



GLOBAL ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Anti-Bribery and Anti-Corruption Policy

MaxLinear, Inc. (“MaxLinear” or, the “Company”) is committed to fostering a culture that promotes fairness, integrity, and ethical decision-making and following applicable laws and regulations wherever we do business, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the U.K. Bribery Act (2010) (“UKBA”).

MaxLinear strictly prohibits all forms of bribery. Our policy is simple:

- ❖ **We never pay bribes – in any amount – to obtain or retain business.**
- ❖ **We never give anything of value to foreign officials to influence or that may appear to influence their decision making.**
- ❖ **We record all transactions accurately.**

Any attempt to pay, authorize, or promise a bribe, kickback, or any other form of corrupt payment – in any amount – is strictly prohibited. It does not matter if the intended recipient of the bribe works in the public or private sector. It does not matter if the intended recipient conducts business in a country where paying bribes is a common practice, “necessary to get anything done,” or “engrained in the business culture.” And it does not matter if “everyone else is doing it.” No officer, director, or employee shall pay, authorize, or promise to give anything of value – whether directly or indirectly through a third party – in order to improperly influence any person or entity to act favorably towards MaxLinear.

Who Does This Apply To?

The *MaxLinear Global Anti-Bribery and Anti-Corruption Policy* (the “*ABAC Policy*”) 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”).

This *ABAC Policy* also applies to third parties when they are acting on the Company’s behalf or representing MaxLinear, including distributors, sales reps, agents, brokers, consultants, suppliers, professional advisors, and other business partners (collectively, “MaxLinear Third Parties”).

Prohibited Activities

MaxLinear strictly prohibits all forms of bribery, kickbacks, or corruption. We never offer, promise, pay, or provide anything of value to anyone, in order to obtain business, retain business, secure an improper advantage, or inappropriately influence the recipient’s decision-making.

A payment does not need to involve the exchange of money to be considered a bribe or kickback. Any payment, gift, promise, favor, or other benefit—of any tangible or subjective value—qualifies as a corrupt payment under this *ABAC Policy* and is strictly prohibited. Some examples include:

- Gifts, meals, entertainment, or hospitality;
- Gift cards;
- Travel;
- Hiring favors;
- Charitable donations

The prohibition on bribery applies regardless of whether the intended recipient is associated with a private enterprise or government at any level.

Selecting, Engaging, and Managing MaxLinear Third Parties

This *ABAC Policy* also applies to MaxLinear Third Parties, meaning that what we are prohibited from doing directly, we also cannot do indirectly through a MaxLinear Third Party. That is because MaxLinear and its employees can be held liable for improper or corrupt payments made by MaxLinear Third Parties on the Company’s behalf, even if MaxLinear or its employees do not participate in, direct, or have knowledge of the improper or corrupt payment.

That is why MaxLinear conducts risk-based due diligence on all MaxLinear Third Parties. That is also why, when engaging any MaxLinear Third Party, the Company must ensure that, among other things:

- The Third Party is qualified for the expected engagement;
- The Third Party’s compensation is fair and reasonable under the circumstances;
- Agreed-upon deliverables are received by MaxLinear; and
- Proof of performance and other documentation are accurate and sufficiently detailed.

To ensure that MaxLinear Third Parties adhere to our strict ethical standards, all MaxLinear Third Parties must understand and agree to the Company’s compliance expectations, including as described in the *MaxLinear Code of Ethics and Employee Conduct* and in this *ABAC Policy*.

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MaxLinear Third Parties also must review and certify compliance with this *ABAC Policy* and the *MaxLinear Code of Ethics and Employee Conduct*.

Special Considerations When Dealing with Government Officials

MaxLinear's business includes government customers, end users, and other partners and the Company regularly interacts with government officials, entities, and other government stakeholders as part of our business. These government officials are often the face of a government agency or instrumentality, such as elected representatives, permitting officials, customs officials, and tax inspectors, among others. However, government officials also include employees of state-owned or -controlled entities and companies, such as professors working at public universities or employees of state-owned telecommunications companies.

All MaxLinear Employees and MaxLinear Third Parties who deal with "government officials" as part of their duties must be careful to avoid even the appearance of impropriety in such interactions.

As such, the Company requires all MaxLinear Employees obtain written pre-approval from the Legal Department or Chief Compliance Officer before offering or providing anything of value—including gifts, meals, entertainment, travel, and other business courtesies—to any government official.

Facilitation Payments Prohibited

The FCPA contains a narrow exception—referred to as "facilitating payments"—that allows the payment of a nominal amount to ensure non-discretionary governmental actions, such as processing visas or business permits. This FCPA exception does not extend to payments made to induce a government official or employee to ignore his or her lawful duty or to exercise discretion in the award of business.

Despite this narrow statutory exception, MaxLinear prohibits all "facilitating payments" or other "grease" payments unless the health or safety of an employee is at risk. If such a health and safety payment is ever made, the event and related details of the payment must be fully reported to the Company's Chief Compliance Officer as soon as reasonably practicable, but no later than 24-hours after such payment.

Political Contributions and Lobbying

No political contributions may be made by, on behalf of, or with, any funds and assets of MaxLinear. Additionally, you may not use MaxLinear resources (e.g., facilities, staff, telephones, email accounts, computers, supplies, letterhead, logos) to further your personal political activities.

The laws that regulate and define lobbying activities are various and complex. Generally, any contacts with government personnel for the purpose of influencing legislation, regulations or decision-making may constitute lobbying. All lobbying and corporate political activities sought to be done on the Company's behalf must be approved in advance and in writing by MaxLinear's CEO and either the General Counsel or Chief Compliance Officer.

Accounting and Recordkeeping

MaxLinear must keep records that accurately reflect the Company's transactions and the disposition of MaxLinear's assets. This requirement applies not only to MaxLinear's reported financial statements and

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general ledger, but to other ordinary business records, including purchase orders, invoices, expense reports, and receipts used to support requests for payment or reimbursement.

MaxLinear strictly prohibits any “off-the books” accounts or payments, or the making any false, misleading, or inaccurate invoices, purchase orders, or accounting entries intended to obscure the actual purpose of the invoice or payment. This prohibition applies regardless of the amount of the invoice or payment.

Ensuring Compliance with this ABAC Policy

All MaxLinear Employees are required to follow and take reasonable actions to prevent any violation of applicable laws and regulations, this *ABAC Policy*, and any other applicable Company policies, including the *MaxLinear Code of Ethics and Employee Conduct*. Any MaxLinear Employee who learns of or suspects a violation of law, this policy, or the *Code of Ethics and Employee Conduct* must promptly report the matter to their manager, the Legal Department, the Chief Compliance Officer, or through one of the confidential and anonymous reporting methods described below.

MaxLinear managers are responsible for compliance with this *ABAC 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.

Reporting Concerns

If you have a concern about any improper conduct or suspicious activity, including any suspected misconduct involving bribery, 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.
- ✓ Report the concerns to MaxLinear’s Chief Compliance Officer at 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, pursuant to the *Confidential Reporting Policy*, in good faith makes a complaint or reports a potential violation of this *ABAC 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 in the case of a MaxLinear Third Party. Where appropriate, MaxLinear may refer the matter to relevant authorities.