

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE (SB 657)

The California Transparency in Supply Chains Act of 2010 (SB 657) requires companies that manufacture or sell products in the State of California to disclose their efforts, if any, to provide information regarding their efforts to eradicate slavery and human trafficking in their direct supply chains. The law was designed to increase consumers' knowledge about products they buy and the companies they choose to support.

pSemi Corporation ("pSemi") is committed to complying with the law wherever we operate and to conducting all business activities in accordance with the highest ethical standards. We expect the same of the parties with which we do business. Our ethical standard is reflected in our Code of Ethics and Business Conduct ("Code"), which outlines our expectations of ethical conduct and compliance with all laws from our employees and others who work and represent pSemi.

Upon being hired, pSemi employees attend Ethics training and are asked to acknowledge receipt of training and the Code of Ethics and Business Conduct. pSemi maintains a 24/7 Business Conduct Helpline where employees can submit any concerns of possible ethics and compliance violations, including slavery and human trafficking, anonymously, if requested. Every submission is reviewed and handled accordingly. Any employee who is found to have violated the Code provision is subject to disciplinary action, up to and including termination of employment and referral to appropriate legal authorities.

To ensure that our supply chain reflects our commitment to compliance and ethics standards, our corporate business practice provides that pSemi's purchasing decisions with suppliers include being based on integrity. pSemi expects its suppliers to comply with legal requirements and operate consistently with the principles of the Code when working on our behalf. Accordingly, we consider these rights issues when we assess potential suppliers. While pSemi does not have a formal verification program, we do perform periodic audits of suppliers to evaluate and address issues relating to compliance with regulations and pSemi's policies, processes and procedures.