BROADCOM

CODE OF ETHICS AND BUSINESS CONDUCT



TABLE OF CONTENTS

Letter from our CEO	**3**
Introduction	**4**
Reporting or Raising a Concern or Misconduct	**4**
No Retaliation	**5**
Audits or Investigations	**6**
Anti-Discrimination and Harassment-Free Workplace	**7**
Respecting Human Rights	**8**
Workplace Health and Safety	**8**
Confidentiality	**9**
Protection and Proper Use of Broadcom Assets	**11**
Integrity and Accuracy of Books and Records	**13**
Data Privacy	**13**
Insider Trading	**14**
Conflicts of Interest	**15**
Media and Public Discussions	**18**
Anti-Bribery and Anti-Corruption	**19**
Fair Dealing	**22**
Doing Business with Governments	**23**
Responsible Engagement with Governments	**23**
Export Compliance	**24**
Compliance with this Code	**24**
Waivers	**24**



LETTER FROM OUR CEO

Broadcom is committed to conducting business with integrity. It is important that we act honestly and ethically to achieve and sustain our best-in-class technology and exceptional financial performance.

This Code of Ethics and Business Conduct (this "**Code**") sets the standard that we expect from all Broadcom employees and all contractors and consultants doing business with Broadcom.

Maintaining the highest standards of business conduct and ethics in our worldwide operations is possible only if each of us commits to following this Code every day at work and when we represent Broadcom.

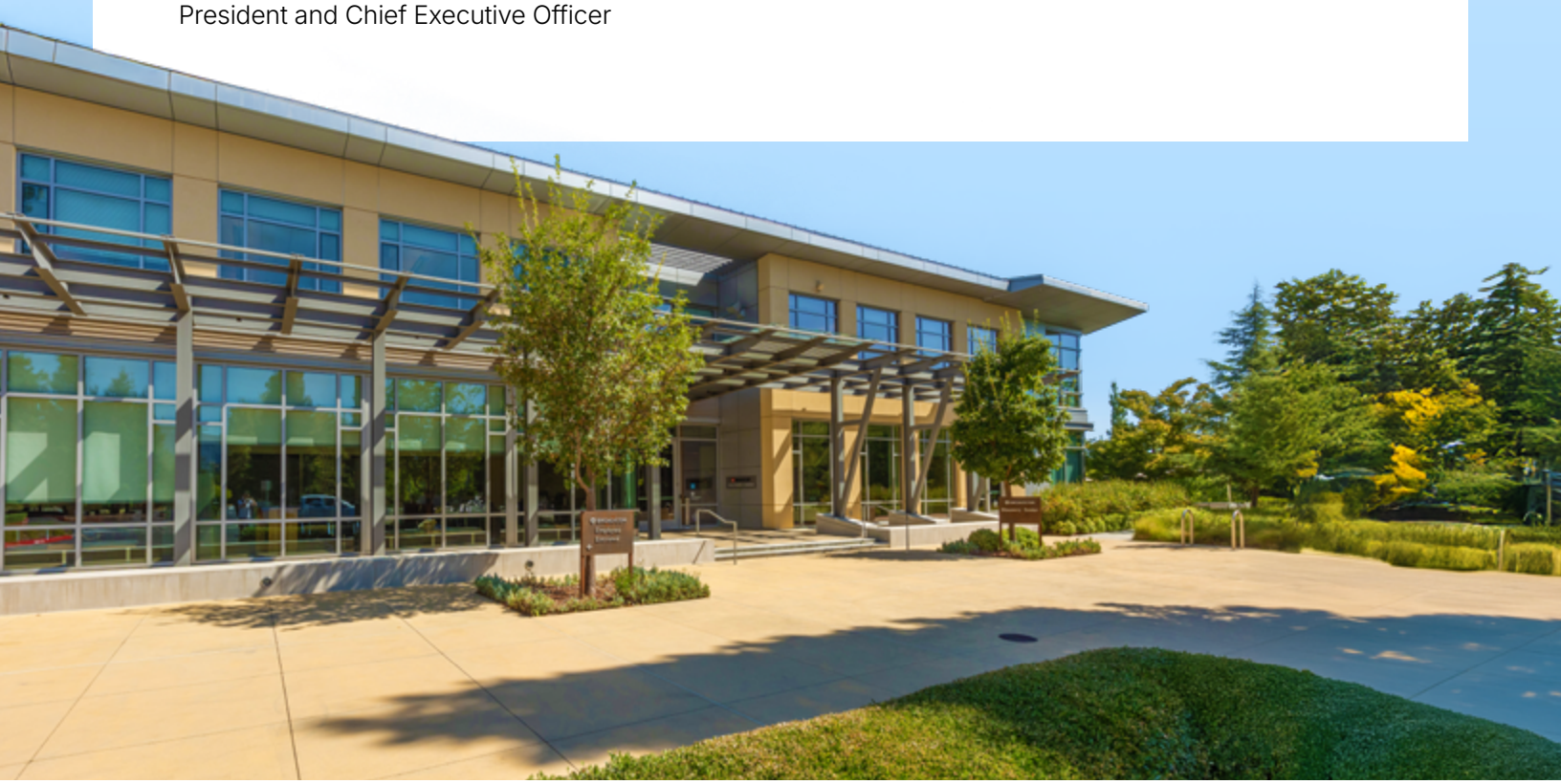
Broadcom's corporate integrity and reputation depend upon your honesty and integrity. Your personal integrity is the foundation of Broadcom's corporate integrity.

Understanding and complying with this Code is a requirement for all of us at Broadcom. This Code may not address every situation you might 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



INTRODUCTION

This Code of Ethics and Business Conduct (this "**Code**") applies to Broadcom Inc. and each of its subsidiaries (collectively, "**us**," "**our**" or "**Broadcom**") and its employees, officers, members of the Board of Directors ("**Board**") and certain contractors and consultants.

This Code governs your conduct at Broadcom and your interactions with Broadcom's employees, customers, contractors, suppliers and governments across the world.

Nothing in this Code alters the at-will nature of employment at Broadcom, if applicable.

REQUIRED COMPLIANCE

You are required to:

- Read, understand and comply with this Code and all other Broadcom policies
- Apply good judgment and integrity in making business decisions at Broadcom where there is no stated guideline in this Code or other Broadcom policies
- If you are a manager, oversee compliance with this Code by the individuals that you manage

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

FAILURE TO COMPLY

Failure to comply with this Code may result in disciplinary action, up to and including termination of your employment or business relationship with Broadcom. In certain cases, legal action may be pursued by Broadcom.

REPORTING OR RAISING A CONCERN OR MISCONDUCT

If you are aware of an actual or a potential violation of this Code, other Broadcom policies or applicable law, you must promptly report it. Failure to report it is a violation of this Code.

Reports must be made in good faith and with a reasonable belief in the accuracy of the information reported.

Reports should contain as much specific information as possible to allow the person investigating the report to adequately assess the nature, extent and urgency of the report.

If I am an employee of a subsidiary of Broadcom Inc., do I need to comply with this Code?

Yes.

This Code doesn't address the situation that I am facing. What should I do?

Use good judgment and integrity and reach out to the resources mentioned in this Code for assistance.

What if I fail to comply with this Code?

Failure to comply may result in disciplinary action, including possible termination of your employment or business relationship with Broadcom.

What if I see an actual or potential violation of this Code?

You are required to promptly report it.



You may not take any action that would violate attorney-client privilege to which Broadcom or its agents may be entitled or violate your confidentiality obligations with regard to Broadcom confidential or proprietary information.

There are various ways Broadcom addresses concerns or misconduct. This includes reports to the Audit Committee of the Board ("**Audit Committee**"), discussions with senior management, employee communications, improvements in processes and controls and, when appropriate, individual corrective action measures, up to and including termination of employment.

You may raise concerns, report misconduct or ask questions:

- To your manager
- To your Human Resources ("**HR**") business partner
- Anonymously via the Ethics and Compliance hotline (available 24 hours a day in multiple languages)
  - Website: www.broadcom.ethicspoint.com
  - Phone: 1-800-422-3240 (phone numbers for certain other countries can be found at www.broadcom.ethicspoint.com)
- To the Compliance Officer (who is also Broadcom's Chief Legal and Corporate Affairs Officer)
  - Email: compliance.officer@broadcom.com
  - Phone: +1.650.427.6000
  - Mail: 3421 Hillview Avenue, Palo Alto, CA 94304, U.S.A.
- To the Audit Committee
  - Email: audit.committee@broadcom.com

For more information on local requirements and resources that may be applicable to employees, see Broadcom's Ethics and Compliance site.

NO RETALIATION

Broadcom complies with all applicable laws and will not tolerate retaliation against employees, contractors or other Broadcom personnel who report or raise concerns in good faith or participate in an investigation by Broadcom.

If you believe you have been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by Broadcom or its employees or agents for reporting or raising a concern in good faith or participating in an investigation by Broadcom, you should promptly report the possible retaliation to Broadcom's Compliance Officer, and the matter will be investigated.

Who can use the Ethics and Compliance hotline?

It is available to all employees, contractors and third parties.

Can I submit a concern anonymously via the Ethics and Compliance hotline?

Yes.

What if I am afraid my manager will retaliate against me for reporting in good faith a potential violation of this Code?

Broadcom will not tolerate retaliation against an employee who reports in good faith a potential violation of this Code.



AUDITS OR INVESTIGATIONS

Broadcom takes inquiries and concerns seriously, handles them promptly, investigates to the extent necessary and takes corrective actions as appropriate.

You must **not** conduct your own investigation into any matter, unless authorized by Broadcom's Compliance Officer. Your obligation is to report matters and concerns promptly pursuant to this Code.

REQUIRED COOPERATION IN AN INTERNAL AUDIT OR INVESTIGATION

There may be times when you are asked to provide information in connection with internal audits or investigations. In such instances, you are required to:

- Cooperate and respond promptly and truthfully and provide all information that may be relevant to the matter being investigated or audited
- Turn over to Broadcom all communication (including emails, text messages or other communication via other platforms) on your laptops, mobile devices and any storage media containing Broadcom information and data that are being requested, whether such device was issued to you by Broadcom or is a personal device in accordance with Broadcom's Mobile Device Policy
- Physically turn over to Broadcom your Broadcom issued laptop, mobile device and any storage media containing Broadcom information or data and provide applicable login credentials as reasonably necessary to access such information and data on such devices
- Ensure that you comply with Broadcom's Record Retention and Data Destruction Policy for your devices (whether such device was issued to you by Broadcom or is a personal device)
- Comply with all legal hold notices issued to you

Business records, including emails and communications over messaging applications, are subject to internal and external audits and discovery, including by third parties and governments.

You are required to know and comply with Broadcom's legal obligations. Failure to comply may result in disciplinary action, up to and including termination of your employment or business relationship with Broadcom. In certain cases, civil or criminal legal action may be pursued.

If I am a manager, can I investigate a concern regarding a potential violation of this Code?

No. You must promptly report the concern to Broadcom's Compliance Officer or Internal Audit.

If I am a Broadcom employee and I do not cooperate with an internal investigation, am I in violation of this Code?

Yes.



INVESTIGATION PROCESS

As part of the investigation process:

- Confidentiality of the reporting employee will be maintained to the extent reasonably possible within the objectives of this Code. In the course of an investigation, Broadcom may find it necessary to share information with others on a "need to know" basis.
- Upon completion of any investigation, Broadcom will promptly take appropriate corrective action. If an employee is identified to be responsible for violating this Code, he or she will be subject to disciplinary action, up to and including termination of employment, and, in appropriate circumstances, civil action or referral to governmental authorities for criminal prosecution. Additional action may also be taken to deter any future violations of this Code.
- Broadcom maintains a log that tracks the receipt, investigation and resolution of all reports. The log and all investigation-related documents are maintained in accordance with Broadcom's Record Retention and Data Destruction Policy, except as otherwise required by law or regulation.
- If required by local law or regulation, facts, names and identifying factors in the report will be destroyed or anonymized in accordance with local legal requirements. If a report leads to a disciplinary action or other measure, the report may be recorded for the duration of the disciplinary procedure or as otherwise allowable by local law or regulation.
- If required by local law or regulation, the reporter will be informed of the anticipated amount of time needed to review his or her report (generally 5-6 business days) in accordance with local legal requirements and will be informed when the investigation is closed as appropriate.

ANTI-DISCRIMINATION AND HARASSMENT-FREE WORKPLACE

Broadcom is committed to providing equal opportunity to all persons without regard to race, color, sex, gender, sexual orientation, religious creed, national origin, age, disability, pregnancy, marital status, veteran status, political affiliation, union membership or any other basis protected by applicable federal, state or local law. This applies to all 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.

Broadcom does not tolerate unlawful discrimination or harassment of any kind of its employees or non-Broadcom personnel of its business partners and other entities with whom Broadcom does business.

I reported a concern via the Ethics and Compliance hotline, but why did I not receive any information about the outcome of the investigation?

Broadcom investigations are conducted confidentially and you may not be informed of the specific outcome. Upon completion of investigations, Broadcom will promptly take appropriate corrective actions.

I was interviewed for an internal investigation and my manager asked me about it. Should I tell my manager?

No. You are required to maintain confidentiality of the investigation and should report the request to Broadcom's Compliance Officer.

What if I see my colleague harassing another colleague?

You are required to promptly report it to your manager, your HR business partner or Broadcom's Compliance Officer.



If you believe you have been harassed or discriminated against, or have witnessed such behavior, you must promptly report it to your manager, your HR business partner or Broadcom's Compliance Officer.

For more information, see Broadcom's Equal Opportunity Policy Statement and Harassment and Sexual Harassment Policy.

RESPECTING HUMAN RIGHTS

Broadcom is committed to respecting human rights and avoiding complicity in any human rights abuse throughout its operations and supply chain.

Broadcom's employment practices and policies support the 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.

Broadcom complies with applicable labor laws, including wage and hour laws, and Broadcom expects its business partners to do the same.

Broadcom expects its suppliers to acknowledge and implement Broadcom's Supplier Environmental and Social Responsibility Code of Conduct or a code with substantially equivalent terms.

Broadcom complies with the U.S. government's requirements for government contractors as set forth in Broadcom's Combating Trafficking in Persons Compliance Plan.

WORKPLACE HEALTH AND SAFETY

Broadcom seeks to comply with applicable health, safety and environmental laws and regulations.

Broadcom also strives to act in an environmentally responsible manner pursuant to Broadcom's Environment and Sustainability Policy.

You are required to promptly report workplace conditions at Broadcom's facilities that you perceive to be unsafe, unhealthy or hazardous.

What if I see a customer or vendor harassing a Broadcom colleague?

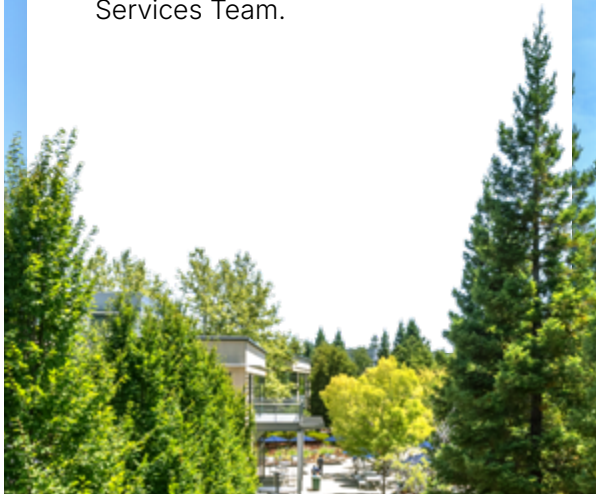
You are required to promptly report it to your manager, your HR business partner or Broadcom's Compliance Officer.

I am an employee. Who should I contact if I believe I have been harassed or discriminated against?

Promptly report it to your manager, your HR business partner or Broadcom's Compliance Officer.

Who should I contact if I have a question related to Broadcom's facilities?

Contact the Workplace Services Team.



CONFIDENTIALITY

Broadcom considers its confidential information one of its most important assets, and protecting Broadcom's confidential information is one of your most important responsibilities.

Confidential information could be provided to you by Broadcom, its customers or other entities with which Broadcom does business.

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

All Broadcom emails, voicemails and 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.

EXAMPLES OF CONFIDENTIAL INFORMATION

The following are examples of confidential information:

- Business and marketing plans
- Financial information, such as actual or projected revenue
- 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 schedules
- Agreements, including statements of work and letters of intent
- Pricing strategies
- Personally identifiable information pertaining to Broadcom's employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers)
- Information provided at internal meetings
- Other non-public proprietary information

Can I disclose Broadcom's confidential information to my family members, such as my parents, spouse or child?

No.

Can I forward internal-only emails meant for Broadcom employees outside of Broadcom?

No. You will be subject to disciplinary action, up to and including termination of employment.

If I am no longer an employee of Broadcom, can I disclose Broadcom's confidential information?

No.

What are my obligations if I legitimately receive confidential information about another company as part of my work at Broadcom?

You must treat this information in the same manner as if it is Broadcom's confidential information.

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

Confirm there is a confidentiality agreement protecting the confidential information to be shared. See the NDA Request Guidance for more information and follow Global Technology Organization's protocols for sharing confidential information.



PROTECTING CONFIDENTIAL INFORMATION

You are required to protect Broadcom's confidential information by:

- Not disclosing confidential information without authorization
- Not discussing confidential information in public or semi-public places
- Not sharing confidential information with Broadcom personnel who do not have a legitimate need to know the confidential information to perform their duties
- Not storing Broadcom information in applications such as the "Notes" features on mobile devices, in text messages or in photos/screenshots
- Not inputting confidential, proprietary, customer or personal data into a generative AI tool unless the tool has specifically been authorized for such use
- Securing laptops, mobile phones and other devices that contain confidential information

You may not, under any circumstances, disclose confidential or proprietary information about Broadcom or other companies obtained at Broadcom.

You are required to protect Broadcom's confidential information until that information is disclosed to the public through approved channels (usually through a press release or formal communication from a member of senior management or an appropriate written legal arrangement) or such information becomes obsolete. This obligation extends even after you stop working for Broadcom.

Unauthorized use or disclosure of Broadcom's confidential information could also be illegal and result in civil liability and/or criminal penalties.

If you are responsible for the unauthorized use or disclosure of Broadcom's confidential information, you will be subject to disciplinary action, up to and including termination of employment.

PREDICTION MARKETS

You may not participate in any prediction market or other speculative platform (including but not limited to placing bets, market creation, or suggesting, pitching, defining or launching a prediction topic) where Broadcom is the subject of a bet or prediction.

You may not use any confidential or proprietary information about Broadcom or any other confidential information obtained at Broadcom in any prediction market or other speculative platform regardless of whether Broadcom is the subject of a bet or prediction.

If you do not comply with the restrictions described above, you will be subject to disciplinary action, up to and including termination of employment, and you may be subject to civil or criminal legal action.

Can I talk to or consult for an industry expert firm or a research firm that is interested in my knowledge of the industry or my experience and skills?

No. You are prohibited from engaging in this activity. Although you may not intend to disclose material non-public information, the information requested from you is likely to be material non-public information about Broadcom and its customers.

Can I be a speaker at a meeting or seminar organized by an industry expert firm or a research firm?

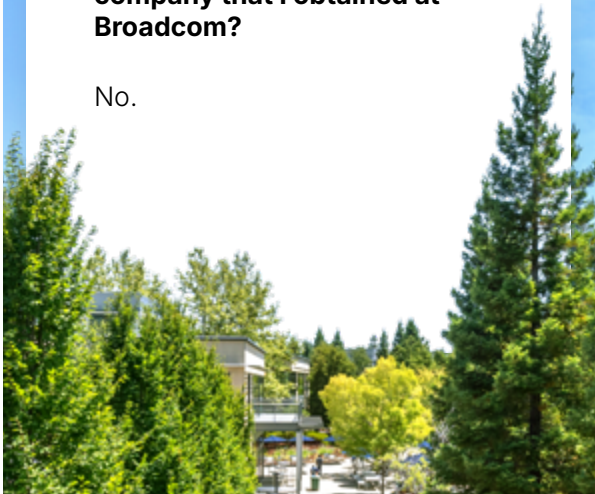
No. See above Q&A.

Can I participate in a prediction topic about Broadcom that is not based on Broadcom's confidential information?

No. You cannot participate in any activity in a prediction market when the topic is Broadcom.

Can I participate in a prediction topic that involves confidential information about another company that I obtained at Broadcom?

No.



PROTECTION AND PROPER USE OF BROADCOM ASSETS

You are expected to protect Broadcom's assets and are required to use Broadcom's assets for legitimate business purposes.

EXAMPLES OF BROADCOM ASSETS

The following are examples of Broadcom's assets:

- Broadcom information, data, records, files, documents, emails and other communications
- Broadcom's corporate name
- Broadcom's intellectual property, including trademarks, branding, trade secrets, copyrights, patents or tradenames
- Office supplies, including Broadcom's letterhead
- Computer and lab equipment
- Office premises
- Employees' work time

To the extent permitted by applicable laws in your location, all physical business data, files and documents on Broadcom's premises and all data residing on or transmitted through Broadcom's 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.

Any devices used to conduct Broadcom business or connect to Broadcom's systems or that contain Broadcom information must comply with Broadcom's Global Technology Organization requirements.

PROTECTING AND PROPERLY USING BROADCOM ASSETS

You may not use Broadcom's assets for any personal purpose unless otherwise authorized.

You are required to prevent loss, misuse, damage, waste or theft of Broadcom's assets.

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

- Access or hack the internal computer system or other resource of another entity without express written approval from the entity responsible for operating that resource

What if I have access to internal folders or documents of another business unit that I should not have access to? Can I access and share that information internally or externally?

No. You should only have access to folders or documents that you have a legitimate business need to perform your work at Broadcom. You should take the necessary steps to have your access removed and not share the folders or documents.

What should I do if I receive a suspicious email that may be a phishing attempt?

Do not click on any links, open attachments or provide any information. Report the email immediately to Broadcom's Global Technology Organization.



- Commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as spam), unlawful downloading of files, movies and music, etc., trafficking in contraband 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.

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

RECORDINGS OF MEETINGS

Generating video recordings or verbatim transcripts of video meetings while conducting Broadcom business or work should be an exceptional occurrence, not a routine practice, and should not be used as a substitute for note-taking or real-time engagement. Generating audio-only recordings of calls or meetings is prohibited.

You may create video recordings at Broadcom only if all the following conditions are met:

- You have a legitimate business purpose to make the video recording
- You have obtained explicit permission from the meeting host and the most senior Broadcom participant in the meeting to make the video recording
- You disclose to all participants that the meeting is being recorded
- After disclosing to all participants that the meeting will be recorded, the participants have the opportunity to leave the meeting or turn off cameras and mute microphones before the video recording begins
- The recording is via the native features of a Broadcom-approved video conferencing application
- The resulting files of the video recording are retained exclusively in a Broadcom-approved repository and kept only as long as needed to accomplish the legitimate business purpose pursuant to Broadcom's Record Retention and Data Destruction Policy
- If a verbatim transcript is created from the video meeting, the meeting host is responsible for ensuring the accuracy of the transcript
- If the resulting file of a video recording or verbatim transcript is disseminated, it is disseminated solely to those who need it for a legitimate business purpose and the recipients are obligated to maintain its confidentiality

Violations of these conditions for video recordings may result in disciplinary action, up to and including termination of employment. These limitations are not intended to restrict otherwise lawful recordings conducted to protect the safety, security or legal rights of Broadcom and its employees.

Can I make an audio-only recording of an internal meeting or call?

No.

Can I record my team meetings for the benefit of those who are not able to join?

Only if all the requirements for recording meetings provided in this section of this Code are adhered to.



INTEGRITY AND ACCURACY OF BOOKS AND RECORDS

Broadcom's books and records must accurately and fairly reflect, in reasonable detail, Broadcom's financial position and transactions.

Broadcom's books and records include but are not limited to expense reports, timecards, business agreements and contracts, statements of work, invoices, financial statements or records, test results and public filings with government or regulatory agencies.

Making false or misleading statements or entries while conducting Broadcom business or in connection with your Broadcom employment or relationship is prohibited.

You are required to ensure that:

- Information or documentation you prepare in connection with your Broadcom employment or relationship is timely and reflected accurately and complies with all applicable laws, rules and regulations
- You do not knowingly make (or cause or encourage anyone to make) a false or misleading statement or omission in Broadcom's books and records
- You do not intentionally hide, disguise or misclassify transactions in Broadcom's books and records
- You comply with Broadcom's internal controls and do not intentionally circumvent Broadcom's internal controls
- You accurately record Broadcom's cash and other assets and do not create an "off-the-books" fund
- You retain or destroy Broadcom's books and records in accordance with Broadcom's Record Retention and Data Destruction Policy

DATA PRIVACY

Many countries have strict rules with respect to the collection, processing and use of personal information about individuals, including customers, suppliers and employees. Many of these rules prohibit transfers of personal information between countries unless certain safeguards are provided with respect to the personal information.

You must use care when collecting, receiving, using, storing, processing and transferring personal information to ensure compliance with applicable privacy and data protection laws and regulations.

Even though I am not in Finance or Legal at Broadcom, does this section apply to me?

Yes. All Broadcom employees are required to maintain accurate business records, including but not limited to invoices, expense reports, timecards, financial records, statements of work, business agreements and contracts, test results or government filings.



EXAMPLES OF PERSONAL INFORMATION

Personal information may include the following information:

- Email addresses
- Home addresses
- Contact information (such as first name, last name, telephone number)
- Government identification number (such as a passport number or 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 in Broadcom's Data Privacy Portal to ensure compliance with applicable privacy and data protection laws and regulations.

INSIDER TRADING

Many countries prohibit "insider trading," which is purchasing, selling, transferring or exchanging a company's securities when you are in possession of "material non-public information" relating to that company's securities.

MATERIAL NON-PUBLIC INFORMATION

Material non-public information includes information 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 or sell in a company's securities.

BROADCOM'S INSIDER TRADING COMPLIANCE POLICY

You are required to review and comply with Broadcom's Insider Trading Compliance Policy. Pursuant to this policy:

- You are prohibited from buying or selling Broadcom securities when you are in possession of material non-public information about Broadcom
- You are prohibited from communicating or "tipping" material non-public information about Broadcom to anyone outside Broadcom
- You are prohibited from buying or selling securities of other companies while you have material non-public information about the other companies that you obtained through your employment or service with Broadcom

What if I have questions about sharing or saving personal information?

Contact Broadcom's Global Privacy Officer.

If my broker is acting on my behalf, is my broker subject to Broadcom's Insider Trading Compliance Policy?

Yes. You cannot have your broker do what you cannot do under Broadcom's Insider Trading Compliance Policy.

What are examples of "material non-public information"?

See Broadcom's Insider Trading Compliance Policy.

What if I have questions about whether I can use my Broadcom stock for derivative transactions, hedge Broadcom stock or pledge Broadcom stock?

See Broadcom's Insider Trading Compliance Policy.



Any questions relating to the purchase or sale of Broadcom's securities or the securities of any other company that you are familiar with due to your responsibilities at Broadcom should be directed to Broadcom's Compliance Officer.

For more information, see Broadcom's Insider Trading Compliance Policy.

CONFLICTS OF INTEREST

While working at Broadcom, you are expected to give your Broadcom work your undivided attention and loyalty. In addition, if your personal interests and the performance of your duties at Broadcom conflict, you must identify and disclose such conflict via Broadcom's Conflict of Interest disclosure process.

If you are found to have engaged in a prohibited activity listed in this section, you will be subject to disciplinary action, up to and including termination of employment.

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 may 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 Broadcom's Compliance Officer.

DISCLOSURE AND PRIOR APPROVAL

If you believe that you may be involved in a potential conflict of interest, you must disclose it and obtain approval prior to your involvement in such activity.

Approval must be obtained from (i) your manager, (ii) Broadcom's Compliance Officer and, (iii) in certain circumstances, from Broadcom's Employment Legal team and/or IP Legal team prior to your involvement in such activity.

To request prior approval regarding actual, apparent or potential conflicts of interest, you must complete a Conflict of Interest Pre-Approval Request. Approval from only your manager is not sufficient.

If I am subject to a closed trading window, is my broker who is managing my portfolio subject to a closed trading window?

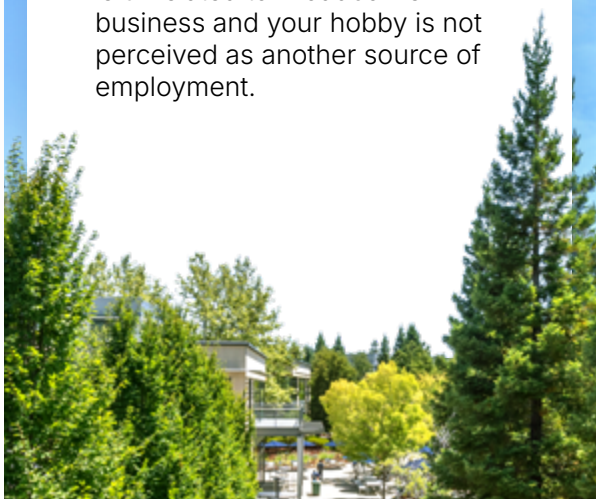
Yes.

Do I need pre-approval if I volunteer at my child's school after work?

No. If you are volunteering after normal work hours and the volunteer activity does not negatively impact your work at Broadcom, then you would not need pre-approval.

Do I need pre-approval if I spend time on hobbies after work?

You do not need pre-approval if all of the following applies: you are spending time on your hobby after your normal work hours, your hobby does not negatively impact your work at Broadcom, your hobby is unrelated to Broadcom's business and your hobby is not perceived as another source of employment.



Broadcom's executive officers and members of the Board must seek prior approval regarding actual, apparent or potential conflicts of interest from the Board's Nominating and Corporate Governance Committee ("**NCG Committee**") or the Audit Committee.

CONFLICT OF INTEREST CONSIDERATIONS

Factors that may be considered when evaluating actual, apparent or potential conflict of interests include:

- Whether there is a negative effect on your Broadcom responsibilities, performance or work
- Whether there is a negative effect on your colleague's Broadcom responsibilities or work, performance or morale
- Whether you have access to Broadcom's confidential information and there is a risk that Broadcom's confidential information may be disclosed or compromised
- Whether a third party may claim ownership of Broadcom's confidential information or intellectual property
- Potential impact on Broadcom's business or relationship with Broadcom's customers, suppliers or other service providers
- Financial or other benefit (direct or indirect) you or your family members or personal acquaintances may receive
- Whether there is involvement with Broadcom's competitor, customer, supplier or other service provider
- Appearance of impropriety to an outside observer

ACTIVITIES THAT ARE PROHIBITED OR REQUIRE PRIOR APPROVAL

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 prior approval from (i) your manager, (ii) Broadcom's Compliance Officer and (iii) in certain circumstances, from Broadcom's Employment Legal team and/or IP Legal team must be obtained:

Prohibited Activities

- If you are a full-time employee – simultaneous employment at another company, firm or business
- Simultaneous employment at Broadcom's competitor, customer, supplier or other service provider
- Consulting for Broadcom's competitor, customer, supplier or other service provider
- Consulting for an industry expert firm or a research firm (regardless of whether you are paid or unpaid)

What type of online certification or course would require pre-approval?

An online certification or course would not require pre-approval if you take the course outside of your normal work hours and the course or certification is a passive activity (such as merely watching course videos without a required thesis or attending in-person classes).

What if I have questions about whether a specific activity or action is a conflict of interest?

Contact your manager, your HR business partner or Broadcom's Compliance Officer.

Can I directly or indirectly manage a family member?

No.



- Starting, owning a significant financial interest in or being involved or associated with a company, firm or business that competes, will compete or is perceived as competing with Broadcom
- Service on a board of directors or an advisory board of a company, firm or business that competes, will compete or is perceived as competing with Broadcom
- Direct supervision of a family member or a close personal acquaintance at Broadcom
- Using your position at Broadcom or Broadcom property, assets or information for personal gain (direct or indirect)
- Diverting or taking away actual or potential business from Broadcom or competing with Broadcom for actual or potential business opportunities

Activities that Require Prior Approval

- If you are a part-time employee – simultaneous employment at another company, firm or business that does not compete with Broadcom or does not have a business relationship with Broadcom (for example, it is not a Broadcom customer, supplier or other service provider)
- Consulting for another company, firm or business that does not compete with Broadcom or does not have a business relationship with Broadcom (for example, it is not a Broadcom customer, supplier or other service provider)
- Service on a board of directors or an advisory board of a company, firm or business that does not compete with Broadcom or does not have a business relationship with Broadcom (for example, it is not a Broadcom customer, supplier or other service provider)
- Service on more than one board of directors or an advisory board of a company, firm or business
- Owning a financial interest in or being involved or associated with a company, firm or business that has, will have or seeks to have a business relationship with Broadcom
- Conducting Broadcom business with a family member or a close personal acquaintance (such as close friends)
- Indirect supervision of a family member or a close personal acquaintance at Broadcom
- If you and your family member or a close personal acquaintance work at Broadcom and there could be an apparent or potential conflict of interest
- You plan to pursue an educational degree or perform research at an educational institution
- You have a teaching engagement with an educational institution where the timing and responsibilities could be an apparent or potential conflict of interest

If you have additional questions related to this Conflicts of Interest section, contact Broadcom's Compliance Officer or Ethics and Compliance Team.

Can I be a consultant for an industry expert firm or a research firm while working at Broadcom?

No. You are prohibited from providing services to an industry expert firm or research firm because it is a conflict of interest.

Can I ask a supplier, vendor or other service provider I work with at Broadcom to hire, employ or provide an internship opportunity to a family member?

No.

What if I need prior approval for an activity that may be seen as a conflict of interest?

You can submit a Conflict of Interest Pre-Approval Request.



MEDIA AND PUBLIC DISCUSSIONS

BROADCOM'S OFFICIAL SPOKESPERSONS

Broadcom's Chief Executive Officer ("**CEO**"), Chief Financial Officer ("**CFO**") and Director of Investor Relations are designated as Broadcom's official spokespersons for financial matters.

Unless a specific exception has been made by Broadcom's CEO, CFO or Director of Investor Relations, these designees are the only individuals who may communicate with members of the investment community and/or the press on behalf of Broadcom related to financial matters.

Broadcom's Vice President of Global Marketing, as well as the CEO, is designated as Broadcom's official spokesperson for marketing, technical and other related information.

Broadcom's official spokespersons may, from time to time, further designate others as official spokespersons for Broadcom in their discretion.

MEDIA INQUIRIES

Unless you have specifically been designated as Broadcom's official spokesperson, you may not provide any information to the media, press or financial analysts about Broadcom "off the record," confidentially and/or secretly.

If you receive inquiries from the media, press or members of the investment community (such as financial analysts), you must refer them to Broadcom's CFO, Director of Investor Relations or Vice President of Global Marketing.

SOCIAL MEDIA

Unauthorized posting or discussion on social media of any information or rumors about Broadcom, such as Broadcom's business, products, financial information or position, customers or mergers and acquisitions, is prohibited.

You may not post or discuss Broadcom's confidential information in any social media platform, such as in a "chat room" or in the comments section, whether you use your own name or a pseudonym or if your profile is public or private.

For more information about authorized and unauthorized postings, see Broadcom's Social Media Policy.

If I am a Broadcom employee, can I answer questions for an article or interview?

No. You may only provide information to the media, press or financial analysts if you are specifically designated as Broadcom's official spokesperson.

Can I post information about Broadcom on my social media account?

You may post only authorized information per Broadcom's Social Media Policy.

If I am a Broadcom employee, can I comment on forecasts or rumors about Broadcom's financials, mergers and acquisitions or customers on my personal social media account?

No.



ANTI-BRIBERY AND ANTI-CORRUPTION

Broadcom is committed to complying with the anti-bribery and anti-corruption laws of each country where Broadcom does business, including but not limited to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

Broadcom does not tolerate bribery and corruption, directly or indirectly, in connection with any of its business dealings.

You are prohibited from:

- Offering, promising or providing anything of value to influence a person's conduct to obtain an improper advantage
- Requesting, accepting or agreeing to accept anything of value for an improper advantage
- Making facilitation payments or small payments to "speed up" processes
- Providing improper payments via a third party (such as a distributor, partner or a supplier) to circumvent Broadcom policies and the law

You are required to:

- Review and comply with Broadcom's Anti-Corruption Policy
- Comply with monetary thresholds in Broadcom's Travel and Expense Policy and Anti-Corruption Policy and obtain the required prior approvals via a Gifts, Meals or Entertainment Pre-Approval Request
- Complete Broadcom's anti-bribery and anti-corruption training courses that are assigned to you
- Promptly report any actual or potential violation of Broadcom's Anti-Corruption Policy to Broadcom's Compliance Officer

GIFTS, MEALS OR ENTERTAINMENT

Gifts, meals or entertainment offered on behalf of Broadcom must have a legitimate business purpose, such as a discussion, demonstration or explanation of Broadcom's products or services that are meant to create goodwill and not an improper advantage.

Under some laws, giving anything of value to a government official to obtain or retain an improper business advantage or favorable treatment is a criminal act subject to prosecution and conviction.

To avoid the perception of impropriety, gifts, meals and entertainment offered on behalf of Broadcom must meet all of the following requirements:

- It must have a legitimate business purpose
- No cash or cash equivalents (such as gift cards or gift certificates)

Can I avoid the prior approval requirement if I pay for a gift, meal or entertainment out of my own pocket and do not seek reimbursement from Broadcom?

No. You may not avoid complying with Broadcom policies by paying for business gifts, meals or entertainment yourself.

Can I offer to pay for lunch or dinner after a business meeting with a customer?

Yes. But there must be a legitimate business purpose for the meal and you must comply with the applicable approval requirements in Broadcom's Travel and Expense Policy and Anti-Corruption Policy.



- It must comply with monetary thresholds and prior approval requirements in Broadcom's Travel and Expense Policy and Anti-Corruption Policy
- It must be reasonable in amount (based on local customary business practices and cost of living)
- It must not be provided at a frequency that would suggest an improper advantage
- A Broadcom employee must attend if a meal or entertainment is provided
- It does not violate any applicable laws, rules or regulations
- It does not violate any policies of the recipient
- It must be accurately recorded in Broadcom's books and records, including expense reports

CONSIDERATIONS WHEN PROVIDING GIFTS, MEALS OR ENTERTAINMENT

- Is the gift, meal or entertainment solely for the purpose of cultivating or creating goodwill in a business relationship?
- Is the gift, meal or entertainment moderate, reasonable, business appropriate and not in poor taste?
- If what you provided was disclosed publicly, would you and/or Broadcom be comfortable?
- Would you feel pressured to reciprocate or do something you would not normally do as a result of receiving the gift, meal or entertainment?
- Are you trying to pressure someone to reciprocate or do something he/she would not normally do by offering a gift, meal or entertainment?
- Have you checked to confirm that the gift, meal or entertainment does not violate any laws or the recipient's code of ethics or other similar policies?

If you have additional questions related to this Anti-Bribery and Anti-Corruption section, contact Broadcom's Compliance Officer or Ethics and Compliance Team.

When choosing a service provider, vendor, supplier or partner, what should I consider?

You must adhere to the principles of fair competition by selecting a service provider, vendor, supplier or partner based on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

What if a customer suggests a restaurant that is known to have inappropriate entertainment or be an inappropriate place to discuss business?

Politely inform the customer that you cannot meet the customer at the suggested location and suggest an alternate location.



ACCEPTANCE OF GIFTS, MEALS AND ENTERTAINMENT

You must not accept gifts, meals or entertainment that may compromise your judgment in the performance of your duties.

You must comply with the monetary thresholds and prior approval requirements in Broadcom's Travel and Expense Policy and Anti-Corruption Policy.

CHARITABLE CONTRIBUTIONS

Broadcom will not directly or indirectly reimburse any personal charitable contributions or related expenses.

Any charitable donation on behalf of Broadcom that is separate from Broadcom's matching program requires prior approval via a Pre-Approval Request.

Prohibited Activities

You are prohibited from:

- Soliciting charitable contributions from persons or entities with which Broadcom does or seeks to do business
- Giving the impression that you are representing Broadcom in any personal charitable activities
- Engaging in any charitable activity on Broadcom time
- Soliciting for your personal charitable activities on Broadcom time
- Using Broadcom resources (e.g., facilities, colleagues, telephones, email accounts, computers, supplies, letterhead, logos) to further your personal charitable activities

POLITICAL CONTRIBUTIONS

Broadcom will not directly or indirectly reimburse any personal political contributions or related expenses.

Voluntary personal political participation, including political contributions, does not require prior approval from Broadcom, except in the circumstances described in Broadcom's Political Interaction and Contributions Policy.

Any political contribution (monetary or non-monetary) by or on behalf of Broadcom is prohibited, unless prior approval has been obtained as set forth in Broadcom's Political Interaction and Contributions Policy.

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

Yes.

Can I donate to a charitable organization on behalf of Broadcom and not seek reimbursement?

No.



Prohibited Activities

You are prohibited from the following activities, except as described in Broadcom's Political Interaction and Contributions Policy:

- Soliciting political contributions from persons or entities with which Broadcom does or seeks to do business
- Giving the impression that you are representing Broadcom in any personal political activities
- Engaging in any political activity on Broadcom time
- Soliciting for your personal political activities on Broadcom time
- Using Broadcom resources (e.g., facilities, colleagues, telephones, email accounts, computers, supplies, letterhead, logos) to further your personal political activities

For more information, see Broadcom's Political Interaction and Contributions Policy and Anti-Corruption Policy.

FAIR DEALING

Broadcom strives to outperform its competition fairly and honestly. Advantages over competitors are to be obtained through superior performance of Broadcom's products and services, not through unethical or illegal business practices.

You are expected to deal fairly and honestly with Broadcom's customers, suppliers, employees and anyone else with whom you have contact in the course of performing your responsibilities at Broadcom.

The following are examples of prohibited conduct:

- Acquiring competitively sensitive or confidential information from employees of other companies through improper means
- Bringing competitively sensitive or confidential information from your past companies to Broadcom
- Inducing improper disclosure of competitively sensitive or confidential information from past or present employees of other companies

If information is obtained by mistake that could be competitively sensitive information, a trade secret or other confidential information of another business or company, you must consult with Broadcom's Compliance Officer.

What should I do if my customer accidentally sends me their confidential information?

You must delete and not use or share the customer's confidential information and contact Broadcom's Compliance Officer.



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 eligibility for 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 Broadcom's directors, officers and 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 more information, see Broadcom's Anti-Corruption Policy, Political Interaction and Contributions Policy and Travel and Expense Policy.

RESPONSIBLE ENGAGEMENT WITH GOVERNMENTS

When Broadcom engages governments around the world regarding its views and concerns relevant to its business, Broadcom engages in a responsible and transparent manner.

Broadcom strictly adheres to applicable laws and regulations wherever it does business. Engagement with governments, such as lobbying activities for, or on behalf of, Broadcom may only be conducted by authorized Broadcom representatives and with prior approval of Broadcom's CEO, Chief Legal and Corporate Affairs Officer or Head of Government Affairs.

For more information, see Broadcom's Political Interaction and Contributions Policy.

If I am unsure whether a customer is a government entity, who should I ask?

Contact Broadcom's Compliance Officer.



EXPORT COMPLIANCE

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

- U.S. and international 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 or specific companies or individuals
- Export controls, which restrict travel to designated countries and prohibit or restrict:
  - Exporting goods, services and technology to unauthorized parties or countries, designated countries, denied persons or denied entities from the United States
  - Re-exporting U.S. origin goods from the country of original destination to such unauthorized parties or countries, designated countries, denied companies or denied entities

COMPLIANCE WITH THIS CODE

Broadcom's Compliance Officer, under the direction and oversight of the Audit Committee or the NCG Committee, will monitor and audit compliance with this Code. Broadcom's Compliance Officer will periodically provide reports to the Board, the Audit Committee or the NCG Committee, including information on alleged violations of this Code and the actions taken.

WAIVERS

Any waiver of this Code for executive officers (including, where required by applicable laws, Broadcom's principal executive officer, principal financial officer, principal accounting officer or controller or persons performing similar functions) or directors may be authorized only by the Board 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 Broadcom's CEO or Compliance Officer in writing and will be reported to the Audit Committee.

What if I have questions about exporting Broadcom's products or providing services to certain countries?

Contact Broadcom's Global Trade Compliance Team.



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