

**SAMSUNG**



# Code of Conduct

⇒ Driving Us Forward to Success

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# A Message from Leadership

## Colleagues,

At Samsung, our success has always been centered around our ability to evolve and innovate in order to deliver best-in-class products and services that make a meaningful impact on society. However, success means more than just meeting our business goals – it is also about our commitment to acting ethically and with integrity in everything we do.

Samsung is a company that is built on a foundation of strong core values – People, Integrity, Change, Excellence and Co-Prosperity. Our Code of Conduct is an extension of these values and serves as a framework for how we make decisions, take actions and ultimately, drive our business forward. It provides guidance on how to act with integrity and make ethical choices.

Our people are talented, dedicated and passionate individuals who take pride in our collective success. Each and every one of us is responsible for understanding and following our core values and our Code of Conduct – and Samsung's reputation depends on how we live these values. By working together, we can continue to preserve our strong reputation and build a better Samsung.

Sincerely,



**KS Choi**  
President & CEO,  
Samsung Electronics North America

# Samsung Values



## People

Quite simply, a company is its people. At Samsung, we're dedicated to giving our people a wealth of opportunities to reach their full potential.



## Excellence

Everything we do at Samsung is driven by an unyielding passion for excellence and an unfaltering commitment to develop the best products and services on the market.



## Change

As we have done since our foundation, we set our sights on the future, anticipating market needs and demands so we can steer our company toward long-term success.



## Integrity

Operating in an ethical way is the foundation of our business. Everything we do is guided by a moral compass that ensures fairness, respect for all stakeholders and complete transparency.



## Co-Prosperity

Samsung is committed to becoming a socially and environmentally responsible corporate citizen in all of its communities worldwide.



# Introduction

Our Code Is Our Framework



## Our Code Is Our Framework

Samsung's success of yesterday, today and tomorrow is built on our ability to innovate, change and deliver safe and high-quality products and services to the market. Our people drive this success by acting with the highest levels of integrity. This Code of Conduct provides the framework for how to act with integrity and make ethical decisions. While conducting business for Samsung, we are all committed to:

- Acting ethically and honestly.
- Accepting responsibility for our actions and decisions.
- Following our Code, policies and the law.
- **Speaking Up** when we have questions or concerns.

## We Look to Our Leaders and Other Managers to Set the Example

We all play an important role in creating our culture, but leaders and managers have additional responsibilities, including:

- Leading by example and setting a positive tone for employees to emulate.
- Creating an environment that emphasizes our values in our words and actions.
- Promoting a workplace where compliance is expected.
- Identifying any compliance risks within our roles and responsibilities.
- Raising issues identified to a **Speak Up Resource** when needed.

As a global company selling a wide variety of products and services, Samsung's policy is to comply with laws that may vary across our businesses and in different countries and cultures. We must all abide by the laws, regulations and policies that apply to our business and role at Samsung. If you have questions about what law applies, it is important that you reach out to one of the **Samsung Speak Up Resources** described in this Code.



Everyone at Samsung Electronics America and its subsidiaries and affiliated companies in North America, including our board of directors, executive officers and employees, are responsible for understanding and following this Code. We also hold our business partners to the same high ethical standards.

Remember that **ethical leadership starts with you** – leading by example is the best way to inspire others.

## Making Ethical Choices

Everyone at Samsung should always use good judgment in making decisions to drive Samsung's success forward, but if you are ever unsure, you should ask yourself:



If the answers to the above questions present any doubt, consult with a **Speak Up Resource**.

## We Drive Forward and Succeed Together

Everyone at Samsung plays an important part in our growth and success. Following this Code and asking questions when you aren't sure about something are fundamental to Samsung's ability to drive forward.

You are encouraged to seek guidance and to report concerns when you see or hear of activities you think may not be right. The most important thing is that you **Speak Up**, not how you speak up. To report a concern or ask questions, contact one of the below:

### Samsung Speak Up Resources



The Samsung Webline: <https://samsung.webline.sai360.net>



The North America (NA) Compliance Team (by phone or email)

- U.S. and Canada: 1-855-50-COMPLIANCE (1-855-502-6675)
- International: +1-201-334-FONE (+1-201-334-3663)
- Email: [NACompliance@sea.samsung.com](mailto:NACompliance@sea.samsung.com)



The **Samsung Webline** is an online resource for reporting concerns **anonymously**.

Our Code is supported by policies that may be found on our local company intranet sites. Each Samsung subsidiary or affiliate has specific people who may be contacted as an additional resource.

## **We Understand How Concerns Are Handled**

When you raise concerns, you can count on Samsung to take them seriously and to investigate them. At times, you may be asked to participate in an investigation, and if this happens, you are expected to cooperate fully and communicate honestly.

Violations of laws and regulations can have severe consequences for both the Company and the individuals involved. The Company will take appropriate action, up to and including termination of employment, if a violation of our Code, policy or law has occurred.

## **We Do Our Part to Prevent Retaliation**

Samsung is committed to creating a “speak up” culture where anyone can ask questions, seek guidance or report concerns of potential wrongdoing without fear of retaliation. No one will be retaliated against for making a good-faith report, for asking questions or for cooperating in an investigation — even if the concern turns out to be unfounded. Anyone who retaliates against another individual may be subject to discipline, up to and including termination of employment.



# 1

# Our People Drive Us Forward



## We Work in a Safe and Healthy Environment

At Samsung, we are dedicated to providing a work environment that is healthy, safe and secure for all. We comply with all health and safety laws and regulations that apply to our work. This includes maintaining a workplace that is free from violence, threats of violence and anyone working under the influence of drugs or alcohol.

## We Support Diversity and Inclusion

At Samsung, our people are one of our greatest assets and as a result, we are committed to creating an inclusive work environment of diverse backgrounds, ethnicities, cultures, beliefs and experiences. We each play an important role in our workplace, which respects the diversity of people, ideas and viewpoints.

We each play an important role in our workplace, which respects the **diversity of people, ideas and viewpoints.**

## We succeed with integrity by

- Performing our work safely and not under the influence.
- Conducting work safely and responsibly.
- safety risks and concerns.
- Not engaging in threats or violent or intimidating behavior.

## We succeed with integrity by

- Respecting each other regardless of individual characteristics or backgrounds.
- Promoting a diverse and inclusive workplace and not engaging in favoritism.
- Listening to other opinions and ideas and communicating responsibly.
- Following our policies and our Employee Handbook.

## We Treat Others with Dignity and Respect

We strive to create a team where each of us feels welcomed and valued, and we share the responsibility of treating each other with respect. We foster a dynamic team environment that is free from any form of harassment, discrimination, favoritism or disrespectful treatment.



**Harassment and discrimination** are defined as any action taken against another based on certain characteristics, including but not limited to:

- |                   |                                 |   |
|-------------------|---------------------------------|---|
| - Race            | - Religion                      | - Transgender status                                  |
| - Color           | - Pregnancy                     | - Military status                                     |
| - Sex             | - Medical condition             | - Veteran status                                      |
| - Gender          | - Genetic information           | - Marital or civil union status                       |
| - Ethnicity       | - Disability                    | - Any other trait or characteristic protected by law. |
| - National origin | - Sexual orientation            |   |
| - Ancestry        | - Gender identity or expression |   |
| - Age             |                                 |   |

Harassment includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment, and can take many forms, including physical actions, spoken and written remarks, and videos or pictures. Harassment negatively affects individual work performance and our workplace as a whole, and will not be tolerated.

## We succeed with integrity by

- Making all employment-related decisions based on an individual's strengths and experiences.
- Not participating in, and always acting to prevent or stop, any harassing or discriminatory behavior.





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**Our Brand  
and Reputation  
Drive Us Forward**

## We Protect Company Information and Assets

Our work for Samsung provides us with access to information and other assets that we have a responsibility to use sensibly and to safeguard from loss, theft and misuse. We should all protect confidential and proprietary information and assets and treat these assets and property carefully and responsibly.



Samsung assets include physical, financial, intellectual and human assets, physical premises, communication systems, equipment, corporate charge cards, supplies and other information or items purchased, owned or maintained by the Company.

We have a responsibility to **use information and other assets sensibly** and to **safeguard them** from loss, theft and misuse.

## We succeed with integrity by

- Respecting the confidentiality of all sensitive and proprietary information regardless of who it belongs to.
- Only sharing information on a need-to-know basis.
- Using our technology assets primarily for business purposes.
- Exercising good judgment when using Samsung assets.
- Safeguarding the integrity and security of our business systems from unauthorized access.



## We Avoid Conflicts of Interest

As Samsung employees, we should all make sound business decisions that are in the Company's best interest. This includes avoiding any situations that might create or even appear to create a conflict of interest.



**A conflict of interest can occur when our personal, financial or family interests interfere with our ability to do our jobs objectively or effectively. Even the appearance of a conflict can damage our personal credibility and the Company's reputation.**

At Samsung, "family" includes:

- spouse or domestic partner
- parents, children, grandparents and grandchildren
- brothers and sisters
- aunts, uncles, nieces and nephews
- cousins
- in-laws
- anyone with whom we share a home

## We succeed with integrity by

- Not having any financial or ownership interest in a company that competes or does business with Samsung, such as a customer, vendor or business partner.
- Removing ourselves from employment-related decisions or supervision that involves a personal, romantic or family relationship.
- Avoiding second jobs that may conflict with our roles and responsibilities at Samsung.
- Disclosing outside board of director positions to a Speak Up Resource.
- Following our internal policies on conflicts of interest and seeking guidance and approval before taking any action that may be a conflict of interest.

## We Help Prevent Fraud

Our business and financial records help us make important business decisions and are fundamental to Samsung's continued success. The accuracy and integrity of our business records are also legally required, which is why it is essential that we maintain all records with honesty and transparency. We all have a responsibility to follow our internal processes and to help prevent fraud.

Fraud occurs when information is intentionally concealed, altered, falsified or omitted for individual benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline).



### Examples of fraud include:

- Falsifying expense reports
- Altering numbers to meet productivity or bonus goals
- Presenting false information to regulatory authorities
- Falsifying time cards
- Misrepresenting sales or donations of products to obtain unauthorized pricing for a customer
- Misstating financial information in our company's books and records

## We succeed with integrity by

- Submitting only accurate and honest financial records, such as correct time sheets, invoices or expense reports.
- Using company-issued credit cards for business purposes only.
- Providing timely, realistic forecasts and assessments to management.
- Watching for signs of fraud and reporting any concerns immediately.

## We Do Not Tolerate Bribery and Corruption

Samsung's success and reputation depend on each of us following the law and acting ethically at all times. This includes abiding by strict local and international laws prohibiting offering and accepting bribes.

Samsung does not tolerate bribery and expects that anyone acting on our behalf follows this same standard. No one should ever give or offer anything of value directly or indirectly, through a third party, to anyone, including government officials, in order to obtain business or to influence an act or decision.

Violations of anti-bribery and corruption laws can have severe consequences. If you have any questions, seek guidance from our internal policies or a [Speak Up Resource](#).



A bribe is any act of offering or accepting anything of value, including for personal or financial gain, in order to secure a competitive advantage.

## We Exchange Gifts and Hospitality Appropriately

When we exchange gifts and hospitality, we must do so in a manner that demonstrates good judgment and moderation. Although gifts and hospitality can help foster business relationships, if they are extravagant, or if they lack transparency or a legitimate business purpose, they may be inappropriate. We must be careful to ensure that any gifts or hospitality do not harm our reputation, damage trust, or violate the recipient's policies.

If you are involved in selling to a **government body**, be sure to find out if more specific policies apply to you by contacting a [Speak Up Resource](#).

### We succeed with integrity by

- Exchanging gifts and hospitality only when they are appropriate, reasonable and infrequent.
- Never giving or receiving cash or cash equivalents.
- Avoiding putting ourselves or others in situations where the gift or hospitality could influence or appear to influence a business decision.
- Seeking guidance from NA Compliance when exchanging gifts or hospitality.

### **We Compete Vigorously but Fairly**

Samsung thrives in the market by staying ahead of our competition and finding ways to drive innovation for our customers and consumers. While competing aggressively helps us meet our business goals, we should do so through fair business practices.

We abide by antitrust laws, which promote fair competition and prohibit competitors from creating “agreements” that prevent, restrict or distort the exercise of free competition.

### **We Are Responsible with Our Sales and Marketing Practices**

When marketing or selling our products, we do so with honesty, fairness and integrity, and we make only truthful and accurate statements.

Regardless of the value of a transaction or the length of a business relationship, we should never take unfair advantage of our business partners or competitors through unethical means, including manipulation, abuse of confidential information, misrepresentation of material facts or any other unfair or deceptive practice. We expect our business partners to meet these same high standards.

If you have questions about antitrust laws, consult our internal policies or a **Speak Up Resource**.



A group of business professionals are gathered around a conference table in a modern office. A woman with dark curly hair is smiling at a man in a checkered shirt who is also smiling. Another person is visible in the foreground, seen from the back. The office has large windows and modern decor.

**3**

**Our Business  
Partners  
Drive Us Forward**



## We Sell and Deliver Safe and High-Quality Products

Over many years, our business partners, customers and consumers have come to trust the products and services we create, sell and deliver. Each and every one of us plays an important role in preserving this trust and confidence in the marketplace. We care deeply about product safety and quality, and we make sure our products meet or exceed our own internal standards, as well as the standards set by laws, regulations and our industry.

Each and every one of us plays an important role in **preserving our customers' and consumers' trust and confidence.**

## We succeed with integrity by

- Keeping safety, quality and customer satisfaction at the foundation of our business.
- Understanding the needs, lifestyle and behaviors of our customers and consumers so we can innovate and change.
- Meeting the promises we make to our customers and holding our business partners accountable.
- Following all laws and regulations related to the design, manufacturing, packaging, storage and shipment of our products.
- Complying with all applicable laws, regulations and company procedures in the event of a product safety issue, and contacting a Speak Up Resource with any concerns.

## We Respect the Privacy of Personal Information

The collection and storage of information is increasingly important to Samsung's success, and our customers and consumers count on us to do so in appropriate ways. Collecting information must also be done in compliance with strict laws governing data protection and privacy, as well as our internal policies. We must always protect personal information related to other Samsung employees and our customers, consumers and business partners, and exercise caution (such as obtaining consent) prior to disclosing personal information to others.



**Personal Information may include, but is not limited to, items such as:**

- Name
- Address
- Email
- Government-issued identification numbers
- Biometrics
- Facial recognition attributes
- Medical history

## We Look for Ways to Advance Accessibility

Our products and services are in the hands of millions of people. These people depend on our ability to create and deliver technology solutions that are inclusive and accessible for those with disabilities. We strive to continuously look for ways to increase the accessibility of our products and services so that all can experience the excitement of our technologies.

### We succeed with integrity by

- Following our policies when collecting, processing, using, transferring or disclosing personal information.
- Only accessing, collecting, using, or sharing personal information for authorized business reasons and with proper consent.
- Taking privacy concerns into account when developing new products.
- Immediately reporting a data breach, including a loss or theft of personal information, to a Speak Up Resource.

### We succeed with integrity by

- Looking for ways to advance accessibility to those with visual, hearing, mobility, speech and other disabilities.
- Finding ways to improve our technologies to help people with disabilities.
- Being honest about the accessibility of our products and services.
- Respecting and following legal requirements related to accessibility.

# 4

**Our Global  
Communities  
Drive Us  
Forward**



## We Act as Good Corporate Citizens

We are committed to being a good corporate citizen and to remaining involved in our communities, creating a meaningful and positive impact on the places where we live and work. One of the ways in which we support our surrounding communities is through volunteer projects and charitable giving.

We are committed to complying with laws and regulations that help protect human rights and the safety of children. We do not tolerate or permit human trafficking or the use of child labor or any form of forced, indentured or involuntary labor in any of our operations or at any of our properties.

## We Follow Global Trade Regulations

The products we sell are produced all over the globe, crossing borders on a daily basis. Our ability to deliver products and services to our customers requires that we follow very complex customs and other international trade laws and regulations. These laws, which are constantly changing, govern areas such as imports, exports, economic sanctions and immigration. We must all take care to understand how they apply to our work and follow them in our business activities.

When questions arise, seek help from our internal policies or a **Samsung Speak Up Resource**.



**Violations of global trade laws and regulations can result in severe civil and criminal penalties for the Company and our employees, and may impact our ability to import our products and deliver them to our customers.**



## We Help Make the Environment Better

We are committed to incorporating sustainable thinking into our business and working to deliver products and solutions that reduce the environmental footprint of Samsung and our consumers. We follow applicable environmental laws and strive to exceed industry standards of environmental excellence. We work to deliver products and solutions that are eco-friendly, use energy more efficiently, are made from more preferable materials and can be safely recycled or disposed of at the end of their lifecycle.

We follow applicable **environmental laws** and strive to **exceed industry standards of environmental excellence**.

## We succeed with integrity by

- Supporting environmental stewardship and continually evaluating and minimizing the impact we have on the planet.
- Striving to increase the energy efficiency and recyclability of our products.
- Reducing the amount of sensitive and hazardous substances we use.
- Supporting environmental sustainability through pollution prevention, waste management, recycling, energy conservation and energy-saving innovations.



# Conclusion

We Drive Forward and Succeed Together





# Our Code helps us achieve our success and drives us forward the right way — with integrity.

As the people of Samsung...

## We Create a Positive Work Environment

- We respect others and listen to their opinions.
- We promote diversity and inclusion.
- We do not tolerate harassment or discrimination.
- We work in a healthy, safe and drug-free work environment.
- We communicate responsibly.

## We Protect Our Brand and Reputation

- We use Samsung assets responsibly.
- We protect confidential information and intellectual property.
- We safeguard our information technology systems.
- We avoid conflicts of interest.
- We prevent fraud.
- We do not tolerate bribery and corruption.
- We exchange gifts and hospitality appropriately.
- We compete vigorously but fairly.
- We are responsible with our sales and marketing practices.

## We Promote Our Global Communities

- We strive to make a positive impact on our communities.
- We respect international trade laws.
- We take the initiative to reduce our environmental footprint.

## We Support Our Business Partners

- We sell and deliver safe and high-quality products.
- We respect the privacy of personal information.
- We help advance accessibility.



