



GLOBAL FOREIGN CORRUPT PRACTICES ACT (FCPA) AND ANTI-CORRUPTION POLICY

InterDigital, Inc. ("InterDigital" or the "Company") is dedicated to fostering and maintaining the highest ethical standards. Bribery and corruption are prohibited under the laws of many of the countries in which InterDigital does business, including the United States Foreign Corrupt Practices Act of 1977 (the "FCPA"), the United Kingdom Bribery Act of 2010 (the "Bribery Act") and the OECD Anti-Bribery Convention (collectively referred to as the "Anti-Corruption Laws"). It is the policy of the Company to fully comply with both the letter and spirit of those laws and all other laws against government corruption and commercial bribery. This Policy applies to the Company and all of its subsidiaries, officers, directors, employees, and agents worldwide.

The purpose of the Global Anti-Corruption Policy set forth below is to describe the practices and procedures of InterDigital and its subsidiaries, officers, directors and employees ("Employees"), as well as its distributors, agents, contractors, business partners, and any other third-party representatives acting on the Company's behalf that present an appreciable risk of violating the Anti-Corruption Laws (collectively "Third Party Representatives") must follow to ensure that the Company's practices meet or exceed all applicable legal and ethical standards.

This Policy will be implemented and overseen by the Legal Department. The Company will require annual certifications from all employees certifying that they have read and understand this Global Anti-Corruption Policy. The Company does not expect its officers, directors, employees, and agents to become experts in compliance with the Anti-Corruption Laws. However, the Company expects and requires all those subject to its governance to seek guidance regarding any conduct that may violate the Anti-Corruption Laws. Please consult with the Legal Department should you have any questions.

Anti-Corruption Laws

The FCPA, the Bribery Act, and the laws and regulations of many other countries prohibit bribery of public officials and bribery of private individuals. A bribe is any promise, authorization, offer or payment of anything of value, made to an individual to corruptly induce such individual to obtain or retain business, secure an advantage, induce that individual to act partially or not in good faith or abuse a position of trust. Bribes can be anything of value, including travel, entertainment and gifts, as well as money, no matter what the value. Bribes can occur in the public or private sector **and will not be tolerated by the Company.**

Under the FCPA, bribes may not be authorized, promised, offered, or made to any "Foreign Official" for the purpose of influencing a government act or otherwise securing a sale, contract, or any other improper business advantage. The term "Foreign Official" is interpreted broadly and includes, but is not limited to: (1) any employee, director, or officer of a foreign or domestic government or any department, agency, or instrumentality of a government; (2) a state-owned or controlled entity, including, in many countries, telecom, health care, and educational institution employees; (3) a public international organization, such as the Red Cross or World Bank; (4) any person acting in an official capacity for or on behalf of such governmental bodies or public organizations, including entities hired to review and accept bids for a government agency; and

(5) foreign or domestic political parties, candidates for political office, and members of royal families. Other laws, including the Bribery Act, also prohibit bribes to Foreign Officials.

In addition, the Bribery Act and other laws also prohibit offering, giving, or promising a bribe to any individual, whether or not a public official, for an improper purpose or to influence the performance of a relevant function or activity, including any activity connected with a business, trade or profession, or any activity associated with their employment. Such "commercial bribery" has increasingly been a focus of enforcement in many countries, including the U.S. and

U.K. Actions that may violate the FCPA or Bribery Act may also violate other laws in the countries where the Company does business, including state, local, and municipal laws, as well as mail and wire fraud laws.

Bribery of anybody, whether or not a Foreign Official, is therefore illegal and strictly prohibited by the Company's policies and the Anti-Corruption Laws. For more guidance on how to handle providing things of value to Foreign Officials and private individuals, see the section below entitled "The Company's Policy" and/or contact the Legal Department.

Third Party Representatives

The Company violates anti-bribery laws if it authorizes a Third Party Representative, such as a consultant, agent, contractor, reseller, joint venture partner or any other intermediary, to engage in bribery on its behalf. In addition, the Company can be held liable if it disregards or ignores signs that should have alerted the Company that a Third Party Representative intended to make a bribe on its behalf. Under the FCPA, firm belief that the Third Party Representative will pass through all or part of the value received from the Company to a government official, or an awareness of facts that create a "high probability" of such a pass-through, also constitute knowledge under this law. As such, Third Party Representatives must be investigated, also known as conducting due diligence, prior to their engagement with the Company to ensure their commitment to compliance with the Anti-Corruption Laws.

Company employees will conduct risk-based due diligence on Third Party Representatives prior to their engagement. Before entering into, or renewing any agreement with, or compensating a foreign third party, employees should perform an analysis of that party's reputation for, and history of, legal compliance, particularly with respect to the Anti-Corruption Laws. The Third Party Representative's qualifications should be determined and documented. Employees should consult the Legal Department for instructions and guidance pertaining to the due diligence process.

Company personnel should be particularly alert to any "red flags" that may be encountered during due diligence or in transactions with Third Party Representatives. "Red flags," as discussed in more detail below, can arise with any Third Party Representative involved with the Company's foreign business operations, but arise more frequently in dealings with joint venture partners and foreign agents (such as promoters, sales agents, brokers, distributors, or consultants). **The basic rule is simple: a red flag cannot be ignored, it must be addressed.**

"Red flags" can arise at any stage of a transaction – during due diligence, during contract negotiations, in the course of operations, or at termination. "Red flags" that do not present serious issues at one stage of a transaction or relationship may pose significant liability risks when they appear at a different stage or in combination with a different overall set of facts. Thus, the significance of "red flags" must be considered in context rather than in isolation. All "red flags" must immediately be investigated and appropriately addressed. If you become aware of facts that may be "red flags" but are not sure how to respond to them, you should immediately contact the Legal Department.

The following are some "red flags" that frequently arise with Third Party Representatives involved in non-U.S. operations:

- A reference check reveals the third party's flawed background or reputation;
- The transaction involves a country known for corrupt payments;
- The Third Party Representative is suggested by a government official, particularly one with discretionary authority over the business at issue;
- The Third Party Representative objects to Anti-Corruption Law representations in Company agreements;
- The Third Party Representative has a close personal or family relationship, or a business relationship, with a government official or relative of an official;
- The Third Party Representative requests unusual contract terms or payment arrangements that raise local law issues, such as payment in cash, payment in another country's currency, or payment in a third country;
- The Third Party Representative requires that his or her identity or, if the third party is a company, the identity of the company's owners, principals or employees, not be disclosed;
- The Third Party Representative's commission exceeds the "going rate" or must be paid in cash;
- The Third Party Representative indicates that a particular amount of money is needed in order to "get the business" or "make the necessary arrangements";
- The Third Party Representative requests that the Company prepare or accept false invoices or any other type of false documentation; or
- The Third Party Representative requests payment in a third country (i.e., not where services are rendered, or where the third party resides), or to an account in another party's name.

After due diligence is completed and any risks are mitigated, the Third Party Representative's (as defined above) relationship with the Company must be memorialized by a written contract and such contract must contain appropriate Compliance with Anti-Corruption Laws language. The Company may, where appropriate, obtain periodic Anti-Corruption certifications from Third Party Representatives.

Political Contributions

The Company reserves the right to communicate its position on important issues to elected representatives and other government officials. It is, however, always the Company's policy to comply fully with all local state, federal, foreign, and other applicable laws, rules, or regulations regarding political contributions. No Company funds, facilities, or services of any kind may be paid or furnished to any candidate or prospective candidate for non-U.S. public office, to any non-U.S. political party, or to any non-U.S. political initiative, referendum, or other form of political campaign, unless explicitly permitted by applicable laws. Any such contribution must also be pre-approved in writing by the Legal Department.

Charitable Donations

The Company is committed to improving and promoting the interests of the communities in which it conducts business operations. Those working on the Company's behalf may provide charitable donations only to not-for-profit bona fide charitable organizations. However, no charitable donation may be made for the purpose of inducing any individual or entity to purchase, lease, recommend, use, or arrange for the purchase or lease of a Company product or service. Prior approval of the Legal Department must be obtained before any charitable donation is made on the Company's behalf.

Books and Records and Internal Control Violations

The FCPA also requires that the Company make and keep books and records which: (1) have reasonable detail; (2) accurately and fairly reflect transactions and the disposition of assets; and (3) are not false. In addition, the FCPA requires that the Company keep a system of internal controls that provide reasonable assurances that transactions: (1) occur only as permitted by the Company's policies; and (2) are accurately recorded in the Company's books and records. As such, Company employees or agents must never submit false, misleading, inaccurate, or fictitious documents to the Company. This is the responsibility of all employees, not just those working in the finance department.

Penalties

Violations of the Anti-Corruption Laws can result in severe criminal and civil penalties for both the Company and the individuals involved, including imprisonment, forfeiture of profits, and significant fines. In addition, bribery is always a violation of the Company's policies and will result in disciplinary action, up to and including termination of employment.

The Company's Policy

To ensure compliance with the Anti-Corruption Laws, it is the policy of the Company that:

1. The use of Company funds or assets for any unlawful or improper purpose is strictly prohibited.
2. No payment shall be made to any Foreign Official or other individual for the purpose of making a sale, obtaining favorable action by a government agency, or inducing that individual to violate an expectation that the individual will act in good faith, impartially, or in accordance with a position of trust.
3. No gifts of substantial value or lavish entertainment shall be provided to anyone because they can be construed as attempts to improperly influence decisions in matters affecting the Company's operation:
 - a. All travel provided to a Foreign Official must be pre-approved in writing by the Legal Department;
 - b. All gifts provided to a Foreign Official must be of nominal value. Gifts to Foreign Officials with a value of less than \$50 USD do not need prior approval from the Legal Department. All gifts with a value above \$50 provided to Foreign Officials must be pre-approved by the Legal Department;
 - c. Gifts to private individuals must be of a reasonable value, not lavish or excessive, and do not require prior approval. Gifts should never be part of a quid pro quo;
 - d. All meals and entertainment provided to a Foreign Official must also be of nominal value. Meals and entertainment to Foreign Officials with a value of less than \$200 USD per person do not need prior approval from the Legal Department. All meals and entertainment provided to a Foreign Official with a value above \$200 USD per person must be pre-approved by the Legal Department; and
 - e. Meals and entertainment to private individuals must be of a reasonable value, not lavish or excessive, and do not require prior approval. Meals and entertainment must never be part of a quid pro quo.
4. The offer, payment, authorization or promise to transfer in the future any Company funds, assets, gifts, or anything else of value to any Foreign Official or other individual is strictly prohibited for the purpose of influencing any act or decision of any such person in his or her official capacity or to induce improper performance of any relevant function or activity.

5. The retention of a Third Party Representative, such as a consultant, agent, contractor, reseller, joint venture partner or any other intermediary presenting an appreciable risk of exposing the Company to liability for violating the Anti-Corruption Laws, must occur after due diligence has been conducted and any "red flags" have been addressed by the Legal Department.
6. No political contribution or charitable donation shall be made with corporate funds or assets regardless of whether the contributions are legal under the laws of the country in which they are made, unless pre-approved, in writing, by the Legal Department.
7. All records must truly reflect the transactions they record. All assets and liabilities shall be recorded in the regular books of account. No undisclosed or unrecorded fund or asset shall be established for any purpose. No false or artificial entries shall be made in the books and records for any reason. No payment shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the document supporting the payment.
8. Any employee who learns of or suspects a violation of this Policy should promptly report the matter according to the guidelines under "Reporting Violations or Potential Violations of this Policy" below. All managers shall be responsible for the enforcement of and compliance with this Policy.
9. Employees who regularly conduct business with Foreign Officials or who are involved in the sale of products to government entities will receive anti-corruption training on a regular basis, but in no event less than once a year.
10. All employees should receive anti-corruption training at least once every two years.
11. A violation of this Policy will lead to disciplinary action, up to and including termination of employment.

Reporting Violations or Potential Violations of This Policy

If an individual suspects or becomes aware of any action related to bribery, recordkeeping or internal controls that he or she believes may be illegal, unethical or inappropriate, or otherwise in violation of this Policy, the person should immediately report the situation to the Legal Department. Any manager or Human Resources representative who receives a report of a potential violation of this Policy or the law must immediately inform the Legal Department. If for any reason an individual is uncomfortable discussing the matter with the Legal Department, he or she may raise the matter directly with the Audit Committee.

If the individual wishes to report his or her concerns anonymously, he or she may access the Company's anonymous toll-free telephonic or web-based hotline at <https://secure.ethicspoint.com/lrn/media/en/gui/22466/index.html> or (888) 279-1905.

Anonymous reports should be factual instead of speculative or conclusory, and should contain as much specific information as possible to allow the persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

The Company will not permit retaliation of any kind against anyone who makes a report or complaint in good faith with a reasonable basis for believing that a violation of this Policy or other illegal, unethical or inappropriate conduct has occurred.

DATED: April 20, 2023