



## Supplier Ethics and Compliance Policy

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 same high standards of honesty, fairness and personal integrity as Xilinx and its employees, to maintain eligibility to conduct business with Xilinx.

This Policy applies globally to all suppliers to Xilinx. A “supplier” is any entity that provides goods or services to Xilinx, including the supplier’s employees, agents and other representatives. Suppliers will also be fully responsible to ensure that any subcontractors, agents or other third parties that they employ in their work for Xilinx will act consistently with this Policy.

### ➤ Compliance with Laws

Suppliers’ personnel will comply with all applicable laws, regulations and policies in their dealings with Xilinx, including all applicable government contractual requirements that flow down to Xilinx through supplier 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.

### ➤ Management System

Suppliers will maintain a management system designed to ensure compliance with applicable laws, regulations, Xilinx requirements, and corporate social responsibility policies. Suppliers’ management will be committed to compliance, will identify, assess and mitigate compliance risks related to their business operations, and will facilitate continual improvement, including communications, training, and employee participation.

### ➤ Labor and Human Rights

Suppliers will commit to upholding the human rights of workers, and to treating them with dignity and respect by international standards. These include the requirement 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.

### ➤ Health and Safety

Suppliers will 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.

### ➤ **Environmental Responsibility**

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

### ➤ **Bribes or Kickbacks**

Suppliers 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 suppliers. This prohibition extends to the offering, promising or giving of any favors to any family members of both suppliers' and Xilinx employees or with any other persons with whom suppliers have or Xilinx employees have significant personal relationships in exchange for obtaining or retaining Xilinx's business.

### ➤ **Conflicts of Interest**

Suppliers 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. Suppliers 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 suppliers, and are to be disclosed and approved in advance by Xilinx management.

### ➤ **Unfair Business Practices**

Suppliers will not fix prices or rig bids with suppliers' competitors. Suppliers will not allocate customers or markets with suppliers' competitors, or exchange current, recent, or future pricing information with their competitors. Suppliers will otherwise comply with all applicable antitrust and competition laws and regulations.

### ➤ **Anti-Corruption Laws**

Suppliers understand their 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. Suppliers will act in accordance with local and international laws and regulations regarding anti-corruption.

### ➤ **Political Contributions or Unauthorized Lobbying**

Suppliers are not authorized to make any type of political contribution or charitable donations on behalf of Xilinx. Suppliers 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.

#### ➤ **Restrictions on Use of Inside Information**

If suppliers are aware of material, non-public information relating to Xilinx or its business, suppliers 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.

#### ➤ **Respect for Intellectual Property Rights**

Suppliers respect intellectual property rights worldwide and will utilize intellectual property only in accordance with the rights licensed to suppliers by the respective owners. Suppliers will always safeguard and protect 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.

#### ➤ **Minimizing Supply Chain Vulnerabilities**

Suppliers will take those steps necessary to minimize supply-chain vulnerabilities related to Xilinx parts within their custody or control. This includes accounting for 100 percent of materials processed on behalf of Xilinx and documented procedures to ensure no leakage of scrapped or excess parts. Suppliers 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.

#### ➤ **Avoiding Use of Conflict Minerals**

Suppliers will not use any Conflict Minerals, including columbite-tantalite (an ore consisting of tantalum and niobium, otherwise known as “coltan”), cassiterite (tin oxide, SnO<sub>2</sub>), 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 suppliers determine minerals originating from sources that finance such conflict have been used in products manufactured for Xilinx, suppliers will promptly submit to Xilinx a remedial plan that includes no further sourcing from those sources.

#### **Contact Information**

Questions or inquiries regarding this Policy should be sent to the Xilinx Global Compliance Department at [globalcompliance@xilinx.com](mailto:globalcompliance@xilinx.com)