



December 31, 2011

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) will go into effect in the State of California. This law was designed to increase the amount of information made available by manufacturers and retailers regarding their efforts (if any) to address the issue of slavery and human trafficking, thereby allowing consumers to make better, more informed choices regarding the products they buy and the companies they choose to support.

Atmel seeks at all times to conform to the Electronic Industry Citizenship Coalition's Code of Conduct (the "Code of Conduct"). The Code of Conduct is underpinned by international labor and human rights standards. We believe that workers at supplier facilities have the right to freely choose employment and the right to a workplace free of harassment and unlawful discrimination. Slavery and human trafficking can take many forms, including forced labor and child labor.

Atmel Corporation has zero tolerance for suppliers that traffic in persons, use forced labor in performing contracts, or use debt-bonded contract labor (all referred to here as "Forced Labor"). Atmel has undertaken efforts to require that its vendors comply with the Code of Conduct and pledges to continue to do so in the future. Additionally:

- Atmel does not believe that any of its suppliers engage in Forced Labor practices. The company has initiated a review of its supply chain to evaluate compliance with these requirements. Atmel conducts these reviews, and will conduct any verification efforts, with its own qualified employees. Atmel does not anticipate engaging any third party to perform these reviews or verification as of the date of this Statement.
- Atmel has not, as of the date of this Statement, conducted audits of its supply chain. If it determines that such audits are appropriate, it would expect to conduct audits under those circumstances, without prior announcement, either by independent auditors or its own qualified employees.
- Atmel has begun to require its direct suppliers to certify that materials incorporated into its products comply with all applicable laws addressing Forced Labor.

- Atmel intends to implement a policy specifically addressing Forced Labor matters, including slavery and human trafficking issues, and to integrate that policy into its supply chain requirements.
- Atmel trains employees responsible for supply chain management on how to identify and respond to supply chain issues, such as Forced Labor. We require all Atmel employees and contractors to comply with our [Standards of Business Conduct \(SBC\)](#).

Atmel does not utilize any Forced Labor activities at its own facilities in the United States or elsewhere.

Atmel expects to take appropriate actions to ensure that its products are not manufactured through Forced Labor. If you have questions about Atmel's practices, plans, or policies with respect to these matters, please contact Fred Bishel, Global Quality Systems Engineer, at 719-540-1188 or fred.bishel@atmel.com.