

# OMNIVISION Group

## ENVIRONMENT, SOCIAL RESPONSIBILITY AND GOVERNANCE POLICY

### I. INTRODUCTION

Will Semiconductor Co., Ltd. Shanghai together with its subsidiaries (hereafter referred to as the “OMNIVISION Group” or the “Company”) is committed to responsible business practices in the areas of environmental responsibility, social responsibility and corporate governance. (“ESG”)

### II. ENVIRONMENTAL RESPONSIBILITY

We embed environmental stewardship in everything we do. We believe we have a responsibility to minimize the energy, carbon, water and waste impacts of our businesses. We recognize that our activities have an impact on the environment and strive to limit this impact as much as possible. We are committed to ensuring that our businesses are environmentally responsible and energy efficient. We are committed to driving down our energy and carbon impacts. We recognize the challenges of climate change. We will use our best efforts to achieve continuous improvements.

We recognize that key environmental impacts are the:

- emission of greenhouse gases;
- generation of waste and hazardous materials;
- use of energy, water, manufactured products and natural resources.

We are focused on:

- minimizing our emissions of greenhouse gases;
- reducing the production of and recycle waste;
- efficiently use energy, water, manufactured products (e.g. paper) and natural resources;
- promote and develop the use of green energy;
- identify energy waste;

- increase use of videoconferencing to minimize air travel;
- source products that are made from sustainable sources or recycled materials or that are designed to be easy to reuse or recycle wherever practicable;
- eliminating, where possible, the use of products made from unsustainable natural resources (i.e. plastic bottles);

### **III. SOCIAL RESPONSIBILITY**

#### **A. HUMAN RIGHTS**

OMNIVISION Group respects human rights seeks to avoid the infringement on the human rights of others and is committed to addressing adverse human rights impacts where OMNIVISION Group is directly involved. In order to meet this responsibility, OMNIVISION Group has policies, procedures and processes appropriate to its size and circumstances that help it fulfil its responsibility to respect human rights. We are committed to the remediation of any adverse human rights impacts caused by OMNIVISION Group.

We believe in maximizing the individual contributions of our employees. We believe that the similarities, the differences and the power of our people allow us to sustain competitive advantages that lead to extraordinary business results. OMNIVISION Group's commitment to embracing and exemplifying inclusiveness extends throughout our business. And we are committed to those beliefs because a truly inclusive work environment - one with a richness of backgrounds and perspectives - leads to a better, more rewarding place to work.

In the event OMNIVISION Group determines that a human rights violation may have occurred, OMNIVISION Group would take swift and appropriate action to investigate, then address the issue, as previously discussed.

#### **B. EMPLOYEE ENGAGEMENT WITH COMMUNITY PARTNERS**

OMNIVISION Group provides dedicated time for employees to volunteer in the communities where they live and work. Partnering organizations include local

and national non-profit organizations, local schools, environmental non-governmental organizations, and local health care organizations. OMNIVISION Group supports community volunteer activity through our OAK (OMNIVISION Group Acts of Kindness) program. We named the program OAK after the tree, symbolic of strength, morale, resistance and knowledge; it is often associated with honor, nobility, and wisdom.

### **C. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

OMNIVISION Group considers freedom of association as the basis of a regular dialogue between the Company and its employees.

To that purpose, OMNIVISION Group respects the individual right of its employees to freely join, participate in or quit labor organizations to assert and defend their interests. Subsequently, OMNIVISION Group guarantees that any employee wishing to do so shall be protected against any internal measure limiting his or her freedom of association such as discrimination of any kind, pay loss or dismissal.

OMNIVISION Group also recognizes the importance of dialogue with freely appointed employee representatives, employee representative bodies or organizations (like trade unions), and supports collective bargaining.

### **D. WORKING HOUR AND LEAVE**

OMNIVISION Group pays attention to the overall well-being of its employees, which includes the right to have time dedicated to social, mental and physical well-being dimensions in their life. We comply with the requirements as defined under applicable local laws and regulations for regular work, overtime, maximum hours and leave.

### **E. CHILD AND FORCED LABOR**

OMNIVISION Group has significant headcount and operations in the United States, China, Singapore, Japan, Taiwan, EU, and other global locations with regional headquarters, sales offices, employing professional employees at these locations. OMNIVISION Group prohibits all forms of child labor, forced labor or exploitative working conditions as prohibited by the UN Guiding

Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the UN Declaration of Human Rights, the UN Global Compact and the principles laid down in the OECD Guidelines for Multinational Enterprises.

#### **F. LABOR NON-COMPLIANCE**

OMNIVISION Group is committed to acting ethically in dealing with customers, employees, shareholders, partners, suppliers, competitors and the community and with respect to applicable laws. In the event of a non-compliance event, our Global Corporate Governance Program describes associated response actions, and if warranted, consequences. OMNIVISION Group, in accordance with local labor laws, does not tolerate managers, contractors, or outside consultants who are found to be in violation of multiple labor issues and such relationships may be terminated.

#### **G. MINIMUM/LIVING WAGE**

OMNIVISION Group supports the right of individuals to earn such a wage as to be able to afford goods or services for quality of life, food, utilities, transport, healthcare, education, childcare, and personal recreation. This living wage is in every case at least at the minimum wage rates and requirements by country. OMNIVISION Group strives to compensate all employees fairly for the skills and activities performed.

#### **H. ISSUES RELATED TO DIVERSITY, EQUAL OPPORTUNITY AND DISCRIMINATION**

OMNIVISION Group is committed to following fair employment practices that provide equal opportunities to all employees. We do not discriminate or allow harassment on the basis of race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status. OMNIVISION Group also values diversity and believes that a diverse workplace builds a true competitive advantage.

## **I. EMPLOYEE DEVELOPMENT TRAINING AND POLICY COMMUNICATIONS**

OMNIVISION Group strongly believes in investing in the development of its employees, so they can aspire to higher goals and achieve more in their career. Programs are offered to employees to assist them in their personal growth, based upon their skill sets, goals and professional maturity. In addition, employees are asked to complete a series of on-boarding training upon their hire. This helps them set goals aligned with their development and assures the supporting resources are available for them to be successful in these areas.

OMNIVISION Group provides employees online access to policies and information. There is also annual communication and training on the policies and associated relevant changes through our Corporate Compliance Governance Program. Related policies are also discussed within the Code of Business Conduct and Ethics, which is available in multiple languages to assure global employee access to this information.

## **J. EMPLOYEE HEALTH AND SAFETY**

OMNIVISION Group ensures high standards of health and safety for all its employees in the Company's work activities. This includes providing personal protective equipment and implementing health and safety management systems to sustain continuous improvement.

OMNIVISION Group will also integrate safety across processes, continuous education and promote a strong safety culture.

## **K. SUPPLIER CODE OF CONDUCT**

We are committed to acting ethically in dealing with suppliers. Suppliers shall conduct their business in an ethical manner, and in compliance with all applicable laws. In particular, suppliers must:

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers

(including OMNIVISION Group employees), government officials and any other party are in compliance with applicable anti-bribery laws;

- Adhere to anti-trust and other competition laws;
- Disclose to OMNIVISION Group information regarding potential conflicts of interest relating to their activities as an OMNIVISION Group supplier, including disclosure of any financial interest an OMNIVISION Group employee may hold in your business;
- Protect all confidential information provided by OMNIVISION Group and our respective business partners;
- Respect intellectual property of others, including OMNIVISION Group;
- Adhere to international trade regulations and export control regulations;
- Respect Human Rights
- Strictly adhere to environment protection laws, responsible sourcing;
- Respect the rights of their employees to join labor unions voluntarily, bargain collectively, and refuse to participate in this activity;
- Prohibit all forms of child labor, forced labor and exploitative labor;
- Pay at least at the minimum wage rates required by local law and strive to provide fairer remuneration for the skills and activities performed by their employees;
- Not discriminate or allow harassment on the basis of race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status;
- Provide working hours that do not exceed the maximum time stipulated by local laws. The weekly working hours including overtime should not exceed 60 hours, unless in the case of emergency. All overtime work must be voluntary. Employees must take at least one day off every seven days;
- Value the personal growth of employees and provide training, resources and opportunities for employee development;
- Provide a safe and healthy workplace for all of their employees and shall conduct their business in an environmentally sustainable way;
- Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks;
- Ensure that all workers are sufficiently aware of these risks and appropriately

- trained on the implementation of control measures, and
- Ensure that the goods provided to OMNIVISION Group are in compliance with requirements regarding the prohibition and restriction of substances covered under the scope of all relevant regulations including OMNIVISION Group Conflict Mineral Policy and Hazardous Substances Control Standard.

## **IV. CORPORATE GOVERNANCE**

We are committed to acting ethically in dealing with customers, employees, shareholders, partners, competitors and the community, and in compliance with all applicable laws. We support this commitment through our robust Global Corporate Governance Program. The program supports OMNIVISION Group's worldwide culture of compliance and ethics through partnerships and collaboration with commercial team members and other key stakeholders and works with teams across OMNIVISION Group to monitor our activities and performance. The primary purpose of our governance program is to support our culture of integrity and to detect and prevent violations of laws, regulations and Company policies, taking into account and tailoring the program to our unique environment.

Our Code of Business Conduct and Ethics is the foundation and cornerstone for our existing policies and our governance program. All employees, including employees responsible for supply chain management, are required to comply with the Code, which provides guidance regarding business conduct and practices to all OMNIVISION Group team members. All employees participate in annual training on the Code which includes training on ethical decision making and upholding laws and regulations, to ensure understanding and compliance with the requirements of the Code. Employees and business partners are encouraged to raise questions when they need guidance or clarification and to report any concerns or suspected violations of the Code of Business Conduct and Ethic, Anti-Bribery and Anti-Corruption Policy, other Company policies, procedures and/or applicable laws.