disciplines.

Some human rights risks in the semiconductor manufacturing include: the right to a safe and healthy work environment, the right to information, the rights of women and children, and the right to an effective remedy. While these potential risks may generally exist, the production, operation, and testing of semiconductors generally require technical and professional skills and the use of capital-intensive assets that are at a lower risk for human rights violations.

Actions taken to address human rights risks

Silicon Labs maintains a commitment to safeguarding the health and security of its employees and the public, responsibly managing social impacts, and upholding respect for human rights in its operations. It is Silicon Labs Norway's policy to comply with all applicable laws and regulations, including those related to employment, safety, security, health and the environment.

Silicon Labs Norway is committed to respecting human rights as a fundamental principle in its operations, reinforced through training and integrated into its policies and practices.

Standards, procedures and processes

Several key standards, procedures, and processes guide Silicon Labs Norway's integrated approach to human rights:

- As a member of RBA, Silicon Labs has a commitment to abide by the [RBA Code of Conduct](#) as well as require its suppliers to follow the same standards. The code ensures Silicon Labs goes beyond compliance and maintains

best practices in all supply chain operations. Silicon Labs' [Supplier Code of Conduct](#) addresses human rights topics as set forth in the Responsible Business Alliance (RBA) Code of Conduct.

- Silicon Labs has implemented a [Global Human Rights Policy](#) to protect, respect and advance human rights as a core component of its business operations. This policy applies to all employees, contingent workers and business relationships, including partners, supply chain and vendors. The Global Human Rights Policy respects internationally recognized human rights as set out in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. This Global Human Rights Policy encompasses principles within the United Nations Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, Silicon Labs' Code of Business Conduct and Ethics and the laws of the countries in which we operate.
- Silicon Labs' [Code of Business Conduct and Ethics](#) and [Business Conduct Standards](#) are the principles that guide the conduct of our business operations by all employees at all levels. Through the Code of Business Conduct and Ethics and Business Conduct Standards, Silicon Labs commits to:
 - honest and ethical conduct;
 - full, fair, accurate, timely and understandable disclosures in our public communications;
 - compliance with applicable laws, rules and regulations; and
 - being accountable for adherence to the Code of Business Conduct and Ethics.

Addressing human rights risks in our supply chains and business partners

Silicon Labs holds its suppliers, vendors and contractors to compliance, anti-corruption, non-conflict, safety and other guidelines and our standard terms and conditions oblige suppliers to adhere to all applicable laws and regulations, including those related to employment, safety, and security, health and the environment, impose similar terms and conditions on their subcontractors, and permit audits and allow access to office and work locations, documentation and personnel. These standard terms also allow for termination if the supplier's performance or conformance to such terms is not acceptable.

Furthermore, as a member of RBA, Silicon Labs has access to additional tools to increase transparency and collaboration with its suppliers including the RBA Self-Assessment Questionnaire ("**SAQ**") designed to help members identify social, environmental and ethical risks in their supply chains and the RBA Validated Assessment Program ("**VAP**"), the standard for onsite compliance verification and effective, shareable audits.

Throughout the year, our employees are required to attest to Silicon Labs' Business Conduct Standards and complete other annual training to improve their understanding of human rights issues.

Actions taken to assess effectiveness

Supply Chain

As a member of the RBA, Silicon Labs engages with its suppliers in the RBA tool to evaluate the risk based on location, complete annual RBA SAQs and, as needed, VAP audits. In 2023, Silicon Labs achieved its goal to reach 100% facilities SAQ response from its major suppliers (those who make up 90% of Silicon Labs' manufacturing spend), and >80% for all suppliers. Based on the results of this risk analysis, Silicon Labs has not identified any high-risk suppliers.

Furthermore, Silicon Labs is committed to regularly working with its major suppliers to ensure 100% complete a facility SAQ and a minimum of 80% conduct a VAP with the goal of Silver recognition by 2025. In 2024, Silicon Labs is targeting 80% of all suppliers to complete their facilities SAQ.

Based on 2023 SAQs received, Silicon Labs broke down the SAQ scores into the four categories: Labor, Health & Safety, Environmental and Ethics with scores ranging from 0-100. The scores have given us a further insight to focus on environmental, health, and safety risks throughout our supply chain in 2024.

Silicon Labs reviewed the details of 21 valid audits within the last 18 months to identify the higher-risk areas of our extended supply chain operations. The initial results revealed major findings of potential high risk in the areas of environment, occupational health and safety, labor and supply chain management. Findings are addressed within the RBA VAP process and validated before closure. Silicon Labs reviews all findings and corrective actions as appropriate. Silicon Labs aims to annually evaluate and review the VAPs that have been completed by all suppliers.

Tables detailing the high-risk areas identified are available in Silicon Labs' [2023 Corporate Sustainability Report](#).

Business Partners

For this report, Silicon Labs Norway also ran its 2023 business partners through the RBA Heat Map based on industry and location. The 2023 business partners were identified using our accounting data of parties who have invoiced us in the 2023 calendar year. Certain partners initially fell in the RBA Heat Map as potential high risk based on the location or industry. While the annual spend with many of these potential high-risk partners were minimal, Silicon Labs Norway conducted additional diligence on each vendor and does not have reason to believe that such partners were engaged in human rights violations. Silicon Labs Norway will continue to use such findings to inform any future or ongoing engagement in 2024.

Grievance Mechanisms

Silicon Labs Norway is committed to conducting business with the highest ethical standards and according to applicable laws, rules, and regulations. For this reason, we encourage all customers, partners as well as our own employees to always report any suspected fraudulent or unethical behavior by Silicon Labs or its employees. This may be done anonymously via [EthicsPoint](#).

This procedure is intended solely for reporting suspected misconduct or irregularities, such as fraudulent, inappropriate, dishonest, illegal or negligent activity or behavior, and should not be used for customer complaints or to report on issues related to personal disputes.

Closing

Silicon Labs Norway has prepared this Statement in line with the requirements of the Transparency Act. We are committed to respecting human rights as a fundamental principle in our operations. This Statement will be made available at www.silabs.com and be reviewed annually.

Inquiries related to the Transparency Act may be made by contacting Silicon Labs via email at supplychain@silabs.com. To properly address requests, please provide Silicon Labs with the following information: full name, Country/Region, and nature of the request.



Néstor Ho

Chairman of the Board of Directors of Silicon Laboratories Norway ApS