



# Code of Conduct and Business Ethics



Contents

Letter from CEO.....3

Introduction.....4

1. Act with Business Integrity .....6

2. Act with Personal Integrity .....8

3. Treat Others with Respect.....9

4. Care for SiTime .....11

5. Take Action, Speak Up! .....12





## Letter from CEO

As we work at SiTime to transform the timing industry and become the global leader in timing devices, we must remember to do so with the highest standards of integrity and business ethics. Our dedication to our community, customers, and stockholders must include doing business the right way, honestly, fairly, and lawfully.

The laws and standards of business conduct are complex. Our Code of Conduct and Business Ethics ("Our Code") provides guidelines on how to act with integrity and make the right choices in an easy-to-understand way. It also explains our obligation to speak up if we see something that may not be right.

Please read Our Code and understand how it applies to you, because it is everyone's responsibility to uphold Our Code and to lead with integrity and respect.

Thank you for all that you do every day for SiTime's growth and success.

Rajesh Vashist  
CEO



## Introduction

SiTime's Code of Business Conduct and Ethics ("Our Code") provides our guiding principles for the way we do business, with uncompromising integrity and high ethical standards every day and every place where we do business, and in accordance with all applicable laws and regulations.

Each SiTime employee and board member is expected to read, understand, and comply with Our Code. We expect all third parties we do business with, including consultants, independent contractors, suppliers, and others who do business with SiTime, to act in a manner consistent with Our Code and/or our Supplier Code of Conduct and Business Ethics, which may be found at [www.sitime.com](http://www.sitime.com).

Our Code provides high-level guidance. It is not possible to predict and spell out every ethical scenario we may face, so we rely on your good judgment and high ethical standards to uphold and apply the guiding principles in Our Code. If you have questions about Our Code or what to do in a situation, speak up or seek guidance from your manager, the Human Resources team, our Chief Legal Officer, or submit your questions to our hotline (see the contact information below under [Speak Up](#) on page 5). We may revise Our Code from time to time, and you are expected to become familiar with any revisions. Along with Our Code, we also have other corporate policies, which you are expected to read and follow. Failing to comply with Our Code, SiTime's policies, or applicable law can lead to disciplinary action, up to and including termination of employment or service, and legal proceedings if warranted.

Our Code should be the minimum standards that we expect from our employees and board members in conducting our business. It is not intended to reduce, replace or limit any other legal or contractual obligations that you have to SiTime.



There are many reporting channels for you to speak up, including managers, the Human Resources team, and the Chief Legal Officer.

We also have a speak up hotline hosted by an independent third party to provide confidentiality and anonymity where permitted by law which you can reach:

☎ At 1-855-650-0005  
(United States and Canada)

☎ At 1-800-603-2869  
(outside the United States and Canada); or

✉ By email at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)

## Training

From time to time, you may be required to complete training on Our Code or provide certifications we deem necessary. We expect you to complete any required trainings in a timely manner.

## Waivers

Any waiver of Our Code that involves a member of the board of directors or executive officer must be approved by our board of directors and will be disclosed in line with applicable rules or laws. Any other waivers must be approved by our Chief Legal Officer.

## Speak Up

If you are aware of violations or potential violations of Our Code, one of SiTime's policies, or the law, you are required to speak up. We prohibit retaliation against someone who in good faith: makes a report, raises a concern of a potential violation, or participates or assists in an investigation. When you speak up, your concerns and questions are treated with respect.

If you wish to speak up regarding accounting, internal accounting controls, or accuracy of our financial statements, you may also submit a report directly to SiTime's audit committee of the board of directors at [auditchair@sitime.com](mailto:auditchair@sitime.com).





# 1. Act with Business Integrity

We act with high ethical standards

- › We ensure our actions comply with applicable laws, Our Code, and other SiTime policies.
- › We use our good judgment and consider what the impact would be on SiTime if our conduct or action became public.

We do not engage in bribery or corruption

- › We comply with all applicable anti-bribery and anti-corruption laws. We prohibit directly or indirectly giving, receiving, or offering a bribe (including cash, gifts, entertainment, or anything of value), kickback, or other payment, that can improperly affect a business decision or gain an improper business advantage, and we prohibit having a third party to do so on our behalf.
- › We understand there are strict rules when interacting with government officials or others connected to a government.
- › We do not accept or give gifts or entertainment that may influence, or appear to influence, business decisions or judgments. Any gifts or entertainment we accept or give are reasonable and customary with respect to the location and circumstances, are infrequent, and do not embarrass SiTime. We do not give or receive cash or cash equivalents.

See also: Complying with the U.S. Foreign Corrupt Practices Act

We respect confidential information and intellectual property of others

- › We safeguard the proprietary and confidential information of our customers, suppliers, and partners. We do not publicly disclose such information without the express permission of its owner.
- › We respect the intellectual property of others. We do not incorporate intellectual property of others in our products without a license or permission.

We are committed to fair competition

- › We comply with applicable antitrust and competition laws.
- › We gather competitive information with care, seeking only data that is publicly available or licensed to us.
- › We do not have discussions or make arrangements with competitors that have the effect of limiting competition by price, volume, margin, commission, bid rigging, boycotting, or allocation of markets, customers, contracts, or territories.
- › We represent our products accurately and truthfully. We do not make misleading statements in advertising, marketing, or sales materials. We do not make false or illegal claims about a competitor or its products.



## We comply with international trade laws

- › We ensure we comply with applicable import and [export](#) laws and regulations, including economic sanctions, export controls, and antiboycott laws whenever we provide or receive products and technologies.

## We maintain accurate business records and comply with our disclosure obligations

- › We ensure our business records are complete, timely, and accurate. We retain, protect, and destroy our business records according to SiTime policy. Email and other electronic communications may be business records. We avoid exaggeration, colorful language, guesswork, legal conclusions, and other expressions that are in violation of SiTime policy.
- › We are committed to full, fair, accurate, timely, and clear disclosure in reports and documents that we file with or submit to government agencies.

See also: Code of Ethics for Senior Financial Officers and Document Retention and Destruction Policy

## We select our suppliers carefully

- › We extend our commitments to our customers and stockholders to our supply chain.
- › We require our suppliers to comply with applicable laws and our Supplier Code of Business Conduct and Ethics.

## We seek to protect the environment

- › We strive to minimize the environmental impact of our products and operations, and work with our suppliers to do the same.
- › We work to reduce or prevent pollution and waste caused by our activities and to conserve natural resources such as water.
- › We comply with applicable environmental laws and regulations.

See also: [Supplier Code of Business Conduct and Ethics](#)

An "[export](#)" occurs when a product, service, software, technology or piece of information is provided to a party of another country — regardless of where they are located.

## 2. Act with Personal Integrity

### We avoid conflicts of interest

- › We act in the best interests of SiTime in business decisions. We avoid actions and relationships that interfere with our job performance, independent judgment, and duties to SiTime.
- › We do not use business opportunities or investment opportunities we learn of at SiTime for our personal benefit or the benefit of anyone else.
- › We avoid situations where our own interests or the interests of an individual we have a close relationship with conflict, or appear to conflict, with the interests of SiTime.
- › We do not engage in commercial activities outside of SiTime that are, or may have the appearance of being, in conflict with our employment with SiTime or the interests of SiTime without prior approval by our Chief Legal Officer.
- › We immediately disclose to our manager or the Chief Legal Officer any actual or potential conflicts of interest that arise.

See also: Complying with the U.S.  
Foreign Corrupt Practices Act

### We do not trade on or disclose material non-public information

- › We do not trade securities of SiTime while we are aware of material, non-public information. We do not trade securities of other companies while we are aware of material, non-public information about such company as a result of our relationship with SiTime. Material, nonpublic information is information an investor would consider important in making a decision to buy, hold or sell stock.
- › We do not discuss material, nonpublic information about SiTime with anyone outside SiTime except when required for business reasons and with appropriate confidentiality agreements. We do not discuss material, nonpublic information about SiTime with others within SiTime who do not have a valid business need to know.
- › We do not make recommendations to anyone regarding the buying, selling, or holding of SiTime securities.

See also: Insider Trading and Communications Policy

### Some examples of conflicts of interest are:

- › Taking a role with a SiTime competitor, customer, partner, or supplier;
- › Influencing a SiTime decision for personal gain or for gain for an entity you have an interest in;
- › Having someone related to you report to you at SiTime;
- › Material personal investments of yours or someone you have a close relationship with in a SiTime competitor, customer, partner, or supplier.



### 3. Treat Others with Respect

We respect and promote human rights

- › We comply with all applicable laws regarding human rights and require our suppliers do the same.
- › We prohibit child labor, human trafficking of persons, coercion, physical discipline, and forced, prison, indentured, or slave labor.
- › We provide wages and benefits and respect working hours that meet or exceed local laws.

See also: [Global Human Rights Policy](#) and [Supplier Code of Conduct and Business Ethics](#)

We respect others

- › We are committed to a work environment of respect and fairness, free of harassment and unlawful discrimination.
- › We do not tolerate conduct that is abusive, is intimidating, or creates an offensive or hostile work environment. This includes, but is not limited to, offensive conduct, derogatory jokes or comments, bullying, sexual or psychological harassment, threats, or unwelcome sexual advances.
- › This applies to our interactions with coworkers, customers, suppliers, partners, and other third parties we do business with.

See also: [Global Human Rights Policy](#), [Supplier Code of Conduct and Business Ethics](#), and [Policy Against Sexual and Other Workplace Harassment](#)

We promote diversity

- › We encourage the diversity of thinking that comes from the differences in experiences, knowledge, perspective, culture, customs, and background of all of our employees because we believe a diverse workforce supports creativity, problem-solving and better decision-making.
- › We treat each person fairly, and we do not tolerate discrimination or harassment against anyone on the basis of any protected characteristics, including: race, religion, color, age, sex, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, political affiliation, covered veteran status, protected genetic information, or marital status.
- › We make employment decisions based on qualifications, experience, and achievements.



We provide a safe and healthy work environment

- › We are committed to providing a safe and healthy workplace for all of our employees and contractors and comply with applicable health and safety laws.
- › We do not tolerate violence in the workplace, with our equipment, or while you are engaging in SiTime business, and we prohibit behavior that could cause someone to feel threatened or unsafe.
- › We promote safe and efficient working conditions and therefore you must avoid being under the influence of illegal or controlled substances that impair your ability to fully perform your job while at work or engaging in SiTime business.
- › We may not bring illegal substances, incendiary devices, firearms, or other weapons onto any SiTime premises or when we are engaging in SiTime business.
- › We expect our suppliers and partners to comply with all applicable health, safety, security, and environmental laws and standards in their operations.

See also: [Environmental, Health and Safety Policy](#), [Global Human Rights Policy](#) and [Supplier Code of Conduct and Business Ethics](#)





## 4. Care for SiTime

We safeguard our assets and intellectual property

- › Our intellectual property is one of our most valuable assets. We protect SiTime confidential information and only disclose it when required for business reasons and with appropriate confidentiality agreements. When we choose to release SiTime confidential information to the public, we use authorized and approved channels.
- › We use SiTime assets only for ethical and legal purposes that benefit SiTime and its stockholders. We only use SiTime assets for their intended business purpose and we keep them safe from loss, damage, waste, misuse, and theft.
- › We are responsible for SiTime assets issued to us and we must immediately return all such assets upon request or upon termination of services.

We respect data privacy

- › We protect the personal data of current and former employees, prospective employees, members of our board of directors, customers, partners, and suppliers.
- › We collect, store and use personal data solely for legitimate business purposes in accordance with our applicable policies.

See also: [Online Privacy Policy](#) and [Data Protection Policy](#)

We are thoughtful in our external communications

- › We have authorized spokespersons that communicate on behalf of SiTime or about SiTime's business to the press, analysts, or stockholders, or in public forums.
- › We refer any questions from investors or financial analysts to our Chief Financial Officer and any questions from the press or other media outlets to our Executive VP, Marketing.
- › We are responsible and respectful in our use of social media. We do not disclose, comment on, or discuss confidential information of SiTime. We only post in our personal capacity, unless specifically authorized to post on behalf of SiTime.

See also: [Regulation FD Policy](#), [Social Media Policy](#), [Social Media Guidelines](#), [Insider Trading and Communications Policy](#)

We do not represent SiTime in politics

- › We ensure that our individual political views and activities are not viewed as those of SiTime. We do not engage in individual political activities during working hours, or use SiTime's name, funds, property, facilities, or equipment for individual political activities.
- › We get pre-approval from our Chief Legal Officer for any proposed political contributions or lobbying on behalf of SiTime.





## 5. Take Action, Speak Up!

We act when we are aware of violations or potential violations

- › We will promptly report any suspected violations of Our Code, SiTime policies, or any law in one of the following ways:
    - to our manager,
    - to the Human Resources team,
    - to the Chief Legal Officer, or
    - through the speak up hotline hosted by an independent third party which can provide confidentiality and anonymity where permitted by law:
- ☎ At [1-855-650-0005](tel:1-855-650-0005)  
(United States and Canada)
- ☎ At [1-800-603-2869](tel:1-800-603-2869)  
(outside the United States and Canada); or
- ✉ By email at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)
- › We may also submit reports regarding accounting, internal accounting controls, or accuracy of our financial statements to SiTime's audit committee of the board of directors at [auditchair@sitime.com](mailto:auditchair@sitime.com).
  - › We do not make reports or accusations that are knowingly falsely or without reasonable belief.
  - › We preserve confidentiality, to the extent possible.

We cooperate with investigations

- › We cooperate with internal and external investigations and provide complete, accurate, and truthful information.
- › We never alter or destroy records, books or documents in response to anticipated or actual litigation, investigations, or audits.
- › Only our Legal team responds to litigation or investigations from governmental or other external agencies.

See also: Document Retention and Destruction Policy

We do not retaliate

- › We do not retaliate against someone who in good faith: makes a report, raises a concern of a potential violation, or participates or assists in an investigation. SiTime will take appropriate disciplinary action for anyone violating this prohibition on retaliation. Our right to protection from retaliation does not give us immunity for any violations by us of Our Code, SiTime policies, or the law.

We have an open door and encourage questions, sharing concerns, and making good faith reports regarding Our Code, SiTime policies, and any potential violations.

