
Global Code of Conduct

2018. 03

Samsung Display Co., Ltd

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『Samsung Global Code of Conduct: Preface』

At Samsung Display¹, every day we aspire to be the most—beloved, innovative and admired—company for our clients and customers, one client and one customer at a time, both qualitatively and quantitatively for each and every product and service we provide. Every day we devote our finest people, resources and latest technology to create products and services that meaningfully improve the lives of people and the communities they live in.

Samsung’s values of 『People, Excellence, Change, Integrity, Co-prosperity』 (“**Samsung Values**”) and the guiding principles embodied in the Samsung Values are the foundation of this pursuit and everything we do as a company. They are fundamental to our success, our identity, our longevity and our passionate pursuit to be the most beloved, innovative and admired company—first and foremost for our customers, but equally for our people, partners, shareholders and the communities we serve, work and live in.

The Samsung Global Code of Conduct (the “**Code**”) is based on Samsung Values and embodies principles that should guide the actions and decisions of every member of Samsung Display—to do the right thing, every time, in every situation, on a daily basis, and it is one of the ways we put Samsung Values into practice.

It is our compass, pointing us in the right direction by reminding us of what each member of Samsung Display already knows—that we must do the right thing, use good judgment and apply common sense in everything that we do. That means following the letter and spirit of the laws, regulations and Samsung’s policies that

¹ Use of the terms “**Samsung Display**”, “**Samsung**” and “**the Company**” throughout the Code refers collectively to Samsung Display Co., Ltd. and its majority-owned subsidiaries.

apply to us or the situation confronting us; acting ethically and honorably with integrity and honesty, and in the best interest of Samsung in every action and decision we undertake in connection with our duties.

Simply put, the Code explains the global standards each member of Samsung Display must follow, as well as our legal and ethical responsibilities. It provides guidance on the behaviors we are all expected to follow. And it requires that we make them habits.

The Code contains Samsung's major principles and policies regarding conduct and some practical examples of expected behaviors in common situations that a member of Samsung Display may confront. However, the Code is a single document and it cannot anticipate every situation we encounter or cover every eventuality, particularly as laws differ between countries. The Code is not a complete manual that describes all of the policies and procedures applicable to a particular situation. If specific situations are not expressly covered, uphold the spirit of the Code and the principles of Samsung Values by exercising common sense and good judgement, always in compliance with applicable laws.

You are an integral part of Samsung. Your actions, words and behaviors do matter, regardless of where you are located, your job or your position.

Make practicing this Code a priority; make living out the principles of Samsung Values a daily goal.

Principle 1: We comply with laws and ethical standards

1-1 Samsung is committed to complying with applicable laws and regulations.

- o Samsung Display is committed to full compliance with the laws, rules and regulations of the countries in which it operates. Samsung takes its responsibilities to comply with laws and regulations very seriously. Every member of Samsung Display is responsible for being familiar with and following the relevant laws, regulations and Company policies and procedures that govern the business activities in which such member engages. Act within the bounds of applicable laws, rules and regulations of the countries where we do business. Comply with the letter and spirit of laws, regulations and policies.
- o No one at any level of Samsung has the authority to violate the Code or any law or regulation, or to require another member of Samsung Display to do so. Do not violate, or ask or encourage others to violate this Code, Samsung Values or the Company's policies or procedures. Do not fail to raise a known or suspected violation of this Code. Do not willfully or purposefully ignore this Code. Do not allow the needs of the business to justify doing something that violates the law or is inconsistent with principles of Samsung Values or this Code.

1-2 Samsung is committed to treating everyone with respect, dignity and fairness.

We embrace diversity and a globally inclusive culture.

- o Samsung respects the inalienable rights of every person. It embraces diversity and does not discriminate against anyone based on race, ethnicity, nationality, gender, religion, place of birth, disability, marital status, pregnancy and childbirth, political affiliation or sexual orientation in our employment and business operations.

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- o The Company is committed to complying with applicable labor laws and does not employ underaged persons.
 - o Samsung is committed to treating members of the Samsung community, applicants and others fairly and in a non-discriminatory manner, including when determining compensation and other terms of employment, and always in compliance with applicable employment and anti-discrimination laws and regulations.
 - o Samsung is committed to providing a safe and healthy workplace environment, including by complying with all policies, laws, regulations and standards relating to conditions of employment, including those concerning hours, wages and other working conditions (e.g., minimum wage, overtime, maximum hours) in accordance with the specific nature of their duties, where relevant.

1-3 Samsung is committed to competing fairly and ethically, always within in the bounds of applicable competition laws

- o The Company is committed to competing fairly, abiding by the competition laws and regulations of each country in which we operate, and not conducting acts that unfairly limit competition with competitors or customers, including by colluding on price, production volume, bids, sales territories or other terms and conditions whose main purpose is to unlawfully limit competition.
- o Samsung is committed to complying with all applicable export control laws and economic sanctions laws and policies governing international trade.
- o Samsung employees are not permitted to accept money, goods, entertainment and/or anything of value from customers or anyone who does or is seeking to do business with Samsung, nor engage in any activities that violate applicable laws, including applicable antitrust and competition laws, and fair trade principles.

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- o Samsung employees are not permitted to directly or indirectly offer, promise, or provide gifts of any kind in order to gain or to compensate for improper benefits.
 - o Samsung respects the trade secrets and confidential information of other companies and individuals. It is committed to obtaining information from or about third parties (e.g., competitors) only in a legal and ethical manner.
 - o Samsung is committed to complying with applicable antitrust and competition laws, and not engaging in any unlawful activities with customer or partners that is intended to harm competitors.

1-4 Samsung is committed to being transparent and it is committed to doing so by accurately recording all transactions and through disclosures

- o Samsung is committed to recording all transactions truthfully, faithfully and accurately in accordance with international accounting standards and applicable national accounting laws and regulations. Samsung's financial statements are regularly audited by an independent accounting firm.
- o Samsung is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations. The Company is committed to conducting business with customers only involved in legitimate business activities, with funds derived from legitimate sources by avoiding entering into business relationships with customers of uncertain identity, and avoiding illegal, sham, or suspicious transactions.
- o Samsung is committed to complying with the disclosure requirements of the countries where its shares or Samsung-sponsored GDRs are listed and committed to disclosing material information in a timely manner, as required by applicable laws, rules and regulations.

1-5 Samsung is politically agnostic and does not get involved in politics

- o Samsung respects the political views of each member of Samsung Display and each member's right to express such personal views outside of Samsung, especially through the vote. However, Samsung is committed to building and maintaining a respectful work environment and does not permit political activities of any kind during working hours or on Samsung premises. You must not allow your political views or activities to affect or be perceived to affect the way you do your job.
- o Although Samsung respects the right of its members to participate in the political process, such participation is a personal decision and you must conduct all political activities on your own time, away from work, and at your own expense.
- o Samsung respects the rights of individuals to perform their civic duties and exercise his or her rights as a citizen. The Company is committed to approving legitimate requests for personal time away from work to perform or exercise such rights or duties, in accordance with applicable laws.
- o Members of Samsung Display are prohibited from using any Company resources, including money, providing free manpower and services or use of Company assets to further any political goals.
- o Samsung respects and is committed to comply with laws and regulations regarding interactions with government officials and agencies, including donating funds or providing benefits of any kind. Samsung employees are prohibited from using Company funds or assets to make unlawful donations or engaging in improper dealings with governments or government officials.

1-6 Samsung is committed to protecting personal and confidential information of individuals and business partners

- o Samsung is committed in complying with the relevant privacy laws of each country as well as our internal privacy policies in processing any personal information of customers, employees, partners or guests.
- o Samsung personnel who handle personal information must do so with care so as to prevent loss, theft, leak, falsification, alteration or damage while in our custody and always in compliance with applicable laws and regulations governing privacy, confidentiality, and information security.
- o Samsung is committed to collecting, using and processing personal and confidential information only for authorized and legitimate business purposes and ensuring that third parties with access to such information are contractually obligated to protect it, and always in accordance with any relevant contractual obligations and applicable laws.

Principle 2: We maintain a clean organizational culture

2-1 We make a strict distinction between business and personal affairs in our duties

- o As a member of Samsung Display, you are prohibited from using, embezzling or misappropriating Company funds, assets or your position with Samsung for personal gain, or engaging in any deceitful or illegal activities such as falsifying expenses.
- o You must not, directly or indirectly, buy or sell the securities of a company, other marketable securities, or real estate on the basis of material nonpublic information you acquire through your position at Samsung. Members of Samsung Display are prohibited from misappropriating internal nonpublic information for personal gain, or engaging in any acts that would damage the reputation of Samsung.
- o If there is a conflict of interest between you and the Company, put the interest of the Company first, and act at all times solely in the best interest of the Company. Make all business decisions and conduct all business activities solely in the best interests of the Company. Avoid any action which may generate actual or perceived conflicts of interest. Avoid any financial or other business relationships with suppliers, customers or competitors that would compromise, or even appear to compromise, your ability to make objective business decisions in the best interest of Samsung.
- o Only use Company assets and facilities in connection with your duties at Samsung or for other pre-approved purposes.

2-2 Samsung respects the intellectual property (IP) rights and other intangible rights belonging to the Company and other companies and individuals

- o As part of your duty to safeguard the assets of the Company, protect and take care to ensure that you maintain the confidentiality of all nonpublic Company intellectual property and other confidential information.
- o You must memorialize and report information acquired in connection with your duties in sufficient detail to accurately reflect transactions, taking care to record all information truthfully, faithfully and accurately, as well as safeguard and manage such information in the same manner as other intellectual property.
- o You must report any intellectual property that you produce or invent to the Company during the course of your employment or in connection with your work at Samsung. Disclose and assign to Samsung all interests in any technology, software, invention, improvement, discovery, know-how, design, copyright, or any intellectual property or creation you, or a group including you, made or conceived that arises out of, or in connection or relationship with, your employment or assignment with Samsung. Assist Samsung to perfect such assignment or to secure appropriate intellectual property protection for any of the foregoing and understand that any patents that are filed must be filed through Samsung.
- o Samsung respects the intellectual property rights of third parties, and does not intentionally infringe or improperly use valid patents, trademarks, copyrights and other intellectual property rights of any third party.

2-3 We are committed to providing a safe and healthy workplace

- o Samsung is committed to providing a safe and healthy workplace environment and it does not tolerate any direct or indirect behavior which could be construed as harassment or bullying. Such behavior includes, but is not limited to sexual harassment, as well as all other forms of harassment, physical assault, insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicitly nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumors, or any conduct that conflicts with national, state or local law, or the Company's policies and procedures.
- o Samsung is committed to treating members of the Samsung community with respect, dignity and fairness and partnering with members of the Samsung community to grow together and prosper together. We are committed to creating and promoting a healthy work culture built on a foundation of loyalty, trust and cooperation.

2-4 Protect the reputation and dignity of Samsung Display in all activities

- o As an employee, you are not permitted to be simultaneously employed by a third party or be otherwise engaged in outside business activities while you are employed by the Company when such employment or activities prevent you from fully performing your duties, including any overtime assignments, unless otherwise approved.
- o You must receive official approval (i.e., through the Company approval process) prior to disclosing the Company's confidential information to third parties and make sure such disclosure is appropriate, in terms of content and context, in light of the sensitivity of such information.

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- o Samsung does not permit its officers and employees to serve on boards of companies that could create actual or perceived conflicts of interest or participate in competitive business activities.
 - o Samsung respects the views of each individual employee and each person's right to express such personal views outside of Samsung. However, you must clearly state that you do not speak on behalf of Samsung, nor are you representing Samsung, and that all personal opinions expressed on social media and other public arenas are solely your own.

Principle 3: We respect customers, shareholders and employees

3-1 We are committed to putting the customer at the center of everything we do

- o Samsung's goal is to develop products and services from the customers' perspective and to promote research and development from the customers' perspective. We heed the voices and recommendations of our customers in the improvement of product design, distribution, and service.
- o Samsung exists because of our customers, and Samsung is committed to grow with our customers. We believe that each interaction with our customers matters and we are committed to engaging every customer with the respect and dignity they deserve.
- o Samsung competes on the merits of our products and services. Compete fairly, but vigorously, and never use deception or misrepresentation. Be fair, factual and complete in our advertising, sales and promotional materials and do not falsely advertise the quality and performance of our products or services and take care not to spread false information about our competitors' products or services. Our communications with our customers or potential customers must be truthful and accurate. We sell the quality of what we do; we do not disparage our competitors.
- o The customer is the center of our business and Samsung is committed to customer satisfaction. Treat each customer with respect and dignity in resolving customer service issues. Be responsive, transparent and effective in resolving each customer's issues.

3-2 Samsung is committed to managing our business with a focus on increasing value for our shareholders

- o Samsung is committed to doing the right thing for our shareholders. That means that the Company will continue to actively pursue policies and initiatives to enhance the rights and interests of our shareholders and maximize shareholder value through transparent and sound management.
- o Members of Samsung Display are responsible to our shareholders. Part of fulfilling that responsibility is timely and accurately disclosing material information about the performance of the Company. Each member of Samsung Display should do their part by recording all transactions truthfully, faithfully and accurately so that the Company is able to honor its responsibility to disclose material financial and corporate information in a timely fashion.
- o Samsung values the opinions of its shareholders and we are committed to listening, considering and adopting great ideas that will help the Company. We put our commitment into practice by carefully reviewing and considering every legitimate petition from our shareholders and implementing ideas that we in good faith believe will improve Samsung, in accordance with applicable law.

3-3 Samsung is committed to improving the lives of our employees

- o Samsung is committed to offering equal opportunities to all employees and treating them fairly and equally. We base employment decisions, including promotions, solely on individual merit, considering each person's qualifications, professional competence, ability and achievements.
- o Samsung is committed to supporting and providing opportunities for continuous learning and employee development.
- o Samsung is committed to providing a work environment where initiative and creativity are encouraged.

o Samsung respects the rights of every individual and abides by the employment laws in the countries where we operate for all type of workers, whether they are temporary, immigrant, student or an expatriate.

Principle 4: We care for the environment, health, and safety

4-1 We are committed to developing cleaner, safer, smarter, and more environmentally friendly products and technology solutions

- o Samsung is committed to complying with international environmental standards, environmental laws and regulations and our internal environmental policies. Each employee must strictly comply with all environmental, health, and safety (EHS) laws and policies that apply to our operations.
- o Samsung is committed to developing cleaner, safer, smarter, and more environmentally friendly products and technology solutions for our clients and customers. We continue to strive to minimize any harmful environmental impact at every stage of our business activity from product planning, design, development, production, distribution and sales to disposal, while also working to provide a larger selection of eco-friendly products.
- o Samsung tries to make its own environmental footprint more sustainable and run our businesses in an environmentally responsible manner by working to actively minimize the use of harmful materials, utilize resources more efficiently and recycle waste products for the benefit of the environment.
- o Samsung is committed to adopting clean production technologies to minimize the emission of greenhouse gases and pollutants and is committed to utilize environmentally friendly production processes that reduce the use of chemicals as well as energy, water and other resources.

4-2 Your health and safety is important to us

- o Samsung is committed to providing a safe and healthy workplace for employees, business partners, visitors and vendors working within, or visiting, our facilities and premises. As part of that commitment, we comply with all relevant international standards, laws and regulations and our internal policies relating to the health and safety of employees.
- o Samsung is committed to fostering a culture that emphasizes workplace safety. Do your part in helping us to build a safe workplace by actively participating in Samsung's initiatives to promote employee health and minimize or eliminate safety risks.
- o Samsung has emergency response procedures in place to help ensure your safety and minimize any disruptions to our operations in the event that an unforeseen external risk such as natural disasters, fires or outbreak of infectious diseases, etc., occurs. The Company is committed to improving or regularly updating such procedures to further reduce any disruptions to our operations.
- o Samsung is committed to the health and safety of our customers. We will continue to put the health and safety of customers at the center of our business activities from planning, design, development, production, distribution and sales to disposal of products.
- o Samsung will continue to clearly inform our customers on how to safely use and operate our products or services.

Principle 5: We are a socially responsible corporate citizen

5-1 We take our responsibilities as a corporate citizen seriously and we are committed to faithfully fulfilling those responsibilities

- o We work each day to make the next day better and provide a better future for our customers, our shareholders, our partners, our communities, the world we live in and ourselves—to prosper together because we recognize that we are not an island to ourselves. We grow *because of* our customers, our shareholders, our partners and our communities. And we are *committed to grow with* our customers, our shareholders, our partners and the communities we serve, work and live in.
- o Samsung is committed to creating stable well-paying jobs and faithfully fulfilling its tax and legal obligations in communities where we operate.
- o Do the right thing. Use good judgment and apply common sense in carrying out your duties and responsibilities. That means following the letter and spirit of the laws, regulations and Samsung’s policies that apply to you or the situation confronting you; acting ethically and honorably with integrity and honesty, and in the best interest of Samsung in every action and decision you undertake in connection with your position at Samsung. The aggregation of your actions is what makes Samsung a responsible and trustworthy corporate citizen.
- o Though not every member of Samsung Display officially represents Samsung, each member is an unofficial ambassador to the communities we serve. We encourage every one of you to make an effort to build trust within your local communities by faithfully fulfilling your duties and responsibilities, ethically and honorably with integrity and honesty.

5-2 We respect the social and cultural values of local communities and we are committed to prosper together with local communities

- o Samsung Display is committed to full compliance with the laws, rules and regulations of the countries in which it operates. The Company also respects the culture, values and beliefs of local communities in which we operate, and strives to improve the lives of local residents. We encourage you to actively participate in helping us realize this goal.
- o Samsung is committed to contributing in the development of local communities we serve by creating good jobs and opportunities to develop the human resources within such communities.
- o Samsung is committed to the highest standard of corporate citizenship and we actively participate and contribute to the advancement of the arts, academia and sports of communities we serve, as well as provide other philanthropic support.
- o Samsung strives to become a part of the communities we serve and we are committed to doing our part as a member of the local community, especially in cases of relief efforts necessitated by natural or man-made disasters. We encourage each of you to actively participate in community initiatives or causes by getting involved, whether it is through Company-sponsored volunteer activities or on your own initiative.

5-3 Samsung is committed to growing and prospering together with our partners

- o We grow with the help of our partners, and we are committed to grow with our partners. Samsung is committed to building trusting relationships with our partners and to continue to work with our partners to enhance customer satisfaction in our products and services.

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- o Samsung is committed to selecting business partners in accordance with business objectives by applying fair standards without discrimination. You have a responsibility to treat Samsung's partners or potential business partners fairly, and in the best interest of Samsung. Never engage in any form of unlawful discrimination.
 - o Child labor, illegal, abusive or forced labor, or discrimination have no place in our operations. As part of our commitment to comply with laws and regulations, Samsung encourages our business partners to comply with international standards, laws and regulations on human rights, child labor, working hours, forced labor, discrimination and the environment, and monitor their compliance by reflecting it in the evaluation of our business partners.

5-4 We continue to innovate and improve means of access to information technology for everyone

- o As we said at the outset, Samsung aspires to be the most beloved, innovative and admired company of our clients and customers. As part of its pursuit and commitment, the Company will continue to invest in research and development to develop new innovative products that will improve the lives of people and the communities they live in.
- o Samsung is committed increasing access to technology so that everyone, regardless of social status, can equally enjoy the benefits of the latest technologies.
- o We realize that increasing access to technology also means making our products accessible to those who have special physical needs. Samsung is committed to keeping our customers with special needs in mind in our product planning, design, and development to make our products easier to use and more accessible for our customers.

5-5 Samsung is passionate about bringing joy, value and innovation to our customers by setting new standards in quality

- o Samsung is committed to putting our customers at the center of everything we do and each member of Samsung must do their best to increase customer value by delivering top quality products.
- o Samsung develops its products to meet or exceed the highest international standards in quality management to ensure customer satisfaction, and always in compliance with relevant laws and regulations as well as our internal quality control policies. No member of Samsung should do anything that is contrary to our commitment.
- o Samsung works with our partners to improve quality and eliminate defects in the components supplied by our partners.

『Appendix 』 Obligation to Comply with the Code of Conduct

Every member of Samsung Display is responsible for being familiar with and following relevant laws, regulations and Company policies and procedures that govern the business activities in which such member engages. At all times, act within the bounds of applicable laws, rules and regulations of the countries where we do business. Comply with the letter and spirit of laws, regulations and policies.

Although knowing all aspects of every applicable law may not be possible, we do expect you to understand major laws and regulations that apply to your work. We understand that application and interpretations of these laws can be complex and fact-specific, so seek help when you have questions. Contact your Legal Compliance/Legal Department regarding questions about the applicability or interpretation of any rule, law or regulation.

[Application of the Code of Conduct]

The Code applies to Samsung Display and all of its employees as well as to any subsidiaries and their employees domestic and overseas with a majority interest held by Samsung Display.

The Code also applies to business partners when conducting business for Samsung Display.

[Reporting Violations of the Code of Conduct]

Employees should immediately report any specific or suspected violations of the Code through any of the following channels: the Compliance Program Management System whistleblowing channel, the Compliance Team email (cp.display@samsung.com), Global Business Ethics website's "Reporting Wrongful Practices" menu, or the Audit Team email (audit.sdc@samsung.com).

Speak up if you see or suspect violations of this Code. Samsung has company-wide communication channels open to reporting grievances and will ensure that no one is disadvantaged for speaking up. Samsung Display does not tolerate retaliation against anyone who reports in good faith and will protect the identity of those who speak up so that employees may raise issues without fear of retaliation. Retaliation against individuals for raising claims or concerns regarding discrimination, harassment, or intimidation, or for participating in the investigation of a claim or concern, is prohibited.

[Discipline for Violations of the Code of Conduct and Responsibilities of Compliance]

Violations of the Code may be subject to disciplinary actions according to the Employee Handbook.

Executives and other managers must be alert to situations or actions that may violate the letter or spirit of the Code, our policies, or procedures. Where such situations arise or are suspected, executives and other managers have a duty to make sure that the issue is properly resolved or promptly escalated to the appropriate person or function.

[Hierarchy in Case of Conflict]

The Code is by its very nature aspirational because it reflects our commitment to the highest standards. However, we recognize the possibility that laws and regulations in the various countries where we conduct business may have requirements that conflict with the Code. In the event of such conflicts, the affected overseas Samsung Display subsidiary should give priority to applicable local laws over the Code.