

## **QORVO, INC.**

### **CODE OF BUSINESS CONDUCT AND ETHICS**

#### **Ethics and Employee Responsibility**

Good ethics means good business.

We have built our reputation on unquestionable ethical behavior and consider this a key contributor to our success. The trust and respect of all people – fellow workers, customers, stockholders, suppliers, competitors and the general public – are valuable assets that cannot be purchased, but must be earned. Once earned, trust and respect become the cornerstone of continuing relationships and will preserve our reputation for integrity. Our Code of Business Conduct and Ethics holds all directors, officers and employees of Qorvo accountable to the highest level of ethical standards.

Business is about people and we value our relationships with all of our constituents. We engage customers, co-workers, suppliers, investors and the communities we serve with integrity, respect, and the sincere desire to offer our best effort in everything we do. Collectively, Qorvo leaders and employees strive to make a positive difference in the world. We maintain a set of basic expectations for our employees:

- We expect our employees to be honest and fair in all their business dealings, with both fellow employees and people outside the organization.
- We expect our employees to focus on customer service and to promote excellent relationships with our suppliers.
- We expect our employees to understand and work hard to achieve our company goals.
- We expect our employees to meet the highest ethical standards in all company activities.

Our Board of Directors has adopted this Code of Business Conduct and Ethics as a guide to help us live up to our company's high ethical standards. This Code does not cover every issue that may arise, but it establishes principles that should guide you in a wide range of business settings. Every employee should become familiar with the Code and comply with it, because one person's misconduct can damage our hard-earned reputation and compromise the public's trust in Qorvo.

#### **Scope and Application of this Code**

When this Code refers to "employees," the term includes all employees (including temporary and part-time employees), officers, directors, agents, independent contractors and other personnel of Qorvo located throughout the world. Likewise, references in this Code to our company or to Qorvo include Qorvo, Inc. and all of its subsidiaries and affiliates throughout the world.

This Code may have been modified for certain countries in which Qorvo operates to comply with local laws and work rules. In the case of any conflict between the terms of this Code and the terms of any locally implemented code of conduct, code of ethics or similar document, the local document will control.

This Code governs your conduct as an employee and requires you to avoid even the appearance of improper behavior. Even well-intentioned actions that violate the law or our standards of conduct may result in appropriate disciplinary action, including termination. If you are in a situation that you believe may violate or lead to a violation of this Code, follow the guidelines described below under the heading “Reporting of Code Violations.” It is also your responsibility to report violations of this Code by others. Any person who we determine has violated this Code may be subject to discipline, up to and including termination.

This Code is not an employment contract and confers no rights relating to employment.

### **Compliance with Laws and Regulations**

We must comply with the letter and spirit of the law, use good judgment and common sense, and adhere to the highest standards of ethical conduct. All employees must respect and obey all local, state and federal statutes and regulations and the statutes and regulations of any countries in which we do business. You should seek advice from your supervisor, the Legal Department or the Compliance Officer if you have questions about such laws, especially when dealing with governments of countries or territories outside of the United States.

#### Be careful when trading in Company stock

You may not use “inside” information to trade in our stock or the stock of another company for your personal benefit. Inside information is any material non-public information that a reasonable investor would consider important in making a decision to purchase, sell or hold stock in a company. Please note that information related to cybersecurity risks and incidents may constitute inside information. If you possess inside information regarding Qorvo or any other company, you must not:

- Trade in or execute transactions regarding that company’s stock or securities while in possession of the information;
- Use the inside information for personal gain or for other’s personal gain; or
- “Tip” others who may buy or sell stock or securities using this information.

Further, you must not short sell Qorvo stock or engage in derivative-type transactions (e.g., put or call options) involving Qorvo’s securities.

Read our Policy Statement on the Prevention of Insider Trading for additional information.

## Anti-Corruption

Qorvo operates in multiple foreign countries and conducts business around the world. U.S. and foreign laws require our conduct in international business to meet certain standards. Specifically, Qorvo as well as our employees and agents (wherever located) are obligated to comply with all applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, the China Anti-Unfair Competition Law, the Korea Improper Solicitation and Graft Act of 2016 and similar laws (collectively “Anti-Corruption Laws”).

Qorvo’s basic policy is simple: You may not offer to pay or pay bribes to anyone, at any time, in any amount, for any reason. Further, you may not authorize or knowingly or tacitly permit a third party conducting business on Qorvo’s behalf to offer to pay or pay bribes on Qorvo’s behalf to anyone, at any time, in any amount, for any reason.

While what is perceived to be a “bribe” may vary somewhat by culture, the standard we are required to meet under the Anti-Corruption Laws is the same across the globe. In general, a “bribe” is an offer to pay or payment of *anything of value* to a government official, political party or other person for the purpose of *influencing an official act or decision, inducing an unlawful act or securing an improper advantage* in order to *obtain, retain or direct business* to Qorvo.

To avoid any appearance of impropriety, Qorvo prohibits offering internships or full-time employment to family members of foreign government officials at the direct or indirect request of such officials, or to other candidates referred to Qorvo by foreign government officials, absent the prior approval of both the Chief Human Resources Officer and the Compliance Officer.

Qorvo has adopted separate gift and entertainment and other policies to address compliance with Anti-Corruption Laws, and you should consult these policies for more information (See “Entertainment, Favors and Gifts” below).

## Export Controls

A number of countries maintain controls on the destinations to which products, software or technical data may be exported. Some of the strictest export controls are maintained by the United States. These controls include controls on the export of defense products as well as controls on certain commercial and dual-use products. U.S. export controls also include sanctions prohibiting export transactions with certain countries and certain foreign corporations and foreign nationals.

The U.S. export regulations are complex and apply both to exports from the United States and to exports of products from other countries when those products contain U.S.-origin components or technology. Software created in the United States is subject to these regulations even if duplicated and packaged abroad. In some circumstances, an oral presentation containing technical data made to a foreign national in the United States may constitute a controlled export because it is deemed to be an export to the home country of the foreign national.

If you need guidance on whether a particular transaction requires an export license, whether a country or an entity is on the U.S. sanctions list, or whether a proposed technical presentation to a foreign national may require a U.S. government license, please contact Qorvo's General Counsel or Manager, Import/Export.

### Fair Dealing

Countries around the world have laws, rules and regulations that promote and enforce free and fair competition and trade practices that govern how companies deal with their competitors, customers and suppliers. These antitrust laws, rules and regulations are known outside the United States as "competition laws." We must compete on the merits of our products and not engage in any form of unfair competition such as giving or accepting bribes, agreeing or exchanging information with competitors on pricing, dividing up markets, boycotting or defrauding customers or suppliers, unfair bidding practices or describing a competitor's products inaccurately to promote our own.

Some of the most serious antitrust offenses occur between competitors when they agree to fix prices or divide customers, territories or markets. You must not talk with competitors about confidential pricing, contract terms and conditions, costs, marketing or production plans, customers or any other proprietary information without seeking prior guidance and approval from your supervisor or the Compliance Officer. Regulators can allege that illegal agreements were reached based on "loose talk," informal discussions or the mere exchange of certain information.

We must comply with applicable trade restrictions and boycotts imposed by the U.S. government, as well as with U.S. anti-boycott laws that prohibit companies from participating in any international boycott not sanctioned by the U.S. government. The mere receipt of a request to engage in any such boycotting activity is a reportable event by law.

Success in a highly competitive business like ours demands an understanding of competitors' strategies. While collecting data on our competitors, you may use all legitimate resources, but you must avoid illegal or unethical conduct. You should not use employees of competitors or suppliers as a source of nonpublic information. You should consult your supervisor or the Compliance Officer if you need further guidance in this area.

### **Doing Business with Governments**

Special laws, rules and regulations apply when we sell our products or conduct research and development, either directly or as a subcontractor, to the U.S government and its departments and agencies. Many foreign countries also have special laws, rules and regulations governing their procurement practices. We must always comply fully with all applicable laws, rules and regulations (local, state, federal and foreign) regarding contracting and contact and dealings with government employees and public officials. You should seek advice from your supervisor, the Legal Department or the Compliance Officer if you have questions about such laws, rules or regulations, especially when dealing with governments of countries or territories outside of the United States.

## Application of Qorvo's Commitment to Business Ethics to Government Contracting

Qorvo is committed to complying with its legal and ethical obligations to the U.S. government, and to ensuring that all employees at any level with government contracting duties have the training and resources to achieve the highest standards of legal and ethical business practices when dealing with government agencies. In applying Qorvo's commitment to business ethics in dealing with both commercial and government customers, those employees with government contracting duties must take special notice of the unique aspects of government contracting applicable to their duties. They must comply with the letter and spirit of the government contracting laws, rules and regulations that apply to Qorvo and to government contracts awarded to Qorvo. This means that they are responsible for reading and understanding those laws, rules, regulations and contracts, being accountable for any mistakes made with government customers, and for disclosing promptly any mistakes made or other concerns about government contract compliance. They are also responsible for treating government customers with respect and understanding the special laws, rules and regulations that cover contacts with government employees.

### Qorvo Employees Must Comply with Government Ethics Rules

Employees with government contracting duties must learn and comply with applicable ethics rules and Qorvo policies regarding gifts to government employees, lobbying and political contributions. Employees must recognize that failure to comply with these ethics rules and policies could constitute a criminal act with grave consequences for the employee, Qorvo and the government employee involved.

### Protecting the Integrity of Qorvo Intellectual Property, Resources and Assets Involved in Government Contracting

Employees must ensure that Qorvo's intellectual property, resources and assets are provided to government agencies in compliance with the applicable government contracts and regulations. Any direct or indirect payment (including fees, commissions or any other item of value), or use of Qorvo assets or facilities for the private benefit of any individual government official, is prohibited unless the payment or item is approved by the Compliance Officer.

### Preserving the Integrity of Government Contract Bid Proposals and Pricing Information

Employees preparing government contract bid proposals are required to learn the procurement integrity and confidentiality laws, rules and regulations applicable to such proposals. Employees must comply strictly with the prohibitions against sharing of or disclosing pricing or other Qorvo information before, during and after submission of a bid proposal.

### Promoting Honesty and Accountability with Government Agencies

Employees with government contracting duties must record and report their contract activities accurately and honestly. When a request for information or records is received from the government as required by a contract provision or regulation, employees must respond promptly and fairly to such a request, after having discussed the request and response with appropriate Qorvo management.

## Reporting and Disclosure of Government Contract Nonperformance, Fraud, Waste or Abuse

Employees who have direct credible information about an actual or potential violation of a federal procurement statute, rule, regulation or a material provision of a government contract have a legal obligation to disclose this information to their supervisor or to a member of Qorvo's executive staff. Alternatively, you can report violations to the Compliance Officer, the Chief Human Resources Officer, or the Chair of the Audit Committee or through the Company's Ethicspoint website or the Department of Defense's hotline system (See "Reporting of Code Violations" below). Failure to make such a disclosure could result in significant harm to Qorvo and is grounds for disciplinary action up to and including termination. When in doubt, employees are encouraged to talk to their supervisor or manager, the Compliance Officer, the Chief Human Resources Officer or another company officer about the best course of action. It is a violation of this Code to intimidate or impose any form of retribution or retaliation on any employee who, in good faith, reports misconduct of others related to government contracting (See "No Retaliation" below).

## Compliance Arrangements with Subcontractors and Suppliers

When Qorvo is a prime contractor under a government contract, employees must ensure that they flow down any government clauses that are required to be included in government subcontracts. Employees must also ensure that these subcontractors and suppliers have sufficient financial and operational assets to assist Qorvo in meeting its performance obligations under government contracts.

## Training and Proficiency Evaluation

Employees with government contracting duties are required to undergo training in government procurement and anti-fraud measures. These employees must demonstrate their proficiency in relevant government contract rules, and will be evaluated on their proficiency.

## Data Security

Employees must follow Qorvo's data security requirements that are designed to comply with government contracting requirements for data security, use of cloud resources and reporting of cyber-related incidents. Third parties handling employees' and customers' personal data must comply with all regulatory requirements and must meet our security standards prior to handling such personal data.

## **Conflicts of Interest**

We all have a responsibility to avoid situations where our personal interests interfere with the interests of Qorvo as a whole. A conflict of interest occurs when an employee's personal or family interests give the appearance of impropriety or divided loyalty between the employee's interest and Qorvo's. Avoid any situation that creates a real or perceived conflict of interest.

When considering whether a conflict of interest exists, interests of family members (including any child, stepchild, parent, spouse, sibling or other person sharing an employee's household) should be taken into account.

Conduct or activities that involve a material conflict of interest between an employee and Qorvo violate this Code unless they are approved in advance. If the conduct or activity involves an officer at the level of Vice President or above or a member of the Board of Directors, the Governance and Nominating Committee must provide the approval unless the rules of the Securities and Exchange Commission or The NASDAQ Stock Market require the Board of Directors, or the Audit Committee, or both, to provide the approval. Any approval of a “Related Person Transaction” involving an executive officer, member of the Board of Directors or director nominee in accordance with Qorvo’s Related Person Transaction Policy will be sufficient for purposes of satisfying the approval requirements of this Code. In all other cases, the Compliance Officer is authorized to handle approvals.

It is not possible to list every activity that might present an actual or apparent material conflict of interest. However, the following are examples of conduct or activities by an employee that would violate this Code unless approved in advance as described above:

- A business transaction involving Qorvo and another entity with whom the employee (or his or her family member) has a direct or indirect material relationship;
- The direct or indirect use for personal gain by an employee (or his or her family member) of any Qorvo trade secrets or other confidential or proprietary information of Qorvo;
- An employee arranging, facilitating, encouraging or otherwise influencing the hiring by Qorvo of the employee’s family member unless the family relationship has been disclosed in advance to or is otherwise known by the Chief Human Resources Officer;
- An employee supervising another employee who is a family member where the supervisor has authority with regard to such matters as work assignments, compensation or promotions;
- An employee owning (directly or indirectly) more than a five percent (5%) equity ownership interest in a Qorvo competitor, customer, supplier or other business associate (excluding ownership through a mutual fund or any investment account not managed by the employee);
- An employee or a family member having an outside business, employment or other material interest that would impair the employee’s ability to perform his or her duties for Qorvo;
- Receipt by an employee or his or her family member of improper personal benefits as a result of the employee’s position in Qorvo;
- An employee serving as an employee, officer or member of the board of directors (or of a technical, scientific or similar advisory board) of, or as a consultant or adviser to, a Qorvo competitor, customer, supplier or other business associate unless authorized to do so by our Board of Directors (employees should avoid any direct or indirect business connection with our competitors, customers, suppliers or other business associates, except on behalf of Qorvo);

- An employee accepting cash compensation or stock, stock options or other stock-based compensation from another company where the employee is serving, at our request, on the board of directors of the company or in another advisory capacity, unless our Board of Directors approved such compensation in connection with our requesting the employee to serve;
- An employee conducting personal business or affairs on company time or using our facilities and equipment for personal business, except where meeting with a third party on our premises serves the convenience of an officer of Qorvo or promotes an officer's charitable or civic cause and in any event does not interfere with the performance of the officer's duties;
- An employee accepting employment or consulting work outside of Qorvo that interferes with the proper performance of the employee's job at Qorvo or puts the employee in a situation where confidential information of Qorvo could be used or discovered; or
- An employee accepting directed shares in a stock offering by a competitor, customer, supplier or other business associate of Qorvo pursuant to a "friends and family" program or arrangement.

These are just a few examples. The key to the successful handling of any actual or potential conflict of interest is to disclose it as soon as you discover it. If you have any doubt about whether you have a conflict of interest, you should discuss it with your supervisor or the Compliance Officer.

### **Service on Other Boards**

From time to time you might be asked to serve as a member of the board of directors or as a member of a technical, scientific or similar advisory board of another company. This Code prohibits you from serving in such capacity with a competitor, customer, supplier or other business associate of Qorvo unless such service is at the request of or approved by the Qorvo Board. In addition, our policy prohibits you from serving in such capacity for any other for-profit enterprise without first obtaining the approval of the Chairman of the Board and the Chief Executive Officer. (Members of the Qorvo Board are required only to notify the Chairman of the Board and the Chief Executive Officer if they are asked to serve on a board described in the preceding sentence.) This prohibition does not apply to service on the boards of charitable, educational or other non-profit organizations.

### **Entertainment, Favors and Gifts**

Qorvo recognizes that exchanging business courtesies such as meals, entertainment and routine promotional gifts can be a part of building strong business relationships; however, gifts and entertainment may create an obligation or perceived obligation on the recipient to the giver and may be considered a bribe. Please refer to Qorvo's Gift and Entertainment Guidelines for specific guidance on acceptable and prohibited activities in this area. In addition to compliance with these Guidelines, employees must always comply with all applicable federal, state, local and foreign laws and regulations relating to gifts and entertainment. In particular:



- Do not participate in any business entertainment activity or accept or give gifts that would violate the law, violate the other party's policies or practices or create embarrassment for Qorvo.
- Do not request gifts, meals or entertainment. Our suppliers, customers and other business associates should never feel obligated to provide gifts, meals, entertainment or sponsorships.
- Do not give or accept cash or cash equivalent gifts (such as gift certificates and stored value cards) **in any amount**.
- Non-cash gifts of nominal value (less than U.S. \$100) generally are acceptable.
- In considering whether a gift is appropriate, employees are strongly encouraged to limit their gifts to Qorvo branded promotional items available in the company store, perishable food items such as nuts, candy or a fruit basket or items that commemorate a particular holiday, event or transaction.
- Employees should not provide business gifts, meals, entertainment or other courtesies **in any amount** to a U.S. or foreign government official without the prior approval of the Compliance Officer.
- Meals and business entertainment should be moderately scaled, infrequent, reasonably related to Qorvo's legitimate business interests and limited only to those who are directly involved in the business relationship.

## **Confidentiality**

Qorvo's trade secrets and other confidential information give us a competitive edge in the marketplace. Protect our confidential information at all times. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to us or our customers if disclosed. This includes product designs and layouts, product plans and road maps, invention records, manufacturing methods and processes, technical data, computer programs (including source code), developments, test results, models, simulations, semiconductor mask works, engineering records and reports, product specifications, marketing plans, business plans, budgets, product prices, cost data, financial data and projections and other engineering, scientific, technical or business information of ours that is not public information. Employees are responsible to safeguard and protect this information from unauthorized disclosure, use, changes or loss. This includes the acceptable use of your computer equipment and electronic resources. Many measures, such as assignment of individual passwords, installation of anti-virus software, data encryption, and screen locking are in place to protect Qorvo's computing environment. Individuals may not circumvent or disable any security measures unless prior authorization is granted from our Information Technology Department.

You should also respect any confidentiality or other agreements you have with previous employers and make these requirements known to your supervisor.

Confidential information also includes similar information you obtain in the course of your employment that is owned by third parties and was disclosed to us subject to non-disclosure agreements or similar restrictions on use or further disclosure.

To further Qorvo's business, our confidential information may be disclosed to potential business partners. However, such disclosure should never be done without carefully considering its potential benefits and risks. If you determine in consultation with your manager and appropriate Qorvo management that disclosure of confidential information is necessary, you must contact the appropriate Qorvo officer to ensure a written non-disclosure agreement is signed prior to the disclosure.

Any information created in the course of your employment with or service to Qorvo belongs to Qorvo. Employees leaving Qorvo must return all proprietary information in their possession. Your obligation to protect proprietary and confidential information continues even after you leave Qorvo.

### **Company Spokespeople, Speeches, Publications and Endorsements**

All inquiries or calls from the financial press or the financial community should be referred to the Chief Executive Officer, the Chief Financial Officer, the Corporate Vice President of Marketing or the Vice President of Investor Relations. The Chairman of the Board, Chief Executive Officer and Chief Financial Officer, or others designated by them from time to time, are the only people who may communicate with the financial press on behalf of Qorvo.

Before giving speeches or presenting technical papers for publication, employees must follow Qorvo's Author and Speaker Program & Approval Process, which sets forth the approval process applicable to the disclosure or publication of corporate, technology and product-related information in customer-oriented trade publications, technical journals, conferences and other venues (See Qorvo's Employee Connect intranet site under "Resources—Awards & Recognition").

Similarly, employees who are asked to be interviewed by trade journals with regard to our products or technologies should first consult with Qorvo's Corporate Marketing Department prior to accepting or participating in interviews. Ideally, a Corporate Marketing Department employee should be present during the interview with the trade journal.

Employees should also consult with the Corporate Marketing Department before agreeing to provide any references, endorsements or testimonials on behalf of Qorvo regarding the products or services of any other companies.

### **Financial Integrity and Disclosure**

We will always give full, fair, accurate and timely disclosure of our accounting and financial systems as required by law. All employees are required to ensure that all records and reports are full, fair, accurate, timely, truthful and understandable. Never misstate facts, omit critical information, modify records or reports to mislead others, participate in unauthorized extra contractual promises, commitments or "side letters" on behalf of Qorvo or assist others in doing so.

As a public company, the integrity of the financial information of Qorvo is paramount. It guides the decisions of the Board of Directors and is relied upon by our stockholders and the financial markets. For these reasons, it is essential that our employees exercise the highest standard of care in preparing such reports in accordance with the following guidelines:

- All accounting records, as well as reports produced from those records, must be in accordance with the laws of each applicable jurisdiction;
- All records must fairly and accurately reflect the transactions or occurrences to which they relate;
- All records must fairly and accurately reflect, in reasonable detail, our assets, liabilities, revenues and expenses;
- Our accounting records must not contain any false or intentionally misleading entries;
- No transactions should be intentionally misclassified as to accounts, departments or accounting periods;
- All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;
- No information should be concealed from our internal auditors or from the independent registered public accounting firm that audits our financial statements; and
- Compliance with our system of internal accounting controls is required.

Our Chief Executive Officer, Chief Financial Officer, Principal Accounting Officer or Controller and Treasurer (the “Senior Financial Officers”) have overall responsibility for assuring full, fair, accurate, timely and understandable disclosure of relevant financial information to our stockholders and investors. In particular, they are responsible for ensuring that we comply with rules of the SEC governing disclosure of financial information and for assuring that press releases and communications with investors and securities analysts are fair and accurate. Among other things, the Senior Financial Officers must:

- Establish and maintain procedures designed to ensure internal control over financial reporting and disclosure controls and procedures designed to ensure that financial information is recorded, processed, summarized and reported to those responsible for preparing periodic reports and other public communications and to assure our reports and communications are complete, accurate and timely;
- Oversee the appropriate personnel to help ensure that the procedures governing internal control over financial reporting and disclosure controls and procedures are being followed;
- Carefully review each periodic report for accuracy and completeness before it is filed with the SEC and carefully review each public communication containing financial information before it is released;

- Promptly disclose to their superiors, and if necessary to the Audit Committee of the Board of Directors and our independent registered public accounting firm, any material weaknesses in, or concerns regarding, our disclosure controls and procedures or internal control over financial reporting; and
- Never create or maintain secret or unrecorded funds, assets or accounts, or intentionally make a payment or approve an invoice, expense report or other document that is incorrect, misleading or inaccurate.

## **Employment Practices**

To recruit and retain high-caliber employees who share our values, our employment practices are designed to provide an environment that encourages you to comply with this Code, be respectful of our employees, customers and other business partners and perform your duties with fairness, honesty, integrity and professionalism.

Qorvo is committed to providing a work environment that is free from unlawful discrimination or harassment. We hire, evaluate and promote employees on the basis of their ability, achievements, experience and performance. Accordingly, we will provide equal opportunity for all in recruitment, career development, promotion and compensation without regard to personal characteristics such as race, color, religion, gender, national origin, ancestry, age, non-disqualifying disability, medical condition, genetic information, veteran status, marital status, pregnancy, gender expression, gender identity, sexual orientation, political affiliation, union membership or any other characteristic protected by federal, state or local law, regulation or ordinance.

Qorvo forbids any unwelcome or offensive conduct that is based on an individual's race, religion, gender, age, disability, or any other protected status. Qorvo expressly forbids harassing behavior or conduct based on sex or gender. Sexual harassment might involve gender hostility rather than sexual attraction or desire, and it includes harassment based upon sexual orientation, gender identity, gender expression and transgender status. It may include unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex.

To provide a work environment that is conducive to productivity and personal growth, we prohibit harassing behavior and conduct both at and outside our facilities, and whether the harasser or the victim is an employee, supervisor, customer, supplier or other visitor. We also prohibit retaliation against anyone who has made a harassment complaint.

If you believe you or another employee has experienced discrimination, harassment or retaliation, immediately report the incident by following the procedures provided below under the heading "Reporting of Code Violations." We will promptly investigate an alleged discrimination, harassment or retaliation complaint and based on the results of the investigation, we will take prompt and appropriate corrective action according to the circumstances, which may include disciplinary action up to and including termination.

The laws affecting employment practices are complex and constantly evolving. It is critical that each supervisor and manager maintains awareness of current legal developments and our employment practices by seeking appropriate advice from our Human Resources Department.

Employees are encouraged to review our Policy Prohibiting Discrimination and Harassment and other applicable policies available on Qorvo's Employee Connect intranet site on the Human Resources home page, for more detailed information on these topics.

### **Health and Safety**

Employees are important contributors to our success. Our policy is to maintain a drug-free, secure workplace where all employees are attentive to hazard prevention and the avoidance of accidents and injuries. We are committed to protecting your health and safety and that of our customers, suppliers and visitors.

Safety protection is a condition of employment for all employees. You are accountable for your own safety and the safety of those around you. No deviations from our safety practices or procedures are permitted without the approval of the appropriate company personnel. You should report to work in a condition to properly perform your duties, free from the influence of drugs or alcohol. Violence and threatening behavior of any kind will not be tolerated.

You are responsible for reporting accidents, injuries and unsafe equipment, practices or conditions. If you violate applicable legal requirements or our policy related to health and safety, or if you intentionally fail to prevent violations or take reasonable corrective action, you will be subject to discipline, up to and including termination.

### **Protection and Proper Use of Company Assets**

Qorvo assets are to be used for Qorvo's business, not for yourself, your family or your friends. You should safeguard Qorvo's assets against loss, damage, misuse or theft, and care should be taken to ensure they are not misappropriated, loaned to others, sold or donated, without appropriate authorization. Theft, carelessness and waste hurt our profitability.

Company assets include such things as documents, equipment, facilities, information, our logo and name, materials and supplies.

### **Company Funds**

Every Qorvo employee is personally responsible for all company funds over which the employee has control. Company funds must be used only for company business purposes and you should take reasonable steps to ensure that Qorvo receives good value for company funds spent. Accurate and timely records of each expenditure are expected and expense reports should be submitted in a timely manner. You should immediately report to your supervisor or the Compliance Officer any suspected incident of fraud or theft.

## Electronic Information

Our computer resources, including the internet, intranet and electronic mail, should be used to support and advance our business purposes. Any personal use of these technologies should not create additional costs for Qorvo, interfere with work duties or violate any of our policies.

Electronic messages (including voicemail), to or from Qorvo equipment or accounts, and computer information are considered our property, and you should not have any expectation of privacy related to the use of such electronic information. Unless prohibited by law, we reserve the right to access and disclose this information as necessary for business purposes. You should use good judgment and not send a message or access or store any information that you would not want to be seen or heard by others.

## **Corporate Citizenship**

We are committed to being a good corporate citizen. We recognize the importance of making a positive contribution to society and the communities in which we operate. We meet these goals by contributing to the economy of the communities in which we operate, encouraging volunteerism and support of local community needs and activities, complying with environmental laws and regulations and supporting and encouraging public policies that promote good corporate citizenship and take into account legitimate employee and community interests.

Qorvo is a member of the Responsible Business Alliance (“RBA”) and is committed to finding solutions to common concerns in our industry in the areas of labor and human rights, health and safety, the environment and ethics. As a member of the RBA, we have agreed to comply with the RBA Code of Conduct and to ask our suppliers to adopt the RBA Code of Conduct or similar principles. The RBA Code of Conduct may be accessed at <http://www.responsiblebusiness.org/standards/code-of-conduct/>.

## **Political Contributions**

We respect and support our employees’ right to participate in political activities through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. However, you may not conduct these activities during business hours or on our property or use any of our resources, such as telephones, computers or supplies, in connection with your political activities. Qorvo will not reimburse you for personal political contributions.

We may sometimes express Qorvo’s views on local and national issues that affect our business. If we do, we may use our funds and resources when permitted by law. We may also make limited contributions to political parties or candidates in jurisdictions where it is legal and customary to do so. Any contributions of Qorvo funds or provision of “in kind” contributions from Qorvo to a political party or campaign, a political action committee, a candidate for political office or in furtherance of any political practice or cause without the prior approval of the Chief Financial Officer are strictly prohibited.

## Reporting of Code Violations

As part of its commitment to honest and ethical behavior, Qorvo requires you to report actual or suspected violations of this Code. You should initially report violations to your supervisor. You should also seek his or her advice if you have a question or concern about compliance with this Code, other policies and procedures or applicable laws, or if you have a question about the right thing to do in a particular situation. In many cases, the supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. You should remember that it is your supervisor's responsibility to help solve problems.

In cases where it might be inappropriate or uncomfortable for you to discuss an issue or question with your supervisor, or if the supervisor does not address the issue or question to your satisfaction, you should discuss the matter with the Compliance Officer, the Chief Human Resources Officer, any other Qorvo officer, or the Chair of the Audit Committee of the Board of Directors. You may also raise your concerns via the [Ethicspoint whistleblower website](#)<sup>1</sup> or to the Department of Defense Fraud Hotline 1-800-424-9098 for federal compliance and ethics issues. You may identify yourself or choose to remain anonymous. Please refer to our Whistleblower Policy for other means to raise your concerns.

Supervisors are required to report alleged violations of this Code to the Compliance Officer promptly after receipt. The Compliance Officer is required to investigate each such report to determine if a violation of the Code has occurred. If such a violation has occurred, our Compliance Officer will work with the appropriate Qorvo personnel (who may vary depending on the nature of the violation) to achieve an appropriate and satisfactory resolution.

Our Compliance Officer has reporting responsibility to the Chair of the Audit Committee of the Board. The Compliance Officer will make quarterly reports to the Audit Committee concerning alleged violations of this Code reported to the Compliance Officer by employees or their supervisors since the most recent quarterly report. The Compliance Officer's report will also describe the status of any pending investigations of alleged violations and the resolution of any previously ascertained violations of the Code. In addition, upon the request of the Chair of the Audit Committee, the Compliance Officer will report to the Audit Committee regarding the effectiveness and administration of this Code.

The above procedures are in no way intended to limit employee reporting of alleged violations relating to accounting or auditing matters to proper governmental and regulatory authorities, including the SEC, or limit an employee's participation in any investigation or proceeding that may be conducted by such governmental and regulatory authorities, including providing documents or other information. Employees do not need prior authorization to take such actions and are not required to notify their supervisor, the Compliance Officer, any other Qorvo representative or the Audit Committee that they have taken any such actions.

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<sup>1</sup> The Ethicspoint whistleblower website can be accessed by clicking on the hyperlink above (for employees viewing this document electronically), or by visiting <http://qorvo.ethicspoint.com>.

## **Enforcement of this Code**

If you violate this Code you will be subject to disciplinary action, up to and including termination.

We will investigate alleged violations of this Code and provide any person who is alleged to have violated this Code a fair opportunity to be heard regarding the alleged conduct. All employees are expected to cooperate in internal investigations of misconduct.

Disciplinary measures will depend on the circumstances of the violation and will be applied in consultation with your Human Resources representative. Consideration will be given to whether or not a violation was intentional, as well as whether an employee acted in good faith in reporting the violation and cooperated with any resulting investigation or corrective action.

## **No Retaliation**

We will not discharge, demote, suspend, threaten, harass or in any manner retaliate or discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of any violation of this Code or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002, Section 21F of the Securities Exchange Act of 1934 or other applicable laws and regulations. This includes good faith reporting of a potential violation of this Code to a member of Congress, an authorized official of a U.S government contracting agency, the Department of Justice, the SEC or other lawful authority.

Because the duty to come forward is a requirement, this policy against retaliation applies even where the good faith allegation proves ultimately groundless. Any employee who violates our non-retaliation policy will be subject to disciplinary action. Any employee who knowingly makes a false or misleading report also will be subject to disciplinary action.

Except as required by law, we will take reasonable steps to safeguard the confidentiality of statements and other information that you report under this Code, unless it is not practicable to do so or the interests of Qorvo require disclosure.

## **Approvals, Amendments and Waivers**

This Code has been approved by our Board of Directors. The Governance and Nominating Committee shall review and reassess this Code annually and recommend any proposed changes to our Board of Directors for approval. Any amendment to the provisions of this Code that requires disclosure under applicable law, SEC rules or the rules of The NASDAQ Stock Market will be disclosed on our website in accordance with applicable law or regulation.

Any waiver of any provision of this Code for executive officers and directors may be made only by our Board of Directors and will be promptly disclosed, along with the reasons for the waiver, as required by the rules of The NASDAQ Stock Market or by applicable law. Our “executive officers” for this purpose are those officers who are required to file reports of their stock transactions under Section 16 of the Securities Exchange Act of 1934. Other employees, agents or contractors must have approval in writing from the Compliance Officer.



If the Compliance Officer receives a request for consent or approval from an executive officer or director in accordance with any provision of this Code, the Compliance Officer will consult with the Chairman of the Board to determine whether the granting of such consent or approval constitutes a waiver for the purpose of the Board approval requirement.

## **Conclusion**

Situations that involve a violation of ethics, laws or this Code of Business Conduct and Ethics may not always be clear and may require difficult judgment. No code of ethics can anticipate every business situation that might present an ethical dilemma. In trying to determine whether any given action is appropriate, answer the following questions:

- What is in Qorvo's best interest?
- What Qorvo policies and practices are relevant?
- Could I testify in a court of law or before a government agency about my action without exposing Qorvo or myself to liability?
- Will my action seem like the appropriate one the next day or over time?
- Would I feel comfortable telling my manager, my family or my friends about my action?
- What laws and regulations – U.S. and foreign – apply to this decision or situation?

Even after you have considered these questions, you may be unsure about what to do. A word of caution: violations of laws, regulations, rules and orders may give rise to your own individual criminal or civil liability. You could also be subject to disciplinary actions by Qorvo and potentially lose your job. You may also subject Qorvo to civil or criminal liability or cause Qorvo to lose business.

If you have any concerns or questions about how this Code might apply to you, you should contact your supervisor or the Compliance Officer.

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