

## 2025 Slavery and Human Trafficking Policy Statement

April 15, 2025

**onsemi** is committed to ensuring that modern slavery and human trafficking, in any form, does not occur in our business or supply chain. This “2025 Slavery and Human Trafficking Policy Statement” (the “Statement”) is made pursuant to the requirements of the statutes and regulations noted below and reflect our continuing efforts to eradicate slavery and human trafficking in our business and supply chains.

The California Transparency in Supply Chain Act of 2010 (SB657) and the U.K. Modern Slavery Act 2015 (the “Acts”) require certain companies to state their efforts and actions taken during the fiscal year to ensure modern slavery and human trafficking are not taking place in their operations and supply chains. Similarly, the revised Federal Acquisition Regulation (FAR) 52.222-50 (entitled “Combating Trafficking in Persons”) and new FAR provision 52.222-56 (Certification Regarding Trafficking in Persons Compliance Plan) are aimed at removing slavery and human trafficking from the U.S. Federal Government contracting supply chain.

Likewise, several forced labor regulations, such as the U.S. Uyghur Forced Labor Prevention Act, the German Supply Chain Due Diligence Act, the Norwegian Transparency Act, the New Zealand Modern Slavery Act, the Australia Modern Slavery Act and the European Union Forced Labor Regulation (EUFLR), require companies to set up due diligence processes to identify, assess, prevent and remedy human rights and environmental risks and impacts in their supply chains and in their own operations. To comply, such companies must also ensure they provide ways for employees of indirect suppliers to file complaints alerting the company to any potential human rights or environmental violations.

**onsemi** recognizes that slavery and human trafficking can occur in many forms, such as forced labor, child labor, domestic and indentured servitude, sex trafficking, and workplace abuse. To this end, we affirmatively state the steps we have taken during the last fiscal year (and continue to take) to identify the risk of slavery and human trafficking in our business or in any part of our supply chain.

As a full member of the Responsible Business Alliance (“RBA”), a nonprofit coalition of companies committed to supporting the rights and well-being of workers and communities engaged in the global supply chain, we publicly demonstrate our commitment to environmental and social compliance. RBA members commit to the [RBA Code of Conduct](#), version 8.0 (“RBA Code”), and as such we are expected to actively pursue conformance to the Code through all of our internal operations, as well as our supply chain. Version 8.0 of the Code states:

*Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes 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 in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers’ dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a*

*language the worker can understand, that contains a description of terms and conditions of 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 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. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Participants shall maintain documentation on all leaving workers. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-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.*

The focus on slavery and human trafficking is part of a larger effort of supply chain transparency and accountability. We partner with our supply chain to create an environment where workers have the right to: freely choose employment, associate freely, voluntarily join or not join in labor unions and worker councils, and bargain collectively if they choose.

**onsemi** has further adopted the Organization for Economic Cooperation and Development (OECD) "[OECD Due Diligence Guidance for Responsible Business Conduct](#)" to conduct risk-based due diligence on forced labor, slavery and human trafficking in our supply chain. This framework encompasses the following key elements:

## 1. Responsible Business Conduct

Incorporating responsible business conduct in policies and management systems is a core commitment at **onsemi** and demonstrated through the following policies and guidance adhered to by our board of directors and executive management: Social Compliance Commitment, Human Rights Policy, **onsemi** Code of Business Conduct, our Social Compliance Commitment Guide and this Statement. For more information on our commitment, guidance and policies, please visit our Social Responsibility page linked here: [Social Responsibility](#)

Additionally, **onsemi** has integrated a comprehensive management system as a full member of the RBA, adhering to its requirements, including the Validated Assessment Program (VAP).

## 2. Identification and Assessment

We evaluate the risks of human trafficking and slavery through conformance to the RBA Code. All **onsemi** facilities complete the RBA's risk-based Self-Assessment Questionnaire (SAQ) on an annual basis.

As part of the supplier onboarding process, all suppliers are required to agree and comply with the RBA Code and **onsemi's** social compliance (formerly corporate social responsibility) and environmental requirements. Major suppliers are required to complete the RBA's Supplier SAQ on an annual basis as well.

The Supplier SAQ is a self-evaluation of the existing policies and practices against the requirements of the RBA Code including evaluation of facility policies, worker demographics, living conditions, health and safety standards, etc., the rating of which is based on adherence to the RBA Code.

### 3. Prevention and Mitigation

- a. **Internal Accountability and Tracking:** Every two years, **onsemi** manufacturing sites are subject to an RBA VAP audit that assesses our sites against the RBA Code and requirements by RBA-accredited independent third-party audit firms. These firms are trained in social and environmental auditing based on the RBA VAP protocol which sets consistent, industry-wide standards.

Non-compliance with the RBA Code on matters relating to slavery and trafficking is taken seriously. It is considered one of the most severe types of nonconformance, and corrective action plans to remedy any identified instances of nonconformance are expected to be implemented at the shortest possible timeline. Corrective action plans (including remediation when appropriate) are logged and tracked in our corrective action management system. All corrective actions and results are verified for effectiveness.

Similarly, our RBA internal auditors, some of whom are also certified by the RBA, perform internal RBA audits against the RBA Code at manufacturing sites every other year to alternate with the external independent third-party audits. The audit covers the same RBA audit criteria and protocol in labor, ethics, health and safety, environment, supply chain management, and management systems.

In 2024, 9 out of 18 **onsemi** manufacturing facilities were subject to internal RBA audits and 15 manufacturing sites participated in initial or closure external RBA VAP audits. Six of our sites also participated in customer audits or shared RBA Validated Audit Reports (VAR) with customers.

- b. **Supplier Engagement and Supplier Audits:** We conduct the following activities regularly and extensively.

We ask our major suppliers to re-sign the statement of conformance to the **onsemi** [Code of Business Conduct](#), social compliance tenets and the RBA Code whenever the RBA Code and/or the **onsemi** Code of Business Conduct has a major change or when additional elements are added to either the RBA Code or the **onsemi** Code of Business Conduct. In addition, major suppliers must also complete a SAQ. All site-level suppliers are required to comply with the RBA Code.

We audit suppliers that we identify as “high risk” in our supply chain. The risk evaluation includes, among others, the risk rating from the SAQ, feedback from our supplier assessments and company contacts. These supplier audits are announced and conducted by an independent third-party audit firm certified to conduct RBA audits.

- c. **Capacity Building / Training:** RBA’s eLearning Academy contains online learning modules that cover the RBA Code, as well as modules specifically related to the California Transparency in Supply Chains Act and Forced Labor Prevention. In addition, there are modules on hiring and related topics that are particularly relevant to these issues. Modules can be assigned to both internal staff and suppliers, and course completions can be tracked. Members can also upload their own resources to the RBA eLearning Academy for their teams. The RBA encourages its members to share any resources they may have on these topics in the RBA eLearning Academy for community use. The RBA also offers in-person training sessions on a variety of topics.

In addition, **onsemi** offers the following to its employees and suppliers:

We ensure training is conducted on the RBA Code of Conduct through participation in Code interpretation, RBA Labor and Ethics Lead Auditor and Auditors’ Training, RBA worker communication classes and/or internally developed training classes. Training is available for all employee levels throughout the organization.

Select suppliers and on-site service providers received training on the RBA Code Standards: Labor, Ethics, Environment, Health and Safety, Supply Chain and Management Systems. In doing so, **onsemi** aims to mitigate risk by creating dialogue and encouraging capacity building.

Through our annual training of the **onsemi** Code of Business Conduct, employees and contractors are further provided with training and education relating to the RBA to promote social and environmental compliance and responsibility in the workplace and the communities we serve. In addition, during our participation in the 2024 Ethics and Compliance Week, this year’s theme focused on social compliance and included modules on: forced labor, modern slavery, and trafficking in persons; identification of victims of human trafficking; 11 indicators of forced labor; **onsemi’s** forced labor and human trafficking due diligence process; and practical advice of how to identify the signs of human trafficking and how to safely provide potential help to victims.

#### 4. **Communication**

Section E12 of the RBA Code includes a clause stating that companies should have a management system that contains “a process to communicate the [RBA] Code requirements and to monitor supplier compliance to the [RBA] Code.” Our manufacturing

sites that employ foreign workers have a rigorous selection process to ensure the labor agencies at both sending and receiving countries are following the law and the Code requirements.

The labor agencies supplying domestic and foreign workers are required to sign service agreements to adhere to the Code, which we ask them to re-sign every two years. Once selected, the company or a third party audits the labor agencies for continued compliance. The RBA also convenes regular teleconferences, webinars and other meetings to increase awareness, understanding and recommendations to monitor risk associated with labor recruitment practices.

In addition, as **onsemi** is a member of the Responsible Minerals Initiative (RMI), our suppliers must certify that they are not supplying our company with non-conformant materials from conflict-affected and high-risk areas.

Furthermore, Section 5.1 of the OECD states that relevant information on due diligence policies, processes, and activities to identify and address actual or potential adverse impact should be externally communicated. To this end, certain relevant information relating to our due diligence process is further reported in our Annual [Sustainability Report](#).

## 5. Reporting / Grievance Mechanism

For concerns related to slavery and human trafficking, employees and other stakeholders can submit a report using our [Ethics and Compliance Helpline](#), or by directly contacting the [National Human Trafficking Hotline](#) (to speak with a hotline advocate) at 1-888-373-7888 (outside the United States at +1 202-745-0190), the Global Human Trafficking Hotline at 1-844-888-3733 (FREE), or texting “HELP or BEFREE” to 233733 (BEFREE) (outside the United States text “BEFREE” to +1 202-657-4006).

This Statement includes the efforts **onsemi** has taken in our own business, as well as with our suppliers, to eliminate slavery and human trafficking from our supply chain and our own business. These efforts, as well as this Statement, are reviewed by our board of directors annually and updated publicly.

For complete information regarding our social compliance (or formerly corporate social responsibility) program, visit the “Social Responsibility” section of our website at [Social Responsibility](#).



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**Hassane El-Khoury**  
President and Chief Executive Officer  
**onsemi**