

## **EQUAL EMPLOYMENT OPPORTUNITY POLICY**

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.

### **Policy Prohibiting Discriminatory Conduct**

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, recruiting, hiring, compensation, benefits, training, assignments, evaluations, coaching, promotion, discipline, discharge and layoff.

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 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 Unlawful Harassment**

The Company is committed to providing a work environment that is free from unlawful harassment of any kind. Harassment includes unwelcome, unsolicited conduct because of membership in a protected group that has the purpose or effect of unreasonably interfering with an individual's work performance or which otherwise creates an intimidating, hostile or offensive working environment.

Our policies prohibiting harassment below are designed not only to comply with the law but also to ensure we have a safe, respectful and healthy working environment. Because conduct does not need to violate any harassment law to violate this policy, we refer to harassing and/or inappropriate conduct as described below collectively as "unacceptable conduct."

The prohibitions set forth below on unacceptable conduct apply not only in the workplace itself but also to all other work-related settings, such as off-site meetings, as well as business trips and business-related social functions. The prohibitions also apply when you work remotely, including on virtual/video meetings. In some cases, conduct outside of the workplace and unrelated to work or a work-related setting may be cause for corrective action.

It is also important to remember that the prohibitions below on unacceptable conduct apply not only to oral and written communications, but also to e-mail, texts, voicemail, Internet communications and searches, and other technology-assisted communications. The prohibitions apply regardless of whether you use the Company's network or equipment.

The prohibitions on unacceptable conduct below also extend to social media communications and activities (post, share, tweet, like, etc.) that: (a) are or become public; or (b) are or may be seen by employees, business partners, customers and others with whom we do or may do business (even if not public).

The prohibitions on unacceptable conduct apply not only to the conduct of employees of the Company but also to the conduct of non-employees (for example, business partners, customers, vendors, suppliers and contractors) with whom our employees come into contact in the course of their employment with the Company. Conversely, the prohibitions against unacceptable conduct set forth in this policy apply to the conduct of employees relative to non-employees with whom employees come into contact in the course of their employment with the Company.

In this sections that follow, we include specific examples of unacceptable conduct. It is not our intent to make anyone uncomfortable. To the contrary, we provide specific examples to help avoid confusion on whether something is acceptable.

## **Policy Prohibiting Sexual Harassment / Unacceptable Conduct**

Under federal regulations, sexual harassment is defined as:

- Threatening or insinuating, 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;
- Making any employment decision or taking any employment action based on a person's submission to or refusal to submit to sexual advances;
- Engaging in unwelcome sexually-oriented or otherwise hostile conduct that 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

Consistent with the Company's commitment to a safe, respectful and healthy working environment, the following conduct is unacceptable, and therefore prohibited under the circumstances set forth in the Policy on Harassment above, regardless of whether it is unlawful:

- Sexual assault (or attempting same);
- Granting or denying an individual any term, condition or benefit of employment because of the individual's submission to, or refusal to submit to, sexual advances (or offering or threatening to do so);
- Sexual propositions (direct or indirect);
- Favoring someone with whom you are having a romantic and/or sexual relationship;
- Engaging in unacceptable physical contact, such as patting, pinching, brushing or rubbing against another person's body;
- Engaging in sexual bantering, "jokes" and "teasing;"
- Making sexual, suggestive or other derogatory or otherwise unacceptable comments about an individual's appearance, sexuality, pregnancy or body;
- Making other comments about an individual's appearance, pregnancy or body after the recipient (or object) of the comments indicates the comments are unwelcome;
- Engaging in discussions of, or questions and comments about, sexual desires, fantasies, experiences, frustrations or the like;
- Referring to employees based on their gender or gender identity in derogatory, degrading, demeaning or negative terms;
- Viewing, disseminating, displaying or transmitting sexual, suggestive or gender-biased content by way of videos, e-mail, text messages, Internet images, mobile phone screen savers, social media, etc.;
- Using obscene, off color or otherwise hostile language of a sexual, suggestive or biased nature, such as sex-based epithets;
- Engaging in verbal or nonverbal innuendo of a sexual, suggestive or biased nature, such as leering and gawking;
- Engaging in any other conduct of a hostile or abusive nature directed at individuals based on their gender, even if not sexual in nature; and
- Engaging in any other unacceptable conduct of the kind or similar to that referred to here or elsewhere in this Policy.

## **Policy Prohibiting Harassment / Unacceptable Conduct Based on Any Protected Group**

Under federal, state or local law, harassment on the account of any protected group (such as race, color, religion, national origin, sex, gender, age, disability, sexual orientation or gender identity) may be a form of unlawful discrimination.

Consistent with the Company's commitment to a safe, respectful and healthy working environment, the following conduct is unacceptable and therefore prohibited under the circumstances set forth in section 2 above, regardless of whether it is unlawful in and of itself:

- Physical violence-- or threatening or calling for physical violence—directed at a protected group;
- Slurs or epithets to describe any protected group;

- Derogatory, demeaning or otherwise negative comments or other communications based on an individual's membership in any protected group or about a protected group, including name calling, mockery and insults;
- Transmitting, showing or describing videos, e-mails, text messages, objects, cartoons, software, photos, pictures, drawings, social media posts or other communications that reflect negatively on any protected group;
- "Jokes," nick names, comments, images or stories which have the purpose or effect of stereotyping, demeaning or making fun of any protected group;
- Verbal or non-verbal innuendo which relates to or reflects negatively upon any protected group;
- Use of words or symbols of violence or hatred toward a protected group or individuals in a protected group;
- Stereotypic or biased comments about members of a protected group:
- Asking inappropriate questions or making inappropriate comments about attributes that may relate to a racial, religious, ethnic or other protected group, such as about names, hair, hair textures or hairstyle, attire, culture, diet, accent or manner of speech;
- Engaging in any behavior of a hostile or abusive nature directed at someone based on their protected characteristic; and/or
- Engaging in any other unacceptable conduct of the kind or similar to that referred to here or elsewhere in this Policy because of their membership in a protected group.

## Workplace Bullying

InterDigital is committed to having a safe, respectful and healthy working environment. Consistent with this commitment, the Company prohibits bullying, even if not based on a protected group characteristic. For purposes of this policy, bullying exists if the Company determines that there is severe or pervasive abusive and/or hostile conduct directed at a specific employee.

The followings are examples of unacceptable conduct that the Company may determine, in its sole discretion, constitute bullying either alone or in conjunction with other conduct:

- Cursing at or about an employee.
- Screaming at an employee in public.
- Disciplining an employee in public.
- Sabotaging the work (or work area) of another employee.
- Making false statements about an employee's character knowing the statements are false with the intent to harm the employee.

Even if the Company concludes that conduct does not constitute bullying under this policy, the Company may take corrective action if the Company concludes that the conduct is unprofessional.

Employees can raise concerns about bullying and/or unprofessional conduct using the Complaint Procedure below. Such concerns will be investigated similarly to other concerns raised under this Equal Employment Opportunity Policy.

### **Reasonable Accommodations**

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) 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. 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 or evaluating whether an individual is entitled to a reasonable accommodation (e.g., leave of absence and/or time off).

In addition, 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 made aware of the need for such accommodations.

Upon receiving a request for a reasonable accommodation, the Company will 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 as defined by the applicable law.

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 an executive, manager, or supervisor and anyone requests an accommodation of you, you should direct the employee to contact their Human Resources Business Partner and you too must report this by calling your Human

Resources Business. You may neither keep the request confidential nor resolve the request on your own.

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 appeal such decision by using the Complaint Procedure set forth below.

### **Policy Prohibiting Retaliation**

The Company will neither engage in nor tolerate unlawful retaliation of any kind by anyone against any person who in good faith: (a) raises a complaint about unlawful discrimination, harassment or retaliation; (b) serves as a witness or otherwise participates in the investigatory process; (c) opposes practices that they believe violate this policy; or (d) has requested or received a reasonable accommodation under this policy. The Company also will neither engage in nor tolerate unlawful retaliation of any kind by anyone against a person who is associated with any person who engages in the conduct just described.

Prohibited unlawful retaliation includes an adverse tangible employment action, such as denial of a raise or promotion. It also may include changes in the terms and conditions of employment, such as work assignments. Prohibited unlawful retaliation also may include harassment (ostracism) as well as adverse actions independent of the workplace, such as trying to exclude an employee from membership in an outside professional organization because of a complaint the employee raised at work.

Because the Company is committed to a culture where individuals can raise in good faith concerns without fear of retaliatory conduct of any kind, conduct does not need to violate the law to violate this prohibition.

It is no defense to retaliatory conduct that the complaint did not have legal merit. Generally speaking, so long as an individual acts in good faith, he or she is protected against retaliatory conduct of any kind.

The prohibition on retaliation applies to internal complaints as well as external complaints (that is, complaints filed with a governmental administrative agency/commission and/or in court).

### **Complaint Procedure**

If you believe that there has been a violation of this Equal Employment Opportunity policy by any employee or non-employee with whom you come into contact in connection with your employment (discrimination, harassment, retaliation, failure to accommodate or other unacceptable conduct), you strongly are encouraged to contact your Human Resources Business Partner or the Chief People Officer or by using the Hotline as set forth below.

If the conduct involves an Executive or HR, you also may contact the Chief Executive Officer, Chief Legal Officer or VP Employment Counsel.

You may use this complaint procedure if: (a) you have been the object/target of the conduct; (b) you have witnessed the conduct directed at someone else or not at anyone in particular; or (c) you otherwise become aware of the conduct. You also can use this Complaint Procedure if you are not satisfied with how your request for a reasonable accommodation was handled or the outcome of the request.

The Company has established a Hotline so that you can report complaints about possible violations of this and other policies. To do so, you may call the toll-free number 1-888-279-1905 from any phone either internally or externally. Callers cannot be identified through caller ID. You may also access the Hotline by visiting this website: [www.secure.ethicspoint.com](http://www.secure.ethicspoint.com) in order to ensure a timely investigation takes place, you should leave as many facts as possible (who, what, when, where, etc.). While you can report any concerns you may have anonymously through the Hotline, the Company's ability to conduct an adequate investigation may be limited if it does not have the opportunity to speak with you as part of its investigation.

## Duty to Report

Supervisors, managers and executives must report:

- All complaints made to them of alleged or suspected violations of this policy, even if the individual who made the complaint has asked to keep the complaint confidential and/or that no corrective action be taken.
- Conduct which they see, hear or of which they otherwise becomes aware, if such conduct may violate this policy, even in the absence of a complaint or objection.

Reports should be made to your Human Resources Business Partner or the Chief People Officer.

If the complaint involves an Officer/Executive or HR, you may also report the complaint to the Chief Executive Officer, Chief Legal Officer or VP Employment Counsel.

## Investigations

All complaints will be investigated promptly and adequately<sup>1</sup>.

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

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<sup>1</sup> All investigations are reported to the Audit Committee of the Board of Directors in a timely manner. The Chief Legal Officer, in partnership with the Chief People 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.

The Company will treat any complaint as confidential as possible but cannot promise absolute confidentiality. More specifically, the existence and nature of your complaint, as well as the identity of any complainant, witness or accused, ordinarily will be disclosed by the Company only to the extent necessary to conduct an adequate investigation and/or to take appropriate corrective action.

The Company will neither engage in nor tolerate retaliatory conduct as set forth above.

The person who initiated the complaint and the accused person will be notified when the investigation is complete. Ordinarily, such parties will be told generally of the Company's conclusions and the nature of the corrective action taken, where applicable.

### **Corrective Action**

If the Company concludes that an employee or non-employee has violated this policy by engaging in prohibited conduct, even if not unlawful, the Company will take appropriate corrective action, up to and including termination of their employment or other relationship with the Company.

If the Company concludes that a supervisor or above did not make a report as required by this policy, the Company will take appropriate corrective action, up to and including termination of their employment.

Any corrective action will be prompt and proportionate, designed to remedy the wrong and avoid future harm.

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.

### **Appeals**

If you are not entirely satisfied with how your complaint has been handled, for whatever reason, you may appeal your concerns. You also may appeal if you are not satisfied how your request for a reasonable accommodation was handled.

You may address your concern to the Chief People 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 complaint." In the case of reasonable accommodations, it is sufficient to state: "I wish to appeal my reasonable accommodation request."

You also may appeal by using the Hotline described above.

If your concern involves the Chief People Officer, you may appeal to the Chief Executive Officer or Chief Legal Officer.