Xilinx
Supplier Ethics & Compliance Policy
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Xilinx, Inc. and its affiliated entities worldwide (Xilinx) are committed to the highest standards of business ethics and integrity in dealings with suppliers and other parties. In particular, we expect all of our suppliers to conduct themselves with the highest standards of honesty, fairness and personal integrity as Xilinx and its employees. The commitment of our valued suppliers to the word and spirit of this Policy is essential to our mutual long-term success.

Introduction
This Policy applies globally to all suppliers to Xilinx. “Supplier” means any business, company, corporation, person or other entity that sells, or seeks to sell, any kind of goods or services to Xilinx, including the Supplier’s employees, agents and other representatives.

As a Supplier, we acknowledge as follows:

➢ We Have Read, Understood and Will Follow this Policy
We are expected to read, understand and follow by this Policy in all our dealings with, and on behalf of, Xilinx. We understand that signing and returning the Supplier Ethics and Compliance Certification Form attached in Exhibit A is an important requirement for maintaining eligibility to conduct business with Xilinx. We will be fully responsible to ensure that any subcontractors, agents or other third parties that we employ in our work for Xilinx will act consistently with this Policy.

➢ We Abide by the Law
We will comply with all laws, regulations and policies applicable to us and our dealings with Xilinx, including all applicable government contractual requirements that flow down to us through our contracts with Xilinx. This includes, but is not limited to, the rules regarding suspension and debarment of companies from doing business with the U.S. Government and applicable laws and regulations in other jurisdictions.

➢ We Manage Compliance
We maintain a management system that is designed to ensure compliance with applicable laws, regulations, Xilinx requirements, and corporate social responsibility policies. This affirms our management’s commitment to compliance, to identify, assess and mitigate compliance risks related to our business operations, and to facilitate continual improvement, including communications, training, and employee participation.

➢ We Uphold the Human Rights of Workers
We are committed to uphold the human rights of workers, and to treat them with dignity and respect by international standards. This includes that all work shall be voluntary and workers will not be required
to turn over identification materials as a condition of employment, no child labor will be used, working hours and wages shall be set fairly and in accordance with local laws, all employees shall be treated humanely without threat or harassment, coercion, or unlawful discrimination of any kind, and employees shall enjoy the freedom of association.

**We Promote Worker Health and Safety**
We strive to maintain a safe and healthy work environment that promotes occupational safety by minimizing worker exposure to potential hazards, implementing emergency plans and response procedures, adopting procedures and systems to mitigate occupational injury and illness, minimizing worker exposure to industrial chemical or biological agents and taking proper safety measures, protecting workers from the potential harm caused by overwork or hazardous equipment, and ensuring a sanitary working and living environment.

**We Act upon Environmental Responsibility**
We appreciate the value of environmental responsibility and, in accordance with applicable laws and regulations, we abide by the following: we obtain all required environmental permits and registrations that apply to our operations; we make continuous efforts to reduce waste and discharges of all types; we identify and carefully manage hazardous substances to ensure proper use, storage and disposal; we monitor and treat all air emissions and wastewater discharges; and we follow labeling and recycling, and prohibit or restrict the use of certain environmentally hazardous substances.

**We Understand Prohibitions against Bribes or Kickbacks**
We will not offer, promise or provide to any Xilinx employee a kickback, favor, cash, gratuity, entertainment or anything of value to obtain favorable treatment from Xilinx. Xilinx employees are similarly prohibited from soliciting such favors from us. This prohibition extends to the offering, promising or giving of any favors to any family members of both our and Xilinx employees or with any other persons with whom we have or Xilinx employees have significant personal relationships in exchange for obtaining or retaining Xilinx’ business.

**We Avoid Conflicts of Interest**
We will not enter into a financial or any other relationship with a Xilinx employee that creates any actual or potential conflict of interest for Xilinx. We understand that a conflict of interest arises when the material personal interests of the Xilinx employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and corrected. Even the appearance of a conflict of interest can be damaging to Xilinx and to us, as the Supplier, and are to be disclosed and approved in advance by Xilinx management.

**We Avoid Unfair Business Practices**
We will not fix prices or rig bids with our competitors. We will not allocate customers or markets with our competitors, or exchange current, recent, or future pricing information with our competitors. We will otherwise comply with all applicable antitrust and competition laws and regulations.
We Act in Accordance with Anti-Corruption Laws
We understand our obligation to maintain the highest standards of integrity in all business interactions. Any and all forms of corruption, such as bribery, extortion or embezzlement, are strictly prohibited. We will act in accordance with local and international laws and regulations regarding anti-corruption.

We Avoid Political Contributions or Unauthorized Lobbying on Behalf of Xilinx
We are not authorized to make any type of political contribution or charitable donations on behalf of Xilinx. We are not authorized to undertake any type of lobbying or other similar representative efforts on behalf of Xilinx before any kind of government entity, official or body or representative without the express consent of the Xilinx’ Global Compliance Department.

We Understand Restrictions on Use of Inside Information
If we are aware of material, non-public information relating to Xilinx or its business, we may not buy or sell Xilinx securities or engage in any other action to take advantage of that information, including passing that information on to others.

We Respect Intellectual Property Rights
We respect intellectual property rights worldwide and will utilize intellectual property only in accordance with the rights licensed to us by the respective owners. We will always safeguard the protection of Xilinx’ intellectual property and will not disclose or transfer any intellectual property or confidential information to any other party without the express written consent of the owner.

We Act to Minimize Supply Chain Vulnerabilities
We will take those steps necessary to minimize supply-chain vulnerabilities related to Xilinx parts within our custody or control. This includes accounting for 100% of materials processed on behalf of Xilinx and documented procedures to ensure no leakage of scrapped or excess parts. We will further act to ensure the detection and removal from the supply chain of suspect or tampered parts, salvaged parts, parts of unknown or questionable origin, or potentially faulty or counterfeit parts wherever possible.

We Avoid the Use of Conflict Minerals
We will not use any Conflict Minerals, including columbite-tantalite (an ore consisting of tantalum and niobium, otherwise known as “coltan”), cassiterite (tin oxide, SnO₂), gold, or wolframite (tungsten ore) originating from mines controlled by armed groups in the Democratic Republic of Congo or adjoining countries (collectively, the “Congo Region”) or any other mineral used to finance conflict in the Congo Region. In the event we determine minerals originating from sources that finance such conflict have been used in products manufactured for Xilinx, we will promptly submit to Xilinx a remedial plan that includes no further sourcing from those sources.

Contact Information
You should address any questions or inquiries regarding this Policy to the Xilinx Global Compliance Office at globalcompliance@xilinx.com.
**Exhibit A**

**SUPPLIER ETHICS & COMPLIANCE CERTIFICATION FORM**

Xilinx, Inc. and its affiliated entities worldwide ("Xilinx") are committed to the highest ethical and legal standards in the conduct of its business. We also expect all of our suppliers to conduct themselves with the highest standards of honesty, fairness and integrity.

The undersigned Supplier hereby acknowledges that it has received, read and understood the Xilinx Ethics and Compliance Policy ("Policy"), and agrees that all of its employees, agents and representatives doing business with Xilinx and Xilinx’ authorized agents or representatives will receive the Policy and will abide by the principles and requirements set forth in the Policy.

The obligations under the Policy are hereby incorporated by reference into each agreement that Xilinx has with Supplier under which Xilinx procures or can procure products or services from Supplier. Supplier also understands that its agreement to comply with the Xilinx Ethics and Compliance Policy does not obligate Xilinx to conduct business or place any orders with Supplier.

Please indicate your agreement to the terms of the Xilinx Supplier Ethics and Compliance Policy by signing below and returning a signed copy to [globalcompliance@xilinx.com](mailto:globalcompliance@xilinx.com).

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