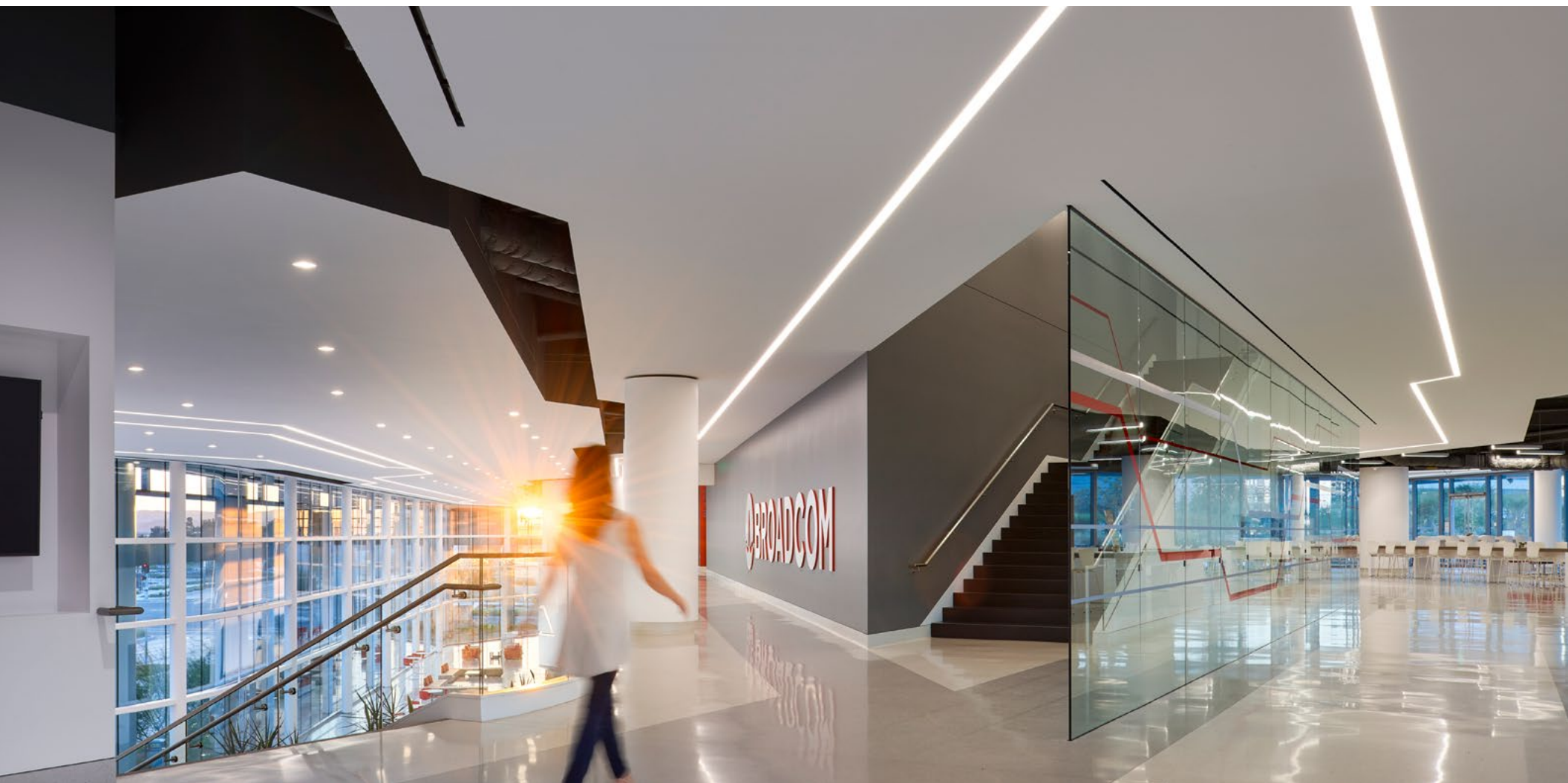




Code of Ethics and Business Conduct



Effective: March 2021

Code of Ethics and Business Conduct

Letter from our CEO	3	Media/Public Discussions	11
Introduction	4	Protection and Proper Use of Company Assets	11
Speaking Up	5	Conflicts of Interest	12
No Retaliation	6	Anti-Bribery and Anti-Corruption	14
Failure to Comply	6	Corporate Opportunities	16
Legal Compliance	6	Lobbying	16
Audits and Investigations	6	Fair Dealing	16
Respecting Human Rights	6	Doing Business with Governments	17
Anti-Discrimination and Harassment-Free Workplace	7	Export Compliance	17
Confidentiality	7	Monitoring Compliance	18
Data Privacy	9	Environmental Stewardship	18
Integrity and Accuracy of Business Records	9	Waivers	18
Insider Trading	10		

Letter from our CEO

To Broadcom Employees, Officers and Directors:

Broadcom is committed to maintaining the highest standards of business conduct and ethics in all of our worldwide operations and locations. This includes an expectation of always operating with transparency and uncompromising integrity in everything that we do.

At Broadcom, we all share the responsibility of achieving Broadcom's sustainable, long-term success through integrity, as well as best in class technology, innovation and exceptional financial performance.

This Code of Ethics and Business Conduct sets the standard of excellence that we expect from all Broadcom employees, officers, directors, contractors, suppliers, distributors and other business partners doing business with Broadcom. It also represents our unwavering commitment to act ethically and comply with the law.

Please take the time to familiarize yourself with the contents of this Code. Understanding and abiding by this Code are requirements for all of us at Broadcom. This Code will not address every situation you may face, but it will help you understand our expectations and recognize when you should ask for guidance.

Regards,



Hock E. Tan
President and Chief Executive Officer
Broadcom Inc.



Introduction

This Code of Ethics and Business Conduct (this “Code”) applies to Broadcom Inc. and each of its subsidiaries (collectively, “we” or “Broadcom”) and its employees, officers, directors and certain contractors and consultants.

Our policy is to conduct our affairs honestly and ethically in all of our worldwide operations and locations. Our corporate integrity and reputation depend upon the honesty and integrity you bring to Broadcom. Your personal integrity is the foundation of our corporate integrity.

We expect you to read, understand and abide by the requirements set forth in this Code. If you are a manager, you are responsible for overseeing compliance by individuals you manage.

It is your responsibility to apply common sense, together with integrity, in making business decisions where there is no stated guideline in this Code.

Action by members of your family, significant others or other persons who live in your household (“Family Members”) also may potentially result in ethical issues to the extent they involve Broadcom. Consequently, in complying with this Code, you should consider not only your own conduct, but also that of your Family Members.

Nothing in this Code alters the at-will employment policy of Broadcom applicable to all U.S. employees.



This Code reflects our commitment to:

- Honest and ethical conduct
- Prompt internal reporting of any violations of the law or this Code
- Anti-retaliation for reporting in good faith questionable behavior or possible misconduct
- Consistent enforcement of this Code, including clear and objective standards for compliance
- Complying with applicable governmental laws, rules and regulations
- Full, fair, accurate, timely and understandable disclosure about Broadcom, our business and financial results
- Confidentiality of information entrusted to employees, officers, directors and certain contractors and consultants by Broadcom and our customers
- Protecting Broadcom's legitimate business interests, including its assets and corporate opportunities

Speaking Up

Raising Questions and Concerns and Reporting Issues

We strive to create an environment where you can speak openly about our business practices, ask questions and raise concerns.

If you are aware of a potential violation of this Code, other Broadcom policy or applicable law, you have a responsibility to report it promptly to your manager, your Human Resources (“HR”) business partner or the Compliance Officer.

To promote the highest levels of ethics and compliance, we address concerns in a variety of ways, including through reports to the Audit Committee, senior management discussions, employee communications, process and controls improvements and, where appropriate, individual corrective action measures.

In addition to your manager and your HR business partner, you can report concerns or violations or ask questions by contacting:



COMPLIANCE OFFICER

Mark D. Brazeal, our Chief Legal Officer, is our Compliance Officer and can be reached at:

Email: compliance.officer@broadcom.com

Phone: **+1.408.433.6336**

Mail: **1320 Ridder Park Drive
San Jose, California 95131, U.S.A.**

ANONYMOUS HOTLINE

Employees, contractors, suppliers and all third-parties may use our Compliance Hotline, which is available 24 hours a day and in multiple languages. All inquiries and concerns may be submitted anonymously, where permitted by law. You may use either of the following methods to file a report on the Compliance Hotline:

Click on **File a Report** (www.broadcom.ethicspoint.com) or go to the **EthicsPoint website**.

Call **+1.800.422.3240** in the United States and Canada, or for other international numbers [click here](#).

After clicking the link, select the country in which you are located on the pull down menu under “To Make a Report” to obtain the telephone number.

AUDIT COMMITTEE

You may also report potential violations to the members of the Audit Committee of our Board of Directors, who may be reached by email at audit.committee@broadcom.com.

No Retaliation

We take inquiries and concerns seriously, handle them promptly, investigate to the extent necessary and take disciplinary actions as appropriate. In accordance with [Broadcom's Open Door Policy](#), Broadcom will not tolerate retaliation for raising a concern or reporting questionable behavior or possible misconduct in good faith.

Failure to Comply

Failure to comply with this Code is a violation of this Code and will not be tolerated. If you violate this Code, you may be subject to disciplinary action, which, depending on the nature of the violation, may range from a warning or reprimand up to and including termination of employment or business relationship and, in appropriate cases, civil legal action or referral to government authorities for criminal prosecution.

Legal Compliance

We expect you to comply with all applicable laws, regulations and legal guidelines, and any violations may subject you, as well as Broadcom, to civil and/or criminal penalties.

If a law conflicts with this Code, you must comply with the law. If a local custom conflicts with this Code, you must comply with this Code.

Audits and Investigations

Unless authorized by the Compliance Officer, neither you nor your manager may conduct an investigation. There may be times when you are questioned or asked to provide information in connection with internal audits or investigations. In such cases, you are required to cooperate and to tell the truth.

You should be aware that conduct and records, including emails, are subject to internal and external audits and discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

Respecting Human Rights

We are committed to respecting human rights and avoiding complicity in any human rights abuse throughout our company, operations, supply chain and communities. Our employment practices and policies support the fundamental human rights principles of freely chosen employment, non-discrimination, the elimination of forced and underage labor and the rights of workers to organize and freely associate, as articulated in the International Labour Organization Conventions.

We comply with applicable labor laws, including wage and hour laws, and we expect our business partners to do the same. We expect our suppliers to acknowledge and implement the [Broadcom Supplier Environmental and Social Responsibility Code of Conduct](#), which provides clarity with respect to labor, health and safety, environmental, ethics, and management expectations of our suppliers, or a code with substantially equivalent terms. We also comply with the U.S. federal government's requirements for government contractors as set forth in the [Broadcom Combating Trafficking in Persons Compliance Plan](#).

Anti-Discrimination and Harassment-Free Workplace

We understand that business success and innovation thrive in a diverse and inclusive work environment, and as a multi-national and multi-cultural company, we employ people of many different nationalities, ethnicities, cultures, faiths and beliefs around the world.

We are firmly committed to providing equal opportunity to all persons without regard to race, color, sex, gender, gender identity, gender expression, sexual orientation, religious creed, national origin, ancestry, age, physical disability, mental disability, medical condition, pregnancy, marital status, protected veteran status, political affiliation, union membership or any other basis protected by applicable federal, state or local law. This applies to all of our employment decisions including, but not limited to, recruiting, hiring, training, promotions, pay practices, benefits, disciplinary actions and terminations, and prohibits harassment of applicants and employees.

We do not tolerate unlawful discrimination or harassment of any kind.

We also do not tolerate unlawful discrimination or harassment of non-Broadcom personnel of our business partners and other entities with whom we do business.

For more information, see Broadcom's [Equal Opportunity Policy Statement](#) and [Harassment and Sexual Harassment Policy](#).



QUESTION

What are some examples of conduct at Broadcom that are prohibited?

ANSWER

Examples of prohibited conduct include derogatory comments based on a person's race, color, sex or gender or sexual harassment. Similarly, offensive or hostile working conditions created by such harassment or discrimination is not tolerated. If you need more information, contact your HR business partner or the Compliance Officer.

Confidentiality

What is Confidential Information?

Confidential information includes our non-public information that might be of use to competitors or harmful to Broadcom or our customers or suppliers if disclosed.

Examples of Confidential Information

Confidential Information could be the following information provided to you by Broadcom or our customers, suppliers and other persons or entities with which we do business:

- business, marketing and service plans
- financial information
- product architecture
- source codes
- engineering and manufacturing ideas
- designs and design wins
- databases
- customer lists
- customer product orders or actual or projected purchasing volumes
- customer product development or manufacturing schedule
- pricing strategies
- personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers)

Protection of Confidential Information

One of our most important assets is our confidential information. While at Broadcom, you may learn of information about Broadcom that is confidential and/or proprietary.

You have a duty to refrain from disclosing to any person confidential or proprietary information about Broadcom or any other company learned at Broadcom, unless and until that information is disclosed to the public through approved channels (usually through a press release or a formal communication from a member of senior management or an appropriate written legal arrangement) or such information becomes obsolete.

You may not, under any circumstances, disclose confidential or proprietary information about Broadcom or other companies obtained at Broadcom for personal gain, such as disclosing information to third parties in exchange for a consulting fee or other financial incentive.

In addition, you should refrain from disclosing confidential or proprietary information to other Broadcom personnel, and disclosure must be limited to those who have a legitimate need to know the information in order to perform their duties at Broadcom.

You must take care not to inadvertently disclose confidential or proprietary information. Materials that contain confidential information,

such as notebooks, thumb drives, laptop computers, tablets and cell phones, should be stored securely and you should be cautious when discussing sensitive information in public places like elevators, airports, restaurants and “quasi-public” areas within Broadcom, such as cafeterias and lobbies.

All Broadcom emails, voicemails and other internal communications are presumed Broadcom property and/or confidential and should not be forwarded or otherwise disseminated outside of Broadcom, except where required for legitimate business purposes. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

Q&A

QUESTION

What if I need to share confidential information with a customer, vendor or supplier?

ANSWER

Even if there is a legitimate need to disclose confidential information to a customer, vendor or supplier, you cannot disclose the confidential unless there is a signed confidentiality agreement protecting the confidential information.

Contact the Legal Department if you are not sure there is a signed confidentiality agreement.

Q&A

QUESTION

What are my obligations if I receive confidential information about another company?

ANSWER

You must treat this information in the same manner as you are required to treat Broadcom confidential and proprietary information. There may also be times when you must treat as confidential the fact that we have an interest in, or are involved in a business transaction with, another company.

Data Privacy

Many countries have strict rules with respect to the collection and use of personal information about individuals, and such rules apply to companies that collect information about their customers, suppliers and employees. Many of these rules and the European Union General Data Protection Regulation prohibit transmission of personal information from outside the U.S. into the U.S. or other countries, unless certain safeguards are provided with respect to the personal information transmitted.

You must use care with respect to collection, receipt, use, storage and transmission of any personal information to ensure compliance with applicable privacy and data protection laws and regulations.

Q&A

QUESTION

Who should I contact if I have questions about sharing or saving personal information?

ANSWER

If you have questions about appropriate handling of personal information, contact your manager, Broadcom's Data Protection Officer (who can be contacted at data.privacy@broadcom.com) or the Compliance Officer.

What is Personal Information?

Personal information may include information that would be routinely gathered in the U.S. or elsewhere, such as:

- email address
- home address
- contact information
- government identification number (e.g., passport number and social security number)
- other similar personal information

For more information, see Broadcom's [Privacy Policy, Personal Data Handling and Protection Policy](#) and other applicable policies available on [Broadcom's Data Privacy Portal](#).

If you are handling information protected by any policy published by Broadcom, then you must handle that information in accordance with the applicable policy.

Integrity and Accuracy of Business Records

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information provided. Therefore, our corporate and business records should be completed accurately and honestly. Making false or misleading entries, whether they relate to financial results or test results, is strictly prohibited.

Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities.

We require that:

- no entry is made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods
- transactions are supported with appropriate documentation
- the terms of sales and other commercial transactions are reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records

- no cash or other assets are maintained for any purpose in any unrecorded or “off-the-books” fund
- you comply with our system of internal controls

If you collect, provide or analyze information for, or otherwise contribute in any way to, preparing or verifying these reports, you should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about Broadcom that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures.

In addition:

- you may not take or approve any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles or other applicable laws, rules and regulations
- you must cooperate fully with our Finance and Internal Audit Departments, as well as our independent public auditors and legal counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with governmental agencies, are accurate and complete
- you should not knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with governmental agencies or knowingly omit (or cause or encourage



QUESTION

If a research firm contacts me via social media or my personal email and asks whether I would be interested in consulting for a research firm due to my experience in the industry, can I provide consulting services to that research firm?

ANSWER

No. Although you may not intend to disclose material non-public information while consulting, the information requested from you is likely to be material non-public information about Broadcom and its customers.

any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects

Records should be retained or destroyed only in accordance with Broadcom’s [Record Retention and Destruction Policy](#).

Insider Trading

The U.S. federal securities laws and similar laws in other countries prohibit “insider trading” – that is, buying or selling a company’s securities at a time when a person has “material non-public information” about a company.

What is Material Non-Public Information?

Material non-public information includes information that is not available to the public that could affect the market price of a company’s securities or that a reasonable investor would consider important in deciding whether to buy, sell or hold a company’s securities.

Your Responsibilities

You are required to review and comply with Broadcom’s [Insider Trading Compliance Policy and Procedures](#). This policy, among other things, provides that you are prohibited from:

- buying or selling Broadcom securities when you are in possession of material non-public information about Broadcom
- providing or tipping material non-public information about Broadcom or another company to others who might make an investment decision based on it
- trading in securities of other companies while you have material non-public information about the other companies that you obtained through your course of your employment or service with Broadcom



QUESTION

Can I post information about Broadcom on social media?

ANSWER

Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. You may not discuss our confidential business, information or prospects in any “chat room,” regardless of whether you use your own name or a pseudonym. See Broadcom’s [Social Media Policy](#) for additional information about authorized and unauthorized postings.

Media/Public Discussions

It is our policy to disclose material information concerning Broadcom to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in Broadcom will have equal access to information. Specifically:

- all inquiries or calls from the press and financial analysts should be referred to the Chief Financial Officer or the Director of Investor Relations
- we have designated our Chief Executive Officer, Chief Financial Officer and Director of Investor Relations as our official spokespersons for financial matters
- our official spokesperson for marketing, technical and other related information is our Director of Corporate Marketing
- these spokespersons may, from time to time, further designate others as official spokespersons in their discretion

Unless a specific exception has been made by the Chief Executive Officer, the Chief Financial Officer or the Director of Investor Relations, these designees are the only people who may communicate with members of the investment community and/or the press on behalf of Broadcom.

Unless you are a designee, you may not provide any information to the media about Broadcom “off the record,” for background, confidentially and/or secretly.

Protection and Proper Use of Company Assets

You are expected to protect our assets and ensure their proper and efficient use.

Theft, carelessness and waste directly impact our profitability. Our property (such as office supplies, computer equipment, buildings and products) must be used only for legitimate business purposes, although incidental personal use may be permitted. You may not use Broadcom’s corporate name, brand,

trademarks or letterhead for any personal purpose.

You may not, while acting on behalf of Broadcom or while using our computing or communications equipment or facilities:

- access the internal computer system (also known as “hacking”) or other resource of another entity without express written approval from the entity responsible for operating that resource
- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as “spam”), unlawful downloading of movies and music etc., in violation of applicable law, trafficking in contraband of any kind or espionage

If you receive approval to access another entity’s internal computer system or other resource, you must make a written record of that approval so that it may be retrieved for future reference, and you may not exceed the scope of that approval.

Unsolicited bulk email is regulated by law in a number of jurisdictions. If you intend to send unsolicited bulk email to persons outside of Broadcom while using our computing or communications equipment or facilities, you must first obtain approval from your manager and the Compliance Officer.

To the extent permitted by applicable laws in your location, all physical business files and documents on our premises, and all data residing on or transmitted through our computing and communications facilities, including email and word processing documents, is Broadcom property and subject to inspection, retention and review by Broadcom, with or without an employee's or third party's knowledge, consent or approval as allowed by law.

Any misuse or suspected misuse of our assets must be immediately reported to your manager, your HR business partner or the Compliance Officer.

Conflicts of Interest

We respect your right to manage your personal affairs and investments and do not wish to impinge on your personal life. However, we expect to have your undivided loyalty in Broadcom's business dealings. Therefore, you should avoid actual, apparent or potential conflicts of interest between your personal interests and the performance of your duties or the best interests of Broadcom.

Conflicts of interest are prohibited, unless specifically authorized as described below.

What is a Conflict of Interest?

A "conflict of interest" occurs when a person's personal interest interferes, appears to interfere or will interfere with the interests of Broadcom. Even the appearance of a conflict of interest can be damaging and should be avoided.

Whether or not a conflict of interest exists, appears to exist or will exist can be unclear. If you have any questions about a potential conflict of interest or if you become aware of an actual, apparent or potential conflict of interest, you should discuss the matter with your manager, your HR business partner or the Compliance Officer.

Disclosure and Pre-Approval

If you are involved in an actual, apparent or potential conflict of interest, you must: (i) provide the Compliance Officer with a written description of the activity and (ii) obtain approval from the Compliance Officer prior to your involvement in such situation or transaction. You or your manager may not make determinations as to whether an actual, apparent or potential conflict of interest exists.

Officers and directors may only seek approval and determinations regarding actual, apparent or potential conflict of interests from the Nominating, Environmental, Social and Governance Committee (the "NESG Committee") or the Audit Committee.

Factors that may be considered in evaluating apparent or potential conflict of interests are, among others:

- whether it may interfere with your performance, responsibilities or morale at Broadcom, or those of others within Broadcom
- whether you have access to confidential information
- any potential adverse or beneficial impact on our business, or our relationships with our customers or suppliers or other service providers
- whether it would enhance or support a competitor's position
- the extent to which it would result in financial or other benefit (direct or indirect) to you or any of your Family Members, or to one of our customers, suppliers or other service providers
- the extent to which it would appear improper to an outside observer

Examples of Conflicts of Interest

Although we cannot provide every possible situation in which a conflict of interest could arise, the following are examples of situations that are prohibited or where pre-approval from the Compliance Officer must be obtained:

- **Simultaneous employment by or consulting for a competitor, customer, supplier or other service provider.** Employment by or consulting for a competitor, customer, supplier or other service provider is prohibited.

- **Simultaneous employment, starting a business or teaching engagement with entities that are not competitors, customers, suppliers or other service providers.** There may be certain cases where you would like to own an outside business or take on additional part-time work with entities that are not competitors, customers, suppliers or other service providers, or accept teaching engagements with an educational institution, establishment or other organization. It is your responsibility to ensure that such activities do not conflict with Broadcom's interests or affect your performance at Broadcom. You must also ensure that such activities are strictly separated from Broadcom (e.g., do not use Broadcom time or resources for your outside work). In order to avoid any uncertainty, you must obtain approval from your manager and the Compliance Officer in advance of taking on additional outside work or engagement.
- **Service on a board of directors or an advisory board.** Service on a board of directors or an advisory board of a commercial enterprise of a competitor is prohibited. If you would like to serve on a board of directors or an advisory board of any commercial enterprise that is not a competitor but is a customer, supplier or other service provider, you must obtain approval from your manager and the Compliance Officer in advance of providing such service. In addition, you are limited to serving on one board of directors or advisory board of any commercial enterprise. If you would like to serve on more

than one board of directors or advisory board, you must obtain approval from your manager and the Compliance Officer in advance of serving on another board of directors or advisory board.

- **Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business or competes with Broadcom.** If you own or would like to acquire a significant financial interest in an entity that does business, seeks to do business or competes with Broadcom, you must obtain prior approval from the Compliance Officer. This does not apply to investments in publicly traded shares amounting to five percent (5%) or less of the outstanding shares.

When evaluating ownership in other entities for conflicts of interest, the Compliance Officer will consider: (i) the size and nature of the investment; (ii) the nature of the relationship between the other entity and Broadcom; (iii) your access to confidential information; and (iv) your ability to influence decisions at Broadcom and the other entity.

- **Conducting Broadcom business with a Family Member, personal friend or a business in which your Family Member or friend has a significant financial interest.** If a Family Member or personal friend is an employee of, or has a substantial financial interest in, a business seeking to provide goods or services to Broadcom, you must not attempt to use your position with Broadcom to influence the negotiations or transactions in any way. If you are directly or indirectly involved in the

negotiation or transaction, you must declare this conflict of interest to your manager immediately and must obtain prior approval from the Compliance Officer. Material related-party transactions involving any executive officer or director must be approved by the Audit Committee and will be publicly disclosed as required by applicable laws and regulations.

- **Industry Expert or Industry Consultant.** You may not, under any circumstances, act as an "industry expert" or "industry consultant," either paid or unpaid, where you are providing or it appears that you are providing third parties with non-public and/or confidential information about Broadcom's business or the business of its customers or suppliers.
- **Exercising supervision or other authority on behalf of Broadcom over a co-worker who is also a Family Member or with whom you have a close personal relationship.** In such situations, if you are in the managerial or supervisory role, you must inform your manager, who will, in turn, consult with the Compliance Officer and/or HR to determine the appropriate course of action.

For more information, please see the Confidentiality and Insider Trading sections of this Code and Broadcom's [Insider Trading Compliance Policy and Procedures](#).

To request pre-approval regarding actual, apparent or potential conflict of interests, you must complete the [Outside Activity Consent](#) form.

Anti-Bribery and Anti-Corruption

You are expected to comply with all applicable laws (including the U.S. Foreign Corrupt Practices Act (“FCPA”)) prohibiting bribery and corruption. Broadcom strictly prohibits giving, offering or promising anything of value to any third party for the purpose of attempting to improperly obtain or retain business or for any other improper purpose.

In addition, many countries, including the People’s Republic of China and the United Kingdom, have adopted laws prohibiting unethical business practices, such as paying kickbacks to customers or suppliers or making facilitation payments. You are expected to comply with the laws that Broadcom is subject to, including laws outside of the U.S.

You are required to review and comply with Broadcom’s **Anti-Bribery and Anti-Corruption Policy**. You are also required to complete Broadcom’s anti-bribery and anti-corruption trainings that are provided to you. Our Chief Legal Officer oversees Broadcom’s **Anti-Bribery and Anti-Corruption Policy**.

Gifts, Meals and Entertainment

Gifts, meals and entertainment offered on behalf of Broadcom must be directly related to company business and are meant to create goodwill. Providing gifts, meals and entertainment must be (i) lawful

under applicable local laws, (ii) reasonable in amount, (iii) based on local customary business practices, and (iv) offered in good faith only in connection with company business, such as the promotion, demonstration or explanation of company products or services, or the execution or performance of a contract.

In no event may any gift, meal or entertainment be offered or provided in return for any favor or improper benefit to Broadcom or to improperly influence any business or official decision.

Gifts, meals and entertainment may **not** be:

- extravagant or excessive in value
- in cash or cash equivalents
- susceptible to being construed as a bribe or kickback
- made or received on a regular or frequent basis
- in violation of any applicable laws

These principles apply to our transactions everywhere in the world, even in countries where the practice is widely considered “a way of doing business”.



QUESTION

Can I avoid the pre-approval requirement if I pay for business gifts, meals or entertainment out of my own pocket and do not seek reimbursement from Broadcom under the Travel and Expense Policy?

ANSWER

No. You may not seek to avoid our policies by paying for business gifts, meals or entertainment yourself.

Under some laws, such as the FCPA, giving anything of value to a government official to obtain or retain an improper business advantage or other improper, favorable treatment is a criminal act subject to prosecution and conviction. In addition, you and Broadcom may not avoid anti-corruption liability by funneling improper business payments through third parties such as distributors or consultants.

If you are having difficulty determining whether a proposed gift, meal or entertainment is acceptable, consider the following:

- Is it solely for the purpose of cultivating or enhancing a business relationship?
- Is it moderate, reasonable and not in poor taste?
- Would you be comfortable with disclosure of the gift, meal or entertainment to other customers or suppliers, other employees, your manager, your family or the media?
- Do you feel pressure to reciprocate or grant special favors as a result of the gift, or are you trying to pressure someone else to reciprocate or grant favors?
- Are you sure the gift does not violate any laws, regulations or company policies that apply to the recipient?

If you are still uncertain whether a proposed gift, meal or entertainment is acceptable, contact your manager or the Compliance Officer.

Pre-Approval

Gifts, meals and entertainment provided to third parties are subject to monetary limits and may require pre-approval. You must obtain pre-approval before offering or providing anything of value to an official or employee of a government entity, a public international organization or a quasi-governmental entity.

For additional information, please see Broadcom's [Anti-Bribery and Anti-Corruption Policy](#) and [Travel and Expense Policy](#), including information regarding the exchange of business gifts, meals and entertainment, pre-approval process and specified spending limits.

Charitable or Political Contributions

You can make personal charitable contributions and personal, lawful contributions to a political candidate (except as noted in this Code). However, you may not solicit such contributions from persons or entities with which Broadcom does or seeks to do business and you may not engage in any political activity on Broadcom time. In addition, you may not use coercive measures or Broadcom resources (e.g., facilities, staff, telephones, email accounts, computers, supplies, letterhead, logos) to further your personal political activities. Broadcom will not directly or indirectly reimburse any personal political contributions or expenses.

For additional information regarding political contributions, please see Broadcom's [Political Interaction and Contributions Policy](#).

You should not accept gifts, meals or entertainment that may reasonably be deemed to affect or appear to compromise your judgment or actions in the performance of your duties. Gifts or other benefits offered to your Family Members by current or potential vendors or suppliers to Broadcom are also considered gifts subject to these guidelines.

Q&A

QUESTION

Do I need pre-approval if I would like to make a donation to a charitable organization on behalf of Broadcom and seek reimbursement of the donation?

ANSWER

Yes. Please see Broadcom's [Anti-Bribery and Anti-Corruption Policy](#) for information about the pre-approval process.

Corporate Opportunities

You may not take personal advantage of, or divert away from Broadcom, any potential business opportunities in which Broadcom may have an interest that are presented to you or that you discover as a result of your position with Broadcom, or through your use of corporate property or information, unless approved in advance by your manager and the Compliance Officer or the Audit Committee. Even opportunities that are acquired privately by you may be questionable if they are related to Broadcom's existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to Broadcom's lines of business must be pre-approved by the Compliance Officer. You may not use your position with Broadcom or Broadcom property or information for improper personal gain, nor should you compete with Broadcom in any way.

Lobbying

Broadcom strives to maintain a healthy and transparent relationship with governments around the world, by communicating its views and concerns to elected officials and policy-makers where relevant to our business. It is Broadcom's policy to adhere strictly to lobbying laws and regulations wherever it does business. The laws that regulate and define lobbying activities are various and complex. Generally, any contacts with government personnel for the purpose of influencing legislation, regulations or decision-making may constitute lobbying. Lobbying activities for, or on behalf of, Broadcom may only be conducted by authorized Broadcom representatives, or with the prior approval of the Head of Government Affairs.

For additional information, please see Broadcom's [Political Interaction and Contributions Policy](#).

Fair Dealing

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices.

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies, is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your manager, your HR business partner or the Compliance Officer.

You are expected to deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your responsibilities at Broadcom. It is a violation of U.S. and various international laws to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

If you are involved in procurement, you have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

For additional information, please see Broadcom's [Anti-Bribery and Anti-Corruption Policy](#).



Doing Business with Governments

The laws and regulations governing contracting with government agencies are complex, impose extensive additional requirements and create risks not traditionally associated with commercial business transactions.



Violations of these laws and regulations can subject Broadcom and you to damaging civil lawsuits, criminal prosecution, reduction of negotiated contract prices, payment of fines, suspension of our eligibility to receive government contracts and debarment from doing business with the government. These rules, among other things, limit the type and timing of interactions that Broadcom employees and agents may have with government employees while seeking, renewing and fulfilling government contracts.

For example, U.S. “pay-to-play” rules may restrict directors, officers and our employees working with Broadcom customers in the public sector from making personal political contributions to a state or local candidate, officeholder or committee in the United States.

For additional information, please see Broadcom’s **Political Interaction and Contributions Policy** and **Travel and Expense Policy**.

Export Compliance

Broadcom and its employees must comply with all export laws and regulations, including:

- U.S. sanctions and embargoes, which restrict or, in some cases, prohibit companies, their subsidiaries and their employees from doing business with certain other countries identified by the U.S. government (for example, Crimea Region of Ukraine, Cuba, Iran, North Korea, Sudan and Syria) or specific companies or individuals.
- Export controls, which restrict travel to designated countries, or prohibit or restrict:
 - the export of goods, services and technology to unauthorized parties or countries, designated countries, denied persons or denied entities from the U.S.
 - the re-export of U.S. origin goods from the country of original destination to such unauthorized parties or countries, designated countries, denied companies or denied entities

If you have any questions regarding export compliance, please contact Global Trade Compliance at exportapprover-list.pdl@broadcom.com.



Monitoring Compliance

Our Chief Legal Officer, under the direction and oversight of our Audit Committee, will monitor and audit compliance of this Code. The Chief Legal Officer will periodically provide reports to the Board of Directors, the Audit Committee or the NESG Committee that include information on alleged violations and the actions taken.

Environmental Stewardship

We seek to manage our operations in a sustainable manner that considers our direct and indirect, and current and future, impacts on the planet. It is our policy to comply with both the letter and the spirit of the applicable health, safety and environmental laws and regulations and to engage cooperatively with government inspection and enforcement officials. Employees are encouraged to report conditions that they perceive to be unsafe, unhealthy or hazardous to employees or the environment.

For more information, please see our [Environment and Sustainability Policy](#).

Waivers

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or the Audit Committee in writing and will be disclosed as required by applicable laws, rules and regulations. Any waiver of this Code for any other employee may be authorized only by the Chief Executive Officer or the Chief Legal Officer in writing and will be reported to the Audit Committee.

