

Human Rights Policy

1. PURPOSE

This Human Rights policy (the “Policy”) outlines Nordic Semiconductor’s commitment to respecting human rights and ensuring decent working conditions in our operations and throughout our value chain. It provides our human rights framework, including our commitments, principles, and expectations for our employees, business partners, and suppliers.

2. SCOPE

This Policy applies to Nordic Semiconductor ASA and its subsidiaries worldwide (collectively referred to as “Nordic Semiconductor”, “we” or “us” as the case may be), and all directors, officers and employees, including temporary employees of Nordic Semiconductor (collectively referred to as “Employees”). The Policy provides the principles on how we address risks and actual adverse impacts that may affect Employees’ and other stakeholders’ human rights and decent working conditions in our operations and business relationships from initial design and prototype production to manufacturing and distribution.

3. COMMITMENT

At Nordic Semiconductor, we respect all internationally recognized human rights, including those as defined by the International Bill of Human Rights and the International Labour Organization (ILO) core conventions on fundamental principles and rights at work. We are committed to conducting our business consistently with the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the ten principles of the United Nations Global Compact. This means that we strive to avoid infringing on the human rights of others and to appropriately address adverse human rights impacts with which we are involved.

4. KEY PRINCIPLES

In our human rights program, we are guided by the following key principles:

- 1) We treat all people with dignity and respect.
- 2) We recognize our Employees as our greatest asset.
- 3) We place human and labor rights at the core of how we treat our Employees, the workers in our supply chain, and the local communities we are part of.
- 4) We will not tolerate human trafficking, forced labor, or any illicit forms of child labor in our supply chain.
- 5) We respect the rule of law and international norms of behavior.
- 6) We prohibit any retaliatory action for reporting or inquiring about alleged improper or wrongful activity.
- 7) We support diversity, equal opportunity, and non-discrimination.
- 8) We respect the right to freedom of association and collective bargaining.
- 9) We are committed to providing safe and healthy working conditions.

5. HUMAN RIGHTS DUE DILIGENCE

Nordic Semiconductor is committed to implementing a human rights due diligence (HRDD) process that is aligned with international best practices. This process includes:

- 1) Embedding responsible business conduct into policies and management systems;
- 2) Identifying and assessing actual and potential adverse human rights impacts;
- 3) Ceasing, preventing, or mitigating adverse impacts;
- 4) Tracking implementation and results;
- 5) Communicating how impacts are addressed; and
- 6) Providing for or cooperating in remediation when appropriate.

Main office:
Postboks 2336, 7004 TRONDHEIM
Otto Nielsens veg 12, 7052 TRONDHEIM
Phone: +47 72 89 89 00, Fax: +47 72 89 89 89

Branch office:
P.O.Box 436, Skøyen
Drammensveien 126, 0277 Oslo, Norway
Phone: +47 22 51 10 50, Fax: +47 22 51 10 99

For both offices:
NO 966 011 726 MVA
World Wide Web: <http://www.nordicsemi.no>

GROUP POLICY

We recognize that respecting human rights is an ongoing journey. Our performance will evolve as we gather experience and mature our practices. We will continuously review and seek to improve our HRDD efforts taking into account evolving international standards, stakeholder expectations, and lessons learned from our due diligence process. We will engage with actual or potentially affected stakeholders on human rights issues where appropriate.

6. WORKING WITH OUR SUPPLIERS AND BUSINESS PARTNERS

As a global fabless semiconductor company bringing together best-in-class expertise from across the globe, we firmly believe that good collaboration and dialogue with our suppliers and business partners is key to achieving the objectives of this Policy. We expect our suppliers and business partners to comply with all applicable laws and regulations related to human rights and labor standards, and to follow the spirit and intent of this policy and share our commitment to respect all internationally recognized human rights when working for or together with us.

7. GOVERNANCE AND IMPLEMENTATION

The Board of Directors has the overall responsibility for overseeing the implementation of this policy by management through appropriate strategies, procedures, and guidelines. The Audit Committee shall be regularly informed of and have oversight of the implementation of this Policy.

The CEO will actively communicate and promote Nordic Semiconductor's human and labor rights commitment, ensure adequate staffing, and establish clear roles and responsibilities for implementing the human rights due diligence framework. The day-to-day responsibility for implementing the human rights due diligence framework lays with the respective Business Function Managers.

Nordic Semiconductor's Compliance department has the responsibility for overseeing the effectiveness and continuous improvement of Nordic Semiconductor's human rights program.

The Policy will be regularly reviewed and, when appropriate, updated and amended.

8. REPORTING AND TRANSPARENCY

We are committed to transparency in our human rights efforts. We will regularly report on our human rights due diligence activities.

9. GRIEVANCE MECHANISM

We provide accessible channels for stakeholders to raise concerns or report potential human rights violations related to our operations or supply chain. We are committed to addressing these concerns promptly and fairly and prohibit retaliatory action for reporting or inquiring about alleged improper or wrongful activity.