

# OMNIVISION Group

## WHISTLEBLOWING POLICY

### I. INTRODUCTION

Will Semiconductor Co., Ltd. Shanghai together with its subsidiaries (hereafter referred to as the “OMNIVISION Group” or the “Company”) aims to conduct its business with the highest standards of honesty and integrity and any wrongdoing by staff, officers or accredited partners should be reported. This policy is designed to deal with concerns raised in relation to specific issues of wrongdoing which may be illegal, against the public interest or damaging to the reputation of OMNIVISION Group.

By knowing about malpractice/poor practice we can take the necessary steps to safeguard the interests of our customers, employees, shareholders, partners, suppliers and the community. In summary, do not hesitate to get in touch with us.

We recognise that you may be worried that by reporting such issues you may be subject to some adverse action so we have outlined how you can choose to report an incident anonymously and how you will be protected.

### II. WHAT IS WHISTLEBLOWING?

Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by the management or employees. The following are generally accepted as improper and reportable conduct for whistleblowing, of which the list is not exhaustive:

- Any unlawful or illegal activities, whether criminal or breach in civil law;
- Breach of policies and/or procedures;
- Fraud, theft, embezzlement or dishonesty;
- Corruption/bribery;
- Bullying and harassment;
- Actions which can cause physical danger/harm to another person and/or

- can give rise to risk of damage to properties/assets;
- Forgery or alteration of any documents belonging to the OMNIVISION Group, and customers of OMNIVISION Group;
  - Poor or unethical sales practices, including mis-selling;
  - Profiteering as a result of insider knowledge;
  - Gross mismanagement or dereliction of duties;
  - Conflict of interest;
  - Misuse of position or information; and
  - Any other similar or related irregularities.

### **III. WHO SHOULD RAISE A CONCERN?**

Anyone has the right to whistle blow. This Policy applies to all matters involving Company employees (including former employees and irrespective of nature of employment status), customers and any other stakeholders/persons providing services to OMNIVISION Group, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with OMNIVISION Group.

### **IV. HOW TO MAKE A DISCLOSURE?**

We take whistleblowing seriously and your concern matters to us, so we would like to hear from you. If you notice any improper practices occurring within OMNIVISION Group, you can provide the disclosure in writing to [whistleblower@ovt.com](mailto:whistleblower@ovt.com).

### **V. HOW DOES OMNIVISION GROUP HANDLE THE INFORMATION PROVIDED BY YOU?**

After receiving the report of any alleged wrongdoing, it will be investigated by the Audit and Related Party Transaction Control Committee. Depending on the nature of the ethics complaint, the Audit and Related Party Transaction Control Committee will either appoint investigators from a pool of trained Company employees (often in Legal Department, Audit Department or Human Resources Department) or appoint certified external investigators. Selected investigators have the necessary expertise and training and are free of conflict of interest regarding the ethics complaint. The Audit Officer involved, in their role as trusted representative, will discuss with you any (possible) risks of retaliation

and how those risks, if any, can be reduced. Throughout the investigation, the Audit Department remains the central point of contact for all involved parties, including you and other directly involved people, regarding any questions or issues relating to the pending investigation.

## **VI. WHISTLEBLOWER INVESTIGATION**

During a business ethics investigation, the Audit and Related Party Transaction Control Committee will gather facts regarding the ethics complaint. Depending on the nature of the ethics complaint, the Audit and Related Party Transaction Control Committee will either appoint investigators from a pool of trained Company employees (often in Legal Department, Audit Department or Human Resources Department) or appoint certified external investigators. Selected investigators have the necessary expertise and training and are free of conflict of interest regarding the ethics complaint. The investigation officer appointed by the Audit and Related Party Transaction Committee will help to find any potential risks of retaliation and how to deal with these risks. Throughout the investigation process, the Audit Department has always been the central contact point for all issues related to the incident.

## **VII. WHISTLEBLOWER PROTECTION**

OMNIVISION Group commits to ensure that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or indirectly working relative to a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

OMNIVISION Group is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need-to-know basis (e.g., requirement to testify in court). If such a situation arises, OMNIVISION Group shall discuss and seek consent with the whistleblower first before proceeding with the case.

The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

## **VIII. MAKING YOUR CLAIM ANONYMOUSLY OR CONFIDENTIALLY**

To safeguard the position of parties involved in speaking up, confidentiality, privacy and the option of anonymity are of utmost importance to us.

## **IX. RESPONSIBILITY OF WHISTLEBLOWER**

- A.** Whistleblower makes the disclosure in good faith.
- B.** Whistleblower reasonably believes that the information and allegations are substantially true.
- C.** Whistleblower is not acting for personal gain. If the case involves the complainant's personal interests, it must be informed at the outset.