



**POLICY 1.60 – HUMAN RIGHTS**

**Effective Date: October 7, 2021**

**Revision Date: August 11, 2023**

**Unless the content specifies otherwise, this policy applies to all global locations.**

## INTRODUCTION

Wolfspeed is driven by a commitment to our Values that guide every decision we make, how we operate our business, and how we interact with each other, our customers, partners, suppliers and communities. Our goals and future success can only be achieved by our collective commitment to operate with integrity and transparency, a respect for human rights, and a responsibility to our global customers, partners, and the communities where we operate. Integrating our Code of Conduct and Values into our day-to-day business facilitates trust which enables greater innovation and sustainable growth for our company. Human rights are considered as part of the Company’s ongoing processes to identify and assess risk. We commit to engaging with stakeholders to understand their perspectives, improve our monitoring, analysis or remediation of human rights impacts, and better understand how to evolve our actions supporting this Policy.

We recognize the undeniable importance of maintaining and promoting fundamental human rights based on dignity, equality, fairness, and respect in our operations and supply chain. This Human Rights Policy (“Policy”) outlines our core standards and communicates the expectations we have established for our Employees, direct Suppliers, subcontractors, and other business partners in the area of human rights. This Policy also outlines our approach to effective and diligent procurement practices by continually augmenting our procedures and prioritizing vendors that uphold the same level of human rights standards.

### I. SCOPE

As a company built on our Values, we are committed to regularly assessing human rights-related risks and potential impacts, reviewing our policies and management processes, and seeking input from various stakeholders across our value chain. In addition to complying with all applicable laws in countries of operation, Wolfspeed acknowledges and respects the fundamental human rights and labor principles outlined in the following guidelines:

• <a href="#">Convention on the Rights of the Child</a>	• <a href="#">International Covenant on Civil and Political Rights</a>
• <a href="#">International Covenant on Economic, Social, and Cultural Rights</a>	• <a href="#">International Labor Organization’s (ILO) Core Conventions</a>
• <a href="#">Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises</a>	• <a href="#">OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (CAHRAS)</a>

• <a href="#">United Nations (UN) Women’s Empowerment Principles</a>	• <a href="#">UN Guiding Principles on Business and Human Rights</a>
• <a href="#">Responsible Business Alliance Code of Conduct</a>	• <a href="#">Universal Declaration of Human Rights</a>

This Policy applies to all persons working for or on behalf of the Company in any capacity, including, but not limited to, Employees, officers, directors, volunteers, and interns (collectively, “Employees”), as well as any third party that provides goods or services to the Company, including, but not limited to, Suppliers, subcontractors, service providers, consultants, recruiters, and agents (collectively, “Suppliers”).

## II. POLICY

Human rights are universal and inalienable rights inherent to all human beings that allows them to live in dignity, equality, freedom, justice, and peace, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, color, religion, language, or any other status. We are deeply committed to maintaining responsible and ethical practices across our business and seek to uphold and advocate for the fundamental values and human rights of individuals and ethnic groups of all origins.

Guided by our Values and international human rights principles and frameworks, we will continue to develop our knowledge and understanding of the salient human rights risks across our businesses. We are committed to the active promotion of human rights for our Employees, Suppliers, and the communities in which we operate. Together with our supporting policies, these define the minimum standards of behavior that all Wolfspeed Employees and Suppliers are expected to uphold. This commitment goes beyond compliance as we aspire to play a role in the positive development and enhancement of human rights.

We recognize that our policies and programs may not prevent all adverse impacts in our supply chain, and we are committed to providing and/or helping enable remedies where we caused or contributed to those impacts and to using our leverage to encourage our Suppliers to provide remedy where we find impacts directly linked to our business operations. To facilitate this process, we have established a variety of mechanisms that allow our Employees, Suppliers, and other potentially affected individuals to raise grievances and seek remedy. Our mechanisms do not obstruct access to other remedy channels or procedures and, where appropriate, we will collaborate with other organizations and companies to help prevent, mitigate, or remediate adverse impacts.

Our respect for human rights is not limited to these standards:

### 1. Child Labor and Young Workers

Wolfspeed condemns the unlawful employment or exploitation of children and prohibits the use of child labor in our operations or in our supply chain. We comply with all applicable laws and regulations concerning age, hours, compensation, health and safety, and respect the relevant ILO conventions and principles on Minimum Age (C138) and Worst Forms of Child Labour (C182). 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 legal employment in the country, whichever is greatest. Workers under the age of 18 (defined as “Young Workers”) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. We support the development of legitimate workplace programs through Company-approved, short-term internships, apprenticeships, or work experience programs for the educational benefits of Young Workers, but they are never permitted to perform work that may threaten their health and safety or hinder their education or vocational training. We require the age of our workers to be verified at the time of hiring and have processes in place to responsibly remediate any potential policy violations.

## **2. Forced Labor and Human Trafficking**

Wolfspeed has a zero-tolerance stance on the use of forced labor, bonded labor, indebted labor, indentured labor, prison labor, involuntary servitude, slavery, human trafficking or sex trafficking or any use of force or other forms of coercion, fraud, deception, abuse of power or other means to achieve control over another person for the purpose of exploitation for personal or commercial gain or to deprive a person of their freedoms. We are deeply committed to maintaining responsible and ethical practices across our operations and supply chain and seek to uphold and advocate for the fundamental values and human rights of individuals and ethnic groups of all origins.

Allegations of forced labor, trafficking, and modern slavery are not confined to any particular zone or region. We have strict policies against the use of involuntary labor of any kind in our operations or supply chain. Any instance of forced detention and labor suppression of an individual’s human rights is unacceptable. Such conduct not only violates our Code of Conduct, Supplier Code of Conduct, Prohibition Against Modern Slavery & Anti-Human Trafficking Policy and this Policy, but also stands against our fundamental beliefs as a company.

## **3. Harassment and Discrimination**

We are committed to providing a work environment that is free of inappropriate and unlawful discrimination and harassment. We support and uphold the elimination of discriminatory practices with respect to employment and promote and embrace diversity in all aspects of our business operations. We prohibit harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment,

mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment or discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity, religion, disability, pregnancy, veteran status, national origin, political affiliation, union membership, protected genetic information, marital status, or any other characteristic protected by applicable law. More information can be found in the Company's [Anti-Harassment Policy](#).

#### **4. Diversity and Inclusion**

We value and advance the diversity and inclusion of all people with whom we work and engage. We are committed to equal opportunity and the elimination of discrimination and harassment within our operations and with our business and community partners. We strive to maintain workplace environments that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law. The qualities and characteristics we seek for recruitment, hiring, placement, development, training, compensation, and advancement at Wolfspeed are job qualifications, performance, skills, and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace or any work-related circumstance outside the workplace. More information can be found in the Company's [Anti-Harassment Policy](#).

#### **5. Freedom of Association and Collective Bargaining**

Management shall respect the right 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 and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

#### **6. Wage and Benefits**

We pay wages at or above the legally mandated minimum wage requirements, including the legal overtime rate for hourly Employees. Employees are also entitled to, at a minimum, legally mandated benefits and are not required to pay fees, deposits or incur debt as a result of employment.

#### **7. Working Hours**

We recognize the importance of work-life balance and have established policies to guide working hours, overtime, and rest periods for workers in our operations and supply chain. As we continue to evolve our approach, we will strive to meet international standards regarding working hours and rest periods, which include: (i) a standard workweek of no more than 60 working hours (48 regularly scheduled work hours and 12 voluntary overtime hours); (ii) a minimum of 8 hours of rest between days of work; and (iii) at least 24 hours of consecutive rest in every 7-day period, except in emergency or unusual and temporary situations.

## **8. Health and Safety**

Protecting the safety, health, and well-being of our Employees is one of our top priorities as a company. We have established policies and systems to drive health and safety values throughout our operations and strive to create a culture of positive impact on the health and well-being of our Employees and surrounding environment. Our Global EHS function leads the strategy to achieve this vision and oversees our practices which set the global health and safety standards for our business and assesses our performance. We are committed to providing and maintaining a safe and healthy workplace, and we are dedicated to engaging with our Employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues. More information can be found in the Company's [EHS Policy](#).

## **9. Environmental Responsibility and Sustainability**

Our efforts to promote a sustainable environment encompass our operations, the products we design and make, the services we provide, and the people involved. We continually assess our portfolio and business operations with sustainability in mind and implement programs to reduce our environmental impact and related effects on human rights by implementing strategies to prevent pollution, conserve resources, and reduce waste, while also promoting accountability through transparent public disclosure of our reduction efforts. Please refer to our [Environmental Health and Safety Policy](#) and [Sustainability Report](#).

## **10. Protecting Privacy**

One of our most valuable assets is the goodwill we maintain with Employees, customers, and third parties with whom we do business, and thus are committed to the responsible collection, storage, use, transfer, and disposal of their personal data. We follow applicable privacy and data protection laws wherever we do business and respect an individual's privacy when it comes to personal data. Our [Privacy and](#)

[Cookies Policy](#) and related privacy documents are posted on the Wolfspeed website for transparency on how the Company handles personal data.

## 11. Responsible Sourcing and Conflict Minerals

We are aware of the human rights abuses that can occur through the mining and production of "conflict minerals." We strive to only use responsibly sourced minerals in our products. Our commitment and practices are set out in our [Responsible Minerals Sourcing Policy](#).

## III. EXPECTATIONS

Expectations to comply with laws and ethical business practices, including acting with integrity and respecting the fundamental human rights of others, are embedded in our culture and policies and clearly defined in the [Code of Conduct](#). Employees are required to complete annual Code of Conduct training and adhere to our Code and all policies, including this Policy, and the standards which flow from it.

We expect our Suppliers to comply with contractual requirements and uphold and assure respect for human rights in a manner consistent with this Policy and the [Supplier Code of Conduct](#) within their operations and supply chains, or such higher standards as required by law or contract.

## IV. COMPLIANCE AND ENFORCEMENT

Employees and Suppliers are expected to comply with the provisions of this Policy and avoid any activity that might lead to a breach of this Policy. We are committed to maintaining an open culture with the highest standards of honesty and accountability, where anyone can report any genuine concerns in good faith under the "Say Something" program. Employees and Suppliers wish to seek guidance, raise concerns, or suspect or become aware of any action that they believe is not consistent with this Human Rights Policy, applicable laws, our Code of Conduct, or Supplier Code of Conduct should immediately report the violation to the:

- [Legal Department](#);
- [Corporate Compliance Department](#);
- [National Human Trafficking Hotline](#) – to speak with a hotline advocate;

- By phone: 1-888-373-7888
  - By email: [help@humantraffickinghotline.org](mailto:help@humantraffickinghotline.org)
  - By text: text HELP to 233733 (BEFREE)
  - Online chat: [www.humantraffickinghotline.org](http://www.humantraffickinghotline.org); and/or
- [Ethics & Compliance Hotline](#) (Access ID: WOLF, 1-800-452-3918).

The Company will not tolerate retaliation against anyone for reporting a concern in good faith or for cooperating with a compliance investigation regarding this Policy. Additional details about Wolfspeed's intolerance for retaliation can be found in the Company's [Anti-Harassment Policy](#).

All complaints or incidents of potential violations of this policy must be reported promptly. The Company cannot resolve a potential violation unless it knows about it. Every reported potential violation will be investigated thoroughly and in a timely manner.

Willful violation or failure to comply with any of the provisions of this Policy may constitute grounds for disciplinary action, up to and including termination, in accordance with the provisions of applicable local law. In addition, the Company reserves its right to pursue all remedies available by applicable law (including, without limitation, filing a criminal and/or civil complaint) for actions in violation of this Policy. While the Company is committed to working with its Suppliers to rectify any identified instances of human rights violations, we retain the right to terminate the relationship if there is a breach of this policy.