

Supplier Code of Conduct

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Introduction

At Wolfspeed, we believe acting ethically and responsibly is not only the right thing to do, but also the right way to run our business. The Wolfspeed Values guide every interaction we have and every decision we make. These Values and the Wolfspeed Code of Conduct convey our strengths and create a solid foundation for the highest ethical standards of business behavior. Living our Values, adhering to our Code, and complying with all applicable policies, laws and regulations are critical to our day-to-day business. Our uncompromising resolve to operate in an ethical, legal and socially responsible manner enables Wolfspeed to be a trusted partner which empowers greater innovation and sustainable growth for our company. To preserve the trust placed in Wolfspeed, the choices we make for our material and service providers must also reflect our Values and we aspire to work with those who embrace the same principles that we uphold.

Wolfspeed celebrates diversity and is committed to creating an inclusive environment within our Company and our supply chain. We strongly believe that our Suppliers are integral to our journey and play a vital role in the way we conduct our business and deliver value to our stakeholders. By building long-term, trusting partnerships and collaborative relationships with Suppliers that are rooted in a shared set of values and standards, we can achieve mutual success and sustainable business growth.

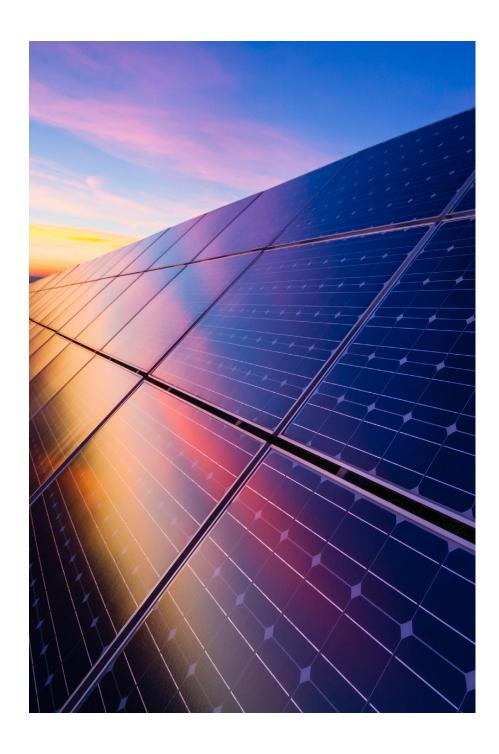
Wolfspeed's Supplier Code of Conduct (hereinafter, "Supplier Code") outlines the standards, practices, and behaviors we expect from each supplier to effectively meet industry and sustainability challenges, ensure compliance with applicable laws and regulations, and maintain the highest ethical practices in the areas of labor and human rights, health and safety, environmental protection, business ethics, and management practices. These expectations are consistent with the concepts and language of the Responsible Business Alliance (RBA) Code of Conduct, as well as internationally recognized conventions and standards.

Wolfspeed expects its Suppliers to operate in full compliance with applicable policies, laws, and regulations and in alignment with the standards of business conduct set forth in this Supplier Code and to cascade these requirements to their suppliers who perform work that is material to the products, parts and/ or services supplied to Wolfspeed. The term "Worker" apples to everyone working for or on behalf of a Supplier, including but not limited to full and part-time employees, temporary, migrant, student, contract, and any other type of worker. Wolfspeed encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards to advance social and environmental responsibility and business ethics. Commitment and adherence to such practices is an important component of our supplier evaluation, selection and development. By its acceptance of any purchase order from Wolfspeed Inc., the supplier confirms that they will abide by the standards set forth in the Supplier Code.

Each Supplier should maintain appropriate standards and procedures for assessing its compliance and addressing any areas of non-compliance. Wolfspeed reserves the right to conduct audits at Supplier's facilities, with due respect to the Supplier's confidential information and intellectual property rights, and/or to request and review supporting documents to verify that a Supplier is meeting the expectations set forth in this Supplier Code. If an instance of non-conformance to the Supplier Code is identified, Wolfspeed will attempt to work with the supplier to correct the issue. Prompt correction is required if any significant deficiencies and/or blatant violations of law are detected. Suppliers are expected to develop a corrective action plan to promptly bring its operations into conformance with the Supplier Code. If a supplier does not develop such a plan or fails to implement it, Wolfspeed may move to terminate the business relationship.

Where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles. The rights of a Supplier and Wolfspeed's rights as a customer are governed by the terms and conditions stipulated in their contractual agreement and this Supplier Code is not intended to modify such terms and conditions. Each Supplier is responsible for knowing, understanding and complying with the laws and regulations applicable to its business, whether specifically referenced in the Supplier Code. Wolfspeed will not provide legal advice to its Suppliers or otherwise be responsible for communicating any legal requirements to, or interpreting the same for, its Suppliers.

The Supplier Code is periodically reviewed and updated as needed to reflect changes in circumstances or to align with current industry requirement and best practices.



Labor and Human Rights

A company's most important resource is its workers and that support and respect for human rights forms the foundation of any successful business. Wolfspeed Suppliers shall comply with all applicable laws and respect internationally recognized human rights, wherever they operate; seek ways to honor the principles of human rights when faced with conflicting requirements; and treat the risk of causing or contributing to human rights abuses as a legal compliance issue wherever they operate.

FREELY CHOSEN EMPLOYMENT (SLAVERY AND **HUMAN TRAFFICKING PREVENTION)**

Suppliers will not use any form of, or source from entities associated with, forced, bonded, indentured, involuntary or exploitative prison, trafficked or slave labor. Prohibited actions include transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility, including unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process for workers entering the country specifically to work for the supplier, workers must be provided with a written employment agreement in their native language that describes the terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) 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 as agreed upon by both parties. All work must be voluntary, and workers shall be free to leave work at any time or

terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

CHILD LABOR AVOIDANCE AND YOUNG WORKERS

Suppliers must comply with all laws and regulations regarding the employment of young workers. These regulations include but are not limited to work schedules, conditions, wages, and labor intensity. Suppliers shall not use child labor in any stage of manufacturing or in the provision of services or supplies. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country in which services and/or products are being performed and/or manufactured, whichever is greatest. The use of legitimate workplace learning and apprenticeship programs, which comply with all laws and regulations, is supported. Workers under 18 years of age (Young Workers) shall not perform work that is likely to jeopardize their health and safety, or their physical, mental or emotional development, including working night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student workers.

WORKING HOURS

Suppliers must ensure working hours do not exceed the maximum set by local law and should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed legally mandated breaks, holiday and vacation days to which they are legally entitled, including time off when ill or for maternity leave. Further, workers shall be allowed at least one day off every seven days and not work more than six consecutive days. All overtime shall be voluntary.

WAGES AND BENEFITS

Suppliers must compensate workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner. For each pay period, workers shall be provided 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 the local law.

HUMANE TREATMENT

Suppliers must treat all workers with dignity and respect. Suppliers must not threaten workers with, or subject them to harsh or inhumane treatment, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse. In support of these requirements, suppliers shall have disciplinary policies and procedures clearly defined and communicated to workers.

NON-DISCRIMINATION

Suppliers must treat workers with respect and dignity and provide a workplace free of harassment and unlawful discrimination, including discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or applicants for employment should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers are expected to recognize the principle of freedom of association and the right to collective bargaining as permitted by and in accordance with applicable laws and regulations. Suppliers shall respect the rights of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers shall be able to openly communicate and share ideas, concerns, and grievances with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment.

DIVERSITY, EQUALITY, AND INCLUSION

Suppliers are expected to promote a work environment that values diversity, equality, and inclusion in adherence with local laws, regulations, and policies specific to equal opportunity and non-discrimination. We encourage suppliers to enable equality of opportunity by fostering and cultivating an inclusive and diverse workforce that encompasses all the differences that make each worker unique. Diversity is encouraged both in the workplace and in the supply chain.

Health and Safety

In addition to full compliance with all applicable health and safety laws, suppliers shall provide workers a safe and healthy working environment that minimizes the incidence of accidental work-related injury, death or illness and enhances the quality of products and services, the consistency of production and worker retention and morale. Suppliers should utilize ongoing worker input and education as essential opportunities to identify and solve health and safety issues in the workplace.

OCCUPATIONAL SAFETY AND INDUSTRIAL HYGIENE

Worker exposure to potential safety hazards (e.g., chemical, physical or biological agents, electrical and other energy sources, fire, vehicles, fall hazards, or excessive noise levels) are to be identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tag-out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with and use appropriate, wellmaintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must be taken to remove pregnant women/nursing mothers from working condition 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, as well as include reasonable accommodations for nursing mothers. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

EMERGENCY PREPAREDNESS

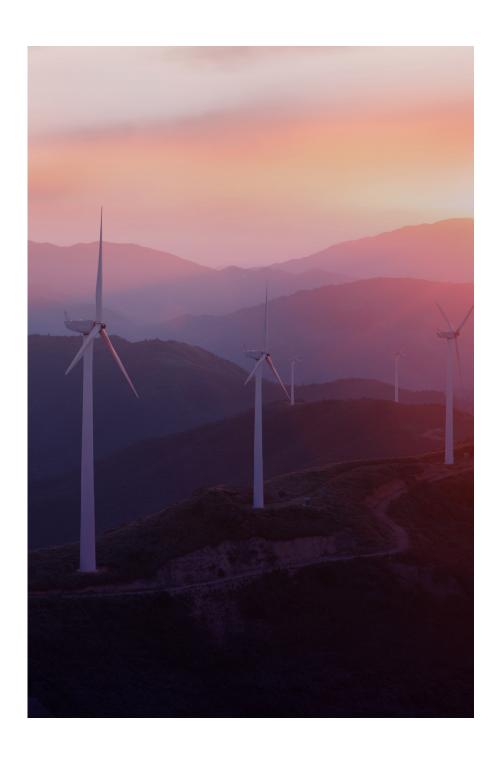
Suppliers shall identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

OCCUPATIONAL INJURY AND ILLNESS

Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage workers to report, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate the return of workers to task.

PHYSICALLY DEMANDING WORK

Suppliers shall identify, evaluate, and mitigate worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks. Suppliers shall integrate this process in the qualification of all new or modified productions lines, equipment, tools, and workstations.



MACHINE SAFEGUARDING

Suppliers shall evaluate production and other machinery for safety hazards. Where machinery presents an injury hazard to workers, suppliers shall provide and properly maintain physical guards, interlocks, and barriers.

SANITATION, FOOD, AND HOUSING

Suppliers shall provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories, provided by the Supplier or a labor agent, are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space as well as reasonable entry and exit privileges.

HEALTH AND SAFETY COMMUNICATION AND TRAINING

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand, 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, including Safety Data Sheets, and warnings shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Suppliers shall provide training to all workers prior to the beginning of work and regularly thereafter. Suppliers are encouraged to initiate and support worker committees to enhance ongoing health and safety education and to encourage workers to raise concerns and provide input regarding health and safety issues in the workplace.

Environment

In compliance with all applicable environmental laws, Wolfspeed expects its suppliers to integrate environmentally responsible practices into their operations. Suppliers should work to minimize adverse effects on the community, the environment, and natural resources, while safeguarding the health and safety of the public. Suppliers are expected to stay current with evolving industry standards and best practice and incorporate other such management system standards and guidelines as they deem relevant based on their industry expertise.

ENVIRONMENTAL PERMITS AND REPORTING

Suppliers shall obtain, maintain, and keep current all required environmental permits, approvals, and registrations and shall comply with all operational and reporting requirements of such permits.

POLLUTION PREVENTION AND RESOURCE REDUCTION

Suppliers shall minimize or eliminate emissions and discharges of pollutants and generation of waste at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

HAZARDOUS SUBSTANCES AND RESTRICTIONS

Suppliers will identify, label, and manage substances posing hazards to the environment (if discharged) to ensure proper handling, transportation, storage, use, reuse or recycling and disposal. Restrictions of the use of hazardous substances (RoHS) as stipulated in Directive 2011/65/EU of the European Union are to be followed for all materials, parts, components, semi-finished goods and trade goods delivered to Wolfspeed. Furthermore, the requirements regarding the registration, evaluation, authorization and restriction of chemicals (REACH) as defined in the European Union Regulation No. 1907/2006 are to be observed for all goods supplied and deliveries made to Wolfspeed.

Suppliers shall comply with all applicable laws and regulations prohibiting or restricting the use or handling of specific substances and will provide documentation, as requested by Wolfspeed, for verification that Supplier material content meets customer, government, statutory and regulatory material content regulations.

SOLID WASTE

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

AIR EMISSIONS

Suppliers shall characterize, monitor, control, and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations prior to discharge. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

MATERIALS RESTRICTIONS

Suppliers are to adhere to all applicable laws, regulations and Wolfspeed requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. At Wolfspeed's request, Suppliers are expected to provide reports on the occurrence of substances in any materials supplied to Wolfspeed that may be restricted by, or require disclosure to, governmental bodies, customers and/or recyclers.

WATER MANAGEMENT

Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required by applicable laws and regulations prior to discharge or disposal. Participant shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Energy consumption and all relevant Scope 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Suppliers are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

CERTIFICATION

Suppliers engaged in the manufacture of or engaged in providing materials that will be part of Wolfspeed branded products shall have ISO14001 certification (or comparable), or a plan to become certified. Alternatively, the material suppliers must provide documented objective evidence of an operational environmental management system and demonstrate equivalency.

Ethics

In addition to full compliance with all applicable business ethics laws, meeting social responsibilities, and achieving success in the marketplace, our suppliers are expected to conduct their business in accordance with the highest ethical standards and to have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement and even the appearance of conflicts of interest.

BUSINESS INTEGRITY

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a policy to prohibit all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws including but not limited to the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act. Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or other third parties to ensure that such third parties comply with this Supplier Code and the anti-corruption laws.

NO IMPROPER ADVANTAGE (BRIBERY AND CORRUPTION)

Suppliers shall not engage in, endorse nor tolerate any form of bribery or corruption, directly or indirectly with any person or organization, including but not limited to government agencies, government officials, or companies. Suppliers shall not offer nor accept any form of improper advantage to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Suppliers must comply with all applicable anti-bribery and anti-corruption laws and regulations that govern operations in the countries in which they do business, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and Canada's Corruption of Foreign Public Officials Act. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

CONFLICTS OF INTEREST

Suppliers must not enter into any transaction with Wolfspeed employees that could create an actual or perceived conflict of interest. A conflict of interest is any situation where an individual's interests or relationships could inappropriately influence, or appear to inappropriately influence, decisions an individual makes on Wolfspeed's behalf. Even the perception of a conflict of interest between a Wolfspeed employee and a supplier could be detrimental to Wolfspeed's business interests and reputation.

DISCLOSURE OF INFORMATION

Suppliers shall perform all business activities and transactions transparently and accurately reflect such activities and transactions in its books and records. Suppliers shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Suppliers shall not falsify records or misrepresent conditions or practices in the supply chain. Wolfspeed reserves the right to request Suppliers' anti-corruption policies and procedures as well as the policies and procedures relevant to their Supply Chain.

INTELLECTUAL PROPERTY

Suppliers shall honor confidentiality commitments and respect intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law or contractual terms. Suppliers shall manage the transfer of technology and know-how in a manner that protects intellectual property rights and is in accordance with the most stringent information protection requirements.

FAIR BUSINESS, ADVERTISING AND COMPETITION

Suppliers shall uphold standards of fair business, advertising and competition and conduct their business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they operate.

PROTECTION OF IDENTITY AND **NON-RETALIATION**

Suppliers shall maintain programs that ensure the confidentiality, anonymity and protection of supplier and worker whistleblowers, unless prohibited by law. Suppliers shall prohibit retaliation against workers who participate in whistleblowing in good faith or who refuse an order that is in violation of the Supplier Code. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations. Supplier shall have a formal communication program to ensure that every employee is fully informed of and understands the policy of non-retaliation.

RESPONSIBLE SOURCING OF MINERALS

Suppliers shall exercise adequate due diligence following the OECD Due Diligence Guidelines with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold, hereinafter referred to as "3TG", and cobalt and to make a reliable determination of the origin and source of such minerals. Supplier shall have a policy and process in place to reasonably assure that any of these minerals contained in the products they manufacture do not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected or High-Risk Areas or in any other way directly or indirectly contribute to human rights violations. We request our Suppliers to ensure that all smelters and refiners in its 3TG and cobalt supply chain take part and actively engage in third party audit programs and to provide any information on such smelters and refiners and their due diligence measures available to Wolfspeed upon request.

TRADE COMPLIANCE

Suppliers must comply with all applicable international trade laws and regulations, including import, export, and reexport controls regulations, as well as applicable embargoes, sanctions, and anti-boycott laws.

PRIVACY

Suppliers shall commit to protecting the reasonable privacy expectations for personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Wolfspeed's Privacy Policy outlines our commitment and explains how we collect, use, disclose and protect our customers' personal information. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Wolfspeed.

Management Systems

Suppliers must adopt or establish a management system designed to ensure: (a) compliance with applicable laws, regulations, and customer requirements related to the Supplier's operations and products; (b) conformance to this Supplier Code; and (c) identification and mitigation of operational risks related to this Code. Such management system shall be continuously monitored and reviewed for continuous improvement and compliance with changing laws and regulations.

COMPANY COMMITMENT

Suppliers should maintain corporate social and environmental responsibility policy statements, affirming Supplier's commitment to compliance and continual improvement, and endorsed by executive management and posted in the facility in the local language or language(s) understood by all employees.

MANAGEMENT ACCOUNTABILITY AND RESPONSIBILITY

Suppliers are expected to clearly identify company representatives responsible for ensuring implementation of and periodic review of the management systems and associated programs.

LEGAL REQUIREMENTS

Suppliers shall have a process to identify, monitor, and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

RISK ASSESSMENT AND RISK MANAGEMENT

Suppliers shall have appropriate measures to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks associated with their operations; determine the relative significance of each risk; and implement appropriate procedural and physical controls to mitigate the identified risks and ensure regulatory compliance.

IMPROVEMENT OBJECTIVES

Suppliers shall have written standards, performance objectives, targets, and implementation plan to improve the Supplier's social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.

TRAINING AND COMPETENCIES

Suppliers shall have programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives, and to meet applicable legal and regulatory requirements.

COMMUNICATION

Suppliers shall have a process for communicating clear and accurate information about Supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

WORKER FEEDBACK, PARTICIPATION, AND GRIEVANCE

Supplier shall have ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Supplier Code to aide with conformance and foster continuous improvement.

AUDITS AND ASSESSMENTS

Suppliers must complete periodic self-evaluations of their facilities and operations to ensure compliance with the Supplier Code, legal and regulatory requirements, and customer contractual requirements relating to social and environmental responsibility. Suppliers are required to respond and certify their compliance with the Supplier Code and all applicable laws upon request from Wolfspeed.

CORRECTIVE ACTION PROCESS

Suppliers shall have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

DOCUMENTATION AND RECORDS

Suppliers will have processes to identify, monitor, understand and comply with applicable laws and regulations and this Supplier Code. Suppliers will obtain, maintain and keep current a valid business license and/or permits as required by applicable laws and regulations. Suppliers will maintain appropriate documents and records to ensure regulatory compliance and conformity to this Supplier Code along with appropriate confidentiality to protect privacy. Documents and records will be made available for inspection upon request by Wolfspeed.

SUPPLIER RESPONSIBILITY

Suppliers should develop, maintain and implement principles consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with the Code. Suppliers shall have a process to communicate the principles of this Supplier Code or comparable requirements to next-tier suppliers and to monitor supplier compliance to this Supplier Code or materially consistent requirements. Suppliers are encouraged to go beyond compliance to applicable laws and take responsibility to continually improve social and environmental conditions and ethical behavior.



Enforcement Provisions



Fundamental to Wolfspeed's relationship with suppliers is that they operate according to principles that at least meet those in this Supplier Code. In the event that a supplier fails to fulfill any of the principles and requirements set out in this Supplier Code, or refuses to meet the minimum standards outlined, Wolfspeed reserves the right to terminate the business relationship. Supplier audits may be used by Wolfspeed to check whether a supplier complies with this Supplier Code, Inspections at the supplier's premises are only carried out following prior notification by Wolfspeed, within normal operating hours and in line with applicable laws.

If a supplier becomes aware of a reasonable risk of a violation of this Supplier Code, the supplier must notify Wolfspeed as soon as practicable. Any identified deficiencies must be corrected on a timely basis as directed by Wolfspeed. Suppliers must provide Wolfspeed with clear, accurate, and appropriate documentation and reports regarding compliance with the Supplier Code upon request.

Reporting Concerns

No code, however comprehensive, can anticipate and address every ethical situation Suppliers may encounter when working with Wolfspeed. This Supplier Code must be complemented by good judgment and common sense. Situations may arise where the need for clarification or more information is needed to make the right decision. Suppliers are responsible for recognizing these situations and acting accordingly, including informing Wolfspeed.

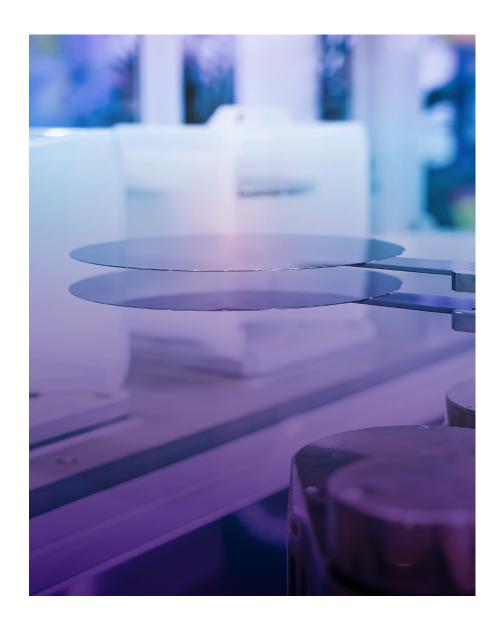
There are many methods to raise concerns, questions or non-compliance matters, including speaking directly with your Wolfspeed contact. Wolfspeed also operates an Ethics and Compliance Hotline where suppliers have the option to report matters anonymously, if they so choose.

WOLFSPEED'S ETHICS & COMPLIANCE HOTLINE

Wolfspeed has a strict non-retaliation policy for individuals who report concerns in good faith. Punishment, penalties and all other forms of retaliatory action against individuals for reporting an ethical or compliance concern in good faith are strictly prohibited.

Every report made to the Helpline is taken very seriously. The Helpline is for all Wolfspeed suppliers.

- 800.453.3918
- www.mycompliancereport.com; Access ID: Wolfspeed
- compliance@Wolfspeed.com



REFERENCES

The following standards were used in preparing this Supplier Code and may be useful as reference and source of additional information.

EXTERNAL SOURCES

- **Dodd-Frank Wall Street Reform and Consumer Protection Act** http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf
- **Eco Management & Audit System** https://ec.europa.eu/environment/emas/index_en.htm
- **Ethical Trading Initiative** www.ethicaltrade.org
- EU General Data Protection Regulation (2016/679/EU) ("GDPR") https://gdpr.eu
- **ILO Code of Practice in Safety and Health** www.ilo.org/public/english/protection/safework/cops/english/download/ e000013.pdf
- **ILO International Labor Standards** www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
- ISO 14001 www.iso.org
- **National Fire Protection Agency** https://www.nfpa.org/
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas** www.oecd.org/corporate/mne/mining.htm
- **OECD Guidelines for Multinational Enterprises** https://www.oecd.org/corporate/mne/

OHSAS 18001

https://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-andsafety/

- **Responsible Business Alliance** http://www.responsiblebusiness.org/Code of Conduct
- REACH Registration, Evaluation, Authorization and Restriction of Chemicals https://ec.europa.eu/environment/chemicals/reach/reach_en.htm
- RoHS Restriction of the Use of Hazardous Substances https://ec.europa.eu/environment/waste/rohs_eee/index_en.htm
- **SA 8000**

https://global.ihs.com/doc_detail.cfm?document_name=CEPAA%20SA%20 8000&item s key=00315270

- Social Accountability International (SAI) www.sa-intl.org
- **Universal Declaration of Human Rights** https://www.un.org/en/about-us/universal-declaration-of-human-rights
- **United Nations Convention Against Corruption** https://www.unodc.org/unodc/en/treaties/CAC/index.html?ref=menuside
- **United Nations Global Compact** www.unglobalcompact.org
- **United States Federal Acquisition Regulation** www.acquisition.gov/far

WOLFSPEED-SPECIFIC SOURCES

Wolfspeed wolfspeed.com

Code of Conduct https://www.wolfspeed.com/code-of-conduct

Community Engagement https://www.wolfspeed.com/company/about/diversity

Corporate Governance https://investor.wolfspeed.com/corporate-governance

Health and Safety https://www.wolfspeed.com/company/sustainability

Product Quality https://www.wolfspeed.com/company/sustainability/product-quality

Social Responsibility https://www.wolfspeed.com/company/sustainability

Supplier Resources https://www.wolfspeed.com/company/suppliers-contractors/supplierresources

Supply Chain https://www.wolfspeed.com/company/sustainability

Responsible Minerals Sourcing Policy https://www.wolfspeed.com/company/suppliers-contractors/supplierresources/conflict-minerals



Thank you

for taking the time to read our Supplier Code of Conduct and for committing to help maintain our reputation and honor our Values.

In your work, you may face difficult decisions. When that happens, use the resources provided in our Code and our policies to guide you in making the right choice. To supplement the Code, Wolfspeed has adopted specific policies, procedures and standards that apply geographically or to specific business units, functions or departments. Each of us is responsible for learning the policies and procedures that are relevant to our individual job responsibilities.

Finally, if you ever suspect behavior that fails to meet our standards, Say Something. You can make a difference.

- Mike Pollard, VP Legal and Chief Compliance Officer

