



Modern Slavery Statement

Effective October 1, 2023

Introduction

This policy applies to all Rambus Inc. entities, including all subsidiaries, affiliates, and respective global business units ("Rambus"), as well as Rambus's suppliers, vendors, and partners. Rambus is committed to the highest standards of responsible business conduct.

Our Business

Rambus makes industry-leading chips and IP that advance data center connectivity and solve the bottleneck between memory and processing. Rambus addresses this challenge as an industry pioneer with over 30 years of advanced semiconductor interconnect experience moving and protecting data. We are a leader in high-performance memory subsystems, providing chips, IP and innovations that maximize the performance and security in data-intensive systems.

Our Policies on Slavery and Human Trafficking

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010 AND THE UNITED KINGDOM MODERN SLAVERY ACT OF 2015 STATEMENT

The California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act 2015 each requires certain businesses to publish an annual statement specifying the efforts taken to prevent slavery and human trafficking in their business or supply chain. Rambus, including its affiliates and subsidiaries, is opposed to slavery and human trafficking in any part of its activities and supply chains and is therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

Our [Human Rights Policy](#) expressly states that Rambus' approach to human rights is aligned with the United Nations Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs) (which references the International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work), and the OECD Guidelines for Multinational Enterprises. These principles prohibit use of any form of slave, forced, bonded, indentured, or involuntary labor and require full compliance with the U.K. Modern Slavery Act of 2015. Our standard contractual terms and conditions for the procurement of goods and services require conformance to applicable laws and regulations, and we reinforce our expectations regarding responsible social, ethical, and environmental conduct.

We are committed to working against modern slavery and human trafficking in our supply chains and in our business. Rambus has adopted the Responsible Business Alliance [Code of Conduct](#) (the "RBA Code of Conduct") which requires, among other things, that a participant's direct suppliers ensure they do not engage in or support modern slavery or human trafficking. In addition, the RBA Code of Conduct requires suppliers to adopt and maintain terms of employment for their employees that comply with local law and requirements of decency.



Due Diligence Processes for Slavery and Human Trafficking

Our efforts to manage our supply chain relationships responsibly include the following actions:

1. **Verification of Product Supply Chains.** Rambus strives to establish close relationships with its suppliers and requires that they comply with the Rambus Vendor Code of Conduct, which is based on the RBA Code of Conduct, including those aspects that relate to modern slavery and/or human trafficking.
2. **Supplier Audits and Risk Assessment.** Rambus reserves the right to verify supplier compliance with company standards and the RBA Code of Conduct. We take a risk-based approach to managing our supply chain and utilize third-party risk analytics to conduct a supply chain risk analysis. Through our annual analysis, we gain deeper insights into inherent geographical risks in our supply chain related to labor, health and safety, environment, business ethics, and management systems. We use the results of the analysis to assign risk assessment tools and prioritize suppliers within our audit program.

Based on the results of the risk assessment, Rambus decides which tool will be most effective to evaluate the supplier. For example, we may require an RBA Validated Assessment Program (VAP) onsite audit to learn more. Suppliers identified as presenting a high risk of forced labor may be required to submit a specialized assessment designed to identify the risk of forced labor at the employment site.

3. **Certification Requirements for Direct Suppliers.** Rambus expects its direct suppliers to verify that they comply with the Rambus Vendor Code of Conduct, which prohibits slavery and human trafficking and requires that they comply with the laws of the country or countries in which they are doing business. Rambus presents the Rambus Vendor Code of Conduct as a total supply chain initiative and requires suppliers to comply with laws regarding forced labor and human trafficking. Rambus also expects its suppliers to monitor the performance of their next tier suppliers against the requirements of the Rambus Vendor Code of Conduct.

As part of the requirements of the RBA Code of Conduct and specialized labor standards, suppliers are required to develop appropriate management systems, which include policies, procedures, and associated documentation, to adhere to the requirements and any applicable laws and regulations, including those prohibiting modern slavery and human trafficking. We may confirm the existence and maintenance of those management systems through our supplier audit program.

4. **Internal Accountability Standards and Procedures.** Rambus requires its employees to comply with company policies and laws, including, but not limited to, policies and/or laws prohibiting the use of modern slavery and human trafficking. Rambus provides channels to report concerns about any potential violation of law or company policy including those related to modern slavery or human trafficking. Rambus promptly investigates any such reports and responds with corrective actions.
5. **Training.** Upon hire, employees are provided materials that detail the policies and values core to Rambus' business. All of our employees are required to annually provide an acknowledgement of our Rambus Code of Business Conduct and Ethics. Individuals who have direct responsibility for supply chain management have access to information on company policies, practices, and procedures related to reporting issues, including those related to forced labor and human trafficking.



Rambus strives for its Procurement team to have access to training on supply chain responsibility, which includes training on forced labor risks in the supply chain. Training is made available to suppliers through the Responsible Business Alliance (RBA)'s website.

Remediation

Rambus aims to track audit findings, including nonconformances, from the release of the audit report through closure. If warranted, suppliers are required to create a Corrective Action Plan (CAP) and submit it to Rambus per the deadlines and requirements informed by the RBA VAP Protocol, including onsite third-party closure audits. If priority nonconformances are found, the process is for Rambus to contact the supplier and request details on the actions the site is implementing to immediately address the nonconformance prior to creating the longer-term CAP. Depending on the severity of the issue, discussions may be elevated for a more in-depth conversation between company executives. Regardless, if a supplier is not following the RBA CAP closure timeline, Rambus executives will be informed for appropriate action.

Accountability

Rambus uses supplier scorecards to track performance against Rambus' supply chain responsibility expectations. Rambus employees from the Procurement and Corporate Responsibility teams participate in supplier business reviews which include a discussion on the scorecard. Performance metrics include:

- Social and environmental commitment and management
- RBA audit performance
- Timely closure of nonconformances, if any
- Environmental management and performance

Further Steps

Rambus recognizes that identifying and mitigating the risks of modern slavery and human trafficking requires ongoing commitment and continual improvement. Our Vendor Code of Conduct includes a standard on freely chosen labor, including prohibiting workers from paying recruitment fees. Supply chain due diligence is an ongoing process. We continuously work toward preventing, detecting, and remediating forced labor, if found in our supply chain.

Rambus management will review, and update as necessary, this statement on a regular basis.