

OmniVision UK Tax Policy

Will Semiconductor Co., Ltd. Shanghai is the ultimate parent company of the OmniVision group. This description of Will Semiconductor Co., Ltd. Shanghai's UK Tax Policy is intended to comply with paragraph 19 of Schedule 19 to the Finance Act 2016. (Hereinafter, the term "the Company" refers to Will Semiconductor Co., Ltd. Shanghai and its subsidiaries.) The Company's UK Tax Policy is applicable to the following indirect subsidiary that operates in the United Kingdom:

OmniVision Trading (Hong Kong) Company Limited

Governance

The Board of Directors of the Company (the Board) bears ultimate responsibility for the Company's global tax strategy and compliance. The group's general tax strategy and approach to compliance applies equally to UK taxes. The execution of the tax strategy and compliance is delegated by the Board to the Chief Financial Officer. Day-to-day management of tax matters is delegated to the Tax Director and the Tax Department. The Tax Department is staffed with qualified and experienced personnel who are knowledgeable in taxation matters.

Risk Management

The Company evaluates and controls its tax risks as a component of its overall framework for internal control over financial reporting. Due care is exercised in tax compliance processes, including preparing and filing accurate tax reports in a timely manner, and establishing information reporting systems that address tax reporting obligations. In addition, the Company maintains a transfer pricing policy that conforms to international best practices. In other words, pricing is based on the arm's length principle, supported by robust economic analyses, and formal documentation is maintained. Lastly, the Company maintains as simple a legal entity structure as is practicable.

The personnel in the Tax Department of the Company constantly monitor changes in tax laws and adjust the tax strategy accordingly. The tax personnel obtain training on various aspects of tax laws and new tax legislation. For tax matters requiring additional specialized knowledge of taxation, the Tax Department engages legal and accountancy firms or other consultants with the specialized knowledge of taxation to address such matters.

Attitude to Tax Planning and level of tax risk

The Company maintains a Code of Business Conduct and Ethics, and is “committed to ethical business practices, and to full compliance with all applicable laws and regulations.” All employees, officers and directors are expected to abide by all applicable laws, rules and regulations in jurisdictions where the Company conducts business. This includes the payment of all taxes due under applicable tax laws and regulations in all countries of operation.

In structuring its business, the Company considers the tax laws of the countries in which it operates, among other factors. However, considerations for business strategies and operations take precedence over tax planning. The Company avoids tax planning arrangements that are lacking in business substance or would otherwise be considered unethical.

The Board has fiduciary duty to the Company’s investors, and under the direction of the Board, management is held responsible for managing the Company’s tax costs, as are other expenditures. Consequently, management tries to take advantage of all tax incentives and exemptions authorized by laws and/or regulations in the jurisdictions in which the Company operates. Management also takes into consideration tax treaties between governments. The Company plans to continue to take advantage of legitimate tax incentives and exemptions in the future.

Relationship with and dealings with HMRC

The Company complies with all HMRC requirements regarding tax report filings. The Company maintains adequate records of its business dealings for HMRC’s review, if requested. When the Company has interpretation issues on the more complex UK tax rules, the Company consults with HMRC and, when deemed appropriate, applies for ruling from HMRC.