

## XILINX CODE OF SOCIAL RESPONSIBILITY

The Xilinx Code of Social Responsibility outlines standards to ensure that working conditions at Xilinx are safe, that workers are treated with respect, fairness and dignity, and that our operations are environmentally responsible.

Fundamental to adopting the Code is the understanding that our business, in all of our activities, must operate in full compliance with the laws, rules and regulations of the countries in which we operate. Our Code encourages Xilinx, as an industry leader, to go beyond legal compliance, drawing upon internationally recognized standards to promote social and environmental responsibility.

Xilinx is committed to obtaining regular input from employees and stakeholders in the continued development and implementation of the Xilinx Code of Social Responsibility.

The Code consists of the following:

- Section A. Labor
- Section B. Health and Safety
- Section C. Environmental
- Section D. Ethics
- Section E. Management Systems

### A. LABOR

#### 1. Freely Chosen Employment

Xilinx does not use forced, bonded or indentured labor or involuntary prison labor. Work is voluntary, and employees are free to leave upon giving reasonable notice, as per worker's contract. Employees are not required to hand over government-issued identification, passports or work permits as a condition of employment. We do not transport, harbor, recruit, transfer, or receive persons by means of force, threat, coercion, abduction, or fraud for labor or services. We do not place unreasonable restrictions on entering or exiting company facilities. We ensure that all workers are presented with a written employment agreement in their native language, or a language that the worker understands, describing the terms of their employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin, and there shall be no substitution or changes allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. We do not destroy, conceal, confiscate or deny access to employee immigration documents (such as government-issued identification, passports, or work permits), unless required by law. In such a case, at no time should workers be denied access to their documents. And we do not require workers to pay recruitment fees or other related fees for employment.

## **2. Young Workers**

Xilinx does not use child labor, and we implement appropriate mechanisms to verify the age of workers. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. If child labor is identified, assistance/remediation is provided. Xilinx supports the use of legitimate workplace apprenticeship programs, which comply with applicable laws and regulations. Workers under the age of 18 should not perform hazardous work and may be restricted from night work with consideration given to educational needs. We properly manage workers through maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. We provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

## **3. Working Hours**

Work weeks are not to exceed the maximum hours set by local law based on the acknowledgement that worker strain can lead to reduced productivity, increased turnover, and a heightened possibility of injury or illness. A work week should not exceed the maximum allowable hours set by local law—or, in areas where such guidance is not provided, no more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers should be allowed at least one day off every seven days. All overtime is voluntary.

## **4. Wages and Benefits**

Compensation paid to employees comply with applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, employees are compensated for overtime at pay rates greater than regular hourly rates (as applicable or required by local laws). Deductions from wages as a disciplinary measure are not permitted. For each pay period, we provide workers with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labor will be within the limits of local law.

## **5. Humane Treatment**

Xilinx does not allow or tolerate harsh or inhumane treatment, including any violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Our disciplinary policies and procedures in support of these requirements are clearly defined and communicated to all workers.

## **6. Non-Discrimination/Non-Harassment**

Xilinx is committed to a workplace free of harassment and unlawful discrimination. Xilinx will not engage in discrimination or harassment based on race, color, age, gender, marital status, sexual orientation, ethnicity, gender identity, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or as otherwise prohibited by applicable laws in hiring and employment practices such as promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, employees

or potential employees are not subject to any medical tests (including pregnancy or virginity tests) or physical exams that could be used in a discriminatory way. These policies are in consideration of the ILO Discrimination (Employment and Occupation) Convention (No. 111).

## **7. Freedom of Association**

Xilinx respects the rights of workers to associate freely, join or not join labor unions, seek representation or join workers' councils bargain collectively, and engage in peaceful assembly in accordance with local laws. We also respect the rights of workers to refrain from such activities. Based on the acknowledgement that open communication and direct engagement between employees and management are the most effective ways to resolve workplace and compensation issues, employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

## **B. HEALTH AND SAFETY**

Xilinx recognizes that the quality of products and services, consistency of production, and employee morale are enhanced by a safe and healthy work environment. Xilinx further recognizes that continuous employee input and education is vital to identifying and solving health and safety issues in the workplace. For more than a decade, Xilinx has been third-party certified to the [ISO14001](#) and [ISO45001](#) (replacing OHSAS 18001) standards at our key operational sites. Our [EHS Policy](#) describes Xilinx's strong culture of protecting the environment and promoting a safe and healthy workplace. In accordance with these principles, Xilinx endeavors to address health and safety in the following ways:

### **1. Occupational Safety**

Xilinx's health and safety programs are based on a risk assessment process to identify, evaluate, and estimate the levels of hazards involved in a situation, and comparing these against external benchmarks or standards to determine acceptable risks. Employee exposure to potential health and safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicle, and fall hazards, etc.) are mitigated through proper design, engineering and administrative controls, preventative maintenance and safe work procedures, and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, employees are provided with appropriate personal protective equipment and educational materials about risks to them, associated with these hazards. Reasonable steps are also taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

### **2. Emergency Procedures**

Potential emergency situations and events are identified and assessed, and their potential impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans, and providing contact information for emergency responders. These plans and procedures also focus on minimizing harm to

life, the environment, and property. Emergency drills are executed annually (as feasible) or as required by local law, whichever is more stringent.

### **3. Occupational Injury and Illness**

Procedures and systems are in place to manage, track and report occupational injury and illness, including provisions to:

- a) encourage worker reporting;
- b) classify and record injury and illness cases;
- c) provide necessary medical treatment;
- d) investigate cases and implement corrective actions to eliminate their causes; and
- e) facilitate return of workers to work.

### **4. Industrial Hygiene**

Employee exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are eliminated or controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by engineering and administrative means, employees are provided with appropriate personal protective equipment, free of charge. Protective programs shall be ongoing, and include educational materials about the risks associated with these hazards.

### **5. Physically Demanding Work**

Employee exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is identified, evaluated and controlled.

### **6. Machine Safeguarding**

Production and other machinery is evaluated for safety hazards. Physical guards, interlocks and barriers are provided and properly maintained for machinery used by employees.

### **7. Sanitation, Food, and Housing**

Employees are provided with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Currently, there are no situations under which employees require dormitories. If required, employee dormitories provided by Xilinx or a labor agent will be clean, safe, and provide emergency egress, hot water for bathing, adequate lighting, heat, and ventilation, and reasonable personal space, with reasonable entry and exit privileges.

### **8. Health and safety communication**

Xilinx provides mandatory Code of Conduct and compliance training related to Environment, Health, and Safety. New hires are expected to complete all assigned courses within 30 days of joining the company. We also provide ongoing training to all workers prior to the beginning of work and regularly thereafter. Training is provided in the language of the worker, or in a language that the worker understands for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety-related information is clearly posted in facilities or placed in a location identifiable and accessible by workers. Workers shall be encouraged to raise any health or safety concerns without fear of retaliation.

## C. ENVIRONMENT

Xilinx recognizes that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. To demonstrate our commitment, Xilinx is certified to ISO14001 at its primary testing facilities. In accordance with the following, Xilinx endeavors to:

### 1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring) and registrations are obtained, maintained and kept current and their operational and reporting requirements are followed.

### 2. Pollution Prevention and Resource Reduction

Waste of natural materials, including water, electricity, minerals, and virgin forest products, are reduced or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance and facility processes, materials substitution, conservation, recycling and reusing materials.

### 3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard if released to the environment are identified, labeled, and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

### 4. Solid Waste

Xilinx implements a systematic approach to identify, manage, reduce and responsibly dispose of or recycle non-hazardous solid waste generated from Xilinx operations, industrial processes and sanitation facilities as required by applicable laws.

### 5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion by-products generated from operations are characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. We also conduct routine monitoring of the performance of our air emission control systems.

### 6. Materials Restrictions

Xilinx adheres to applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal.

### 7. Water Management

Xilinx documents, characterizes, and monitors water sources, use, and discharge. We also seek opportunities to conserve water and control channels of potential contamination. Wastewater generated from Xilinx operations, industrial processes and sanitation facilities are monitored, controlled and treated as required by applicable laws prior to discharge or disposal.

## 8. **Energy Consumption and Greenhouse Gas Emissions**

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are tracked and documented at the facility level. We are continuously looking to improve energy efficiency and minimize consumption and greenhouse gas emissions, and have set a corporate-wide greenhouse gas reduction goal, that we publicly report progress against.

## **D. ETHICS**

To meet social responsibilities and to achieve success in the marketplace, Xilinx upholds the highest standards of ethics, including:

### **1. Business Integrity**

The highest standards of integrity are upheld in all business interactions. Any forms of bribery, corruption, extortion or embezzlement by employees are strictly prohibited.

### **2. No Improper Advantage**

No bribes or other means of obtaining undue or improper advantage are offered or accepted. This prohibition includes promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record-keeping, and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

### **3. Disclosure of Information**

Information regarding business activities, structure, financial situation and performance is to be maintained confidential where appropriate and only disclosed in accordance with applicable regulations and prevailing agreements. All business dealings shall be transparently performed and accurately reflected on Xilinx's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

### **4. Intellectual Property**

Intellectual property rights of Xilinx as well as third parties are respected and protected; transfer of technology and know-how is done in a manner that protects intellectual property rights, and customer and supplier information is safeguarded.

### **5. Fair Business, Advertising and Competition**

Xilinx upholds standards and laws of fair business, advertising and competition.

### **6. Protection of Identity and Non-Retaliation**

Xilinx maintains programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers, unless prohibited by law. The company has a communicated process for personnel to raise concerns without fear of retaliation.

## **7. Responsible sourcing of minerals**

Xilinx has a policy to reasonably assure that tantalum, tin, tungsten, and gold that may be used in our products are sourced in a way consistent with the Organization for Economic Cooperation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized framework. We exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers on request.

## **8. Privacy**

Xilinx is committed to protecting the reasonable privacy expectations of personal information for everyone we do business with, including suppliers, customers, consumers, and employees. We comply with privacy and information security laws and regulatory requirements where personal information is collected, stored, processed, transmitted, and shared.

## **E. MANAGEMENT SYSTEMS**

The management of Xilinx believes in principles designed to ensure:

- Compliance with applicable laws and regulations related to the conduct of its business worldwide;
- Conformance with this Code; and
- The identification and mitigation of operational risks related to this Code.

### **1. Company commitment**

The management aims to promote the continuous improvement of Xilinx with respect to the status of its compliance efforts and level of commitment to social and environmental concerns in its role as a responsible corporate citizen.

### **2. Management accountability and responsibility**

Xilinx has identified a senior executive and company representative that is responsible for ensuring implementation of management systems and associated programs. Senior management reviews the status of these management systems on a regular basis.

### **3. Legal and customer requirements**

Xilinx will continue to strive to conform to legal and regulatory requirements, the principles of this Code, and contractual requirements related to its social and environmental responsibility. We have a process to identify, monitor, and understand applicable laws and regulations as well as customer requirements.

### **4. Risk assessment and risk management**

Xilinx has a process to identify legal compliance; environmental, health, and safety; and labor practice and ethics risks associated with its operations. We have determined the relative significance of each risk and implemented appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

**5. Improvement objectives**

Xilinx has written performance objectives, targets, and implementation plans to improve its social, environmental, and health and safety performance, including a periodic assessment of performance toward achieving those objectives. Xilinx will endeavor to correct deficiencies identified by internal or external assessments, inspections, investigations, or reviews in regard to its business conduct and operations.

**6. Training**

Xilinx provides programs for training managers and employees to implement its policies, procedures, and improvement objectives, and to meet applicable legal and regulatory requirements.

**7. Communication**

Xilinx communicates clear and accurate information regarding its performance, practices and expectations to its employees, suppliers, and customers.

**8. Worker feedback, participation, and grievance**

Xilinx employs ongoing processes for worker feedback, participation, and grievance, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers are given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

**9. Audits and assessments**

Xilinx conducts periodic self-assessments to ensure conformity to legal and regulatory requirements, the content of the Code of Conduct, and customer contractual requirements related to social and environmental responsibility.

**10. Corrective action process**

Xilinx employs a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

**11. Documentation and records**

Xilinx creates and maintains documents and records to ensure regulatory compliance and conformity to company requirements, along with appropriate confidentiality to protect privacy.

**12. Supplier responsibility**

Xilinx communicates Code of Conduct requirements to suppliers and monitors their compliance to the Code.