



## OPEN DOOR POLICY FOR REPORTING COMPLAINTS

### Statement of Policy

Broadcom Inc. and each of its controlled subsidiaries (collectively, “Broadcom”, “we” or the “Company”) are committed to fostering open discussion in the workplace of our business practices and to complying with all applicable laws and regulations. Accordingly, the Company will not tolerate conduct that violates Company policies or the laws and regulations applicable to the Company. Each Company employee is encouraged to promptly report a good faith complaint regarding Company accounting, internal accounting controls or auditing matters (“Accounting Matters”), as well as any suspected illegal acts or violations of Company policies by the Company, its employees or its agents (“Legal Allegations”), in accordance with the provisions of this policy. Any other third party, such as vendors, customers, shareholders or competitors, also may report, under this policy’s procedures, a good faith complaint regarding such matters. To facilitate this process, the Audit Committee (“Audit Committee”) of our Board of Directors has established the procedures in this policy for (i) the receipt, investigation, retention and treatment of complaints regarding Accounting Matters and Legal Allegations, and (ii) the confidential, anonymous submission by Company employees of concerns regarding Accounting Matters, Legal Allegations and Retaliatory Acts (as defined below). This policy supplements the Company’s Code of Ethics and Business Conduct (“Code”) and should be read in conjunction with the Code.

**Employees are strongly encouraged to report their concerns using one or more of the methods specified below under “Reporting of Complaints”, including reporting the matter to the Company’s Compliance Officer, who can be reached by email at [compliance.officer@broadcom.com](mailto:compliance.officer@broadcom.com) or by telephone at +1.408.433.6336. You may also report suspected violations to the Audit Committee, the members of which can be contacted by email at [audit.committee@broadcom.com](mailto:audit.committee@broadcom.com).**

Reports made under this policy must be made in good faith, with a reasonable belief in the truth and accuracy of the information reported.

### Explanation of Matters Covered by this Policy

While employees are encouraged to submit reports regarding any suspected violation of law or policy, this policy applies to complaints relating to:

- (i) Accounting Matters, including, without limitation:
  - fraud, deliberate error or gross negligence or recklessness (a) in preparing, evaluating, reviewing or auditing any Company financial statement or (b) in recording and maintaining Company financial records;
  - deficiencies in, or noncompliance with, the Company’s internal accounting controls;
  - misrepresentation or false statements to management, regulators, the outside auditors or others or by a senior officer, accountant or other employee regarding a matter contained in the Company’s financial records, financial statements, financial reports (including discussions in quarterly or annual reports filed with the U.S. Securities and Exchange Commission (the “SEC”)) or audit reports; or

- deviation from full and fair reporting of the Company’s results or financial condition;
- (ii) Legal Allegations, including, without limitation, non-compliance with legal and regulatory requirements promulgated by the SEC and The Nasdaq Stock Market; and
- (iii) Retaliatory Acts, as described in detail below under “Policy of Non-Retaliation.”

### **Policy of Non-Retaliation**

It is the Company’s policy to comply with all applicable laws that protect our employees (including the employees of our subsidiaries) against unlawful discrimination or retaliation by us or our agents as a result of their lawfully reporting information regarding, or their participation in, investigations involving Accounting Matters or Legal Allegations. If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation (a “Retaliatory Act”) by the Company or its agents for reporting complaints or cooperating with investigative efforts regarding Accounting Matters or Legal Allegations in accordance with this policy, he or she may file a complaint with our Compliance Officer (see below). Complaints regarding potential Retaliatory Acts will be handled as set forth below under “Policy for Receiving and Investigating Complaints.”

### **Reporting of Complaints**

#### *Reporting to the Compliance Officer*

The Audit Committee has appointed the Chief Legal Officer as the “Compliance Officer” responsible for administering this policy. Our Compliance Officer’s contact information is:

Name: Mark D. Brazeal  
Phone: +1.408.433.6336  
Email: [compliance.officer@broadcom.com](mailto:compliance.officer@broadcom.com)

The Compliance Officer is responsible for receiving and reviewing and then investigating (under the Audit Committee’s direction and oversight) complaints under this policy. If an employee has a complaint regarding an Accounting Matter, Legal Allegation or potential Retaliatory Act, he or she should report such complaint to the Compliance Officer. If the suspected violation involves the Compliance Officer, the employee should instead report the suspected violation to our Audit Committee. In such event, the Audit Committee shall determine whether the Audit Committee or management should investigate the allegation. Members of the Company’s Audit Committee may be contacted by email at [audit.committee@broadcom.com](mailto:audit.committee@broadcom.com). The current members of the Audit Committee may be found at [investors.broadcom.com](http://investors.broadcom.com) under Corporate Governance.

#### *Anonymous Reporting of Complaints*

We have also established procedures for reporting complaints about Accounting Matters, Legal Allegations and potential Retaliatory Acts anonymously and confidentially. You may anonymously report complaints in any of the following ways:

1. The Broadcom Compliance Hotline, hosted by Navex EthicsPoint, a third-party vendor retained by Broadcom to provide secure and independent reporting capability 24 hours a day, enables you to file a report in two ways:

- a. **Online** via the web page hosted on EthicsPoint’s secure server, you can click on [File a Report](#) (www.broadcom.ethicspoint.com) or go to the [EthicsPoint website](#) (www.ethicspoint.com), or
  - b. **Call** +1.800.422.3240 in the United States and Canada, or for other international numbers [click here](#).
2. **Email** our Compliance Email Box at [compliance.officer@broadcom.com](mailto:compliance.officer@broadcom.com), or members of the Audit Committee at [audit.committee@broadcom.com](mailto:audit.committee@broadcom.com); or
  3. **Mail** the complaint via regular mail to the Compliance Officer at 1320 Ridder Park Dr., San Jose, California, 95131 U.S.A.

The complaint procedures provide a mechanism for an employee to bypass a supervisor he or she believes is engaged in prohibited conduct. Anonymous reports should be factual, not speculative or conclusory, and should contain as much specific information as possible to allow the Audit Committee, Compliance Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

Except as required by law or regulation, this policy does not permit any Company employee to take any action that would violate the confidentiality of any applicable attorney-client privilege to which the Company or its agents may be entitled under statute or common law principles, or violate the Company employee’s confidentiality obligations with regard to Company proprietary information.

### **Policy for Receiving and Investigating Complaints**

Upon receipt of a complaint, the Compliance Officer will determine whether the information alleged in the complaint pertains to an Accounting Matter, a Legal Allegation or a Retaliatory Act. The Audit Committee shall be notified promptly of all complaints determined to pertain to an Accounting Matter or a Legal Allegation and shall determine the planned course of action with respect to the complaint, including determining that an adequate basis exists for commencing an investigation. The Compliance Officer will, or will appoint one or more internal and/or external investigators to, promptly and fully investigate each viable claim (under the direction and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances in the case of an Accounting Matter). With regard to complaints pertaining to potential Retaliatory Acts, the Compliance Officer may investigate the matter, refer the matter to the Vice President of Human Resources for investigation or may appoint one or more internal and/or external investigators to promptly and fully investigate each viable claim. The Compliance Officer will confidentially inform the reporting person (if his or her identity is known) that the complaint has been received and provide him or her with the name of, and contact information for, the investigator assigned to the claim. Neither you nor any supervisor may conduct any investigation, unless authorized to do so by the Compliance Officer. Your cooperation in any investigation will be expected.

Those investigating a complaint shall maintain the confidentiality of the reporting employee to the extent reasonably possible within the objectives of the Code. In the course of any investigation, the Company may find it necessary to share information with others on a “need to know” basis. Upon completion of any investigation, the Company will promptly take appropriate corrective action under the circumstances. If an employee is determined to be responsible for a Code violation, he or she will be subject to disciplinary action, up to and including termination of employment, and, in appropriate circumstances,

civil action or referral to governmental authorities for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

### **Retention of Complaints**

The Compliance Officer will maintain a log of all complaints, tracking their receipt, investigation and resolution, and shall prepare periodic summary reports thereof for the Audit Committee. The Audit Committee and, at the discretion of the Compliance Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with our *Record Retention and Destruction Policy*, except as otherwise required by law or regulation.

April 2018