



Policy Against Human Trafficking and Slavery

Introduction

Semtech Corporation, as a global corporate company, recognizes its responsibility to address and mitigate the risk of modern slavery and human trafficking in its operations and throughout our supply chain. This statement sets out our commitment and actions taken to do our part to eradicate these abhorrent practices, and meets the requirements of the California Transparency in Supply Chains Act and the UK Modern Slavery Act 2015 which supports our commitment, resolution and established principles for action against forced labor.

Structure, Business & Supply Chains

A description of Semtech Corporation's structure, values, business units and product brands can be found in our Annual Report and in our Conflict Mineral Report, both on our website. Our commitment is embedded in our drive to operate both a sustainable and profitable enterprise and is at the core of our everyday work. Semtech's senior leadership has established this policy and meets yearly to review our social accountability program, policy statements and progress toward achieving our goals, including our goal to drive ethical sourcing practices-protecting human rights across our supply chain.

Policies

This policy outlines the efforts Semtech Corporation will make to seek to eradicate human trafficking and slavery from our supply chains. Semtech opposes any use of slavery or human trafficking in the manufacture and distribution of our products and fully supports the promotion of ethical and lawful business practices within our workplace. Semtech will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of our global organization. This policy complies with the California Transparency in Supply Chains Act and UK Modern Slavery Act of 2015.

Semtech's supply chain are an important part of our success and our culture. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as Semtech Corporation. The workplace practices that we expect from our business partners include:

- Suppliers are not to use slave labor, illegal child labor or forced labor.
- Suppliers will ensure that the overall terms of employment are voluntary.
- Suppliers shall follow all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits.
- Suppliers shall follow all local applicable laws pertaining to the number of hours worked in a seven (7) day week.



- Suppliers will periodically certify that they conform to the expectations described above and that all materials incorporated into products manufactured for Semtech Corporation comply with the laws regarding human trafficking and slavery of the country or countries in which those business partners are doing business.

Supply Chain Due Diligence

Semtech's business partners must be able to demonstrate compliance with this Policy at the request and satisfaction of Semtech Corporation.

Semtech's policy addresses the need for open dialogue about potential violations and concerns, and provides confidential reporting helplines managed through external services specializing in addressing sensitive matters. These contact points are available 24 hours a day, seven days a week.

Semtech will maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking.

Semtech will promptly and thoroughly investigate any claim or indication that a business partner is engaging in human trafficking or slave labor. If a supplier to Semtech is found in violation of this policy, Semtech will take prompt, remedial measures to address the violation.

Semtech will provide ongoing training to its employees (including those who have direct responsibility for supply chain management), on the laws and Semtech's policy against human trafficking and slavery.

This policy further sets forth the responsibility of every employee to help ensure all of Semtech Corporation's global activities meet our high standards for behavior and business ethics, and establishes accountability for compliance with law and policy.

Risk Assessment & Accountability

Semtech Corporation's ongoing risk of exposure to human trafficking and modern slavery sits within our supply chain. Semtech recognizes that modern slavery and human trafficking can occur at any stage within this supply chain and as such are committed to working to ensure that the principles set out in our Policy are adhered to throughout said supply chain.

Semtech also recognize that business alone cannot effectively tackle and address the issues of human trafficking or modern slavery, a goal that can only be achieved through building sustainable long term partnerships and collaborations between businesses, and governments.

To combat the risk of human trafficking and modern slavery in our supply chain, we have maintained our well-established program of ongoing supplier assessment, which is delivered



through our own supplier compliance team.

We have developed this assessment program to help ensure our suppliers are fully aware of our standards and expectations. This is achieved through supplier ethical compliance assessments, compliance survey's, or code declarations. Suppliers must further agree to provide evidence of their related compliance programs.

In our supply chain we will only engage with those business partners who are open and transparent to the process of assessment and who are working towards our requirements.

During our most recent assessment and survey period, Semtech Corporation conducted more than 74 ethical compliance assessments on new and existing business partners throughout our supply chain. If we identified noncompliance, we were prepared to engage with our suppliers on remedial action plans to help ensure issues were addressed and corrected. Our assessment ratings are defined by the severity and/or number of noncompliances identified during the assessment process, these are currently defined as:

- Satisfactory: meets our ethical business standards and expectations.
- Needs Improvement: Meets our ethical business standards expectations but could require differing levels of remedial corrective actions.
- Unsatisfactory: Falls below the expectations of our ethical business standards and requires immediate remedial action to address the noncompliances to enable new or ongoing business relationship. Conditions such as a failure to respond to inquiries or assessment protocols, or issues were identified that are not accepted or tolerated by Semtech businesses and are related to incidents of the following but not limited to:
 - Child Labor
 - Convict/Indentured/Forced Labor
 - Corporal Punishment
 - Slavery and Human Trafficking
 - Acts of Bribery

The following table provides a breakdown of assessments and results during survey period.

	Fiscal Year 2019	Fiscal Year 2019 %
Satisfactory	74	100.0%
Needs Improvement	0	0.0%
Unsatisfactory	0	0.0%
Total	74	100%



Zero Tolerance

Our policy in zero tolerance cases is to terminate the business relationship with the supplier.

For suppliers where we identify critical noncompliance issues, corrective and remedial action plans are developed and implemented. In the small number of cases where suppliers are unwilling to work with us to achieve compliance within an agreed time frame, we maintain the right to end the business relationship and cancel outstanding purchase orders.

Semtech acknowledges, simple termination of a contract relationship may not always be the most appropriate response. We recognize that in the event of noncompliance, withdrawal of our business may cause severe hardship to those employed and will therefore attempt to work with our business partners through a remediation program to achieve ongoing compliance.

Training and Awareness

In response to the California Transparency in Supply Chains Act of 2010 and UK Modern Slavery Act of 2015, Semtech Corporation created an online training course that we require all relevant employees, supervisors and managers to complete annually company-wide.

Effectiveness and Performance Indicators/Monitoring

Semtech Corporation recognizes that the risks from human trafficking and modern slavery change, and as such our approach to preventing these issues are expected to be reviewed annually by the Semtech Corporation legal, Human Resources, Quality, and Supply Chain management groups. This approach will monitor and review:

- Effectiveness of risk assessment processes
- Staff training programs
- Assessment programs (where applicable); and
- Reporting and escalation processes.

Policy and collaborative statement of Semtech Corporation meeting the requirements set forth within the California Transparency in Supply Chains Act of 2010 and UK Modern Slavery Act of 2015.