

## **QORVO, INC.**

### **WHISTLEBLOWER POLICY**

Qorvo, Inc. (the “Company”) is committed to upholding the values and behavior outlined in the Company’s Code of Business Conduct and Ethics (the “Code of Conduct”), including ensuring that the Company complies with applicable accounting and auditing standards and that the Company maintains sound internal controls under the supervision of the Audit Committee of our Board of Directors (the “Audit Committee”).

The Company recognizes that to meet this commitment, the Company must cultivate open and effective channels of communication with employees and third parties who otherwise might be reticent to report concerns about questionable behavior and practices for fear of management reprisal. Accordingly, to facilitate the free flow of information, encourage proper individual conduct and alert the Company to potential problems before they have serious consequences, the Audit Committee has adopted this policy for receiving and handling complaints from employees and third parties.

This policy applies to the receipt, retention and treatment of complaints by employees or third parties regarding conduct, behavior, events, circumstances or other factual matters with respect to the Company or its officers, directors or employees concerning (i) suspected misconduct related to accounting, internal accounting controls, or auditing matters (“Accounting Matters”), (ii) possible violations of U.S. or foreign securities laws, (iii) possible violations of other federal or state laws, such as the U.S. Foreign Corrupt Practices Act, (iv) possible violations of the laws of jurisdictions outside of the U.S., such as the U.K. Bribery Act, (v) possible violations of the Code of Conduct, and (vi) possible violations of other Company policies or guidelines. This policy describes how employees and third parties can submit confidential, anonymous reports of concerns regarding the foregoing matters.

#### **Scope of Matters Covered by this Policy**

This policy applies to employee and third-party complaints relating to, but not limited to, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any of our financial statements;
- fraud or deliberate error in the recording and maintaining of our financial records;
- deficiencies in or noncompliance with our internal accounting controls;
- misrepresentation or false statements to or by any of our employees or by our independent auditors regarding a matter contained in our financial records, financial reports or audit reports;
- deviation from full and fair reporting of our financial condition;

- intentional misstatements or material omissions in reports filed with the Securities and Exchange Commission;
- use of insider information to trade in the Company’s stock or “tipping” others who may trade on such information;
- payment or acceptance of bribes of any kind;
- violation of the anti-corruption laws in any jurisdiction in which the Company conducts business; and
- other violations of the Code of Conduct or other Company policies, including but not limited to:
  - engaging in business which creates a conflict of interest;
  - improper use or disclosure of the Company’s confidential information;
  - harassment or discriminatory employment practices; and
  - violations of Company health and safety policies.

### **Submission and Receipt of Complaints**

- Employees with complaints or concerns should initially report such matters to their supervisor.
- In cases where it might be inappropriate or uncomfortable for an employee to discuss a concern with his or her supervisor, or if the supervisor does not address the issue to the employee’s satisfaction, such employee may report his or her concern, or a third party may report its concern, to our Compliance Officer, by contacting the Compliance Officer at the following address, email and phone number:

Compliance Officer  
 Qorvo, Inc.  
 7628 Thorndike Road  
 Greensboro, NC 27409-9421  
 U.S.A.  
[Email: ComplianceOfficer@qorvo.com](mailto:ComplianceOfficer@qorvo.com)  
 Phone: (336) 678-7119  
 Fax: (336) 678-0445

Alternatively, an employee may discuss his or her concern with the Chief Human Resources Officer or any other Company officer.

- An employee may forward concerns to the Compliance Officer on an anonymous basis by calling the Company’s confidential, toll free Ethics and Compliance Hotline at 1 (800) 481-7088, which is a hotline operated by a third party agency to ensure

confidentiality. Employees calling internationally should use the numbers listed in Appendix A. Employees may also raise concerns via the [Ethicspoint Whistleblower Website](#).<sup>1</sup> Additionally, if the concern is a U.S. government contracting compliance issue, an employee may raise his or her concern to the Department of Defense fraud Hotline at 1 (800) 424-9098.

- If the Compliance Officer is the subject of the concern or the employee or third party otherwise believes the Compliance Officer has not given or will not give proper attention to his or her concerns, the employee or third party may report his or her concerns in writing directly to the Chair of the Audit Committee. The Audit Committee Chair's contact information is as follows:

Chair of the Audit Committee  
Qorvo, Inc.  
7628 Thorndike Road  
Greensboro, NC 27409-9421  
U.S.A.  
Attn.: Legal Department

- An employee or third party may forward concerns on a confidential and/or anonymous basis to the Audit Committee by delivering a letter or memorandum setting forth his or her concerns in a sealed envelope addressed to the Chair of the Audit Committee, labeled prominently "Confidential: To be opened by the Audit Committee only." If the employee would like to discuss his or her concerns with the Audit Committee, the letter or memorandum should indicate a telephone number, email or address at which he or she can be contacted if the Audit Committee believes it would be appropriate. The envelope should be addressed to:

Chair of the Audit Committee  
Qorvo, Inc.  
7628 Thorndike Road  
Greensboro, NC 27409-9421  
U.S.A.  
Attn: Legal Department

## **Treatment of Complaints**

- Upon a supervisor's receipt of a complaint from an employee, a supervisor will notify the Compliance Officer of such complaint promptly after receipt.
- Upon the Compliance Officer's receipt of a complaint from an employee, a supervisor or a third party, the Compliance Officer will (i) determine whether the complaint

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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>.

actually pertains to an appropriate matter under this policy and (ii) when possible, acknowledge receipt of the complaint to the sender.

- Upon the Chair of the Audit Committee's receipt of a complaint from an employee or a third party, the Chair of the Audit Committee will notify the Audit Committee of such complaint, and the Audit Committee will oversee the review of such complaint.
- The Compliance Officer will promptly notify the Audit Committee of the receipt of any complaint pertaining to Accounting Matters.
- The Audit Committee will oversee the review of any complaint relating to Accounting Matters received from the Compliance Officer or from an employee or a third party, and the Compliance Officer will oversee the review of all other complaints. The investigation of any complaint may be conducted by such person or persons, including legal counsel, as the Audit Committee or the Compliance Officer determines to be appropriate. The Audit Committee or the Compliance Officer, and any persons conducting an investigation of any complaint at the direction of the Audit Committee or the Compliance Officer, will maintain the confidentiality of such complaint to the fullest extent possible, consistent with the need to conduct an adequate investigation.
- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee or the Compliance Officer, as appropriate.
- The Company 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 complaints regarding Accounting Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002, Section 21F of the Securities Exchange Act of 1934, as amended, or other applicable laws and regulations.

## **Confidentiality**

Supervisors, the Compliance Officer, the Audit Committee and, if applicable, any investigation team, will maintain the anonymity or confidentiality of the person making the complaint to the fullest extent reasonably practicable within the legitimate needs of law and any ensuing evaluation or investigation. Legal or business requirements may not allow for complete anonymity, and in some cases it may not be possible to proceed with or properly conduct an investigation unless the complainant identifies himself or herself. In addition, should a complainant self-disclose his or her identity to persons other than his or her supervisor, the Compliance Officer, members of the Audit Committee or, as applicable, members of any investigation team, the Company will no longer be obligated to maintain such confidence. The identity of the persons subject to or participating in any inquiry or investigation relating to a complaint will be maintained in confidence subject to the same limitations.

## **Reporting and Retention of Complaints and Investigations**

The Compliance Officer and the Chair of the Audit Committee will maintain a log or other record of all complaints received by them under this policy, tracking their receipt, investigation and resolution. The Audit Committee shall, in the exercise of its discretion, determine the extent to which it is appropriate to advise the Board of Directors from time to time concerning the receipt, investigation or disposition of any complaint received by the Audit Committee under this policy.

The Compliance Officer and the Chair of the Audit Committee will maintain copies of complaints and their log or other record of the details of such complaints for a reasonable time or for any period prescribed by our document retention policy, but in no event for less than five years.

### **Content of Complaints**

To assist in the response to or investigation of employee complaints, such complaints should be factual rather than speculative and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the complaint or concern. Without limiting the foregoing, the complaint should, to the extent possible, contain the following information:

- the alleged event, matter or issue that is the subject of the complaint;
- the name of each person involved;
- if the complaint involves a specific event or events, the approximate date and location of each event; and
- any additional information, documentation or other evidence available to support the complaint.

Complaints that contain unspecified wrongdoing or broad allegations without verifiable evidentiary support will reduce the likelihood that an investigation based on such complaints will be initiated.

### **Roles, Rights and Responsibilities of Employee Complainants and Investigation Participants**

#### **Employee Complainants**

The motivation of Company employees who submit complaints (“Employee Complainants”) is irrelevant to the consideration of the validity of the complaint. However, the intentional filing of a false complaint, whether orally or in writing, may itself be an improper activity and may result in disciplinary action up to and including termination.

An Employee Complainant has a responsibility to be candid and set forth all known information regarding a complaint to his or her supervisor, the Compliance Officer, the Audit Committee and, if applicable, any investigation team. An employee making a complaint should be aware that an investigation may be difficult to conduct if the employee does not agree to be interviewed or provide further information regarding the complaint.

Employee Complainants are not to act on their own in conducting any investigative activities, nor do they have a right to participate in any internal investigative activities other than as requested by their supervisor, the Compliance Officer, the Audit Committee or, if applicable, any investigation team. An Employee Complainant shall not be part of an investigation team unless expressly requested by the Audit Committee or the Compliance Officer, as applicable. An Employee Complainant shall refrain from obtaining evidence relating to a complaint for which he or she does not have a right of access. Such improper access may itself be an illegal or improper activity and may result in disciplinary action up to and including termination.

The Company will use reasonable efforts to provide each Employee Complainant with a response to his or her complaint and a summary of the outcome of any investigation based upon the complaint, unless counsel, the Audit Committee or the Compliance Officer determines that there are overriding legal, company or public interest reasons not to do so.

Employee Complainants are entitled to protection from retaliation for having made a complaint or disclosed information relating to a complaint in good faith. The Company shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an Employee Complainant in the terms and conditions of employment based upon any lawful actions of such Employee Complainant with respect to good faith reporting of complaints or otherwise as subject to applicable laws. An Employee Complainant's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the complaint or an ensuing investigation.

This policy is in no way intended to limit employee reporting of alleged violations to proper governmental and regulatory authorities, including the Securities and Exchange Commission, or 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 us, their supervisor, the Compliance Officer, or the Audit Committee that they have taken any such actions.

### **Investigation Participants**

Company employees who are interviewed, asked to provide information or otherwise participate in an investigation of a complaint, including employees who are the subject of the investigation ("Investigation Participants") have a duty to assist in the investigation and to cooperate fully with their supervisor, the Compliance Officer, the Audit Committee and, if applicable, any investigation team.

Investigation Participants should refrain from discussing the investigation or their statements made to their supervisor, the Compliance Officer, the Audit Committee or, if applicable, any investigation team with those not connected to the investigation. If the Investigation Participant knows the identity of the Employee Complainant, the Investigation Participant should not discuss with the Employee Complainant the nature of evidence requested or provided, or statements made to their supervisor, the Compliance Officer, the Audit Committee or, if applicable, any investigation team, unless so authorized by their supervisor, the Compliance Officer, the Audit Committee or, if applicable, the investigation team.

Requests for confidentiality by Investigation Participants will be honored to the fullest extent reasonably practicable within the legitimate needs of law and the investigation.

Investigation Participants are entitled to protection from retaliation for having participated in an investigation. The Company shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an Investigation Participant in the terms and conditions of employment based upon any lawful actions of such Investigation Participant with respect to good faith participation in an investigation or otherwise as subject to applicable laws. An Investigation Participant's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the complaint or an ensuing investigation.

Employees with questions regarding this policy should contact their supervisor, the Compliance Officer or the Chief Human Resources Officer.

Originally adopted as of January 1, 2015  
Last amended as of May 11, 2018

## APPENDIX A

### EthicsPoint International Dialing Instructions

<i>Country</i>	<i>Number to Dial</i>
Belgium	0-800-100-10; At the English prompt, dial 800-481-7088
China	4008880749
Costa Rica	0800-0121386
Denmark	800-100-10; At the English prompt, dial 800-481-7088
Finland	0800-1-14945
France (France Telecom)	0-800-99-0011; At the English prompt, dial 888-301-8647
France (Paris Only)	0-800-99-0111; At the English prompt, dial 888-301-8647
France	0-800-99-1011; At the English prompt, dial 888-301-8647
France	0-800-99-1111; At the English prompt, dial 888-301-8647
France	0-800-99-1211; At the English prompt, dial 888-301-8647
France (Telecom Development)	0805-701-288; At the English prompt, dial 888-301-8647
Germany	0-800-225-5288; At the English prompt, dial 888-301-8647
Hong Kong	800-93-2266; At the English prompt, dial 800-481-7088
India	000-117; At the English prompt, dial 800-481-7088
Ireland	1-800-851-104
Japan	6633-386-8092
Malaysia	1-800-80-8641
Netherlands	0800-022-9111; At the English prompt, dial 800-481-7088
Singapore	800-1102282
South Korea	007-9814-2030-150
Sweden	020-79-8729
Taiwan	00-801-102-880; At the English prompt, dial 800-481-7088
United Kingdom (British Telecom)	0-800-89-0011; At the English prompt, dial 888-301-8647
Vietnam	1-201-0288; At the English prompt, dial 800-481-7088
Vietnam	1-228-0288; At the English prompt, dial 800-481-7088