



Synaptics Supplier and Vendor Code of Conduct –

Synaptics is committed to maintaining the highest standards of ethical, social and environmental responsibility. As a condition of doing business with Synaptics, our suppliers and vendors are required to follow our Supplier Code of Conduct (“Code”), including providing safe working conditions, treating workers with dignity and respect, accepting diversity in race, gender and religion, acting fairly and ethically, and using environmentally responsible practices whenever they are supplying products to Synaptics.

Synaptics requires its suppliers to operate in accordance with these principles and in full compliance with all applicable laws and regulations. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law. Synaptics will assess compliance to these requirements and will regularly monitor and audit our suppliers to ensure ongoing compliance. Any violations of the Code may jeopardize the suppliers’ business relationship with Synaptics, up to and including termination. This Code applies to Synaptics suppliers and their subsidiaries, affiliates, and subcontractors.

Labor and Human Rights

Synaptics believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and suppliers shall uphold the highest standards of human rights.

Anti-Discrimination and Humane Treatment

Supplier shall commit to a workplace free of discrimination, harassment and abuse. Supplier shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices. Supplier shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety and shall not improperly discriminate based on test results. Supplier shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Freely Chosen Employment

Supplier shall ensure that all work is voluntary. Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Supplier shall not withhold workers’ original

government-issued identification and travel documents. Supplier shall ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers. Supplier shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by workers, such fees shall be repaid to the worker. Supplier shall ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and the law.

Prevention of Underage Labor and Young Worker Protections

Child labor is not to be used in any stage of manufacturing. 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, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Supplier 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. 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.

Supplier may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

Working Hours

A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

Wages and Benefits

Compensation paid to workers shall comply 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. 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.



Freedom of Association and Collective Bargaining

Supplier shall freely allow workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment, in conformance with local law.

Worker Feedback and Grievance Systems

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 Code and to foster continuous improvement.

Occupational Health and Safety

Worker health, safety, and well-being is important to Synaptics. Minimizing the incidence of work-related injury and illness creates a safe and healthy work environment that enhances the quality of products and services, consistency of production and worker retention and morale. Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Health and Safety Permits

Supplier shall obtain, keep current, and comply with all required health and safety permits. Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also 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.

Emergency Preparedness and Response

Supplier shall identify and assess potential emergency situations. For each situation, Supplier shall develop and implement emergency plans and response procedures that will minimize harm to life, environment, and property.

Incident Management

Supplier shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Supplier shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.



Working and Living Conditions

Supplier shall provide workers with reasonably accessible and clean toilet facilities and potable water. Supplier-provided dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by Supplier or a third-party shall be clean and safe and provide reasonable living space 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 along with reasonable entry and exit privileges.

Health and Safety Communication

Supplier shall provide workers with appropriate workplace health and safety training in their primary language so that 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 shall be clearly posted in the facility.

Environment

Synaptics recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, we expect our suppliers to minimize the adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public. Synaptics is committed to protecting the environment, and environmental responsibility is at the core of how we operate. Suppliers shall develop, implement, and maintain environmentally responsible business practices. Synaptics will monitor and audit to ensure supplier compliance with the Code.

Environmental Permits and Reporting

Supplier shall obtain, keep current, and comply with all required environmental permits. Supplier shall comply with the reporting requirements of applicable permits and regulations.

Hazardous Waste Management

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous waste.

Non-Hazardous Waste Management

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle nonhazardous waste.

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 prior to discharge or disposal. Supplier shall conduct routine monitoring of



the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Greenhouse Gas Emissions and Energy Consumption

Supplier shall identify, manage, reduce, and responsibly control air emissions emanating from its operations that pose a hazard to the environment. Supplier shall conduct routine monitoring of the performance of its air emission control systems. Supplier shall reduce energy water, natural resource consumption, and greenhouse gas emissions and will look for cost-effective methods to improve efficiency and to minimize their energy consumption and greenhouse gas emissions. Supplier shall minimize hazardous substances consumption by implementing reduction and substitution measures.

Ethics

Synaptics believes social responsibilities and the ability to achieve success in the marketplace, we must uphold the highest standards of ethics expects the highest standards of ethical conduct in all of our endeavors and from our suppliers. Supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

Responsible Sourcing of Minerals

Suppliers shall exercise due diligence on relevant minerals in their supply chains. Suppliers shall develop policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the mineral processing level in order to determine whether relevant minerals originate from regions with high risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts. Supplier shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Supplier shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

Business Integrity

Synaptics has a zero-tolerance policy and prohibit our suppliers to engage in any and all forms of bribery, corruption, extortion and embezzlement to obtain an unfair or improper advantage. Supplier shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

Disclosure of Information

Supplier shall accurately record information regarding its business activities, labor, health and



safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties and as required by law.

Protection of Intellectual Property

Supplier shall respect intellectual property rights and safeguard customer information. Supplier shall manage technology and know-how in a manner that protects intellectual property rights.

Whistleblower Protection and Anonymous Complaints

Supplier shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Supplier shall protect whistleblower confidentiality and prohibit retaliation.

Management Systems

Synaptics believes that sound management systems and commitment are key to enriching the social and environmental well-being of our supply chain. Synaptics holds its suppliers accountable to this Code and all of its Standards. Supplier shall implement or maintain management systems to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

Company Commitment

Supplier shall develop a company policy affirming its commitment to high standards of social and environmental responsibility, ethical conduct, and continuous improvement, endorsed by executive management and posted in the primary local language at all of its facilities.

Management Accountability and Responsibility

Supplier shall identify senior executive and company representatives responsible for ensuring implementation and periodic review of its management systems. Senior management reviews the status of the management system on a regular basis.

Risk Assessment and Management

Supplier shall develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics, and legal compliance risks associated with its operations; determine the relative significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

Performance Objectives with Implementation Plans and Measures

Supplier shall have written standards, performance objectives, targets, and implementation plans, including periodic assessments of the performance against those objectives.



Audits and Assessments

Supplier shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and next-tier suppliers that provide goods or services to Synaptics to ensure compliance with this Code and the law.

Documentation and Records

Suppliers shall maintain appropriate documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

Training and Communication

Supplier shall develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill Supplier's continuous improvement objectives. Supplier shall have a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier supplier(s), and customers. Supplier shall have an ongoing process to obtain feedback on its practices related to this Code and to foster continuous improvement.

Corrective Action Process

Supplier shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

REFERENCES

The following standards were used in preparing this Code and may be a useful source of additional information. The following standards may or may not be endorsed by each Supplier.

Dodd-Frank Wall Street Reform and Consumer Protection Act

<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit System

http://ec.europa.eu/environment/emas/index_en.htm

Ethical Trading Initiative

www.ethicaltrade.org/

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 Association

www.nfpa.org/catalog/home/AboutNFPA/index.asp

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas

<http://www.oecd.org/corporate/mne/mining.htm>

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/investment/mne/1903291.pdf>

OHSAS 18001

<http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/>

Universal Declaration of Human Rights

www.un.org/Overview/rights.html

United Nations Convention Against Corruption

<https://www.unodc.org/unodc/en/treaties/CAC/>

United Nations Global Compact

www.unglobalcompact.org

United States Federal Acquisition Regulation

www.acquisition.gov/far/

SA 8000

<http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937>

Social Accountability International (SAI)

www.sa-intl.org