

# 2025 Annual Report to Comply with Canada Bill **S-211** – An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Reporting entity's legal name: **ON Semiconductor Corporation**  
(dba onsemi)

Location: 5701 N Pima Road Scottsdale AZ, 85250 USA

Related legal entities in Canada not included in this report (for not meet reporting threshold requirements) are:

- **Sound Design Technologies Ltd.**, Address: 970 Fraser Drive Burlington, ON Canada L7L 5P5
- **AMI Semiconductor Canada Company**, Address: 200-611 Kumpf Drive Waterloo, ON Canada N2V 1K8
- **ON Semiconductor Canada Trading Corporation**, Address: Montreal site: 755 St-Jean Blvd., Suite 207 Pointe-Claire, QC Canada H9R 5M9

***This report represents onsemi's commitment to the fight against forced labour and child labour. It covers reporting period January 1, 2024 – December 31, 2024.***

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## Introduction

### About onsemi

**onsemi** specializes in the design and manufacture of semiconductor components primarily used in the automotive and industrial end-markets. Our products play a crucial role in vehicle electrification and safety, sustainable energy grids, industrial automation, and 5G and Cloud infrastructure. Headquartered in Scottsdale, Arizona, USA, we maintain a total worldwide workforce of approximately 26,000 employees. In Canada, our workforce is approximately 160 employees whose primary roles support design, solution engineering, manufacturing, sales and customer and technical support. For a comprehensive list of onsemi locations, please visit our [website](#).

### Governance and Oversight

Our business operations are conducted under the guidance and oversight of the company's Board of Directors. Employees, managers and officers of **onsemi** operate under the direction of the chief executive officer (CEO) and/or executive management. The Board of Directors and its standing committees convene with executive management at least four times a year to review and discuss various aspects of the company. These meetings cover topics such as company performance, human rights, prevention of forced labor and child labor, prevention of human trafficking and Environmental, Social and Governance (ESG) initiatives.

### Supply Chain Structure

**onsemi's** supply chain is multi-faceted comprising of direct material suppliers, foundry and subcontractor providers, indirect material suppliers, and professional service providers. These entities are integrated into a global procurement and sourcing organization ensuring a robust and efficient supply chain.

### Commitment to Responsible Business Practice and RBA

At **onsemi**, we are unwavering in our commitment to the mission and principles of the Responsible Business Alliance (RBA). As a responsible corporate citizen, we adhere to the RBA Code of Conduct and comply with all relevant laws and regulations in the countries where we operate. Our dedication extends beyond legal compliance; we actively champion the fundamental rights of all individuals.

**onsemi** has been a member of the Responsible Business Alliance (RBA) since 2009, achieving full membership in 2010. The RBA is recognized as the world's largest electronics industry coalition dedicated to promoting corporate social responsibility and compliance within global supply chains. Through our active participation in the RBA,



**onsemi** demonstrates its unwavering commitment to ethical practices, sustainability, and the well-being of communities worldwide.

## Our Guiding Principles

1. **RBA Code of Conduct**: We uphold the RBA Code of Conduct, which sets forth ethical standards for labor, human rights, environmental sustainability, and business integrity.
2. **Universal Declaration of Human Rights (UDHR)**: We align our practices with the principles outlined in the UDHR, recognizing the inherent dignity and equal rights of every person.
3. **UN Guiding Principles on Business and Human Rights**: We integrate the UN Guiding Principles into our operations, emphasizing due diligence, transparency, and accountability.
4. **UN Global Compact**: As signatories to the UN Global Compact, we commit to its ten principles related to human rights, labor, environment, and anti-corruption.
5. **Company Policies and Statements**
  - **onsemi Human Rights Policy**
  - **Prevention of Slavery and Human Trafficking**
  - **Code of Business Conduct**
  - **Social Compliance Commitment**
  - **Social Compliance Commitment Guide**

## Our Collaborative Approach

We collaborate with our customers, peers, partners, and suppliers to promote responsible practices across our supply chain. Our focus areas include:

1. **Human Rights**: Our formalized **Human Rights Policy** reflects our commitment to international standards. We respect the rights of workers, communities, and stakeholders.
2. **Labor Practices**: We ensure that all work within our company is voluntary. Workers have the legal right to leave without penalty.
3. **Environment**: We strive for environmental stewardship, minimizing our ecological footprint and promoting sustainable practices.
4. **Health and Safety**: Our management systems prioritize the well-being of our employees and contractors.
5. **Anti-Corruption**: We maintain a zero-tolerance position towards corruption and unethical behavior.
6. **Ethics**: Our **Code of Business Conduct** reinforces our ethical values and our commitment to integrity and compliance.

## Preventing Slavery and Human Trafficking

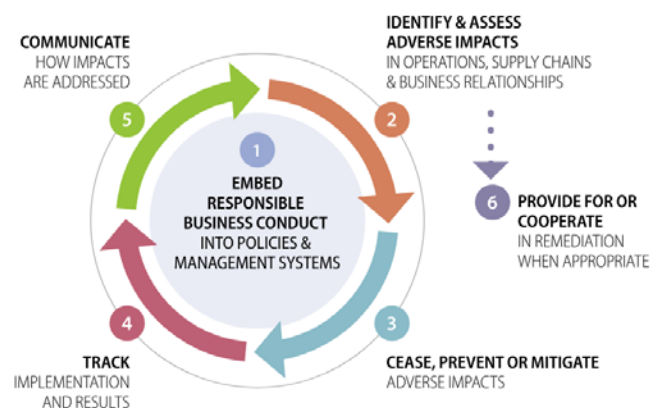
Our [Slavery and Human Trafficking Policy Statement](#) underscores our commitment to eradicating these horrific practices. Key measures include:

- **Awareness:** We educate our workforce about the signs of slavery and human trafficking.
- **Zero Tolerance:** We have zero tolerance for any form of exploitation. Violations are met with swift action.
- **Voluntary Work:** We ensure that all work at onsemi is voluntary, and workers are free to leave without penalty or repercussions.
- **Document Verification:** We ensure that workers' government-issued identification, original work permits, and personal documentation are not retained.

## Forced Labor and Child Labor Due Diligence

onsemi's Responsible Business Alliance (RBA) program encompasses the forced labor due diligence process stemming from the recognition that the rights of workers, especially those vulnerable to forced labor in the supply chain, are respected and upheld. Guided by the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct linked [here](#), our policies and practices are continually assessed and mitigated at all stages of recruitment and employment and remediations are defined for incidents.

### OECD Due Diligence Guidance for Responsible Business Conduct\* and mapping to the onsemi RBA Program and Due Diligence Process



\*OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct, page 21.

We are committed to identifying and addressing risks related to forced labor and child labor collaborating with internal and external stakeholders.

Our commitment includes:

- **Supply Chain Assessment:**
  - *Internal Assessment* - **onsemi** conducts internal assessments at all its manufacturing sites following a two year cycle of internal audits based on the RBA Code of Conduct, regulatory requirements, customer requirements and internal policies.
  - *Third-party Assessment* - Among the pivotal activities undertaken by **onsemi** as an RBA member is the active participation in the RBA Validated Assessment Program (VAP), a leading compliance assessment, verification, and effectiveness monitoring initiative. **onsemi** ensures alignment with industry standards and best practices through regular third-party audits under the RBA VAP as well as participation in industry-wide dialogues and working groups.
- **Worker Recruitment Practices:** Recruitment checks are in place to ensure:
  - Zero recruitment and employment-related fees.
  - Voluntary recruitment through offer letters/employment contracts that are provided and signed prior to the start of employment in a language the “applicants” understand.
  - Age verification where all workers are required to be at least 18 years of age through cross-referencing government-issued documents such as birth certificates, national identification, passport, etc.
- **Risk Mitigation:** An annual review of actual and potential risks is performed, identifying and prioritizing risks through multifunctional teams at our corporate and site level. Mitigating actions are identified for high risks.
- **Supplier Monitoring and Engagement:** We engage with our suppliers to ensure compliance with RBA and regulatory requirements and **onsemi** policies.
  - **onsemi** Code of Business Conduct Acknowledgment
  - All suppliers acknowledge the RBA Code of Conduct before establishing a business relationship.
  - Self-Assessment Questionnaires (“SAQs”) via RBA Portal - Major suppliers are obligated to submit their self-assessments through the RBA Online Portal (or another acceptable alternative/platform). The SAQs serve as the foundation for potential inclusion in the (shared) RBA audit cooperation program, or other independent audit programs.
- **Remediation:** The due diligence program prioritizes prevention and is our foremost mitigation process. In case of an occurrence, however, an ad hoc committee will be created to review and decide on the matter. The committee will be chaired by the Chief Ethics and Compliance Officer as well as the Social Compliance team members. As required from time to time, representatives from regional legal counsel, VP or regional/site human resources, VP of manufacturing or site general manager and VP/Regional Procurement may be asked or requested to join the committee to support and/or provide additional information and guidance.



Cooperation with affected parties to rectify instances of forced labor or child labor is a required and expected practice.

- **Grievance and Reporting Mechanisms:** onsemi has implemented multiple ways to report concerns and grievances such as a 24/7 helpline accessible by all those in manufacturing sites, or by direct email to the Chief Compliance Officer or to any member of the Ethics and Compliance team. Moreover, the 24/7 helpline accessible online or by telephone, is managed by a third-party provider and open to all entities including suppliers and business relationships. Refer [here](#) for the details on how to report an incident or concern.
- **Training and Awareness:** Equally important is the task of educating our workforce and suppliers on recognizing and preventing forced labor. All employees and the onsemi Board of Directors are required to complete training on and reaffirm their commitment to each of the human rights listed above through our annual Code of Business Conduct which further includes training on non-retaliation and social compliance. Global onsemi security personnel and select contractors are also trained on relevant human rights standards through our Code of Business Conduct, the RBA Code of Conduct, and any relevant other training to ensure the human rights of the individual are respected and maintained.
- **Assessing Effectiveness:** At onsemi we stand firm in our commitment to responsible business practice in ensuring that forced labor and child labor are not used in our business and supply chains by conducting regular self-assessment and third-party audits.

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*[Approval and Attestation on Following Page.]*

## Approval and Attestation

In accordance with the requirements of the Act and in particular, Section 11 thereof, this “Annual Report” was reviewed and approved by its governing body in accordance with paragraph (4)(a).

I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: **Hassane El-Khoury**

Title: President and Chief Executive Officer

Date: May 15, 2025

Signature: \_\_\_\_\_



*“I have the authority to bind **ON Semiconductor Corporation** (dba **onsemi**) and its related companies.”*

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