

Employee Relations

InterDigital believes that the work conditions, wages, and benefits we offer to our employees are competitive with those offered by other employers within our industry and within the geographic regions in which we operate. 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 supervisor, department manager or with a member of InterDigital's Human Resources management team.

Equal Employment Opportunity

Non-Discrimination / Non-Harassment

InterDigital is committed to ensuring equal employment opportunity. InterDigital maintains a strict policy to provide a workplace that is free of unlawful discrimination and will neither engage in nor tolerate unlawful discrimination on account of a person's age, sex, race, color, religion, creed, national origin, citizenship, disability, handicap, sexual orientation, marital status, veteran's status, military status or membership in any other protected group.

Moreover, InterDigital makes affirmative good faith efforts to recruit and employ applicants and advance employees in accordance with our Affirmative Action Plan. InterDigital'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 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 and promote inclusion of diversity.

In addition, InterDigital maintains a strict policy to provide a workplace that is free of unlawful harassment and will neither engage in nor tolerate sexual or any other form of unlawful harassment. InterDigital's Non-Discrimination/Non-Harassment Policy covers all areas of employment, including but not limited to hiring, benefits, promotions, compensation, training, discipline and terminations.

By way of example only, the following behaviors and/or communications are inappropriate and as such prohibited, regardless of whether they are illegal:

- Pictures, photos, cartoons, e-mails, Internet web sites, jokes, slurs, epithets, nicknames, conversations, questions, objects, symbols, imitations, and other communications/behaviors which reflect negatively upon, stereotype, or disparage any protected group, (e.g., any race, gender, ethnic group, age, religion or disability).
- Hostile, abusive or demeaning communications or behaviors related to a protected group or directed at someone because of his or her membership in a protected group (e.g., any race, gender, ethnic group, age, religion or disability).

- Requiring sex as a condition of employment or any term or benefit of employment or punishing a subordinate with regard to any term, condition or benefit of employment because he or she did not submit to sexual advances.
- To make any employment decision or take any employment action based on a person's submission to, or refusal to submit to, sexual advances.
- Sexual or suggestive pictures, photos, cartoons, e-mails, Internet web sites, jokes, slurs, profanity, nicknames, conversations, questions, innuendo (verbal and non-verbal), objects and symbols; frequent and/or inappropriate comments on appearance; repeated requests for dates; excessive and/or inappropriate touch; and other inappropriate behaviors and/or communications of a sexual, suggestive or biased nature.

It is important to keep in mind that these are only some examples of inappropriate behavior. If you have any question about whether your behavior is or may be inappropriate, *don't do it*. If you have any question about whether the behavior of another employee is or may be inappropriate, *report it*. Moreover, a claim that you did not intend any harm or that your behavior was only a "joke" is never an excuse to inappropriate behavior.

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 any other technology-assisted communications.

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 meetings and functions at client work sites, as well as business trips and business-related social functions. In addition, behavior outside of the workplace which adversely impacts an employee(s), non-employee(s) or InterDigital's operations and/or reputation is also governed by this policy and may result in corrective action up to and including termination of employment.

Discrimination or Harassment Advanced by Non-Employees

The prohibitions against unlawful discrimination, retaliation and harassment set forth in this Policy apply not only to InterDigital employees but also to non-employees (e.g., contractors/consultants, clients, vendors, or suppliers) with whom our employees come into contact in connection with their employment with InterDigital. Consequently, if you feel discriminated against, harassed (sexually or otherwise) or retaliated against by a non-employee in connection with your employment with InterDigital, you should use the procedure set forth below.¹

Reasonable Accommodations

Upon request, InterDigital will make reasonable accommodations for qualified individuals with known disabilities of which the Company is made aware unless doing so would create an undue

¹ Conversely, the prohibitions against unlawful discrimination, harassment and retaliation set forth in this policy also apply to *your* conduct relative to non-employees.

hardship on the company or its operations. Upon request, InterDigital makes reasonable accommodations with respect to disabilities as well as religious observances, practices or beliefs of which it is made aware and which do not impose an undue hardship on InterDigital. To request an accommodation, please contact a member of the Human Resources management team.

Policy Prohibiting Retaliation

InterDigital will neither engage in nor 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. As with all other provisions of this policy, all employees are protected by this provision as well as restricted in terms of what they can do.

Prohibited retaliation includes adverse tangible employment actions, such as denial of a raise or promotion. It may also include, in some circumstances, other material changes in the terms and conditions of employment, such as work assignment. 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 that the complaint did not have legal merit. Generally speaking, so long as the individual acts in good faith in making a complaint alleging unlawful discrimination, harassment or retaliation, service 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.

Prohibited retaliation will be handled under the policy in the same manner and subject to disciplinary/corrective action to the same degree as any other violation of this policy.

Complaint Procedure

If you believe that you have been discriminated against, harassed by or retaliated against by any employee or non-employee with whom you come into contact in the course of your employment with InterDigital with regard to any term or condition in violation of this Equal Employment Opportunity Policy, please speak immediately with your Department Head, the Chief Administrative Officer, one of the Company's Human Resources Managers or the General Counsel immediately. Please speak with whichever person you feel the most comfortable.

In response, InterDigital will:

- Conduct a prompt and fair investigation;
- Disclose allegations *only to the extent necessary* to conduct the investigation and take corrective action, as necessary (InterDigital shall use its best efforts to maintain confidentiality in this regard);

- Take corrective action with respect to any employee or non-employee who has engaged in illegal and/or inappropriate behavior, including discipline up to and including termination of the employment or other relationship; and
- Not tolerate any unlawful retaliation of any kind against anyone who makes a complaint, serves as a witness or otherwise participates in the investigatory process.

If you are not entirely satisfied with how your complaint has been handled, please contact InterDigital's General Counsel to appeal your complaint. Your appeal should be in writing to help assure that General Counsel is clear that you wish to appeal. While we encourage you to be detailed, all that you are required to state is "I wish to appeal my EEO complaint."

Sanctions for Violations of InterDigital's Equal Employment Opportunity Policy:

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