

# Renesas Global Code of Conduct

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At Renesas Electronics Group (“Renesas”)\*, we conduct business ethically, honestly, and in full compliance with applicable laws and regulations. This applies to every business decision in every area of Renesas worldwide. This document is Renesas’s Code of Conduct (the “Code”), which covers basic legal and ethical requirements and principles for conducting our professional relationships.

Renesas’s principles of business conduct define the way we do business worldwide. These principles are:

- **Honesty.** Demonstrate openness, integrity, and high ethical standards in all business dealings.
- **Respect.** Treat customers, suppliers, employees, and others with respect and courtesy.
- **Confidentiality.** Protect the confidentiality of Renesas’s information and the information of our customers, suppliers, and employees.
- **Compliance.** Ensure that business decisions comply with applicable laws, rules, and regulations.

As part of this, you are expected to:

- **Comply** with Renesas’s Code, our principles, and all applicable legal requirements.
- **Use good judgment.** Apply this Code, review our policies and legal requirements, seek advice, and then make your decision.
- **Speak up.** If you are aware of a possible violation of Renesas’s Code, other Renesas policies, or legal or regulatory requirements, you should notify one or more of the following (depending on the situation): your manager, any member of leadership, Human Resources (“HR”), Finance, or Legal, or contact the Renesas Electronics Group Hotline (the “Group Hotline”).
- **Ask questions.** When in doubt about how to proceed, discuss it with your manager, any member of leadership, your HR representative, Finance, or Legal.

Renesas’s Code applies to all employees, directors, executive officers, executive corporate officers, secondees, interns, and agency staff. It also applies, where appropriate and with consent, to independent contractors, consultants, suppliers, joint venturers, and others who do business with Renesas. If you are a line manager, we expect you to be a role model for the Code, ensure your team members are familiar with it, and hold them accountable for complying with it.

No Code could ever anticipate every ethical decision, etc. we may face in business. This Code identifies the channels and procedures that we

<a href="#">31 Donations and Contributions</a>	16	<p>have established to help answer your questions about matters that may have ethical implications. This Code is not intended to replace any of Renesas’s corporate policies that have been developed for specific topics.</p> <p>Failure to comply with Renesas’s Code may result in disciplinary action up to and including termination of employment or the end of your working relationship with Renesas.</p>
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<a href="#">Taking Initiative</a>	18	<p>Renesas will not retaliate—and will not tolerate retaliation—against any individual for filing a good-faith complaint with management, HR, Legal, Finance, or the Group Hotline, or for participating in the investigation of any such complaint.</p> <p style="text-align: center;"><b>Sincerely,</b></p> <p style="text-align: center;"><b>Hidetoshi Shibata, President and CEO</b></p> <p>*“Renesas Electronics Group” means Renesas Electronics Corporation and all other affiliated corporate entities.</p>
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# 1. Conflicts of Interest

***Is it OK to....?***

***... invite a family member or relative to apply for a job at Renesas?***

***Yes, we encourage employee referrals, but they need to go through the normal recruitment process. Hiring them directly is not allowed.***

***Is it OK to....?***

***... invite people you know to bid or pitch to Renesas for contracts?***

***Yes, but you need to ensure that they go through an appropriate procurement process to ensure openness and transparency. You should always make sure that there is an approved contract in place. Depending on the circumstances, you may also need to recuse yourself from the procurement process if you have significant personal or financial ties to the individuals bidding or pitching to Renesas for contracts.***

A conflict of interest may arise when your personal, professional, financial, or other interests are either inconsistent with—i.e., conflict with—the interests of Renesas, or that give the appearance of impropriety or divided loyalty, etc. Conflicts of interest may erode trust in Renesas, put Renesas at risk, and can damage Renesas’s reputation.

You should not use your position at Renesas to obtain favored treatment regarding business matters such as purchases, sales, or investment opportunities for yourself, your relatives, or third parties such as contractors or suppliers, etc. with whom you or your relatives have a significant relationship.

It is important that you disclose any circumstance or relationship that conflicts or could potentially conflict with Renesas, and complete all required approvals or procedures in accordance with Renesas’s policy.

# 2. Outside Employment and Inventions

***Is it OK to....?***

***... do occasional contract work for another company in an unrelated field while working at Renesas if my employment agreement does not prohibit it?***

***Yes, provided you comply with the Code restrictions and applicable law, and notify your manager and Human Resources.***

Employees may engage in outside activities, including employment with a third party other than Renesas, providing services to a third party, starting their own business, etc., provided such activities are permitted by their employment agreement and local policies. Employees are required to complete appropriate procedures set forth by Renesas before they begin these outside activities. In addition, these outside activities could include working on a personal invention.

Employees must not serve as directors, officers, or consultants of any organization that might supply goods or services to Renesas, buy goods or services from Renesas, or could compete with Renesas, without prior company approval.

Any employee (full-time or part-time) who obtains additional outside employment, or has or is providing services to an outside business, must not:

- Use any time at work for your other job or outside business.

	<ul style="list-style-type: none"> <li>• Use any Renesas assets for your other job or outside business. Renesas assets include but are not limited to Renesas workspace, email, phones, computers, internet access, and printers.</li> <li>• Use your position at Renesas to solicit work for your outside business or other employer, to obtain business opportunities, favored treatment or profit, or to pressure others to assist you in buying or selling your products or services.</li> <li>• Participate in an outside employment activity that could have an inappropriate effect on your ability to perform your duties at Renesas.</li> <li>• Use confidential Renesas information or Renesas proprietary technology to benefit your other employer or outside business, etc.</li> </ul>
<h3>3. Workplace Relationships</h3> <p><i>Is it OK to....?</i></p> <hr/> <p><i>... be in an intimate relationship with another Renesas employee?</i></p> <p><i>Yes. But you should not occupy a position where you have any influence over your partner's work, performance evaluations, or career opportunities.</i></p>	<p>Personal relationships in the workplace may present actual or perceived conflicts of interest when one individual in the relationship is in a position to make or influence employment or business decisions regarding the other. There may be situations where relatives, close friends, or those with whom we are in an intimate relationship are employed by Renesas, its suppliers, or competitors. In these situations, transparency is essential, so it is important to disclose such situations to Renesas as soon as you become aware of them. Renesas can then evaluate and take appropriate steps to avoid the risk of a conflict of interest.</p> <p>Furthermore, a relative of an active employee may not occupy a position that will be working directly within the same department as, for, or supervising the employee. An individual involved in an intimate relationship with a current employee may also not occupy a position that will be supervising the employee. If a familial or intimate relationship is established between two employees in a reporting situation described above during employment, the employee needs to disclose the existence of the relationship and complete any other required procedures.</p> <p>Renesas reserves the right to take or request prompt action if an actual or potential conflict of interest arises regarding relatives or individuals involved in an intimate relationship who occupy positions at any level (higher or lower) in the same line of authority. These actions may include but are not limited to an agreed upon departmental transfer, a change in assigned tasks or work schedule, or a change in reporting structure.</p>
<h3>4. Buying and Selling Shares</h3> <p><i>Is it OK to....?</i></p> <hr/> <p><i>... use my knowledge of Renesas to buy or sell, or advise my friends to buy or sell, Renesas stock?</i></p>	<p>Never buy or sell shares if you know of information that has not been publicly announced and that may significantly impact an investor's decisions ("Material Facts"). Material Facts include but are not limited to important matters decided by the company (e.g., issuance of shares of a certain size, acquisition of treasury stock, merger, and transfer/acquisition of important business); important matters that have arisen within the company (e.g., serious damage from disasters or in the course of operations); financial information of the company; and other items that may have a significant influence on investment decisions.</p> <p>This policy applies to decisions to buy or sell Renesas shares or third-party shares, such as the shares of a Renesas supplier, vendor, customer, or acquisition target. It is also against Renesas policy and may be illegal to give</p>

<p><i>In general, the answer to this is no.</i></p> <p><b>Is it OK to....?</b></p> <hr/> <p><i>... sell shares in a closed period if I really need the money?</i></p> <p><i>It depends. It is your responsibility to be aware of Renesas's closed period and the requirements for buying or selling shares during a closed period.</i></p>	<p>others, such as friends and family, tips on when to buy or sell shares when you are aware of Material Facts concerning those shares. Violations may result in disciplinary action up to and including termination of employment, as well as criminal prosecution which may result in fines and/or imprisonment.</p> <p>In addition, you are not allowed to invest in derivatives of Renesas shares, including hedging transactions and transactions involving options, warrants, puts, or calls or similar instruments related to Renesas shares. (This excludes employees holding, exercising, or selling options or RSU/PSU grants from Renesas.)</p> <p>Certain Renesas employees and directors may be subject to closed periods during which certain requirements must be met before they are allowed to buy or sell Renesas shares. Renesas may announce additional requirements on an individual, group, or company-wide basis under specific circumstances.</p> <p>Even if you are not in a closed period, it is illegal to buy or sell shares based on or when you are aware of Material Facts. Please review the Insider Q&amp;A and your company's policy on Buying and Selling Shares, where applicable, for more information and refer specific questions on buying and selling shares to Legal.</p>
<p><b>5. Harassment and Discrimination</b></p> <p><b>Is it OK to....?</b></p> <hr/> <p><i>...make jokes with sexual innuendo or racial stereotypes even if everyone listening laughs?</i></p> <p><i>No, jokes or comments with sexual innuendo or racial stereotypes are not appropriate.</i></p>	<p>We value diversity in our workforce, as well as in our customers, suppliers, and others. We provide equal employment opportunities for all applicants and employees. We do not discriminate on the basis of race, ethnicity, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or expression, genetic information, physical or mental disability, pregnancy, medical condition, or any other basis protected by law or regulation. We also make reasonable accommodations for disabled employees and applicants, and for the religious beliefs and practices of employees and applicants, as required by law.</p> <p>We follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.</p> <p>We are also committed to providing a workplace free of harassment based on personal characteristics such as race, ethnicity, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or expression, genetic information, physical or mental disability, pregnancy, medical condition, or any other basis protected by law or regulation. We do not tolerate harassment by Renesas or its employees against other employees or non-employees with whom we have a business, service, or professional relationship. Harassment can include slurs, offensive remarks, jokes, and non-verbal, electronic, or physical conduct that could create an intimidating, hostile, or offensive work environment. This applies to interactions with employees, customers, suppliers, and applicants for employment, and any other interactions where you represent Renesas.</p>

	<p>If you feel that you have been harassed or discriminated against or have witnessed such behavior, Renesas encourages you to report the incident to any member of HR, any supervisor or manager, up to and including the CEO, Legal, or the Group Hotline, as appropriate.</p>
<p><b>6.</b> <b>Personal Information</b></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...share personal information regarding other Renesas employees?</i></p> <p><i>Generally, no. Personal information about other employees is confidential and should only be shared with those with a business need to know the information.</i></p>	<p>As part of your job, you may have access to personal information regarding other Renesas employees or applicants, including information regarding their employment history, personal contact information, compensation, or performance and disciplinary matters. You may also have access to individual data, such as personal contact information, for people employed by customers or suppliers. This information is confidential and should be shared only with those who have a business need to know the information. It should not be shared with a third party outside Renesas unless there is a legal or business reason to share the information, you have approval from your manager, and any applicable legal requirements are met.</p>
<p><b>7.</b> <b>Workplace Privacy</b></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...use my Renesas laptop to read personal email at lunch?</i></p> <p><i>Yes, you can use our electronic equipment for incidental personal matters. But because you are using Renesas equipment, we may have the right to monitor or intercept that communication, subject to applicable law and local works agreement.</i></p>	<p>As a Renesas employee, it's important you understand (subject to local related law and regulation, local works agreement, and Renesas's internal review process) that Renesas may take the following steps when you access Renesas's network or systems or use any company device to conduct Renesas business:</p> <ul style="list-style-type: none"> <li>• Access, search, monitor, and archive all data and messages sent, accessed, viewed, or stored on Renesas systems or devices, as this information remains the property of Renesas.</li> <li>• Conduct physical, video, or electronic surveillance, search your workspace (such as file cabinets, desks, and offices, even if locked), review phone records, or search any non-Renesas property (e.g. backpacks, purses) on company premises, subject to applicable law.</li> <li>• Inspect and review the contents of your Renesas equipment.</li> <li>• Disclose to law enforcement or third parties without prior notice information discovered during any search that indicates possible unlawful behavior or matters subject to litigation.</li> </ul>
<p><b>8.</b> <b>External Communication, Public</b></p>	<p>As a publicly traded company, Renesas must comply with a variety of regulations that govern public communications to investors and the public and promote transparency in financial markets. Therefore, all public speaking engagements that relate to Renesas's business or products must be pre-approved by the Senior Vice President of your business area and, if there is potential for media coverage, Corporate Communications.</p> <p>If you author or co-author an article or publication (including publication on websites or social media) that relates to Renesas's products and services, do</p>

## Speaking, and Press Inquiries

### *Is it OK to....?*

*...write an article or present on a topic related to Renesas's products or services?*

*Yes, provided you have advance approval from the Senior Vice President of your business area and, if applicable, Corporate Communications.*

not identify yourself in the publication as a Renesas employee without prior approval from Corporate Communications. In addition, in some cases where the content relates to Renesas's technology, such publications may require Senior Vice President and Legal approval. If you are writing or speaking in a personal capacity, make it clear that you are not speaking on behalf of Renesas.

When representing Renesas, never officially endorse a product or service of another business or an individual unless the endorsement has been approved by your manager and Corporate Communications.

If you receive approval to make a public presentation at a business meeting or conference, you may not request or accept any form of financial compensation, except expenses approved by your manager. Sometimes you may be given a small gift as a "thank you." Provided this does not contravene our gift guidelines (see "[Giving and Receiving Business Gifts](#)" in Section 21 below), you may accept. All inquiries from the media or the financial analyst community must be referred to Corporate Communications or Investor Relations. You must not post messages to any public discussions such as chat rooms, blogs, bulletin boards, or similar open public forums on the internet of information that is confidential to Renesas or likely to influence the company's share price.

## 9. Protecting Renesas's Confidential Information and Information-Related Systems

### *Is it OK to....?*

*...do my work, or talk about work in a train, airplane, or taxi, etc.?*

*When in doubt, don't. You should only do this if you are confident that no one can see or overhear what you are working on or discussing. You should not do confidential work in a place*

One of Renesas's greatest assets is information about our technology, methodology, products, and our customers' products and plans. Do not disclose confidential, operational, financial, trade secret, or other business information without verifying with your manager that such disclosure is appropriate. Typically, disclosure of this information is very limited, and the information may be shared with customers, vendors, suppliers, or other third parties only after a non-disclosure agreement is in place.

Avoid consulting or advisory requests by third parties for expert "industry" information or advice that relates to Renesas's business or technology. Never post Renesas's confidential information on personal social media sites. Even within Renesas, employees should carefully consider whether confidential information is appropriate to share with each colleague and exercise discretion when doing so.

Renesas will implement the necessary security measures to protect its information systems and computer networks ("Information-Related Systems") from computer viruses, as well as information leakage and information system failure caused by unauthorized access. Where security measures are implemented, employees must not interfere with or alter these countermeasures without the express permission of Information Security.

In addition, we each have an obligation to protect Renesas's Information-Related Systems, property, and confidential information and to abide by the following guidelines:

- Watch what you say. Being aware of who is around you and what they might learn from you is an important way to protect Renesas's business

[www.renesas.com](http://www.renesas.com)

<p><i>where you can be overheard or your computer can be seen by others. Consider use of privacy laptop screens as appropriate.</i></p>	<p>and technology secrets and our customers’ confidential information. Don’t let Renesas’s or our customers’ secrets fall into the wrong hands.</p> <ul style="list-style-type: none"> <li>• <u>Protect our assets.</u> Keeping track of Renesas assets and information entrusted to you, and preventing opportunities from loss, misuse, waste, or theft of company property is everyone’s responsibility. Take precautions to safeguard Renesas’s Information-Related Systems. For example, maintain secrecy of your company passwords, be careful of emails from unfamiliar sources, control access to your IT devices, avoid using personal accounts or devices for Renesas business, and double check distribution lists and attachments before sending emails containing confidential information.</li> <li>• <u>Set an example.</u> Behaviors are contagious. Be a model for your co-workers and our partners. For example, use Renesas’s Information-Related Systems only for legal and ethical purposes, and avoid accessing these systems through any unjust or inappropriate means. Do not use Renesas’s Information-Related Systems to access, view, or distribute inappropriate content.</li> </ul> <p>Contact Information Systems or Legal if you become aware of any unauthorized disclosure or loss of confidential information.</p>
<p><b>10. Renesas Identity and Trademarks</b></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...use the Renesas name or logo on news releases and advertisements?</i></p> <p><i>Yes, provided such usage complies with Renesas’s Basic Rules Regarding Marks and Emblems (RGR-BA01).</i></p>	<p>The Renesas name, names of products, and logos collectively create the Renesas identity. Before publicly using the Renesas name, trademarks, product names, service names, taglines, or the Renesas logo, review the applicable Renesas policy on marks and emblems for how names and logos can be used and presented. Before using the product names, service names, taglines, or logos of third parties, check with Corporate Communications or Legal.</p>
<p><b>11. Renesas Inventions and Patents</b></p> <p><i>What should I do if I want to patent an invention that I am working on for Renesas....?</i></p>	<p>Renesas’s practice is to consider patenting the inventions of its employees, regardless of whether the inventions are implemented in actual products. If you are involved in technology, methodology, or product development, you should contact Renesas’s Patent Department regarding the patentability of your innovations without delay after completing the invention. Even computer programs can be protected by copyright if they include creative expressions. Be alert to possible infringement of Renesas’s patents and bring any possible infringements directly to Legal.</p>



<p><i>Contact Renesas’s Patent Department. Renesas will generally patent its employees’ inventions, even if they are not ultimately implemented in actual products.</i></p>	
<p><b>12. Activities Related to Technical Standards</b></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...join an organization that develops or promotes technical standards?</i></p> <p><i>Yes, provided you receive advance approval from your Vice President or Senior Vice President and Legal has reviewed any related membership or contribution agreements.</i></p>	<p>There are numerous organizations that develop or promote technical standards (such as IEEE). Joining or contributing to such groups can put Renesas’s intellectual property at risk of disclosure and implicit or explicit licensing obligations associated with technical standards and standards setting organizations. Before engaging in activities related to technical standards, including, for example, joining a standards organization or working group, contributing technology to a standard, or using a standard in the development of a Renesas technical product, employees should receive approval from their Vice President or Senior Vice President as appropriate and request Legal review of any related membership or contribution agreements.</p>
<p><b>13. Accuracy of Records and Reports</b></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...misstate or misrepresent information in Renesas’s records or reports?</i></p> <p><i>No. All Renesas records and reports must be full, fair, accurate, timely, and understandable.</i></p>	<p>Accurate records are critical to meeting Renesas’s legal, financial, and management obligations. Ensure that all records and reports, including timecards, customer information, technical and product information, correspondence, and public communications are full, fair, accurate, timely, and understandable. Never misstate facts, omit critical information, or modify records or reports in any way to mislead others, and never assist others in doing so.</p> <p>All employees and directors who are involved in public communication or regulatory filing of information regarding Renesas’s financial and business condition must follow Renesas’s disclosure controls and procedures and take appropriate steps to ensure such information is full, fair, accurate, timely, and understandable.</p>
<p><b>14. Fraud and Deception</b></p>	<p>All employees should be alert to risks of fraud, misappropriation, and other irregularities such as fraudulent financial reporting; misappropriation of assets, expenditures, and liabilities for improper purposes; fraudulently obtained</p>

<p><i>What is fraud?</i></p> <hr/> <p><i>Fraud, in general terms, is an intentional act committed to secure dishonest gain and/or cause loss to another.</i></p>	<p>revenue or assets; or avoided costs or expenses. You should report any suspected fraud immediately to your manager, Finance, Legal, or the Group Hotline and adhere to Renesas’s standards, policies, procedures, and controls to provide an environment that will minimize the opportunity for fraud.</p>
<p><b>15. Records, Information Management, and Legal Hold</b></p> <p><i>What is a “legal hold”?</i></p> <hr/> <p><i>A “legal hold” specifies those documents that cannot be altered, destroyed, deleted, or modified in any manner, usually for a certain period of time.</i></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...delete my emails after receiving a “legal hold”?</i></p> <p><i>No. Records subject to a “legal hold” can only be deleted after you are informed by Legal that the hold is no longer in effect.</i></p>	<p>As a Renesas employee, you have a responsibility to manage records and information. The definition of “records and information” is extremely broad. Information includes all documents and data. A “record” is anything that has enduring business value. Records must be kept in accordance to Renesas’s policies for legal, accounting, and other regulatory requirements.</p> <p>At times, Renesas may need to retain records and information beyond the period they would normally be kept. The most common reasons are litigation, other legal matters, or audits.</p> <p>In these situations, retention and preservation of records and information is critical. If you have records and information that may be required for litigation or other legal matters, Legal will place those documents on a “legal hold,” meaning the records and information cannot be altered, destroyed, deleted, or modified in any manner. Legal will notify the individuals most closely identified with the records and information about the legal hold and will provide instructions for retaining the records and information. Recipients of a legal hold must ensure that these instructions are followed. A legal hold remains in effect until you are notified by Legal in writing.</p>
<p><b>16. Customer Focus</b></p>	<p>Every product we make and every service we provide is for our customers. We focus on providing innovative, high-quality products and demonstrating integrity in every business interaction.</p> <p>We will provide products and services with full consideration for their safety, reliability, and quality. Products and services supplied to customers must meet all legally mandated product safety and quality standards and internal company regulations.</p> <p>We will also strive to provide customers with all relevant information needed to use and handle our products and services (e.g. product specifications, usage conditions, and correct usage environment etc.) safely and confidently. If a safety or quality problem should occur with a Renesas product or service, we will quickly identify the root cause, implement corrective measures, and take action to prevent a recurrence.</p>

<p><b>17. Non-Disclosure / Third-Party Information</b></p> <p><i>Is it OK to....?</i>  <i>...share information that may be Renesas confidential with vendors you are working with?</i></p> <p><i>Before sharing any potentially confidential information outside Renesas, make sure that an NDA is in place and approved by Legal.</i></p>	<p>Customers, suppliers, and others disclose confidential information to Renesas for various business purposes. It is the responsibility of every Renesas employee to protect and maintain the confidentiality of this information.</p> <p>When dealing with a customer, supplier, vendor, or other third party, never share Renesas confidential information without your manager’s approval unless the information has already been classified for disclosure. Also, never share Renesas confidential information outside Renesas (for example, with vendors, suppliers, or others) unless a non-disclosure or confidentiality agreement is in place. These agreements document the need to maintain the confidentiality of the information. Copies of signed non-disclosure agreements must be forwarded to Legal. Limit the amount of confidential information shared outside Renesas to the minimum necessary to address the business need.</p>
<p><b>18. Obtaining and Using Business Intelligence</b></p>	<p>Renesas legitimately collects information on customers and markets in which we operate. Renesas does not seek business intelligence by illegal or unethical means. Sometimes information is obtained accidentally or is provided to Renesas by unknown sources. In such cases, it may be unethical to use the information, and you should immediately contact your manager or Legal to determine how to proceed.</p>
<p><b>19. Third-Party Intellectual Property</b></p>	<p>It is Renesas’s policy not to knowingly use the intellectual property of any third party without permission or legal right. If you are told or suspect that Renesas may be infringing or misappropriating an intellectual property right, including patents, copyrights, trademarks, or trade secrets owned by a third party, you should contact Renesas’s Patent Department or Legal.</p>
<p><b>20. Copyright- Protected Content</b></p>	<p>Any employee who uses patents, trade secrets, trademarks or copyrighted works (collectively, “Intellectual Property”) without permission subject Renesas to potential liability. No employee should make use of any Intellectual Property that does not belong to Renesas without confirming whether permission has been granted for that use. Never use or copy any publication, music, videos, software (including “pirated” or “cracked” versions, or versions intended solely for personal use), or other copyright-protected content at work or for business purposes unless Renesas is legally permitted to do so. Never use Renesas facilities or equipment to make or store unauthorized copies of third-party intellectual property, including software or software code.</p> <p>Never use or register a Renesas e-mail address when you purchase or download software for your personal use to avoid a third party’s copyright warning against Renesas.</p>

	<p>Under applicable copyright laws, Renesas owns and protects the original works of authorship (also known as copyrights) of its employees, which may include applying for registered protection of such copyrights. Protectible works of authorship may include original computer programs, algorithms and software code.</p> <p>Open-source software (OSS) and generative artificial intelligence (AI) can be valuable tools that may be utilized to minimize the cost and risk of developing and enhancing software applications and deliver functionality to users. However, uncontrolled use of OSS and/or AI may cause both legal and technical issues that may compromise Renesas’s products, services and Intellectual Property. Prior to using or incorporating OSS or AI tools, code, algorithms or otherwise, please contact Legal directly. Potential ownership issues, infringement claims, or other legal risks are mitigated through the review of OSS product licenses and AI tools and by maintaining a register of approved OSS product licenses. Technical risks are mitigated through management review of OSS product suitability and functionality.</p> <p>Be alert to possible infringement of Renesas’s copyright and raise any potential infringements to Legal directly.</p>
<p><b>21.</b> <b>Giving and Receiving Business Gifts</b></p> <hr/> <p><i>Is it OK to ...?</i> <i>...give a favored customer a Christmas or New Year present?</i></p> <p><i>Yes, provided the conditions on the right column are met.</i></p> <hr/> <p><i>Is it OK to ...?</i> <i>... take a customer or potential customer out to dinner?</i></p> <p><i>Please exercise caution when providing hospitality to government officials (see “Governments as Customers” in Section 27 below).</i></p> <p><i>Yes, provided the conditions on the right are met.</i></p> <hr/> <p><i>Is it OK to ...?</i></p>	<p>Employees may not give or receive gifts or entertainment to or from current or potential vendors, suppliers, customers, or other business associates unless <u>all</u> the following conditions are met:</p> <ul style="list-style-type: none"> <li>• <b>Nominal value.</b> The value of the gift or entertainment is nominal and appropriate to the circumstances. Gifts or entertainment with a value in excess of US\$200 or EUR 200 per person may only be considered appropriate in rare and unusual circumstances. Discuss any gifts or entertainment with a value approaching US\$200 or EUR 200 per person with your Senior Vice President, or if you are a Senior Vice President, with Renesas’s CEO or VP of Legal.</li> <li>• <b>Customary.</b> The item is a customary business gift and would not embarrass Renesas if publicly disclosed. Before offering a gift or entertainment, check with the person or their organization to determine whether doing so would violate their policies or any applicable integrity agreements. Cash is never an acceptable gift. Giving or receiving cash is generally viewed as a bribe or kickback and is always against Renesas policy.</li> <li>• <b>No favored treatment.</b> The purpose of the gift is not to obtain special or favored treatment.</li> <li>• <b>Transparency.</b> The gift is presented openly with complete transparency.</li> <li>• <b>Legal.</b> Giving or accepting the gift is legal in the location and under the circumstances where given, and local tax requirements are met.</li> <li>• <b>Recipient is not a government official.</b> Never provide a gift, including meals, entertainment, or other items of value, to a government official without advance approval from Legal.</li> </ul>

<p><i>...give a customer cash in advance for a taxi back to the airport?</i></p> <p><i>No, but you can reimburse them once they send you the receipt.</i></p>	<p>Employees should register any gifts or entertainment received from an external third party.</p> <p>This policy does not preclude Renesas as an organization from receiving, providing, or evaluating complimentary products or services, or from making charitable donations. It is not intended to preclude Renesas from giving or lending equipment to a company or organization, provided the gift or loan is openly given, consistent with legal requirements, and in Renesas’s business interests. This policy also does not preclude the attendance of Renesas employees at business-related social functions if attendance does not create a conflict of interest.</p>
<p><b>22.</b> <b>Business Expenses</b></p>	<p>All employees must observe policies and procedures regarding business expenses, such as meal and travel expenses, and submit accurate expense reimbursement requests. Please see your company’s policy on Corporate Travel, where applicable, and refer any questions to HR or Finance.</p>
<p><b>23.</b> <b>Competition and Trade Practices</b></p> <p><i>Remember: Always consult Legal whenever you have a question.</i></p>	<p>Anti-competitive activities are strictly prohibited. Agreements and exchange of information with competitors are subject to rigorous scrutiny in all countries. Competitors are expected to compete, and compete aggressively on all terms. Agreements and exchange of information with our resellers, distributors, and suppliers can also give rise to scrutiny, particularly if Renesas has (or is deemed to have) a leading position in the market. You should not:</p> <ul style="list-style-type: none"> <li>• Agree with competitors or exchange information with competitors on price, policies, contract terms, costs, inventories, marketing plans, capacity plans, or other competitively significant terms.</li> <li>• Engage in any action that could be interpreted as forming or participating in a cartel (for example, participating in gatherings or conversations with competitors that may be construed as an attempt to restrict competition).</li> <li>• Engage in any action that could exclude or control the business activities of other companies or prevent new entrants to the business areas in which we operate.</li> <li>• Agree with competitors to divide sales territories, products, or assign customers.</li> <li>• Agree with resellers on the resale pricing of Renesas products without Legal approval, or unjustly restrain the business of sales partners (for example, placing restrictions on resale prices). Resellers must be free to determine their own resale prices.</li> <li>• Violate fair bidding practices or provide information to benefit one vendor over other vendors.</li> <li>• Engage in pricing or practices that could defraud a supplier or others (for example, forcing mutual dealings, delaying subcontract payments, unreasonably returning goods, or demanding unjust price reductions).</li> </ul>

## 24. Anti-Bribery and Anti-Corruption

### *Is it OK to ...?*

*Accept a small payment or a small gift from a new business partner if your refusal will result in a loss of business to Renesas?*

***No. Any bribes, no matter the value, are strictly prohibited. This prohibition on bribery applies to giving or receiving anything of value, not only money. This includes business opportunities, jobs, favorable contracts, donations, travel, gifts, and hospitality.***

Renesas will comply with the anti-bribery and anti-corruption laws of the countries in which it does business, including the Japanese Unfair Competition Prevention Act, the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom (UK) Bribery Act, and the German Criminal Code, all of which may apply to global business. You should not, directly or indirectly, offer or make a payment or offer anything of value to any persons for the purpose of influencing an official act or decision in order to assist Renesas in obtaining or retaining business or otherwise obtaining a business advantage.

In most of the countries where Renesas does business, “facilitation payments” are considered a form of bribery and are illegal. A facilitation payment is any payment made to facilitate or expedite decisions or actions by government agencies or government officials. As part of our zero-tolerance approach to bribery and corruption, Renesas prohibits the making of facilitation payments no matter how small the amounts, whether or not they are permitted by local or other laws.

Renesas’s prohibition against offering, promising, or paying bribes also applies to third parties (including but not limited to new business partners and suppliers) who provide services or act on Renesas’s behalf, such as suppliers, agents, contractors, consultants, and distributors. This principle applies to Renesas transactions everywhere in the world, even where the practice may be widely considered “a way of doing business.” Under some statutes (such as the FCPA), these are criminal actions that can lead to prosecution.

A high degree of risk exists when we interact with government officials who may be in an actual or perceived position of influence that could affect our business. For such reasons, any direct or indirect dealings with government officials that involve the provision of anything of value to a government official, including but not limited to the provision of any gift or favor, must be approved in advance by Legal. You must also refrain from making charitable donations or sponsorships if it confers a personal benefit on a government official or if the donation is part of an exchange of favors with the official. In addition, do not hire an official or someone suggested by, or related to, an official to help Renesas obtain or keep business, or if the official offers to give a benefit to Renesas or threatens to act in a way that harms Renesas if the requested hiring decision is not taken. Always use Renesas’s normal hiring process. See [“Governments as Customers”](#) in Section 27 below for more information.

To ensure that agents and representatives acting on Renesas’s behalf are not themselves offering or receiving bribes or kickbacks, all such arrangements must be pursuant to a written agreement, documented in accordance with all related laws and regulations, and in compliance with Renesas’s policies on ethical business practices. The compensation to be provided in the written agreement must be clearly commensurate with the activities the agent or representative has undertaken.

If you have a question or concern about possible corruption, contact Legal or our group hotline provider’s website: <http://renesas.ethicspoint.com>. You will

[www.renesas.com](http://www.renesas.com)

	<p>not suffer adverse consequences for refusing to pay or take a bribe or kickback, even if this results in the loss of business to Renesas. Renesas will not tolerate any retribution or retaliation against anyone for raising a concern in good faith about a potential violation of this policy, or for cooperating with an investigation. When you raise a concern, we will maintain your confidentiality to the extent permitted by the local law in your country.</p>
<p><b>25.</b> <b>Side Deals or Side Letters</b></p> <p><i>Is it OK to ...?</i> <b>Change a contract once agreed?</b></p> <p><i>Yes, provided the changes are in writing and agreed by both parties. Where relevant, you may also need your manager or Legal to approve the change.</i></p>	<p>All the terms and conditions of agreements entered into by Renesas must be formally documented. Contract terms and conditions define the key attributes of Renesas's rights, obligations, and liabilities and can also dictate the accounting treatment given to a transaction. Making business commitments outside of the formal contracting process, through side deals, side letters, or otherwise, is unacceptable.</p> <p>You should not make any oral or written commitments that create a new agreement or modify an existing agreement without approval through the formal contracting process.</p>
<p><b>26.</b> <b>Money Laundering</b></p> <p><i>Is it OK for ...?</i> <b>Customers or vendors to make large payments in cash?</b></p> <p><i>Generally, no. Acceptance of cash as a form of payment by Renesas is strongly discouraged. Cash payments are often used by money launderers and leave very little in the way of audit trails. If no other option is available, then steps must be taken to verify that payment is being received from a valid Renesas business partner and that controls for handling cash are in place.</i></p>	<p>Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited only to cash-based transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation, and can expose Renesas to severe sanctions.</p> <p>Renesas forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion of funds. Anti-money laundering laws of the U.S, other countries, and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.</p> <p>If you deal directly with customers or vendors, the following examples may be indications of potential money laundering:</p> <ul style="list-style-type: none"> <li>• Attempts to make large payments in cash.</li> <li>• Payments by someone who is not a party to the contract.</li> <li>• Requests to pay more than provided for in the contract.</li> <li>• Payments made in currencies other than specified in the contract.</li> <li>• Payments from an unusual, non-business account.</li> <li>• Transactions forming an unusual pattern such as many repetitive cash payments.</li> </ul>

	Please refer any specific questions to Finance or Legal.
<p><b>27.</b> <b>Governments as Customers</b></p> <p><i>Is it OK to ...?</i> <b>Place a bid on a government contract?</b></p> <p><i>Yes, provided that any special requirements on the contract opportunities are met and you consult with Legal in advance.</i></p>	<p>Governments often place special bidding, pricing, disclosure, and certification requirements on companies with which they do business. Discuss these requirements with Legal before bidding for government business.</p> <p>It may be illegal to give a gift, even an inexpensive meal or a T-shirt, to a government employee. The rules vary depending on the location and job position of the government employee. To prevent violations, obtain approval from Legal for any gifts or hospitality to government officials before giving a gift or providing hospitality.</p> <p>See <a href="#">“Anti-Bribery and Anti-Corruption”</a> in Section 24 above for more information.</p>
<p><b>28.</b> <b>Supply Chain</b></p> <p><i>What if...?</i> <b>I am involved in a supplier selection process and one of the suppliers sends me a nice gift as show of goodwill. The gift doesn't change my opinion and I still plan to make my decision based solely on Renesas's best interests. May I keep the gift?</b></p> <p><i>No. Especially during the selection process, receiving such a gift creates the appearance of impropriety. We should decline any gifts given in such a situation and should report the matter to a manager. Although you may be prepared to make an objective decision, this gift could still give the appearance of the potential supplier having won our favor over another.</i></p>	<p>Responsible supply chain management is particularly important given Renesas's business model and customer requirements. This not only includes operational and commercial aspects, but also labor, human rights, health, safety, environmental, legal compliance, and business ethics. Renesas requires our major suppliers to comply with the Responsible Business Alliance (RBA) Code of Conduct and take part in self-assessment questionnaires and on-site audits every year. As a member of the United Nations Global Compact, we are committed to preventing practices such as forced labor and human trafficking and we expect our suppliers to do likewise.</p> <p>Child labor is not to be used in any stage of manufacturing Renesas products. The term “child” refers to any person employed under the age of 15, 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 apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 should not perform work that is likely to jeopardize their health or safety. Renesas regularly conducts self-checks such as annual surveys and investigations on child labor to confirm that our operations are not illegal or inappropriate.</p> <p>Labor, human rights, health, safety, environmental, legal, or business ethics violations by Renesas's suppliers or vendors can result in significant reputational, contractual, or commercial harm to Renesas and its customers. If you become aware of potentially illegal or unethical practices by Renesas's suppliers or vendors, we encourage you to notify the Renesas employee responsible for the relationship (or their manager) and Legal. Such illegal or unethical practices may include, but are not limited to, forced labor, slavery, disregard of workplace safety standards, unequal treatment in employment, and the withholding of an adequate living wage.</p> <p>Please refer to the <a href="#">Renesas Supplier Code of Conduct</a> for details. Always conduct supplier and vendor negotiations, selection, and management transparently and in Renesas's best interests. Notify your manager or Legal if</p>



	<p>you have concerns about whether a supplier or vendor relationship is being managed inappropriately or other than strictly on business considerations. See your company’s policy on Corporate Procurement/Purchasing and General Authorization, where applicable, for more information.</p>
<p><b>29.</b> <b>Prohibition of Forced Labor</b></p>	<p>Renesas prohibits all forms of forced labor, including but not limited to, bonded labor (including debt bondage), indentured labor, involuntary or exploitative prison labor, slavery, and human trafficking. Additionally, Renesas prohibits the transportation, harboring, recruitment, or transfer of persons through threat, force, coercion, abduction, or fraud for purposes of labor or providing services.</p> <p>Renesas does not impose unreasonable restrictions on workers’ freedom of movement within the facility, nor does it place unreasonable restrictions on entering or exiting company-provided facilities, including workers’ dormitories or living quarters, where applicable. As part of the hiring process, all workers must be provided with a written employment agreement in their native language or a language they can understand. This agreement must detail the terms and conditions of employment. Foreign migrant workers must receive this employment agreement before leaving their country of origin, and there must be no substitutions or changes to the agreement upon arrival in the receiving country unless these changes are made to comply with local law and provide equal or better terms.</p> <p>All work for Renesas must be voluntary, and workers must be free to leave their jobs or terminate their employment without penalty, provided they give reasonable notice as clearly stated in their contracts. Renesas will maintain documentation for all departing workers as required by applicable law or regulations.</p> <p>Renesas prohibits holding, destroying, concealing, or confiscating identity or immigration documents, such as government-issued identification, passports, or work permits. However, if necessary to comply with local law, Renesas may hold such documentation, but workers must always have access to their documents. Workers shall not be required to pay recruitment fees or related costs for their employment. If it is discovered that workers have paid such fees, Renesas will ensure that these fees are reimbursed to the worker within a reasonable duration.</p>
<p><b>30.</b> <b>No Relations with Antisocial Forces</b></p> <p><i>What are antisocial forces?</i></p>	<p>Renesas does not have any relations with groups or individuals who pursue economic gains by using violence, power, and fraudulent methods (so-called antisocial forces).</p> <p>Renesas is committed to taking an uncompromising, company-wide approach against antisocial forces and their associates. We do not have any relationship with any antisocial forces or their associates, and we do not accept any demands from an antisocial force or their associates. We also do not make any hidden deals with antisocial forces, nor do we fund antisocial forces.</p>

<p><i>Any group or individual who seeks economic gains through violence, power, or fraud.</i></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...make an agreement with antisocial forces?</i></p> <p><i>No. Renesas is committed to ensuring that the company has no relationship whatsoever with antisocial forces.</i></p>	<p>Renesas will work with external specialist organizations, as appropriate, to defend against demands from antisocial forces. Moreover, we will take civil and criminal legal measures against illegitimate demands and other pressures or approaches from antisocial forces and their associates.</p>
<p><b>31. Donations and Contributions</b></p> <p><i>Is it OK to....?</i></p> <hr/> <p><i>... volunteer for political office?</i></p> <p><i>Yes, provided a) you do it on your own time, b) you do not use Renesas assets or resources, and c) you are clear that you are doing this in a personal capacity and not on behalf of Renesas.</i></p>	<p>Renesas complies with all laws and internal company regulations related to making donations and will carefully consider the necessity and appropriateness of any proposed donation. Renesas also complies with all laws and internal company regulations related to political contributions, elections, and political activities, and will only participate in such activities, including making contributions, as permitted by law. Any amount of donations or political monetary contributions will be disclosed.</p> <p>Employees are encouraged to support charitable causes as long as that support is provided without the use of Renesas assets (including employee work time or Renesas’s premises, equipment, or funds). Approval for any charitable donations involving Renesas assets will be made on an individualized basis.</p> <p>Renesas also encourages individual political engagement. But you must take part in your personal capacity, not as a Renesas representative. This means you should not make or promise any political or campaign contributions, including in-kind contributions, on behalf of, or as a representative of Renesas. You may not make any political contributions intended to influence corruptly any Renesas business relationship or contract award. (See <a href="#">“Anti-Bribery and Anti-Corruption”</a> in Section 24 above for more information.) You may not use Renesas assets (including employee work time and Renesas’s premises, equipment, or funds) to personally support political candidates or campaigns.</p>
<p><b>32. Trade Restrictions and Export Controls</b></p> <p><i>What are some key compliance measures that employees should keep in mind?</i></p> <hr/> <ul style="list-style-type: none"> <li><i>Recordkeeping: Maintain accurate records of all</i></li> </ul>	<p>Many countries worldwide periodically impose restrictions on exports and other dealings with certain countries, persons, or groups. These export laws regulate the trade of commodities, technologies, and services deemed strategically important due to their potential use in military applications, cybersecurity, and advanced research. These laws extend beyond mere transactions, covering travel to or from sanctioned countries, imports, exports, new investments, and related activities. Additionally, specific laws prohibit support for boycott activities against certain countries or entities, complicating the legal landscape for international trade.</p> <ul style="list-style-type: none"> <li><b>Understanding Export Violations:</b> Violations of export control laws, even inadvertent ones, can lead to severe consequences, including substantial fines, civil and criminal penalties, denial of export licenses, loss of export privileges, mandatory audits, customs inspections, seizures, and significant</li> </ul>

<p><i>import and export transactions, including licenses, permits, and end-use documentation, to ensure transparency and accountability.</i></p> <ul style="list-style-type: none"> <li>● <b>Risk Assessment:</b> Regularly assess potential risks associated with international transactions and develop strategies to address vulnerabilities in compliance.</li> <li>● <b>Continuous Learning:</b> Stay updated with the latest developments in global trade regulations and participate in ongoing training sessions offered by Renesas.</li> <li>● <b>Collaborative Approach:</b> Work closely with colleagues, partners, and Legal to ensure a coordinated and comprehensive approach to compliance.</li> </ul>	<p>delays. The intricate and evolving nature of these laws means that what is permissible in one jurisdiction may be restricted in another, adding layers of complexity to international business dealings.</p> <ul style="list-style-type: none"> <li>● <b>Renesas's Commitment to Compliance:</b> Renesas is committed to maintaining a robust Global Trade Compliance Program, and Renesas has established a Global Trade Compliance team within Legal to implement that program and support all locations where the company operates. The program also includes providing comprehensive training on trade restrictions, export controls, and import/customs requirements to help the business and its employees navigate this complex legal environment. Renesas's Global Trade Compliance Team, supported by key personnel throughout the business, perform a wide array of tasks, from classifying goods and technologies, determining export licensing and shipping requirements, to maintaining required transactional records, and monitoring the latest sanctions and embargoes, ensuring our workforce is always informed and prepared.</li> <li>● <b>Employee Responsibilities and Best Practices:</b> If your work involves the sale or shipment of products, the transfer or sharing of technologies, or the provision of services across international borders, consult with Legal (Global Trade Compliance). This proactive measure is essential to ensure compliance with all applicable laws and regulations. By seeking guidance and clarification, employees can help mitigate risks and avoid potential legal pitfalls. Be aware as well that these export and import laws and regulations also apply to your personal travel when you are taking your Renesas issued devices or other items with you, including your personal devices if they are used to access company resources. Our Global Trade Compliance team is equipped with the expertise to navigate global trade laws and provide tailored advice to suit specific business needs.</li> </ul> <p>At Renesas, a strong culture of compliance not only protects our business but also upholds our reputation as a responsible and ethical leader in the industry. By adhering to these guidelines and actively engaging in compliance efforts, we can achieve our business objectives while maintaining the highest standards of integrity and legal compliance.</p>
<h3>33. Environment, Health, and Safety (EHS)</h3> <p><i>Is it OK to....?</i></p> <hr/> <p><i>...make threats to other employees even if you are joking?</i></p> <p><b>No. Renesas takes all reports of threats seriously, even if an employee made the threat in</b></p>	<p>Renesas incorporates environmental considerations into all stages of its products' life cycle, including research and development, design, procurement, production, sale, logistics, use, and disposal. Renesas is committed to preventing pollution as well as minimizing the impact of our products on the environment.</p> <p>Renesas is also committed to providing a safe workplace for employees, customers, vendors, contractors, and others at all Renesas sites. We comply with the safety laws, standards, and guidelines that apply to our business. Sound safety practices are important in all of our workplaces.</p> <p>To protect our employees, the public, and our communities, we do not conduct any activity without the proper safety precautions, and we do not produce any product without the proper safeguards. We believe workplace injuries and illnesses are preventable. We communicate our expectations and</p>

<p><i>jest. Renesas will investigate and take appropriate action, including but not limited to informing the local authorities and disciplining the offending employee.</i></p>	<p>safety protocols to employees and suppliers and explain the potential health and safety risks and implications of not following these requirements.</p> <p>Moreover, Renesas will not tolerate threats of any kind to its employees, whether explicit or implicit, threatening behavior, stalking, or acts of violence. We take all reports of threatening behavior or violence seriously, look into the matter, and take appropriate action.</p>
<p><b>34. Alcohol, Drugs, and a Smoke Free Workplace</b></p> <p><i>Is it OK to...?</i></p> <hr/> <p><i>...take non-prescription or prescription medicines at work?</i></p> <p><i>Yes, you can take non-prescription medications such as headache tablets, anti-allergy, insulin as well as other medications prescribed to you by your doctor at work provided you do so under safe conditions.</i></p>	<p>Employees are prohibited from manufacturing, distributing, dispensing, possessing, using, or being under the influence of illegal drugs in the workplace or during work hours. Use of alcohol or medications on the job or before work can cause safety issues, damage customer relations, and hurt productivity and innovation. Consumption of alcohol during work hours is prohibited, unless at an organized work social function or business meal. Use good judgment and keep in mind that you are expected to comply with all laws and perform to your full ability when working for Renesas.</p> <p>Renesas is committed to a smoke free and vape free working environment. Smoking and vaping are not permitted in Renesas work areas, except as may be permitted in limited designated areas according to local policies and regulations.</p>
<p><b>35. Community Activities</b></p>	<p>As a global company, we have focused our efforts and investments on environmental initiatives, education of next-generation engineers, and supporting local communities we work and live in.</p> <p>We comply with applicable laws and regulations in each country and region where we operate. For those who wish to participate in volunteering and other social contribution activities, we encourage you to confirm local benefits and policies (e.g., how many volunteer hours are permitted per year). If you have any questions, please consult with HR in your region.</p>
<p><b>Taking Initiative</b></p> <p><i>Who should I contact if I want to report a concern?</i></p> <hr/> <p><i>There are several avenues for you to raise a concern, including but not limited to your direct manager, any other Renesas manager, Human Resources, Legal, or the Group Hotline.</i></p>	<p>Always apply these principles of business conduct, follow Renesas policies, and comply with all laws and regulations. Because the Code cannot address every situation, you should seek guidance whenever you are unsure about the correct course of action. There are many ways to ask questions about the Code or report concerns:</p> <ul style="list-style-type: none"> <li>• In accordance with Renesas’s open door policy, you can ask questions and report concerns about the Code with any manager, such as your direct manager, a department head, a division general manager, or another manager up to and including the Chief Executive Officer;</li> <li>• You can ask questions or report concerns with internal groups who specialize in handling such issues, including Human Resources and Legal; and</li> </ul>

	<ul style="list-style-type: none"> <li>You can report an ethics, compliance, or safety concern online or by phone through the Group Hotline, which is hosted by a third party and allows anonymous reporting where permitted by law.</li> </ul>
<h2>The Renesas Electronics Group Hotline</h2> <p><i>Renesas will not retaliate—and will not tolerate retaliation—against any individual for reporting a concern in good faith with the Group Hotline. You will be expected to have reasonable grounds to suspect the information you are reporting is true, but you will not be subject to a penalty if the information turns out to be incorrect. However, you must not make a whistleblower report that you know is not true or is misleading.</i></p> <p><i>If you believe that you have been retaliated against, you should report it to Human Resources and/or Legal, and we will take swift measures to end any retaliatory actions.</i></p> <p><i>Information on contacting the Group Hotline by toll-free telephone or web access is available on posters in office locations and at <a href="http://renesas.ethicspoint.com">http://renesas.ethicspoint.com</a></i></p>	<p>Renesas provides an anonymous and confidential Group Hotline for you to raise a whistleblower report. This service is managed by NAVEX Global Inc. (“NAVEX”), an external third party. As a data processor, NAVEX is obligated to protect the confidentiality and security of your personal data, using the latter exclusively for the provision of the Group Hotline. All the information you provide through the Group Hotline will be stored by NAVEX on its servers located in the United Kingdom, unless privacy laws in certain countries prohibit the transfer of personal information overseas. Employee data will be collected and processed in accordance with applicable data protection laws and works agreements.</p> <p>The Group Hotline is available 24/7 to all employees worldwide, in multiple languages, to help answer your questions on business conduct issues, policies, regulations, and compliance with legal requirements. It allows you to advise Renesas of situations that may require investigation or management attention. It is also available to third parties such as customers or suppliers to register concerns or possible violations.</p> <p>When making a report, you should provide as much detailed information as possible to ensure a thorough investigation. This includes, for example, information on the time and place where the issue occurred, names of the person(s) involved and their role in the company, as well as possible witnesses and other information that supports your report. The Group Hotline is committed to keeping your issues and identity confidential. If you would be more comfortable doing so, you may contact the Group Hotline anonymously. Information submitted through the Group Hotline will be sent to designated members of Legal and/or Human Resources if needed. Depending on the subject matter of the report, the information may also be shared with designated members of other Renesas divisions, including those involved in answering your questions or investigating and correcting the issues you raise. If your information involves accounting, finance, or auditing, that information may be shared with Renesas’s Internal Control Promotion Committee and/or the Audit and Sustainability Committee as necessary. Renesas will notify you once an investigation has been completed.</p> <p>Due to legal restrictions, anonymous use of the Group Hotline is not encouraged in certain countries. The Group Hotline allows for anonymous reporting, but anonymous reports may make it more difficult for Renesas to take action to resolve the situation.</p> <p>For more information, refer to our third-party hotline provider’s website: <a href="http://renesas.ethicspoint.com">http://renesas.ethicspoint.com</a>.</p> <p>The policies referenced in this Code can be found on the homepage of Renesas’s intranet site. Questions regarding this Code can be addressed to Legal.</p>

***Renesas's Code of Conduct does not form part of any employee's contract of employment or create an employment relationship where one does not otherwise exist. We may amend it at any time without prior notice. Application of this Code of Conduct is subject to local law and works council or similar required consultations and endorsements. If there are any contradictions between the Code of Conduct and local law or works council agreements, the local law or works council agreements shall take precedence.***

**【Related Rules】**

Parent Rules	REL	—
Relevant Rules	REL	RER-AA06 “Renesas Electronics Group CSR Charter”
Previous Rules	EL	—
	RT	—
	REL	—

**【Revision History】**

Revision	Date of Issue	Points of Revision
1	April 1, 2010	Established
2	April 1, 2014	Change of management department
3	March 31, 2016	Change of management department
4	December 1, 2016	Added scope of application
5	July 1, 2017	Change of management department
6	December 1, 2019	Change of management department
7	April 28, 2021	<ul style="list-style-type: none"> <li>- Updates reflecting the current implementation of the Renesas Electronics Group</li> <li>- Expand contents that are consistent with the requirements of various ESG ratings organizations</li> </ul>
8	May 27, 2022	<ul style="list-style-type: none"> <li>- Provide more practical advice for all Renesas employees globally in line with the company’s relevant internal rules</li> <li>- Integrate and update the existing policies in the Codes of Conduct of Renesas Electronics Corporation, Renesas Electronics America, and Dialog Semiconductor</li> </ul>
9	July 1, 2022	Change of management department from CEO office to Legal Division
10	February 29, 2024	Revision according to Global Rules system change (change of Rule Number, etc.)
11	March 28, 2024	Amend to reflect the change of corporate governance structure
12	January 17, 2025	<ul style="list-style-type: none"> <li>- Add section on prohibition of forced labor</li> <li>- Provide additional practical guidance for all Renesas employees globally in line with the company’s relevant internal rules and newly established global rules</li> <li>- Change of the name of “Audit Committee” to the “Audit and Sustainability Committee”</li> </ul>