

SAMSUNG



Vendor Code of Conduct

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Introduction

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. Just as we expect our people to understand and follow our core values, we expect our vendors, business partners and other service providers to do the same. This Vendor Code of Conduct provides the framework for how Samsung's Vendors should act with integrity and make ethical decisions.

Please take the time to review this Vendor Code carefully and ensure that your representatives conduct Samsung's business with this framework in mind. You will be asked to annually certify to this Code and the accompanying Vendor Guidelines. Thank you for your commitment to upholding our core values. By working together, our Vendors can help drive Samsung forward, and we can continue to preserve our strong reputation and build a better Samsung.

1 Ethical Conduct Drives Us Forward

Samsung expects its Vendors to act with integrity and to make ethical business decisions. This begins with complying with all applicable laws and regulations. Additionally, please observe the following:

Conflicts of Interest

Samsung expects its Vendors to avoid situations that might create or even appear to create a conflict of interest. A conflict of interest can occur when personal, financial or family interests interfere with Samsung’s best interests. Examples of unacceptable conflicts of interests include paying a finder’s/referral fee or commission to the Samsung employee who referred business to the Vendor, paying a Samsung employee personally for services, and procuring subcontracting work for Samsung based on familial or personal relationships. Vendors must disclose all potential conflicts of interest with Samsung through the [Samsung Webline](#).

Gifts and Hospitality

Gifts (such as artwork, clothing, wine, spirits, candy, gifts baskets, and other products, merchandise and/ or services given or received without payment) and hospitality (such as meals, entertainment event tickets, golf outings, cultural events, conferences or similar engagements given or received without payment) can help foster business relationships, yet they can also lead to financial and reputational damage.

Therefore:

Gifts

Samsung employees are not permitted to receive:

- any gifts, unless they are *de minimis* in value, such as promotional items or small food or perishable items (e.g., gift baskets, chocolates, popcorn);
- cash or cash equivalents (such as gift cards); or
- free or reduced priced goods, services or other favors for their personal benefit or for the benefit of their family.

Hospitality

Samsung employees are not permitted to accept hospitality unless:

- there is a legitimate business purpose;
- the hospitality is reasonable, customary and not extravagant; and
- both the Vendor and the Samsung employee attend the hospitality event (otherwise, the engagement is considered a gift, and would be subject to the above policies on gifts).

Samsung employees are not permitted to accept free travel and accommodations. Vendors should not pay for Samsung employees' travel and accommodations.

Additionally Samsung employees may not give gifts or hospitality unless the recipient's policies on receiving gifts or hospitality are followed and (a) if a gift, the item is nominal, or (b) if hospitality, both the Samsung employee and the recipient are present.

Bribery and Corruption

Samsung does not tolerate bribery or corruption, and expects its Vendors to abide by all applicable domestic and international laws prohibiting bribery, such as the U.S. Foreign Corrupt Practices Act. Vendors should not make any direct or indirect payments, or promises of payments, for the purpose of procuring or retaining business, including payments to any foreign or other government official.

Fraud

Samsung expects its Vendors to guard against fraud, which may occur when information is intentionally concealed, altered, falsified or omitted for individual benefit or the benefit of others. Vendors should ensure that invoices submitted to Samsung are accurate, and do not conceal or disguise transactions or expenditures. Samsung expects Vendors to report any concerns immediately to a Samsung Speak Up Resource.

Global Trade Regulations

Samsung regularly sells its products internationally, requiring compliance with complex customs and international trade regulation. Thus, Samsung expects its Vendors to comply with all applicable laws governing international trade and trade controls, including all import, export and re-export requirements.



Vendors should use the Samsung Webline to ask questions or express concerns involving gifts or hospitality. Additional rules may apply if products or services are being used for sales to a government body.

2 Protecting Company Assets Drives Us Forward

Use of Samsung Assets

If Samsung provides Vendors any information, technology, systems (including e-mail) and/or physical assets, these must be used solely for purposes authorized by Samsung. Vendors must comply with Samsung's confidentiality, security and privacy procedures as a condition of receiving access to Samsung's internal corporate network, systems and buildings. All data stored or transmitted on Samsung-owned or leased equipment is to be considered confidential and the sole property of Samsung. Samsung may monitor, at its sole discretion, Vendors' use of Samsung networks or systems (including e-mail) and/or access to data stored or transmitted using Samsung's networks or systems. Samsung prohibits Vendors from using Samsung-provided information, technology, and/or systems to create, access, store, print, solicit or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate and/or to send any false, derogatory or malicious communications.

Data Protection

Vendors must abide by all applicable laws and regulations relating to the privacy and security of individuals' personal data, and the confidential information of corporate customers and business partners. This includes reporting any suspected or actual breaches within 48 hours of Vendors becoming aware of the suspected or actual breach. Vendors should use the [Samsung Webline](#) to report suspected or actual breaches as Data Privacy Violations.



**Samsung expects its
Vendors to help protect
its assets.**

Intellectual Property Rights

Vendors must protect and respect intellectual property rights of Samsung and third parties, and not intentionally infringe or improperly use such intellectual property, including, but not limited to, copyrights, patents, trademarks, and trade secrets.

Business Record Keeping

Vendors are expected to honestly and accurately record and report all business information and comply with all applicable laws regarding data retention and accuracy. Vendors must create, retain and dispose of business and employee records in full compliance with all applicable legal and regulatory requirements. Vendors must be truthful in all representations, and guard against misstatements to Samsung, the public, and the government, including in the disclosure of information regarding Vendors' business activities, structure, and financial status to regulatory agency representatives and government officials.

3 Corporate Social Responsibility Drives Us Forward

Non-Discriminatory Workplace

Vendors must not discriminate in hiring, compensation, access to training, promotion, termination, or retirement based on race, color, sex, gender, ethnicity, national origin, ancestry, age, religion, pregnancy, medical condition, genetic information, disability, sexual orientation, gender identity or expression, transgender status, military status, veteran status, marital or civil union status, or any other trait or characteristic protected by law.

Harassment

Samsung does not tolerate the harassment of its employees, and expects its Vendors to refrain from and prohibit the harassment of its employees. Harassment can take many forms, but always includes unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment. Physical conduct, oral or written comments, and videos or pictures that cause individuals to feel harassed should be identified and addressed immediately.



Samsung expects its Vendors to share its commitment to environmental sustainability, human rights, and equal opportunity in the workplace.

Voluntary Labor

Samsung condemns the use of forced labor and human trafficking, and will not work with any Vendor that relies on an involuntary workforce. Vendors must use only voluntary labor and not condone or benefit from involuntary labor. Forced labor, whether in the form of indentured labor, bonded labor, or prison labor, by Vendors and/or their subcontractors is strictly prohibited.

Child Labor

Vendors must comply with all minimum working age laws and requirements and not utilize child labor. For purposes of this Vendor Code, the term “child” shall mean any person under the age of 15 (or 14 where the law of the country permits), under the age of completing compulsory education, or under the minimum age for employment in the applicable jurisdiction, whichever age is greatest.

Physical Abuse

Vendors must not engage in physical discipline or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and/or verbal abuse or other forms of intimidation is strictly prohibited.

Safe Workplace

Vendors must provide a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations and practices, including prohibiting the use, possession, distribution and/or sale of illegal drugs or alcohol. Vendors must develop and implement plans for emergency situations, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, and adequate exit facilities.

Work Permissions

Vendors must only employ workers with a legal right to work, which must be validated by Vendors by reviewing all relevant documents prior to employment of a worker. Vendors must implement procedures which demonstrate compliance with these validations. Vendors must regularly audit employment agencies from whom they obtain workers to monitor compliance.

Employee Relations

Vendors must recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with local laws. It is important to establish open communication and direct engagement between employees and management as a means by which to support positive employee relations.

Living Wage

Vendors must pay living wages under humane conditions. All workers must be provided with clear, written information about their employment conditions with respect to wages before they commence employment, and as needed throughout their term of employment. Deductions from wages as a disciplinary measure is not permitted.

Hours and Overtime

Vendors must not require employees to work more than the maximum hours of daily labor set by applicable laws. Vendors must ensure that overtime is voluntary and paid in accordance with applicable laws and regulations.

The Environment

Vendors must comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharge, including the manufacture, transportation, storage, disposal and release to the environment of such materials.

4 Monitoring and Record Keeping

Vendors must maintain necessary documentation to demonstrate their compliance with this Vendor Code. Samsung and/or its designated agents maintain the right to take certain actions, such as inspection of facilities or review of applicable documentation, to ensure compliance with this Vendor Code.

5 Vendor Authority

Vendors must not enter into any agreement, contract or transaction on behalf of Samsung, hold itself out as a representative or agent of Samsung, or speak to the press or third parties on Samsung's behalf or concerning any business conducted with Samsung, unless expressly authorized in writing to do so by Samsung. Vendors may not use subcontractors without prior approval from Samsung. All Vendors that have been approved to use subcontractors must ensure that the subcontractor's ethical and business practices comply with the Vendor Code.

6 Questions and Reporting of Suspected Violations

Vendors shall self-monitor their compliance with this Vendor Code. In addition to any other rights Samsung may have under its agreement(s) with Vendors, Samsung may, at its sole discretion, immediately terminate any agreement or relationship with Vendors in the event that Vendor acts in a manner that is unlawful or inconsistent with this Vendor Code. Samsung reserves the right at its sole discretion to terminate conducting business with any Vendor that violates this Vendor Code, and such violation may constitute a material breach of a written agreement between Samsung and Vendor.



If you have any questions regarding Samsung's Vendor Code or wish to report any questionable behavior or possible violations, please contact Samsung's Webline at <https://samsung.webline.sai360.net>. Samsung will not tolerate any retribution or retaliation by a Vendor against its employee(s) or anyone else that has, in good faith, sought advice or has reported questionable behavior and/or a possible violation of this Vendor Code.



This Vendor Code is intended to supplement rather than supersede written contracts between Samsung and Vendor.