# Reporting and Investigations Policy

Marvell Technology, Inc.

February 1, 2024

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Effective Date February 1, 2024

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## Overview

This Reporting and Investigations Policy (the "Policy") reflects Marvell's commitment to doing business with uncompromising ethics and integrity every day.

This Policy applies to all Marvell employees and members of the Board of Directors. In addition, any third party, including contingent workers, suppliers, agents, distributors, business partners, consultants, and others who do business with Marvell may report potential breaches of Marvell's Code of Business Conduct and Ethics (the "Code") or of applicable laws and regulations under this policy.

## Purpose

The purpose of this policy is to support Marvell's commitment to:

1. Encourage a "Speak Up" culture by explaining how we treat allegations of misconduct.
2. Implement sound governance for consistent, fair and effective internal investigations.
3. Prevent retaliation against any individuals who raise concerns or participate in an investigation.
4. Comply with applicable laws, including those that protect people who report misconduct.

## Obligation to report misconduct

We have an obligation to speak up if we see something that doesn't look right. By speaking up, we bring issues to light so that Marvell can identify and solve problems quickly. If you are aware of a possible legal violation, unethical conduct or a violation of the Code or other policy, contact your manager or another Marvell resource right away.

Some examples of things we should speak up about include:

- Actions that violate the law
- Fraud, theft, and improper accounting
- Corruption, conflicts of interest, kickbacks, and bribery
- Unfair competition and insider trading
- Actions that pose serious environmental risk
- Actions that endanger health, safety, and employee rights
- Breach of confidentiality, privacy, data protection, or IT security
- Improper interpersonal behavior such as violence, discrimination, harassment, and sexual harassment
- Any other conduct that violates or encourages others to violate our Code or our policies

## How to report misconduct

In many cases your manager can respond to your question or concern. You can also contact any of these reporting channels to assist you in a difficult situation:

- Another manager you trust
- Human Resources
- Ethics and Compliance at compliance@marvell.com
- The Legal Department
- The Concern Line, which allows anonymous reporting, is available via web at www.concernline.marvell.com or telephone 24 hours a day and has operators who speak all of our languages.

## What happens when you contact a reporting channel?

| Internal recipients **(Manager, HR, etc.)** | **Concern Line Web Based Report** | **Concern Line Telephonic Report** |
|---|---|---|
| Once you raise a concern with an internal resource, the recipient contacts Compliance (for Ethics and Compliance concerns) or HR (for HR issues). If appropriate, Compliance or HR opens a case in Ethicspoint, Marvell's case management system. | Once you login to our web based Concern Line, you are asked to answer a series of questions in a form (in your chosen language) in EthicsPoint, Marvell's case management system. Once you enter your information, a new case is opened. | Once you call our Concern Line, a NAVEX Global call center employee asks (in your chosen language) a series of questions and enters the information you provide into EthicsPoint, Marvell's case management system. A new case is opened. |

Once a case is opened, the information is transmitted to the Chief Ethics and Compliance Officer and other responsible individuals. From there, the matter is handled through a structured process, as further detailed below.

## Treatment of internal reports

Responsibility for review and investigation of the report will be assigned to the appropriate owner (generally, Ethics and Compliance, Legal, or HR). The report will be reviewed and investigated, as needed, in accordance with Marvell's Investigation Guidelines and applicable laws.

Investigations are overseen by Marvell's Investigations Committee, which is comprised of select senior leaders. The Investigations Committee provides oversight to the investigations process, reviews investigation outcomes, and recommends corrective action, as appropriate. The Committee seeks to ensure fairness and consistency across the organization.

Marvell complies with all applicable laws in conducting investigations, and in the event there is a conflict between Marvell's standard processes and such requirements, Marvell will follow the applicable legal requirements.

## Investigations process

### Objective

The objective of an investigation is to obtain the facts that will allow Marvell to determine if the concern is substantiated and, if so, whether the conduct at issue violates Marvell's policies or procedures or constitutes misconduct. Investigators generally gather facts through witness interviews, document reviews, and other appropriate means. The investigator will generally make findings about what happened and whether it violated Marvell policy.

### Obligation to cooperate

As Marvell employees, we may be called upon to assist with investigations. We should comply fully with the requests of Marvell investigators and provide these individuals with timely, complete and accurate information. We should never mislead or attempt to improperly influence any investigation, audit or inquiry.

### Timeline

The timeline for an investigation depends on its specific circumstances, nature, scope, and seriousness of the allegation. Marvell will allocate the necessary time and resources for a thorough investigation.

### Resulting actions

If the investigation reveals or substantiates misconduct, Marvell will take appropriate action to address the situation. Remedial measures, such as policy updates, implementation or improvement of a procedure or training, may be recommended to address any root causes related to the misconduct. Marvell may also impose disciplinary action against employees found to have engaged in misconduct.

## Prohibition of retaliation

Marvell is committed to a workplace culture where we feel safe to raise concerns at any time without fear of retaliation. Marvell will not tolerate retaliation against anyone who files a report or participates in an investigation.

If you are concerned about possible retaliation, include a note in your report or directly notify the investigator, HR, or an Ethics and Compliance representative**.**

## Where to turn for help

If in doubt about any aspect of this Policy, you may contact Marvell's Chief Ethics and Compliance Officer, any member of the Ethics and Compliance team at Compliance@marvell.com, or communicate directly with your Human Resources representative.

# Frequently Asked Questions and Answers

**When should I report?**

Report as soon as you become aware of **potential misconduct**. You should not try to conduct your own investigation. Both delayed reports and private investigations can impede Marvell's ability to effectively address the matter.

**Why should I report?**

- It's the right thing to do.
- You are enabling a faster resolution of the issues.
- You are protecting Marvell from the harm that could be caused if the issue is not timely addressed.
- So your concern can be reviewed and, where necessary, investigated in a fair, objective, and independent manner.

**How will my report be handled?**

The Company takes all concerns seriously. We treat each concern as confidential, to the extent possible. We make every effort to investigate all concerns completely and consistently.

**What kind of measures can be taken when the allegations are true?**

If our investigation reveals misconduct, we work to correct the situation and prevent it from happening again. Anyone who violates the Code or Company policy may be disciplined, including termination of employment or contract. Disciplinary actions vary depending on the nature, severity, and recurrence of the misconduct.

**Will I receive the investigation report?**

In general, no. The person who makes the report is usually contacted by the investigation team after the investigation is complete but is not provided a copy of the report. Investigation reports are confidential and, in some cases, subject to legal privilege.

**Can I report anonymously?**

While we encourage reporters to identify themselves because it helps us to better address concerns, reporters may remain anonymous when filing a report on Marvell's Concern Line, if permitted by law.

**Will I be punished for raising a concern?**

No. Marvell will not tolerate retaliation against anyone who, in good faith, raises a possible violation or participates in an investigation. We are committed to a culture of non-retaliation. Everyone should feel comfortable speaking up about concerns.

Acting in good faith means that your report is sincere and honest, regardless of the outcome. If does not matter whether your report turns out to be true, but you must believe the facts you provide are true.

You can speak up about suspected violations of the Code, Marvell policies, or the law without fear of retaliation or negative impact on your employment. Marvell will discipline people who retaliate against someone for making a report or participating in an investigation.