

A large, light olive-green rectangular area containing a decorative pattern of grey dots of varying sizes arranged in a grid-like fashion. A white circle highlights the text "STANDARDS OF BUSINESS CONDUCT".

STANDARDS OF BUSINESS CONDUCT

Worldwide Edition June 2024



Letter to Lumissil Employees from the Chief Executive Officer

Lumissil's Standards of Business Conduct were introduced to Lumissil employees to affirm our commitment to promoting professional excellence and the Company's Core Values: Customer-Driven Attitude, Respect, Empowerment, Results-Oriented, Teamwork, Proactive, Innovation, Honesty, Integrity and Commitment.

We consider the morals of our employees and the integrity of our business to be critical assets of our Company. Our growth over the **past 20** years has been attributed to the knowledge, experience, and talent of our employees; the quality of our products and services; and, above all, our standards of professionalism and business conduct.

As a global company, we have business operations in countries with differing laws, cultures, and practices; therefore, it is even more critical that we remember the fundamental principles of our business. The conduct of our employees is vital to the Company's reputation. All Lumissil employees are expected to comply with the intent of the Standards of Business Conduct when we are performing our job and making decisions. It is important that we all understand and adhere to these standards of conduct to make evident our high standards of integrity and ethics.

As an Lumissil employee, you are responsible for reporting ethics or compliance questions or concerns to your manager, your functional vice president, the Human Resources Department, or to the Compliance Officer at complianceofficer@lumissil.com. No employee will be subject to reprisal, threats, retribution, or retaliation who has in good faith reported a violation or a suspected violation of the law, these Standards of Business Conduct, or other Lumissil policies.

Further, all Lumissil employees must be committed to understanding and complying with the Company's values, policies, and standards. Please read Lumissil's Standards of Business Conduct so you understand what is expected of you. If you have any questions about Lumissil's Standards of Business Conduct, please ask your Manager or the Human Resources Department. When you sign the Standards of Business Conduct Acknowledgment Form, it means you make a commitment to follow these standards of conduct and apply them to our day-to-day work activities.

John Liu
President and Chief Executive Officer



Standards of Business Conduct

Please complete the form and return it to your Human Resources department.

I acknowledge receipt of the “Lumissil Standards of Business Conduct” which applies to all Lumissil employees and employees of Lumissil’s subsidiaries and its affiliates. I understand that this document contains mandatory policies of the Company and any violation of these mandatory policies may result in disciplinary action, which could lead to termination of employment. I understand that it is important to read and understand these policies. I will ask my manager or the HR department if I have any questions or need further clarifications regarding Lumissil Standards of Business Conduct.

EMPLOYEE’S NAME & SIGNATURE

DATE: _____

LUMISSIL SUBSIDIARY/LOCATION

EMPLOYEE’S MANAGER NAME & SIGNATURE

DATE: _____

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I. INTRODUCTION

What is the Standards of Business Conduct?

Lumissil is committed to conduct business with the highest integrity and in compliance with applicable laws. The Standards of Business Conduct embodies the fundamental principles that govern our ethical and legal obligations at Lumissil. It describes, summarizes, and supplements policies, some of which have been in place at Lumissil for years. We have organized the standards into three categories:

- **Code of Business Conduct and Ethics**
- **Outside Communication**
- **Anti-Bribery and Anti-Corruption**

No policy or manual, however detailed, can possibly anticipate all of the situations or challenges we might face on the job. The Standards of Business Conduct serves as a road map and is not intended to be an exhaustive description of the Company's policies or the law.

All Lumissil employees and employees of Lumissil subsidiaries and affiliates are expected to read and understand the Standards of Business Conduct. Violating the Standards of Business Conduct may result in disciplinary action, which could lead to termination of employment.

The policy itself is accessible from Human Resources or the Company's website.

II. Code of Business Conduct and Ethics

This Code of Business Conduct and Ethics is intended to comply with applicable laws, regulations, rules, regulatory orders, and requirements; and to promote Lumissil's Standards of Business Conduct. All Lumissil employees and employees of Lumissil's subsidiaries and affiliates are expected to read and understand this Code of Business Conduct and Ethics; uphold these standards in day-to-day activities; comply with all applicable policies and procedures; and ensure that all agents and contractors are aware of, understand, and adhere to these standards.

The purpose of this Code of Business Conduct and Ethics is to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in reports and documents that Lumissil files with, or submits to, all governing agencies and in other public communications made by Lumissil;
- Compliance with applicable governmental laws, rules, and regulations;
- The prompt internal reporting to an appropriate person or persons of violations of this Code of Business Conduct and Ethics; and
- Accountability for adherence to this Code of Business Conduct and Ethics.

Since the principles described in this Code of Business Conduct and Ethics are general in nature, you should also be aware of all applicable Lumissil policies and procedures for more specific instruction, and contact your manager or the Human Resources Department if you have any questions.

Compliance is Everyone's business

Ethical business conduct is critical to our business. As an employee, your responsibility is to respect and adhere to the guiding principles stated in this document. These are guidelines and practices that reflect legal or regulatory requirements. Violations of these laws and regulations can create significant liability for you, Lumissil, its directors, officers, and other employees.

Violations of the law, the Code of Business Conduct and Ethics, or other Company policies or procedures by Lumissil employees can lead to disciplinary action, up to and including termination of employment. It is part of your job and ethical responsibility to help enforce this Code of Business Conduct and Ethics. You should be alert to possible violations and report possible violations to the Human Resources Department, your functional VP, CFO, or CEO. You must cooperate in any internal or external investigations of possible violations. Reprisal, threats, retribution, or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code of Business Conduct and Ethics, or other Lumissil policies, or against any person who is assisting in any investigation or process with respect to such a violation, is prohibited. In all cases, if you are unsure about the appropriateness of an event or action, please seek assistance in interpreting the requirements of these practices.

Our Responsibilities to the Company and its stakeholders

A. Applicable Laws

All Lumissil employees, agents, and contractors must comply with all applicable laws, regulations, rules, and regulatory orders. Lumissil employees located outside of the United States must comply with laws, regulations, rules, and regulatory orders of the United States, including the Foreign Corrupt Practices Act and the U.S. Export Control Act, in addition to applicable local laws. Each employee, agent, and contractor must acquire appropriate knowledge of the requirements relating to his or her duties

sufficient to enable him or her to recognize potential dangers and to know when to seek advice on specific Lumissil policies and procedures.

B. Conflicts of Interest

Each of us has a responsibility to Lumissil, our stakeholders, and each other to avoid conflicts of interest. Although this duty does not prevent us from engaging in personal transactions and investments, it does demand that we avoid situations where a conflict of interest might occur or appear to occur. Lumissil is subject to scrutiny from many different individuals and organizations. We should always strive to avoid even the appearance of impropriety.

What constitutes a conflict of interest? A conflict of interest exists when the interests or benefits of one person or entity conflict with the interests or benefits of Lumissil. Examples include:

Employment/Outside Employment - Our policies prohibit any employee from self-employment which may create business risks to the interests of Lumissil; or from accepting simultaneous employment with an Lumissil supplier, customer, developer, or competitor; or from taking part in any activity that enhances or supports a competitor's position. Outside employment also must not interfere with an employee's work performance or work schedule, and employees may not use Lumissil's property, facilities, equipment, supplies, IT systems (such as computers, networks, email, telephones, or voicemail), time, trademarks, brand, or reputation in connection with any outside employment. Employees engaging in outside employment must also be sure to comply with Lumissil's Confidentiality Information and Invention Assignment Agreement. If you are considering outside employment but are not sure if it complies with the rules and guidelines in this policy, you should speak with Human Resources who will help you determine whether the outside employment complies with this policy.

Outside Directorships - It is a conflict of interest to serve as a director of any company that competes with Lumissil. Although; you may serve as a director of an Lumissil supplier, customer, developer, or other business partner, our policy requires that you first obtain approval from the CEO or CFO before accepting any directorship. If you are a director of any company, please inform your manager and the Human Resources department.

Business Interests - If you are considering investing in an Lumissil customer, supplier, developer, or competitor, you must first take great care to ensure that these investments do not compromise your responsibilities to Lumissil. Many factors should be considered in determining whether a conflict exists, including the nature of the investment, your ability to influence Lumissil's decisions, and your access to confidential information of Lumissil or of the other company.

Related Parties - As a general rule, you should avoid conducting Lumissil business with a relative or significant other, or with a business in which a relative or significant other is associated in any significant role. Relatives include spouse, sister, brother, daughter, son, mother, father, grandparents, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws. Significant others include persons living in a spousal (including same sex) or familial fashion with an employee.

If such a related party transaction is unavoidable, you must fully disclose the nature of the related party transaction to Human Resources, the Senior Corporate Controller, or Chief Financial Officer. If determined to be material to Lumissil, Lumissil's Human Resources or authorized representative must review and approve such related party transaction. The most significant related party transactions, particularly those involving Lumissil's directors or executive officers, must be reviewed and approved by Lumissil's Board of Directors. LUMISSIL must report all such material related party transactions under applicable accounting rules and securities market rules. Any dealings with a related party must be conducted in such a way that no preferential treatment is given to this business.

C. Corporate Opportunities

Employees, officers, and directors may not exploit, for their own personal gain, opportunities or ideas that are discovered through the use of corporate property, information, or position, unless the opportunity or idea is disclosed fully to Lumissil's Board of Directors and the Board of Directors declines to pursue such opportunity.

D. Protecting LUMISSIL's Confidential Information

Lumissil's confidential information is a valuable asset. Lumissil's confidential information includes product architectures, designs, process technology, yields, product plans and road maps, names and lists of customers and employees, and financial information. This information is the property of Lumissil and may be protected by patent, trademark, copyright, and trade secret laws. All confidential information must be used for Lumissil's business purposes only. Every employee, agent, and contractor must safeguard it. This responsibility includes not disclosing Lumissil's confidential information, such as information regarding Lumissil's products or business, over the Internet or social media.

Each employee of Lumissil should have signed an agreement to protect and hold confidential Lumissil's proprietary information. This agreement remains in effect for as long as you work for Lumissil and after you leave Lumissil. Under this agreement, you may not disclose Lumissil's confidential information to anyone or use it to benefit anyone other than the company without the prior written consent of an authorized Company officer.

(i) **Requests by Customers or Regulatory Authorities** - All government or customer requests for information, documents, or investigative interviews must be referred to Lumissil's Finance Department. No business or financial information may be disclosed without the prior approval of the CEO or CFO.

(ii) **Lumissil Spokespeople** - Specific policies have been established regarding who may communicate information to the press and the financial analyst community. Lumissil has designated its CEO and CFO as official company spokespeople for financial matters. All inquiries or calls from the press and financial analysts should be referred to the CEO or CFO. Please refer to Lumissil's Outside Communication Policy for further details.

(iii) **Computer Security** - Passwords are an important aspect of computer security and are the front line of protection for Lumissil confidential and proprietary information. User passwords are sensitive and confidential. Lumissil employees, consultants, contractors, and all users of Lumissil computing resources are responsible for taking appropriate steps in selecting and safeguarding their passwords. Lumissil employees are expected to keep their passwords secure. A poorly chosen password may result in the compromise of the Lumissil global network. Passwords are critical protective shields against threats to network security, whether threats originate internally or externally. If accounts or passwords have been compromised, report the incident to MIS Support immediately. Employees are not allowed to use another Employee's user ID and password to create and process transactions in the Company's computer systems that affect the Company's financial statements. Employees are not allowed to share their user ID and password amongst themselves to perform transactions in the Company's computer systems. Violation of this policy may subject persons to disciplinary action, up to and including termination of employment.

E. Use of Company's Assets

(i) **General** - Protecting Lumissil's assets is a key fiduciary responsibility of every employee, agent, and contractor. Care should be taken to ensure that assets are not misappropriated, sold, or

donated, without appropriate authorization. All Lumissil employees, agents, and contractors are responsible for the proper use of Lumissil assets, and must safeguard such assets against loss, damage, misuse, or theft.

(ii) **Company Funds** - Lumissil funds must be used only for Lumissil business purposes. Every Lumissil employee, agent, and contractor must take reasonable steps to ensure that Lumissil receives good value for Lumissil funds spent and must maintain accurate and timely records of all expenditures. Expense reports must be accurate and submitted in a timely manner in accordance with the ***Travel and Expense Policy and Procedure***. Lumissil employees, agents, and contractors must not use Lumissil funds for any personal purpose.

(iii) **Computers, Equipment, Internet, and Email** - Employees, agents, and contractors should not maintain any expectation of privacy with respect to information transmitted over, received by, or stored in any computers or electronic communications device owned, leased, or operated, in whole or in part, by or on behalf of Lumissil. Lumissil retains the right to gain access to any information received by, transmitted by, or stored in any such electronic communications device, by and through its employees, agents, contractors, or representatives, at any time, either with or without an employee's or third party's knowledge, consent, or approval. The Company utilizes software-monitoring tools which identify Internet sites and specifically monitors access to sites that are inconsistent with this policy. Lumissil has a specific policy stating that all emails on Lumissil's system are considered Lumissil property and may be read by authorized Lumissil personnel.

(iv) **Software** - All software used by employees to conduct Lumissil business must be appropriately licensed. Lumissil's IT Department will inspect Lumissil computers periodically to verify that only approved and licensed software has been installed. Any non-licensed/unsupported software will be removed.

F. Records on Legal Hold

A legal hold suspends all document destruction procedures in order to preserve appropriate records under special circumstances, such as litigation or government investigations. Lumissil's Finance Department determines and identifies what types of company records or documents are required to be placed under a legal hold.

Lumissil's Finance Department will notify you if a legal hold is placed on records for which you are responsible. You then must preserve and protect the necessary records in accordance with instructions from Lumissil's Finance Department. Records or supporting documents that have been placed under a legal hold must not be destroyed, altered, or modified under any circumstances.

G. Payment Practices

(i) **Accounting Practices** - Lumissil's responsibilities to its stakeholders require that all transactions be fully and accurately recorded in Lumissil's books and records in compliance with all applicable laws and generally accepted accounting principles. False or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation and approval are strictly prohibited and violate Lumissil policy and the law. Additionally, all documentation supporting a transaction should fully and accurately describe the nature of the transaction and be processed in a timely fashion.

(ii) **Prohibition of Inducements or Bribes** - Under no circumstances may employees, agents, or contractors offer to pay, make payment, promise to pay, or issue authorization to pay any money, gift, or anything of value to customers, vendors, consultants, etc. that is perceived as intended,

directly or indirectly, to improperly influence any business decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud. Inexpensive gifts, infrequent

business meals, celebratory events and entertainment, provided that they do not create an appearance of impropriety, do not violate this policy. Questions regarding whether a particular payment or gift violates this policy should be directed to Human Resources or the Finance Department.

H. Foreign Corrupt Practices Act

Lumissil requires full compliance with the Foreign Corrupt Practices Act (FCPA) by all of its employees, agents, and contractors.

The anti-bribery and corrupt payment provisions of the FCPA make illegal any corrupt offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official, or any foreign political party, candidate or official, for the purpose of influencing any act or failure to act, in the official capacity of that foreign official or party; or inducing the foreign official or party to use influence to affect a decision of a foreign government or agency, in order to obtain or retain business for anyone, or direct business to anyone. Please refer to Lumissil's Foreign Corrupt Practices Act policy for additional information.

I. Export Controls

A number of countries maintain controls on the destinations to which products or software may be exported. Some of the strictest export controls are maintained by the U.S. against countries that the U.S. government considers unfriendly or as supporting international terrorism. The U.S. regulations are complex and apply both to exports from the U.S. and to exports of products from other countries, when those products contain U.S. origin components or technology. In some circumstances, an oral presentation containing technical data made to foreign nationals in the U.S. may constitute a controlled export. The Finance Department can provide you with guidance on which countries are prohibited destinations for Lumissil products or whether a proposed technical presentation to foreign nationals may require a U.S. government license.

Responsibilities to our Customers and Suppliers

A. Payments or Gifts from Others

Under no circumstances may employees, agents, or contractors accept any offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value from customers, vendors, consultants, etc. that is perceived as intended, directly or indirectly, to influence any business decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud.

Gifts given by Lumissil to suppliers or customers or received from suppliers or customers should always be appropriate to the circumstances and should never be of a kind that could create an appearance of impropriety.

Any gifts or gratuities that are not of nominal value should be returned immediately and reported to your supervisor/manager or Human Resources. If immediate return is not practical, they should be given to the Company for charitable disposition or such other disposition as the Company believes appropriate in its sole discretion.

Reasonable judgment should prevail in business entertainment engaged in on behalf of the Company. Employees, officers and directors may provide, or accept business entertainment to or from anyone

doing business with the Company only if the entertainment is infrequent, modest, and intended to serve legitimate business goals. Inexpensive gifts, infrequent business meals, celebratory events, and entertainment, provided that they do not create an appearance of impropriety, do not violate this policy.

Questions regarding whether a particular payment or gift violates this policy should be directed to Human Resources or the Finance Department.

B. Handling Copyrighted Material

Lumissil subscribes to publications that help employees do their jobs better. Copyright law generally protects these works, and their unauthorized copying and distribution may constitute copyright infringement. When in doubt about whether you may copy a publication, consult the Human Resources or Finance Department.

C. Handling the Confidential Information of Others

Lumissil has many kinds of business relationships with many companies and individuals. We must take special care to handle the confidential information of others responsibly. We handle such confidential information in accordance with our agreements with such third parties.

D. Selecting Suppliers

Lumissil's policy is to purchase supplies based on price, need, quality, service, and terms and conditions. Lumissil's policy is to select significant suppliers or enter into significant supplier agreements through a competitive bid process where possible. The confidential information of a supplier is entitled to the same protection as that of any other third party.

E. Government Relations

It is Lumissil's policy to comply fully with all applicable laws and regulations governing contact and dealings with government employees and public officials, and to adhere to high ethical, moral, and legal standards of business conduct.

F. Free and Fair Competition

Competition laws govern relationships between Lumissil and its competitors. As a general rule, contacts with competitors should be limited and should always avoid subjects such as prices or other terms and conditions of sale, customers, and suppliers. Participating with competitors in a trade association or in a standards creation body is acceptable when the association has been properly established, has a legitimate purpose, and has limited its activities to that purpose.

Collusion among competitors is illegal, and the consequences of a violation are severe. No employee, agent, or contractor shall at any time or under any circumstances enter into an agreement or understanding, written or oral, express or implied, with any competitor concerning prices, discounts, other terms or conditions of sale, profits or profit margins, costs, allocation of product or geographic markets, allocation of customers, limitations on production, boycotts of customers or suppliers, or bids or the intent to bid or even discuss or exchange information on these subjects. In some cases, legitimate joint ventures with competitors may permit exceptions to these rules as may bona fide purchases from or sales to competitors on non-competitive products, but Lumissil's Finance Department must review all such proposed ventures in advance.

Responsibilities as a Global Corporate Citizen

Lumissil has worldwide business operations in countries with differing laws, cultures, and practices. Lumissil is committed to conducting business with the highest integrity and adhering to standards of conduct socially, environmentally, and ethically.

As a responsible and good corporate citizen, Lumissil is committed to execute and fulfill its obligations in relation to the critical areas of human rights, labor, environmental health, and safety.

A. Equal Employment Opportunities, Discrimination and Harassment

Lumissil is committed to compliance with all applicable laws providing equal employment opportunities and a work environment free of unlawful harassment. This commitment applies to all persons involved inside and outside the Company's operations and prohibits unlawful discrimination by any employee of the Company.

B. Fair Labor in Supply Chain Management

Lumissil is committed to responsible sourcing, including the elimination of human trafficking and slavery, if any, in our supply chain. We expect all of our suppliers to comply with all applicable laws, including eradication of forced, bonded, indentured, involuntary convict or compulsory labor or illegal child labor. Fundamental to Lumissil's tenets, we expect our suppliers to adopt sound human rights practices and to treat workers fairly and with dignity and respect, provide a safe and healthy work environment for their workers, conduct business in compliance with applicable environmental and employment laws and comply with all other applicable laws and regulations. Lumissil is considering at this time whether to adopt formal verification, audit, certification, standards and training processes related to its supply chain. Any Lumissil employee who has material information that a company in Lumissil's supply chain (such as a supplier, contractor, vendor, or other business partner) is engaged in human trafficking or slavery should immediately communicate such information to Lumissil's Worldwide Director of Human Resources.

C. Safety

Lumissil is committed to enforce employee safety in the work place. It is the intention of the company's management to provide safe and healthy working conditions and to establish safe practices which allow people to work together comfortably and efficiently. It is our policy that injury and illness prevention shall be considered of primary importance in all phases of our operation and administration.

D. Environmental Health

Lumissil complies with all relevant environmental legislation and regulations. Lumissil L acknowledges and promotes its environmental responsibility as prescribed by the ISO 14001:2004 Standard and Lumissil L Environmental Policy which adheres to EU Directive of Restriction of Hazardous Substances (RoHS). Lumissil ensures environment preservation by managing and eliminating the impact of hazardous substances, as defined by industry standards, in the product design and materials used and managed by supply chain.

Waivers

Any waiver of any provision of this Code of Business Conduct and Ethics for Lumissil's executive officers must be approved by Lumissil's Board of Directors.

Disciplinary Actions

The matters covered in this Code of Business Conduct and Ethics are of the utmost importance to Lumissil, its stakeholders, and its business partners, and are essential to Lumissil's ability to conduct its business in

accordance with its stated values and applicable laws. We expect all of our employees, agents, contractors, and consultants to adhere to these rules in carrying out their duties for Lumissil.

Lumissil will take appropriate action against any employee, agent, contractor, or consultant whose actions are found to violate these policies or any other Lumissil policies. Disciplinary actions may include immediate termination of

employment or business relationship at Lumissil's sole discretion. Where Lumissil has suffered loss, it may pursue remedies against the individuals or entities responsible. Where laws have been violated, Lumissil will cooperate fully with the appropriate authorities.

III. OUTSIDE COMMUNICATION

Lumissil is subject to certain obligations regarding the disclosure of information to the public. Premature or otherwise unauthorized disclosure of internal information relating to the Company could adversely affect the Company's ability to meet its disclosure obligations. In addition, unauthorized disclosure could cause competitive harm to the Company and, in some cases, result in liability for the Company. All information provided to outsiders, whether material or immaterial, must be accurate and consistent with these responsibilities.

For marketing activities, it is Lumissil's policy to have a consistent message in terms of content and form, including the proper use of our logo.

Disclosure policy: Lumissil employees should not disclose internal information about the Company, except as required in the performance of that employee's regular duties for the Company.

The initial disclosure of material information by the Company will generally be made only through press releases or government applicable filings.

Rumors concerning the business and affairs of the Company may circulate from time to time. The Company's general policy is not to comment on such rumors.

Procedures

As a general rule, communication with stakeholders and investors shall be restricted to the Company's CEO and CFO. These persons may, however, designate other Vice Presidents or Directors to respond to inquiries regarding specific areas of interest. Communication with editors and reporters from the media shall follow this same guideline but if the contact is in Asia, then the Company's CEO is authorized to speak for Lumissil.

Preparation of articles and advertising may be designated to appropriate staff, but final approvals shall be required as noted herein. A sign-off form should be used for approvals and retained on file for two years.

Press Releases

Lumissil will issue press releases from time to time to disclose information which management believes is important or of use to the public, whether or not the information is material. All press releases will be reviewed, approved, and released as follows:

- A. General product press releases – either by the CFO, the Sr. Vice President of Sales and Marketing, or the Product Line Manager. Legal counsel review of each product announcement release is not required as long as the "Safe Harbor" paragraph and "who is Lumissil" paragraph, as previously approved by legal counsel, are included. The "Safe Harbor" may be excluded if there are no forward-looking statements in the press release.

- B. All financial and business related press releases must be released under the control of the CFO.
- C. Product announcements may be released by either the CFO or the SVP of Marketing Dept.

Advertising copy, articles, white papers and company literature

All of these documents will be reviewed and approved as follows:

- A. Advertising Copy – by the CEO and SVP of Sales and Marketing.
- B. Articles and White Papers – by the CEO, SVP of Sales and Marketing, or designated marketing Product Line Manager. Legal counsel review is not required unless the article includes forward-looking statements. General corporate literature must be approved by the CFO and the SVP of Sales and Marketing or their designees.
- C. Corporate brochures must be approved by the CFO and the SVP of Sales and Marketing. Product marketing brochures must be approved by the SVP of Sales and Marketing.
- D. Specific product line literature, such as newsletters, must be reviewed by a designated person as a check and balance on grammar and form. Excluded from this rule are cross reference guides, application notes, QRA manuals, data sheets, product selection guides and other similar items; when in doubt, check with the SVP of Sales and Marketing.

Interviews with the press/media

Product related interviews with trade publications must be approved by the SVP of Sales and Marketing, General Manager, CFO, and CEO. Business, financial, and strategy explanation interviews will be limited to the CEO, CFO, and GM.

Public presentations

All Lumissil employees must receive approval from the CEO, CFO, General Manager, or an appropriate designee prior to accepting, on behalf of Lumissil, any public speaking or audiovisual engagement. Presentations must not contain financial predictions or give material information not previously available. The CEO, CFO, GM Lumissil -China, or an appropriate designee must approve the content of such presentations prior to disclosure.

Handling inquiries

Inquiries received by employees from any outsider, other than in the ordinary course of specific job duties, should be forwarded to the CFO, or if the inquiry is in Asia, to the General Manager.

Failure to comply

Any violation, either by neglect or willful intention, may result in disciplinary action, up to and including termination of employment.

IV. ANTI-BRIBERY AND ANTI-CORRUPTION

Lumissil locations worldwide are committed to conducting business ethically and in compliance with all applicable laws and regulations, including the United States Foreign Corrupt Practices Act (the “FCPA”), the United Kingdom Bribery Act 2010 (the “U.K. Bribery Act”), the United States Travel Act, the OECD Anti-Bribery Convention, and many other similar laws (collectively referred to as the “Anti-Corruption Laws”). Lumissil strictly prohibits all forms of corruption. Corrupt practices include bribes, kickbacks, facilitation payments, and other activities intended to improperly influence a third party or intended to enrich oneself to the detriment of the company.

It is Lumissil’s policy to comply fully with both the letter and spirit of all applicable Anti-Corruption Laws (the “Anti-Bribery and Anti-Corruption Policy”). Each officer, manager, employee, contractor, and third party when conducting business or providing services on Lumissil’s behalf has the responsibility for compliance with the Anti-Bribery and Anti-Corruption Policy within their area of authority and to report any violations to the CEO and/or CFO immediately.

Sensitive Payments and Transactions

The Company, through its officers, agents, employees, and/or contractors, will not make an offer, payment, promise to pay, or authorize the transfer of any of the Company's assets to:

- A.** Any foreign official for the purposes of: influencing any act or decision of a foreign official in his official capacity, including a decision to fail to perform his official functions; inducing a foreign official to use his influence with a foreign government or instrumentality to affect or influence any act or decision of the foreign government or instrumentality, in order to assist the Company in obtaining or retaining business for or with, or directing business to any person.
- B.** Any foreign political party, official, or candidate for foreign political office for purposes of: influencing any act or decision of the political party, official, or candidate in its or his official capacity, including a decision to fail to perform its or his official functions; or inducing such political party, official, or candidate to use its or his influence with a foreign government or instrumentality to affect or influence any act or decision of such government or instrumentality, in order to assist the Company in obtaining or retaining business for or with, or directing business to any person.
- C.** Private Sector Individuals for the purposes of influencing any act or decision of employees, officers, or representatives of private companies, competitors, suppliers, contractors, or any other business entities, where the purpose is to influence their decisions or gain an unfair advantage.
- D.** Intermediaries and Agents for the purposes of influencing any act or decision of payments made to intermediaries, agents, consultants, or brokers who may be involved in facilitating improper transactions or bribes are typically prohibited.
- E.** Family Members or Associates of Officials for the purposes of influencing any act or decision of policies may explicitly state that officers and employees should not make payments or transfers to family members or close associates of public officials, as this could be seen as an attempt to improperly influence the official.
- F.** Any person, while knowing or having a reason to know that all or a portion of the funds or item of value will be offered, given, or promised, directly or indirectly, to any foreign official, to any foreign political party, or to any candidate for foreign political office, for purposes of: influencing any act or decision of the foreign official, political party, party official, or candidate in his or its official capacity, including a decision to fail to perform his or its official functions; or inducing such foreign official, political

party, party official, or candidate to use his or its influence with a foreign government or instrumentality to affect or influence any act or decision of such government or instrumentality, in order to assist the Company in obtaining or retaining business for or with or directing business to any person.

In addition to the matters above specifically addressed in applicable Anti-Corruption Laws, this policy incorporates the following:

- The Company policy prohibits the existence or creation of any undisclosed, secret, or unrecorded funds, assets or liabilities;
- No payment on behalf of the Company should be approved or made with the intention or understanding that any part of the payment is to be used for purposes other than described by the documents supporting the payment;
- No false or fictitious entries should be made in the financial statements or underlying financial records and no employee shall engage in any arrangement that results in such an act; and

The Company's policy prohibits the use of Company assets or funds for purposes other than as specifically authorized by management.

Record Keeping Requirements

As required by the FCPA, the U.K. Bribery Act, and other Anti-Corruption Laws, the Company and its subsidiaries will maintain books, records, and accounts which, in reasonable detail, accurately and fairly reflect all the Company's transactions. The Company, its subsidiaries, and affiliates will maintain a system of internal accounting controls sufficient to reinforce compliance with this policy and provide reasonable assurance that: transactions are executed in accordance with management's general and specific authorization; transactions are recorded as necessary (a) to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and (b) to maintain accountability of assets; access to Company assets and funds is permitted only in accordance with management's general or specific authorization; the accounts recorded on the Company's balance sheet should be reconciled to the underlying accounting detail at reasonable intervals and, where appropriate, compared to the physical assets. Appropriate action should be taken with respect to significant differences.

These record keeping requirements should be reviewed in conjunction with other financial policies.

Reporting of Sensitive Matters

The officers, directors, managers, and employees of the Company and its subsidiaries are responsible for enforcement and compliance with this policy. This includes:

- The necessary communication to inform all employees of their duties and obligations; and
- The periodic review of these matters.

Approvals/Documentation

In the event that any of the sensitive matters described above have occurred, they should immediately be discussed with the General Manager / VP of Finance / Controller of your local office, CFO or Senior Corporate Controller, accompanied by the following information:

- The amount and purpose of the payment;
- The identification and line of business of the recipient of the payment;
- The circumstances under which the payment was made; and
- The manner in which the payment was made, including the character of the accounting entries made in connection with the payment; and the identity of any person who knows of the payment.

V. CONFIDENTIAL ALERT AND REPORTING

Lumissil has designed a communication system that enables any employee to send a confidential email to Lumissil executive officers and/or Lumissil's Compliance Officer. This policy is to cover serious concerns that could have a large impact on Lumissil, including actions that:

- may lead to incorrect or improper financial process, data, and reporting;
- are unlawful;
- are not in line with company policy;
- violate securities law/regulations; or
- otherwise, amount to serious improper conduct.

A. Responsibilities of Management

- It is management's responsibility to report suspected fraudulent or dishonest conduct. In addition, management is responsible for maintaining a system of management controls, which detect and deter fraudulent or dishonest conduct.
- To exercise appropriate judgment in determining if matters are appropriate for referral or reporting and to maintain documentation of such reporting.
- To ensure that employees are aware of and comply with this policy.
- To ensure that no employees who report in good faith a violation of business conduct shall suffer harassment, retaliation, or adverse employment consequence.

B. Protection of Whistleblowers

Consistent with the policies and practices of Lumissil, the executive officers and the compliance officer shall not retaliate and shall not tolerate any retaliation by management or any other person or group, directly or indirectly, against anyone who, in good faith, makes an allegation or provides assistance to any other person or group, including governmental, regulatory, or law enforcement body, investigating an allegation. The executive officers and/or Lumissil's Compliance Officer shall not reveal the identity of any person who makes a good faith allegation, and who asks that his or her identity as the person who made such allegation remain confidential and shall not make any effort or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a good faith allegation, anonymously.

C. Procedures for Making Complaints

All Lumissil employees, agents, and contractors can contact the company-designated compliance officer at complianceofficer@lumissil.com. The information will get to the necessary people at Lumissil for the review process to begin. Lumissil will diligently investigate and take action as appropriate.

VI. CONCLUSION

We each have an obligation to represent Lumissil with unwavering integrity. This is a personal responsibility and we are each accountable for our individual actions. No illegal or unethical act can be justified by claiming it was encouraged or ordered by someone else. Remember that we always have options and resources to help you evaluate whether an action is appropriate or not.

If you are a Manager, you have special responsibilities. You must set an example and you are expected to act on any notice you receive.

While the Standards of Business Conduct cannot anticipate every situation that might arise in your business life at Lumissil, applying the principles supporting it can help us make the right decisions. When you need additional guidance or support, the Standards of Business Conduct informs you where you can seek help.

Ask Before Acting

- Is it legal?
- Does it follow Company policy?
- Is it the right thing to do?
- How would it be perceived by our clients, the media, our communities?

Remember These Rules:

- Know the legal and Company standards that apply to your position
- Never fail to follow these standards
- If you are unsure, ask someone who knows

Acknowledgment:

Approximately every 18 to 24 months we will require each person subject to this Standards of Business Conduct to certify that they have received and read the Standards of Business Conduct, that they understand it, and that they agree to adhere to it during their employment with or service to Lumissil.

Lumissil appreciates your continuing support of these Standards of Business Conduct and your contribution to our success.

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