



# GLOBAL EXPORT CONTROLS & ECONOMIC SANCTIONS COMPLIANCE POLICY

Updated March 2024

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## Statement of Policy

MaxLinear, Inc. is committed to complying with all applicable export controls and economic sanctions laws and regulations (“Export & Sanctions Laws”). The *MaxLinear Global Export Controls & Economic Sanctions Policy* (the “*Policy*”) reflects that commitment and applies to MaxLinear, Inc. and all of its subsidiaries and affiliates worldwide (collectively, “MaxLinear” or the “Company”) and all of MaxLinear’s employees, officers, directors, contractors, and temporary staff (“MaxLinear Employees”).

Because MaxLinear, Inc. is considered a U.S. person, this *Policy* is intended to comply with all applicable U.S. Export & Sanctions Laws, including the Export Administration Regulations (“EAR”) administered by the U.S. Department of Commerce’s (“Commerce”) Bureau of Industry and Security (“BIS”), the U.S. economic sanctions administered by the U.S. Treasury Department’s Office of Foreign Assets Control (“OFAC”) and the U.S. Department of State (“State”), and the International Traffic in Arms Regulations (“ITAR”) administered by State’s Directorate of Defense Trade Controls (“DDTC”).

MaxLinear will also seek to comply with applicable Export & Sanctions Laws globally, taking into account potential conflicts between the laws of the jurisdictions in which MaxLinear conducts business.

In order to comply with the *Policy*, MaxLinear will:

- ✓ Comply with corporate compliance policies set forth in MaxLinear’s *Code of Ethics and Business Conduct*;

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- ✓ Establish and enforce implementing procedures, commensurate with MaxLinear's export control and economic sanctions risk;
- ✓ Conduct internal reviews, including compliance testing and auditing, of this *Policy's* implementing procedures;
- ✓ Conduct a periodic risk assessment of this *Policy* and implement procedures to ensure these compliance controls remain commensurate with MaxLinear's export controls and economic sanctions risks;
- ✓ Designate specified employees with defined export control and economic sanctions roles and responsibilities;
- ✓ Delegate sufficient authority and resources to the General Counsel and Director of Global Trade Compliance to carry out the *Policy* and implementing processes;
- ✓ Establish a "culture of compliance" that encourages the reporting of potential violations;
- ✓ Discourage violations of the *Policy*;
- ✓ Take immediate action to address potential violations of the *Policy*;
- ✓ Provide effective, job-specific training on Export & Sanctions Laws and the implementation of this *Policy* for in-scope MaxLinear Employees, and maintain records of training provided, hold in-scope MaxLinear Employees accountable for completing and understanding such training; and
- ✓ Ensure that MaxLinear's Global Compliance & Risk Committee periodically reviews and approves this *Policy*.

If you have any questions about any situation involving export controls or economic sanctions issues, please contact the Director of Global Trade Compliance, the Legal Department, or the Chief Compliance Officer.

### **Ensuring Compliance with this Policy**

All MaxLinear Employees are required to follow and take reasonable actions to prevent any violation of this *Policy*, and any other applicable Company policies, including the *MaxLinear Code of Ethics and Employee Conduct*.

MaxLinear managers are responsible for compliance with this *Policy*, including taking steps to ensure that MaxLinear Employees reporting to them have appropriate training on compliance requirements and supervising them with respect to those requirements.

To ensure compliance with the *Policy*, MaxLinear Employees should be aware of the following:

- Under no circumstances will MaxLinear undertake a transaction in a manner contrary to applicable Export & Sanctions Laws.
- Questions concerning the requirements related to a transaction with possible export control or economic sanctions requirements should be referred to the Director of Global Trade Compliance, the Legal Department, or the Chief Compliance Officer.
- All MaxLinear Employees are expected to be knowledgeable about the specific export control and economic sanctions policies and procedures regulations that apply to their areas of responsibility.

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- Failure to comply with this *Policy* and its implementing procedures may expose MaxLinear and MaxLinear Employees to civil enforcement, criminal prosecution, fines and penalties, denial of export privileges, and/or loss of government contracting privileges.
- Any MaxLinear Employees who violates this *Policy* may be subject to discipline including, without limitation, termination of employment.

### **Reporting Concerns**

If you have a concern about any improper conduct or suspicious activity under the *Policy* or other suspected misconduct involving Export & Sanctions Laws, recordkeeping, internal controls, or any other violation of an applicable law, regulation, or MaxLinear policy, or if you are ever uncertain, feel uncomfortable about, or question the ethics of any situation or request, you should report the situation immediately in one of the following ways:

- ✓ Report the concerns to MaxLinear’s Legal Department at [legaldepartment@maxlinear.com](mailto:legaldepartment@maxlinear.com).
- ✓ Report the concerns to MaxLinear’s Chief Compliance Officer at [compliance@maxlinear.com](mailto:compliance@maxlinear.com).
- ✓ Report the concerns (including anonymously, if you choose) by accessing the Company’s confidential hotline and messaging system, online at <http://maxlinear.ethicspoint.com> or by phone (toll-free in the United States at +1-844-539-2186; local phone numbers for other countries available on the website).

Managers or Human Resources representatives who receive reports of suspected ethics or compliance violations should promptly report it via one of the methods above.

### **Non-Retaliation**

MaxLinear does not tolerate retaliation or harassment of anyone who in good faith complains or reports that a potential violation of this *Policy*, the *MaxLinear Code of Ethics and Business Conduct*, or other illegal, unethical, or inappropriate conduct has occurred.

### **Disciplinary Actions**

Subject to applicable laws, MaxLinear reserves the right to take whatever disciplinary actions or other measures it determines in its sole discretion to be appropriate for a given situation, up to and including termination of employment for a MaxLinear Employee or termination of business relations. Where appropriate, MaxLinear may refer the matter to relevant authorities.

### **Periodic Review**

The Chief Compliance Officer will oversee periodic reviews to assess MaxLinear’s export controls, economic sanctions, and global trade-related risks and the adequacy and effective implementation of this *Policy*. If any material irregularities are noted during these reviews, the Chief Compliance Officer shall promptly take any necessary actions.

### **Amendments and Changes to this Policy**

This *Policy* has been approved in accordance with MaxLinear’s bylaws and corporate governance

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rules. Any substantive amendments or changes to the *Policy* shall be approved by the Board of Directors and shall be disclosed promptly as required by law.