

# InterDigital Code of Ethics

InterDigital, Inc., its subsidiaries and its affiliates (the “Company”) are dedicated to conducting business according to the highest standards of integrity. Operating with integrity is critical to maintaining the respect and trust of our customers, business partners and shareholders. By acting ethically and communicating truthfully, we enhance our business. For this reason, we strive to continually adapt our policies and practices to ensure compliance with new laws and regulations governing our global business operations, increase the quality of our employee training programs and maintain avenues of communication between the Board, management and employees.

It begins with all of us. In addition to treating one another with respect, each person must exercise good judgment. An understanding of the legal and ethical parameters set forth in InterDigital's Code of Ethics (this “Code”) enhances that judgment.

This Code outlines the broad principles of legal and ethical business conduct embraced by the Company. It is not a complete list of legal or ethical issues one might face in the course of business, and therefore, must be applied using common sense and good judgment. Company policies and procedures supplement the principles contained in this Code and can be found on InterDigital's intranet. If you observe behavior that concerns you or if you have questions about this Code or any applicable policy or procedure, you should contact your supervisor, your manager or any member of the Company's Legal or Human Resources Departments.

## Introduction

The reputation and integrity of the Company are valuable assets that are vital to the Company's success. Each employee, officer and director of the Company is expected to act in good faith and with integrity in the performance of his/her responsibilities on behalf of the Company in addition to acting in compliance with applicable laws. This Code covers a wide range of business practices and procedures. All employees, officers and directors of the Company must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The terms of this Code also apply to consultants retained by the Company who are expected to act in good faith and with integrity in the performance of their duties.

This Code will be strictly enforced. All managers and supervisors are required not only to model appropriate behavior, but are responsible for enforcing this Code by ensuring that the employees they supervise understand their responsibilities under the Code, not sanctioning or overlooking violations and acting to stop violations of the Code or law by those they supervise. Violations of the Code will result in appropriate disciplinary action, up to and including termination of employment.

### *Raising Questions*

The responsibility for compliance with this Code, including the duty to ask questions when in doubt, rests with each employee, officer and director. Unless a particular provision of this Code directs otherwise, to raise questions, employees should contact their supervisor or local office manager, or either of the following persons:

Melissa Leneis  
EVP, Chief Human Resources Officer  
4 Research Way, 3<sup>rd</sup> Floor  
Princeton, NJ 08540  
(609) 524-0038  
Melissa.Leneis@InterDigital.com

Amy A. Miraglia  
Vice President, Employment Counsel  
200 Bellevue Parkway, Suite 300  
Wilmington, DE 19809  
(302) 281-3615  
Amy.Miraglia@InterDigital.com

Officers and directors should contact the General Counsel (“GC”) or the Chair of the Audit Committee.

### *Reporting Possible Violations*

It is essential that we watch for possible infringements of this Code — whether these infringements occur because of lack of oversight or due to intention. Individuals who wish to report possible violations should contact the appropriate person listed below. The Company will not tolerate retaliation for reports made in good faith.

Each employee, officer and director is responsible for reporting possible violations of any laws, rules, regulations or this Code, promptly after it comes to their attention. Unless a particular provision of this Code directs otherwise, to report possible violations, employees should contact their supervisor, the Company's Chief Human Resources Officer or the GC. A supervisor may not authorize or approve a conflict of interest or make a determination as to whether a violation of this policy has occurred without first providing the GC with a written description of the activity and receiving the General Counsel's written approval. Officers and directors should contact the GC or the Chair of the Audit Committee.

Alternatively, individuals may report possible violations (including complaints or concerns regarding accounting, internal accounting controls, auditing or federal securities law matters) by filing a report through the web-based hotline or toll-free hotline at <https://secure.ethicspoint.com/lrn/media/en/gui/22466/index.html> or (888) 279-1905. Reports of potential misconduct may be made anonymously and confidentially, although individuals are encouraged to identify themselves to facilitate follow-up and investigation.

## 1. Compliance with Laws

Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. InterDigital conducts business around the world, and our employees are citizens of many different countries. Certain laws of the United States and other countries in which we operate apply across borders. As a result, all employees, officers, and directors must obey the laws of the cities, states, provinces and countries in which we operate. Although no one is expected to know all the details of these laws, it is important to have a general understanding of the specific laws and regulations that are relevant to your areas of responsibility at the Company and to know enough to determine when to seek advice from supervisors. Any questions about the appropriateness of particular conduct, or about conflicts between this Code and any law, local custom or policy, should be referred to the Legal Department.

## 2. Ethical Conduct

Beyond compliance with laws, the Company requires that all its employees, officers, and directors act in a manner which meets the highest standards of ethical behavior. This includes the obligation to avoid any actual or apparent conflicts of interest in personal and professional relationships. The honesty and integrity of our business conduct must not be compromised. The Company will not condone ethical violations for the sake of personal gain, personal advantage, expediency, or perceived business advantage.

## 3. Conflicts of Interest

The Company expects employees, officers and directors to avoid situations that may create conflicts of interest or the appearance of conflicts with the interests of the Company. A "conflict of interest" exists when a person's own interest (including the interests of a family member or an organization with which the person has a significant relationship) interferes or appears to interfere with the interests of the Company. For example, a conflict can arise when an employee, officer or director has an interest in a third party that provides products or services to the Company. Conflicts of interest may also arise when an employee, officer or director or member of his or her family, receives improper personal benefits as a result of his or her position with the Company. Many conflicts of interest or potential conflicts of interest may be resolved or avoided if they are appropriately disclosed and approved. In some instances, disclosure may not be sufficient and the Company may require that the conduct in question be stopped or that actions taken be reversed where possible.

Conflicts of interest may not always be clear-cut, so where a question arises, employees, officers or directors should consult with the appropriate person listed at the beginning of this Code.

Although it is not possible to list every conceivable conflict, some sensitive areas of conflicts and the Company's related guidelines are as follows:

- **Interests in other Businesses.** A Company employee may not work for a competitor, customer or supplier.
- **Loans.** Loans by the Company to, or guarantees by the Company of obligations of, any director or executive officer or their family members are expressly prohibited.
- **Gifts and Entertainment.** The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, not to gain unfair advantage with customers. Offering or accepting a gift of more than a modest value or entertainment that is more than a routine social amenity can appear to be an attempt to influence the recipient and in certain circumstances and in certain jurisdictions may constitute a violation of anti-bribery and anti-corruption laws and result in criminal prosecution.

The following are guidelines which will assist employees, officers and directors to avoid certain conflicts of interest:

- No gift or entertainment should be offered, given, solicited or accepted by any Company employee, officer, director or family member unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is of modest value, (4) cannot be construed as a bribe and is not reasonably calculated to influence a decision and (5) does not violate any laws or regulations. Employees should discuss with either person listed above in the Introduction to this Code, and officers and directors should discuss with the Chair of the Audit Committee, any gifts or proposed gifts that you are not certain are appropriate. In the event it is determined that you have accepted a gift or entertainment that is of more than modest value but is otherwise permissible, you will be required to deliver it or its value to the Company.
- In some international business transactions, it is customary for business leaders to give gifts to Company employees. Where the gift may be of more than modest value and under the circumstances returning the gift or paying for it could be an affront to the giver, or adversely affect the continuing business relationship, the employee

must report the gift to either person listed above in the Introduction to this Code, or in the case of an officer or director, to the Chair of the Audit Committee. The Company may retain the gift in its sole discretion.

- No payments (other than fees for services), loans, employment or promises of employment, investment opportunities, or vacation trips should be solicited or accepted from any third party working for the Company (e.g. a vendor, consultant, broker).
  
- **Kickbacks, Relationships with Related Parties.** No third party may be recommended for work for the Company on a project or development of the Company where the third party's compensation is paid on the basis of any kickback or fee sharing arrangement with any employee, officer or director. No third party may be recommended for work with the Company without full disclosure and written approval by the Chief Executive Officer ("CEO") or the Chief Operating Officer ("COO"), if the employee, officer or director making the recommendation (a) is a relative of such third party or is a relative of a Control Person of such third party or (b) has a material equity or stock ownership position in such third party. A "Control Person" is a person who has the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of such third party, whether through the ownership of voting securities, by contract, or otherwise.
- **Political Contributions.** While employees, officers, and directors of the Company are free to make political contributions in their own names and for personal reasons, no employee, director, or officer may make a loan, donation, or contribution to a political party or candidate on behalf of the Company or in the name of the Company, unless such contribution is authorized and made by the Company's Political Action Committee, as permitted by law.
- **Outside Activities.** Employees may not freelance or engage in "moonlighting" activities that will materially encroach on the time or attention which should be devoted to the employee's duties, adversely affect the quality of the employee's work, imply sponsorship by the Company or impugn the good name of the Company. No freelance or moonlighting activities should involve use of Company time, resources or facilities nor should such activities utilize confidential information or processes gained as a Company employee.

#### 4. Accounting, Auditing Matters, and Public Disclosure Obligations

The Company's requirement that employees, officers, and directors follow the highest ethical standards applies directly to all actions which involve business accounting, financial reporting, internal accounting controls, auditing matters, and public disclosure obligations. All executive officers bear responsibility for accurate disclosures under the Company's periodic reporting obligations to the Securities and Exchange Commission. In particular, the CEO, Chief Financial Officer ("CFO") and all senior financial officers are responsible for the full, fair, accurate, timely, and understandable disclosure in all reports and documents that the Company files with, or submits to, the Securities Exchange Commission and in any other public communications made by the Company. The CEO, CFO and all senior financial officers shall promptly bring to the attention of the Audit Committee or Board of Directors any information he/she may have regarding:

- Significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data;
- Any fraud, whether material or not that involves management or any other employee who has a significant role in the Company's financial reporting, disclosure or internal controls; or
- Any violation of any law, rule or regulation applicable to the Company or the operation of its business.

Dishonest or inaccurate reporting can lead to civil or even criminal liability for you and the Company and can lead to a loss of public faith in the Company. You should make appropriate inquiries in the event you may see, for example:

- financial results that seem inconsistent with underlying business performance;
- inaccurate financial records, including travel and expense reports, time sheets or invoices;
- the circumventing of mandated review and approval procedures;
- transactions that appear inconsistent with good business economics;
- the absence or weakness of processes or controls; or
- persons within the company seeking to improperly influence the work of our financial or accounting personnel, or our external or internal auditors.

The Company must maintain complete, accurate and timely books, records, accounts and financial statements appropriately reflecting the Company's transactions. Such books, records, accounts and financial statements must conform both to applicable legal requirements and to the Company's system of internal controls.

No employee, officer or director may interfere with or seek to improperly influence, directly or indirectly, the auditing of the Company's financial records. Violation of these provisions shall result in disciplinary action, which may include termination and may also subject the violator to substantial civil and criminal penalties.

The Audit Committee of the Company has adopted special procedures for the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, auditing and federal securities law matters. For further information on the Audit Committee's procedures for complaints of this nature, consult the Audit Committee's Procedures for Handling Reports of Potential Misconduct.

## 5. Confidentiality & Insider Trading

Employees, officers and directors must maintain the confidentiality of the information that they learn during the course of their work at the Company, including information about the Company and information about third parties such as customers and business partners. Employees, officers and directors must also comply with the Company's policies, the confidentiality agreement signed by individuals when they join the Company and any relevant non-disclosure agreement with a third party. Such information may include non-public business, marketing, technical information, customer records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties. The obligation to preserve confidential information continues even after service at the Company ends. Nothing in this Code of Ethics is intended to prevent an employee from reporting information to governmental agencies when an employee has reasonable cause to believe that a violation of law has occurred.

Many countries have insider trading laws that restrict securities trading and other activities by anyone who is aware of material, non-public information. Employees, officers, and directors must maintain the confidentiality of the Company's non-public information and are not permitted to use or share non-public information for any purpose except the conduct of our business and in strict conformance with all applicable laws. All non-public information about the Company, or any other company that you learn of in the course of your duties at the Company, should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. Refer to the Company's Insider Trading Policy for additional information and, if you have any questions, please consult the Company's Legal Department.

## 6. Data Privacy

We take data privacy seriously, and our policies and procedures are designed to comply with applicable laws and regulations governing the Company's processing of personal information. We are committed to protecting the reasonable privacy expectations of everyone with whom we do business, including our employees. We expect all of our employees, officers and directors to follow these policies and procedures, as described further in the Company's Data Protection Policy.

## 7. Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Each employee should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. Employees, officers and directors may not make misleading remarks about individuals or organizations or their products or employees. No employee, officer or director should take unfair advantage of anyone through fraudulent concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice. Stealing proprietary information or trade secrets, or inducing disclosure of such information by past or present employees of other companies, is prohibited.

## 8. Antitrust / Competition

The Company is committed to fair and open competition in markets around the world and all employees, officers and directors are expected to comply with the antitrust / competition laws of the countries in which we do business. Violations can result in substantial money damages and criminal penalties for both the Company and individuals involved.

There are a number of different practices which could be prohibited, such as agreeing with competitors on prices, and division of customers or sales territories. Additionally, refusals to deal, exclusive dealing or tying the sale of a product to the customer's purchase of a second product may also violate these laws. The applicable laws are complex; accordingly, the following guidelines of inappropriate actions are provided to assist in the avoidance of anti-competitive behavior:

### a. Agreements with Competitors

- to set prices or any other economic terms of the sale, purchase or license of goods or services, to use the same method of setting prices or to set other conditions of a sale or purchase;
- on whether or not to bid on a particular project or type of project or setting the terms of a bid;
- to allocate or limit customers, territories, products or services or not to solicit business from each other;
- to boycott (or agree not to do business with) one or more customers, suppliers, licensors or licensees;
- to limit production volume or research and development, to refrain from certain types of selling or marketing of goods or services, or to limit or standardize the features of products or services.

- b. Agreements with customers/ licensees on minimum resale price levels (discounts)**
- c. Other arrangements, which should never be used without prior Legal Department approval**
  - agreements with customers/ licensees on the maximum resale price
  - predatory pricing (pricing below cost)
  - exclusive dealing (requiring customers or licensees not to deal in the goods or services of one of the Company's competitors)
  - charging different prices to similarly situated customers
  - tying arrangements (where the seller conditions its sale of product A to the customer's purchase of product B)

If in doubt as to the lawfulness of a particular practice, seek advice from the Legal Department. Also, if asked by a representative of any competitor of the Company to engage in any of these practices, report it immediately to the Legal Department.

## 9. Equal Opportunities & Diversity

The diversity of the Company's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate discrimination or harassment. The Company's policy against discrimination applies to any legally protected status including, without limitation, race, color, religion, sex (including pregnancy, gender identity and sexual orientation), national origin, disability, genetic information, veteran status, and age. The Company also prohibits discriminatory harassment of any employee covered by the policy against discrimination.

## 10. Health and Safety

The Company strives to provide each employee with a safe and healthful work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe conditions.

Violence and threatening behavior are not permitted. To guarantee safe working conditions, employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The Company has specific policies covering a number of these issues.

## 11. Record-Keeping

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the actual number of hours worked should be reported to ensure compliance with local laws. Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, ask your supervisor or Accounts Payable in the Company's Finance Department.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, and formal reports. Records should always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation please consult the Company's Legal Department.

## 12. Communications

To provide for consistency in external communications and to provide a suitable level of assurance that confidential information is not inadvertently disclosed outside the Company, the CEO, CFO, COO, GC and Chief Communications Officer ("CCO") are designated as primary spokespersons for the Company ("Designated Spokespersons") with respect to communications with any shareholder, the financial press, investment or research analysts, institutional investment managers, stockbrokers, investors and the like ("Enumerated Persons").

The Chairman of the Board of Directors and other non-management members of the Board are also authorized to speak with Enumerated Persons on behalf of the Company from time to time, after consultation by the Chairman of the Board with the CEO with respect to such disclosure. Any such meeting must be in person and must be attended by the CEO and/or CCO, unless otherwise directed by the Chairman of the Board, in which case at least two non-management members of the Board shall attend the meeting.

Other than Designated Spokespersons and non-management members of the Board of Directors (in the circumstances described above), no other employee, consultant or director may communicate about the Company, its business or operations with Enumerated Persons or the media unless such person receives advanced authorization to communicate on behalf of the Company (a "Temporary Spokesperson") from a Designated Spokesperson, and the CFO, CCO or GC is present in person or by telephone. The foregoing shall

not apply to members of the Company's Communications Department who are authorized to speak with members of the media and technology industry analysts as part of their normal duties.

Other than Designated Spokespersons, and Temporary Spokespersons and directors in the circumstances described above, employees, consultants and directors are required to refer any inquiries about the Company to the Communications Department. Employees, consultants and directors are not permitted to engage in any form of unauthorized communications regarding the Company, including, without limitation, posting comments on message boards or engaging in conversations in public chat rooms or other media on the Internet. Without limiting any of the other provisions of this Code or the provisions of the Company's Disclosure and Communications Policy on prohibited disclosures, if any employee, consultant or director makes any public statement about the Company, its business or operations that is not authorized by this Code, such statement shall be clearly communicated as the personal view of such individual and not an authorized statement, view or opinion of the Company.

The above does not constitute, in any kind, a restriction on the freedom of expression of trade unions, representatives, employee representative bodies or employees.

### **13. Protection and Proper Use of Company Assets**

All employees should endeavor to protect the Company's assets, including intellectual property, and provide for their efficient use. Employees should use all reasonable efforts to safeguard the Company's assets against loss, damage, misuse or theft. These efforts may include but are not limited to:

- Employees should be alert to situations that could lead to loss, damage, misuse or theft of the Company's assets, and should report any loss, damage, misuse or theft as soon as it comes to your attention.
- Employees should not use, transfer, misappropriate, loan, sell or donate any of the Company's assets without appropriate authorization.
- Employees must take reasonable steps to ensure that the Company receives good value for company funds spent.
- Employees may not use company assets in a manner that would result in or facilitate the violation of law.
- Employees should use and safeguard assets entrusted to the Company's custody by others in the same manner as the Company assets.

Theft, carelessness and waste have a direct impact on the Company's profitability. Materials, property, and equipment owned by the Company should not be used for non-Company business although incidental personal use may be permitted.

### **14. Trade Restrictions**

Many countries, including the United States, have laws and regulations regarding the import and export of certain goods, services and technologies and conducting business with certain countries, entities or individuals. In certain cases, an export license or other appropriate government approval must be obtained before an item may be transferred or shipped. These laws are complex and vary by country; contact the Legal Department with any questions, especially with respect to entry into new geographic regions.

### **15. Payments to Government Personnel**

The cities, states, provinces and countries in which we operate have various laws regarding payments to government officials, anti-bribery and fighting corruption.

One such example is the U.S. Foreign Corrupt Practices Act, which applies to our actions globally, and it prohibits giving or offering to give anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business.

Additionally, many governments have laws and regulations regarding business gratuities; the violation of which would not only violate Company policy but could also be a criminal offense. Another law applicable to our business is the United Kingdom Bribery Act of 2010, which prohibits providing anything of value to any person, including but not limited to foreign government officials, for the purpose of improperly influencing their official decision-making process or abusing their position. Furthermore, the Bribery Act prohibits the receipt of an improper payment and, most importantly, imposes strict liability on U.K. corporations and those doing business in the U.K. for bribery committed by an associated person.

These prohibitions also generally apply whether the offer or payment is made directly or through a third person such as a reseller, sales agent, consultant, or other business partner. The Company could also be held liable for payments made by its joint venture partners, resellers, or sales agents.

Bribery of anybody, whether or not a government official, is strictly prohibited. The Company's policy on compliance with anti-corruption laws is set forth more fully in the Company's Global Anti-Corruption Policy. The Company's Legal Department can provide further guidance to you in this area.

## 16. Waivers of the Code of Ethics

Waivers of provisions of this Code will be granted only in exigent circumstances and require the approval of the GC. Any waiver of or departure from a provision of this Code involving any director, executive officer or the Company's principal accounting officer (or, if there is no principal accounting officer, the controller) may be made only by the Board of Directors and will be promptly disclosed as required by applicable law or stock exchange regulation.

## 17. Personal Responsibility

We must all work to achieve prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, you must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- Seek help from Company resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, discuss it locally with your office manager, or contact the Legal Department or the Human Resources Department.
- Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

## 18. Investigation Procedures, Disciplinary Action and Non-Retaliation

The GC (or his/her designee) or Board of Directors will promptly investigate reported violations of this Code. The investigation will be handled discreetly and appropriately, and the information and the identity of the reporting person will be disclosed to others only on a need to know basis and/or as required by law. All alleged violations must be reported to the Audit Committee in a timely manner, which may involve reporting prior to the next scheduled Audit Committee meeting. In the case of allegations involving senior executives or directors, the Audit Committee should be directly accountable for ensuring the: (a) completeness and objectivity ensuing investigations, (b) reasonableness of conclusions reached, and (c) appropriateness of remedial actions taken.

If the investigation leads to a conclusion that a violation of the Code has occurred, the Board of Directors or GC will take appropriate disciplinary action, up to and including termination of employment. The GC is directly accountable for effectively addressing all other alleged violations (in partnership with the CHRO as appropriate).

Applicable law and the Company prohibit retaliation of any kind against employees, officers and directors for good faith reports of ethical or legal violations. In addition, no employee, officer or director may retaliate against an individual for participating in an investigation or proceeding involving reports of ethical or legal violations. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Certain violations of this Code may also be subject to civil or criminal prosecution by governmental authorities and others. Where laws have been violated, the Company will report violators to the appropriate authorities.

*Updated as of March 1, 2021  
Rev.2*