

Our Commitment to You – Employee Relations¹

InterDigital is committed to responding to employee concerns in a timely manner. If employees have concerns about work conditions or compensation, they are encouraged to openly discuss these concerns with their manager, department manager or with a Human Resources Business Partner.

Equal Employment Opportunity Policy (EEO)

InterDigital is an Equal Opportunity Employer. We are committed to a healthy workplace environment that encourages growth and respect for all current and prospective employees based upon job-related factors such as their educational background, work experience, and ability to perform the essential functions of a particular job. All employment decisions, policies and practices are in accordance with applicable federal, state and local anti-discrimination laws.

InterDigital will not engage in or tolerate unlawful discrimination (including any form of unlawful harassment or retaliation) on the basis of race, color, religion, creed, national origin, ancestry, citizenship, immigrant status, military status, veteran's status, sex, sexual orientation, gender (including gender identity and/or expression), pregnancy, age, disability, handicap, genetic information, atypical heredity cellular or blood trait, marital status, family status, domestic partner or civil union status or any other legally recognized protected basis under federal, state or local laws, regulations or ordinances.

This policy applies to all terms and conditions of employment, including, but not limited to, hiring, compensation, benefits, training, assignments, evaluations, coaching, promotion, discipline, discharge and layoff.

The Company's policy on equal employment opportunity supports and is consistent with the Company's commitment to enhancing diversity and inclusiveness. Diversity means not only membership in the various "protected groups" identified above, but also diversity in experience, perspective, ideas, style and contacts. We believe that we are much stronger as a Company as a result of the richness of our diversity and strive to ensure that we have policies and practices which are respectful of diversity and promote inclusion.

This entire Equal Employment Opportunity policy applies to all of the Company's executives, managers, supervisors, employees and applicants. All such individuals are both protected under and restricted by this entire policy. You are protected in terms of your right to have a working environment free from unlawful discrimination, harassment and retaliation and other inappropriate conduct as described in this policy. You are

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restricted in terms of your being prohibited from engaging in unlawful discrimination, harassment and retaliation and other inappropriate conduct as described in this policy.

Policy Prohibiting Sexual Harassment

Sexual harassment is a form of sex discrimination. Consistent with the foregoing, the following behaviors are prohibited, whether by a man or a woman and whether directed at a man or a woman:

- To threaten or insinuate, expressly or implicitly, that any person is required to submit to sexual advances or to provide sexual favors as a condition of employment, continued employment or any term, condition or benefit of employment, or that a person's refusal to submit to sexual advances or to provide sexual favors will affect adversely the person's employment, continued employment or any term, condition or benefit of employment.
- To make any employment decision or take any employment action based on a person's submission to or refusal to submit to sexual advances.
- To engage in unwelcome sexually-oriented or otherwise hostile conduct which has the purpose or effect of interfering unreasonably with another person's work performance or of creating an intimidating, hostile, abusive or offensive working environment.

The following behaviors and communications are inappropriate, and are prohibited, whether any of them is, in itself, illegal:

- Denying an employee any term, condition or benefit of employment because of an employee's refusal to submit to sexual advances of supervisor (or someone else);
- Granting an employee any term, condition or benefit of employment because he or she submits to sexual advance;
- Conditioning any term, condition or benefit of employment on an employee's submission to sexual advances (even if no adverse employment action);
- Demanding or requesting sex or sexual favors;
- Requesting a date from someone after the recipient of the request already has said "No" to a prior request;
- Providing preferential treatment to someone with whom the employee is having a sexual or romantic relationship;
- Sexually assaulting another individual;
- Engaging in unwelcome and/or inappropriate physical contact, such as patting, pinching or brushing against another person's body;

- Engaging in sexual bantering, “jokes” and “teasing”;
- Making sexual, suggestive or biased “jokes”;
- Making gender biased or stereotypic comments or other communications;
- Engaging in sexual flirtations, or making sexual advances or propositions;
- Engaging in verbal abuse of a sexual nature;
- Making verbal commentaries about an individual's body, sexuality, or sexual orientation;
- Making disparaging, stereotyping or other inappropriate comments about pregnancy;
- Using sexually-degrading language about an individual (verbally or otherwise);
- Engaging in discussions of, or questions and comments about, sexual desires, fantasies, experiences, frustrations or the like;
- Transmitting, showing or describing pornographic or obscene materials, or other similar communications of any kind;
- Transmitting, showing or describing sexually-explicit or sexually-suggestive objects, cartoons, software, photos, pictures, drawings or other communications;
- Making sexually-oriented or degrading gestures;
- Engaging in verbal or non-verbal innuendo of a sexual, suggestive or biased nature;
- Engaging in other non-verbal communications of a sexual or suggestive nature, such as leering or gawking;
- Using obscene, off-color or otherwise hostile language of a sexual, suggestive or biased nature;
- Referring to employees of either gender in pejorative, negative or demeaning terms;
- Engaging in any other behavior of a hostile or abusive nature directed at one sex, even if not sexual in nature; and/or
- Engaging in any other inappropriate behavior of the kind, or similar to that, referred to here or elsewhere in this policy.

Harassment Based on Any Protected Group

Harassment based on an individual's membership in any protected group (for example, race, age, national origin, ancestry or disability) is equally prohibited and will not be tolerated.

The following behaviors, communications, etc. are inappropriate, and as such, prohibited, regardless of whether any of them is, in itself, illegal:

- Derogatory comments about an individual's membership in any protected group, for example, the "old guy" or "the mommies";
- Displays of cartoons, calendars, computer software, pictures, etc. which are degrading to or reflect negatively upon any protected group;
- "Jokes," comments or stories which have the purpose or effect of stereotyping, demeaning or making fun of any protected group, for example, racial "jokes," Catholic "jokes" or pregnancy "jokes";
- Slurs to describe any protected group;
- Nicknames relating to a person's membership in any protected group;
- Verbal or non-verbal innuendo which relates to or reflects negatively upon any protected group, for example, mimicking a disabled employee's walk or an employee's accent;
- Hate symbols or other symbols which suggest the inferiority of any group, for example, a noose or a swastika;
- Racist, sexist or other hate-based graffiti;
- Inappropriate questions about attire associated with an individual's religion or ethnicity;
- Inappropriate questions or comments about an employee's sexual orientation or gender identity;
- Hostile, abusive or demeaning behavior, including threats, directed at an employee because of his or her membership in any protected group, even if not racial, ethnic, religious, etc. in nature;
- Stereotypic or biased comments or slurs about any protected group, for example, "Latinos are...";
- Comments that suggest an employee does not conform with stereotypic, such as "You don't look Jewish..."; and
- Any other inappropriate behavior of the kind or similar to that referred to here or elsewhere in this policy.

Regarding all Kinds of Harassing/Inappropriate Behaviors

It is important to keep in mind that these are only some examples of inappropriate behavior. If you have any question about whether behavior is inappropriate, don't do it.

It is also important to remember that these prohibitions apply not only to oral and written communications, but also to e-mail, voicemail, Internet communications and searches, and other technology-assisted communications.

The prohibitions may also extend to postings on personal blogs and other forms of social networking if seen by or contain messages about your colleagues or others with whom we work.

The prohibitions on inappropriate behavior set forth above apply not only in the workplace itself but also to all other work-related settings, such as offsite meetings, as well as business trips and business-related social functions. In some cases, conduct outside of the workplace and/or unrelated to a work event may be cause for corrective action as set forth below, for example, calling a colleague at home and asking him or her for sex.

It is of no defense to inappropriate behavior that there was no bad intent, that it was only a "joke" or that it was not directed at any particular person.

It is of no defense that the individual engaging in the inappropriate conduct is a stellar performer.

It is also of no defense to unacceptable conduct that the conduct is "welcome" or otherwise okay to the party or parties engaging in it.

Workplace Bullying

InterDigital will not in any instance tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination. InterDigital defines bullying as repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Such behavior violates InterDigital's Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

Bullying may be intentional or unintentional. However, it must be noted that when an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration during the disciplinary process. As in sexual harassment, it is the effect of the behavior on the individual that is important. InterDigital considers the following types of behavior examples of bullying:

- **Verbal bullying:** Slandering, ridiculing or maligning a person or his or her family; persistent name calling that is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.

- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property
- **Gesture bullying:** Nonverbal threatening gestures; glances that can convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person.
- Shouting or raising voice at an individual in public or in private.
- Using verbal or obscene gestures.
- Not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting).
- Personal insults and use of offensive nicknames.
- Public humiliation in any form.
- Constant criticism on matters unrelated or minimally related to the person's job performance or description.
- Ignoring or interrupting an individual at meetings.
- Public reprimands.
- Repeatedly accusing someone of errors that cannot be documented.
- Deliberately interfering with mail and other communications.
- Spreading rumors and gossip regarding individuals.
- Encouraging others to disregard a manager's instructions.
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, assigning meaningless tasks, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
- Inflicting menial tasks not in keeping with the normal responsibilities of the job.
- Taking credit for another person's ideas.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings.

- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property).

Reasonable Accommodation

When qualified individuals with physical or mental disabilities (including disabilities caused by, exacerbated by, or related to pregnancy or childbirth, including recovery from childbirth) or handicaps notify the Company of such disabilities or handicaps and request reasonable accommodations (such as a leave of absence) for such disabilities or handicaps, the Company will make reasonable accommodations on behalf of such individuals.

Similarly, when individuals notify the Company of pregnancy (including pregnancy, childbirth, or medical conditions related to pregnancy or childbirth, including recovery from childbirth) and request reasonable accommodations relating to the same, the Company will make reasonable accommodations on behalf of such individuals, regardless of whether they are disabled.

Finally, when individuals notify the Company of sincerely-held religious observances, practices and beliefs and request reasonable accommodations relating to the same, the Company will make reasonable accommodations on behalf of such individuals.

Under each set of circumstances above, the Company will consider making reasonable accommodations where the Company is aware of the need for such accommodations. An individual does not have to use the words "reasonable accommodation" or "disability," for example, in order to make a request. Upon receiving a request for a reasonable accommodation, the Company will comply with its legal obligation to engage in an interactive process to make an individualized determination of whether a reasonable accommodation can be provided.

Under each of the circumstances above, no accommodation will be made if it imposes an undue hardship on the Company.

The Company will treat a medical condition or complication that is caused or exacerbated by pregnancy no differently from other medical conditions for the purpose of determining whether an individual is disabled, engaging in the interactive process, and evaluating whether an individual is entitled to a reasonable accommodation (e.g., leave of absence and/or time off).

If you believe you need an accommodation for any of the reasons set forth above, please contact your Human Resources Business Partner.

If you are not satisfied with any accommodation offered by the Company, or with the Company's denial of your request for a reasonable accommodation, you may challenge such decision by using the complaint procedure below.

If you are an executive, manager, or supervisor and anyone requests an accommodation of you, you must report this by calling your Human Resources Business Partner. You may neither keep the request confidential nor resolve the request on your own. If you are not sure whether you have a duty to report, play it safe and report.

Policy Prohibiting Retaliation

The Company will neither engage in nor tolerate unlawful retaliation of any kind by anyone against any person who raises a concern about unlawful discrimination, harassment or retaliation, serves as a witness or otherwise participates in the investigatory process. The Company also will neither engage in nor tolerate unlawful retaliation of any kind by anyone against someone who is associated with any person who raises such a concern. The Company also will neither engage in nor tolerate unlawful retaliation of any kind by anyone against any person who requests an accommodation as set forth above. Further, the Company will neither engage in nor tolerate unlawful retaliation of any kind by anyone against any employee who reports a work-related injury.

Prohibited unlawful retaliation includes adverse tangible employment actions, such as denial of a raise or promotion. It also may include, in some circumstances, other material changes in the terms and conditions of employment, such as work assignments. Prohibited unlawful retaliation also may include adverse actions independent of the workplace, such as trying to exclude an employee from membership in an outside professional organization because of a concern he or she raised at work.

It is no defense to unlawful retaliation by any person (executive, manager, supervisor, etc.) that the concern raised did not have legal merit.

The Company will not engage in or tolerate unlawful retaliation of any kind against any person who makes a complaint of unlawful discrimination, harassment, or retaliation, serves as a witness or otherwise participates in the investigatory process. Prohibited retaliation includes adverse tangible employment actions, such as denial of a raise or promotion. It also may include, in some circumstances, other material changes in the terms and conditions of employment, such as work assignments, if the changes are a product of a retaliatory motive. Prohibited retaliation also may include adverse actions independent of the workplace, such as trying to exclude an employee from membership in an outside professional organization because of a complaint he or she made at work.

It is no defense to retaliation by any person (officer, manager, supervisor, etc.) that the complaint did not have legal merit. Generally speaking, so long as an individual acts in good faith in making a complaint alleging unlawful discrimination, harassment or retaliation, serving as a witness or otherwise participating in the investigatory process, no adverse action can be taken against him or her because he or she made the complaint, served as a witness or otherwise participated in the investigatory process.

Reporting Concerns or Complaints

If you believe that you may have been – or anyone else may have been – unlawfully discriminated against, harassed by or retaliated against or subject to any inappropriate conduct prohibited by this Equal Employment Opportunity Policy (even if not unlawful) by any executive, manager, supervisor, co-worker or non-employee in violation of this policy, you should report your concerns immediately to your manager, Human Resources Business Partner, Chief Human Resources Office or the Ethics Hotline. You also should consult with either of the foregoing individuals if you believe that a reasonable accommodation that you requested was not made but should have been made. In all cases, please speak with whichever person you feel the most comfortable, whatever your reasons.

Similarly, if you have any question as to whether certain conduct is unlawful discrimination, retaliation or harassment or other inappropriate conduct prohibited by this policy, or whether an accommodation may be needed or possible, you are encouraged to speak with any of the individuals identified above.

*The Company Will:*²

- Conduct a prompt and fair investigation;
- Keep your allegations as confidential as possible (disclosing them only to the extent necessary to conduct the investigation-take corrective action);
- Take corrective action with respect to any employee or non-employee who has engaged in unlawful discrimination, harassment or retaliation and/or inappropriate behavior inconsistent with this policy (even if not unlawful), including discipline up to and including termination of the employment or other relationship; and
- Neither engage in nor tolerate unlawful retaliation of any kind against an employee who makes a complaint alleging unlawful discrimination, harassment, or retaliation, serves as a witness or otherwise participates in the investigatory process.

If you are an executive, manager, or supervisor and anyone complains to you that he or she believes that he or she or anyone else may have seen subject to unlawful discrimination, harassment or retaliation (or other inappropriate conduct of the nature described in this policy) or that he or she needs an accommodation or an accommodation requested has not been made, you must report this immediately by contacting your

² All investigations are reported to the Audit Committee of the Board of Directors in a timely manner. The General Counsel, in partnership with the Chief Human Resources Officer, is accountable for ensuring that the Company complies with its stated policy. The Audit Committee is accountable if allegations involve senior executives or directors and will ensure that any investigation is complete, conclusions are reasonable, and remedial actions are appropriate.

Human Resources Business Partner. You may neither keep the concern confidential nor investigate the concern on your own. If you are not sure whether you have a duty to report, play it safe and report to your Human Resources Business Partner.

All employees – whether complainant, accused or witness – are expected to cooperate fully and honestly in any investigation of a violation of this policy.

Discrimination, Retaliation, Harassment and Other Inappropriate Conduct by Non-Employees

The prohibitions against unlawful discrimination, retaliation and harassment and other inappropriate conduct prohibited by this policy apply not only to the conduct of employees of our Company but also to the conduct of non-employees (for example, customers, vendors, suppliers and contractors) with whom our employees come into contact in the course of their employment with our Company. Consequently, if you feel discriminated or retaliated against or harassed (sexually or otherwise) or subject to inappropriate conduct prohibited by this policy by a nonemployee in the course of your employment with the Company, you should use the procedure set forth below. Conversely, the prohibitions against unlawful discrimination, harassment and retaliation and other inappropriate conduct set forth in this policy apply to your conduct relative to non-employees with whom you come into contact in the course of your employment with the Company.

“Appeal” Procedure

If you are not entirely satisfied with how your concern has been handled, for whatever reason, you may address your concern to the Chief Human Resources Officer. Your “appeal” should be in writing to help ensure that it is clear that you wish to “appeal.” While we encourage you to be detailed, it is sufficient to say “I wish to appeal my EEO concern.” You also may appeal by using the hotline discussed above.

Sanctions for Violations of the Company’s Equal Employment Opportunity Policy

Any executive, manager, supervisor, other employee or non-employee who, after appropriate investigation, has been found to have engaged in unlawful discrimination, harassment or retaliation and/or inappropriate behavior inconsistent with this policy (even if not unlawful) will be subject to appropriate (immediate and proportionate) corrective action, up to and including termination of his or her employment or other relationship with our Company.

Any executive, manager or supervisor who fails to make an immediate report of a complaint or concern raised to them as required by this policy will be subject to

appropriate (immediate and proportionate) corrective action, up to and including termination of his or her employment with our Company.

As a reminder, conduct does not need to violate the law to violate this policy. At the same time, not every behavior that may be considered offensive to someone violates this policy.

Exempt and non-exempt employees who violate this policy also may be suspended without pay. Exempt employees will be suspended without pay in full day increments only.

Religious Accommodation

We will attempt to make reasonable accommodations for employee observance of religious holidays and sincerely held religious beliefs, including time off for religious holidays and accommodations related to dress and grooming practices, unless doing so would cause an undue hardship on Company operations. If you desire a religious accommodation, you are required to make the request in writing to your manager as far in advance as possible.

Problem Resolution

InterDigital is committed to providing the best possible working conditions for its employees. Part of this commitment is creating a work environment where problems, complaints, suggestions, or questions will receive a timely response from an InterDigital supervisor and/or the Human Resources Department. InterDigital management strives to ensure fair and honest treatment of all employees. As such, all employees, regardless of their job function or level in the organization, are expected to treat each other with mutual respect.

Generally, routine matters within departments (e.g., suggestions for process improvements) can be addressed between employees and their supervisors. However, if a situation arises where an employee believes that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to speak with their supervisor and/or their respective Human Resources Business Partner.

*NOTE: If your complaint involves discrimination, harassment or retaliation, please use the Complaint Procedure in our **Equal Employment Opportunity Policy** located in the Handbook.*