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## 1 Purpose & Scope

Qorvo monitors its onsite service providers (OSP) throughout the length of the contract to ensure compliance to Qorvo Business Conduct Requirements for Supplier, Contractors and Consultants.

Monitoring occurs with initial vetting, annual internal audits, and third party/customer audits. Topics reviewed focus on labor and human rights.

## 2 Definitions & Acronyms

| Definition  |
|---|
| Document that includes Qorvo Code of Business Conduct and Ethics, Responsible Business Alliance (RBA) Code of Conduct, and How to Raise a Compliance Concern. It will be referenced as "The Code."  |
| External company that provides services to Qorvo. Workers are considered "non-exempt" or hourly workers in non-management positions. Such workers spend their entire workweek supporting Qorvo site(s).  The external company is responsible for all managerial duties of workers, including working hours and wages. |
|   |

## 3 Roles, Responsibilities & Authorities

### 3.1 Qorvo

| Role  | Responsibilities  |
|---|---|
| Sourcing – Facilities<br>Category Mgr. (US) | <ul> <li>Manages the contractual relationship with OSP.</li> <li>Responsible for conducting initial vetting as it relates to CSR.</li> </ul>  |
| Facilities Mgr.                             | <ul> <li>Provides onsite support to Sourcing and CSR and is a point of contact for the OSPs at each site.</li> <li>Partners with the CSR to ensure audit findings related to onsite service provider are addressed in a timely manner.</li> </ul> |
| CSR   | <ul> <li>Conducts internal audits of OSPs and partners with<br/>Facilities Manager to ensure completion of any<br/>corrective action plans assigned.</li> </ul>   |



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## 3.2 Onsite Service Provider

| Role       | Responsibilities & Authorities  |  |
|------------|---|--|
| Management | <ul> <li>Ensure complete and accurate required policies and procedures are onsite and available for review by Qorvo.</li> <li>Ensure annual training is completed by all workers onsite at Qorvo.</li> <li>Participate in audits upon request.</li> </ul> |  |
| Employees  | <ul> <li>Comply with Qorvo related policies and procedures while onsite.</li> </ul>   |  |

#### 4 References

| Reference  | Title   | Location  |
|------------|---|---|
| FOR-001243 | Onsite Service<br>Provider Evaluation   | Sourcing – Facilities Category Mgr. (US)  |
| FOR-000428 | Business Conduct<br>Requirements for<br>OSPs, Contractors and<br>Consultants (Referred<br>to as "The Code") | https://www.qorvo.com/resources/d/qorvo-<br>business-conduct-requirements-for-suppliers-<br>contractors-consultants |
| N/A        | RBA Code<br>Interpretation<br>Guidance  | Validated Assessment Program (VAP)<br>(responsiblebusiness.org)   |



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### 5 Monitoring

#### 5.1 OSP Vetting

OSPs undergo CSR vetting to ensure compliance with Qorvo CSR requirements prior to award of the business. This includes completing the following:

- 5.1.1 OSP Evaluation form (FOR-001243)
- 5.1.2 Acceptance of The Code through contract
- 5.1.3 Acceptance of Responsible Business Alliance (RBA) Code through contract

OSP shall be able to demonstrate conformance to the above requirements through:

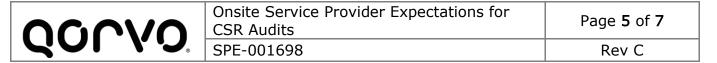
5.1.4 Company programs, policies, procedures, training records, personnel files, and additional documentation

#### 5.2 Internal Audits

- 5.2.1 Qorvo will audit OSPs to verify compliance with The Code.
  - **5.2.1.1** Internal audits can be desktop or onsite. Internal audits that occur onsite typically take 2-3 hours.
  - **5.2.1.2** Internal audits will include management interviews to determine understanding of Qorvo requirements and OSP alignment with The Code.
  - 5.2.1.3 The internal audit focuses on the following labor and human rights requirements as listed in the RBA Code Guidance (see Section 4):
    - **5.2.1.3.1** Involuntary Labor, Child Labor/Young Workers, Harassment and Abuse, Discrimination, Working Hours and Overtime, Wages and Benefits, and Freedom of Association.
  - **5.2.1.4** Internal audits also look at grievance systems.
  - **5.2.1.5** Documentation reviewed includes but is not limited to: OSP handbooks, policies, procedures, trainings, employee time records and pay stubs.
  - **5.2.1.6** OSP Management shall be onsite (for an onsite audit) with documents readily available for the internal audit (see Appendix A).

#### 5.3 <u>Third Party / Customer Audits</u>:

- **5.3.1** OSPs shall participate in any customer-initiated CSR audit when requested.
  - **5.3.1.1** Third party / customer audits will include management interviews to determine understanding of Qorvo requirements and OSP alignment with The Code.



- **5.3.1.2** Third party / customer audits focus on the following labor and human rights requirements as referenced in the RBA Code Guidance (see Section 4):
  - **5.3.1.2.1** Involuntary Labor, Child Labor/Young Workers, Harassment and Abuse, Discrimination, Working Hours and Overtime, Wages and Benefits, and Freedom of Association.
- **5.3.1.3** Third party / customer audits also look at a grievance tracking system.
- **5.3.1.4** Documentation reviewed includes but is not limited to: OSP handbooks, policies, procedures, trainings, employee time records and pay stubs.
- **5.3.1.5** OSP Management shall be onsite with documents readily available for the internal audit (see Appendix A).

### 5.4 Corrective Actions Resulting from Audits:

- 5.4.1 OSP shall correct any findings detected from the audit within a timely manner, as provided by Qorvo.
  - **5.4.1.1** Qorvo's Sourcing Facilities Category Manager (US) will be OSP's point of contact for corrective actions.



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### 6 Appendix

- 6.1 Appendix A: Documentation Required for Audits
  - Employee paystubs for the previous 12 months
    - Information present: Employee name, pay period dates, wages (regular and overtime), benefits, legally required deductions.
    - Information that can be redacted: Employee address and phone number.
  - o **Employee timecards** (data broken out by day) for the previous 12 months
    - Information present: Employee name, pay period dates, working hours by day, regular hours and overtime hours.
    - Information that can be redacted: Employee address and phone number.
  - Employee I-9 forms
    - I-9 forms can be either be printed or displayed via a computer to protect the privacy of the worker.
    - Information that can be redacted: Employee social security number, address and phone number.
  - Employee resumes OR job applications
    - Companies can provide either documentation listed above.
    - Information that can be redacted: Employee address and phone number.
  - Written employee job offers
    - Information present: Employee name, nature of work and where it will be performed, expected regular working hours, overtime hours, frequency of rest days, and holidays, base wages, defined regular, overtime as well as holiday wage rates, deductions (if any), benefits.
  - Employee handbook
    - Including documentation confirming workers received the handbook.
  - Qorvo-related addendums (if applicable)
  - Employee training records on labor related policies / Qorvo policies for past
     12 months
    - Including documentation confirming workers received Qorvo CoC and RBA CoC training.

Template: FOR-000469 Rev K

New Hire checklist form / New Hire Orientation plan



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# 7 Revision History

| Revision | Create Date (mm/dd/yyyy) | Description of Change   | Initiator<br>of Change |
|----------|--------------------------|---|------------------------|
| Α        | 9.17.18                  | Initial Release   | C.Susmilch             |
| В        | 6.24.20                  | Updates to roles and responsibilities for Qorvo; Clarification on internal audit locations (onsite and desktop) | C. Susmilch            |
| С        | 1.29.21                  | Updated link to RBA Code Guidance   | C. Susmilch            |
|          |                          |   |                        |
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| CONTROLLED DISTRIBUTION: | N/A |
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