



## Letter of Global Compliance Officer

Dear Colleagues,

At ViewSonic, we strive to be the leader of high-technology enterprises and provide a valuable contribution to humanity by designing and developing distinguished and eco-friendly products to our customers.

In addition, ethics and integrity have always been one of the most important core values at ViewSonic. We are hereby publishing our updated Global Anti-Corruption Policy to emphasize the value of integrity and how we conduct business.

This Anti-corruption policy is an extension of ViewSonic Code of Conduct, which are the fundamentals for our business. Accordingly, we are committed to conduct business ethically and comply with any laws, regulations in promoting a good work environment based on mutual trust and respect. This Policy is being implemented throughout all ViewSonic entities, whichever of its business industry and location, to unite and strengthen our worldwide team members.

Thank you for your support of the Policy and for the spirit of integrity.

  
ViewSonic Corporation  
CFO: Sung Yi

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# VIEWSONIC ANTI-CORRUPTION POLICY

ViewSonic Corporation is committed to good corporate practices, ethics and integrity in its business dealings, and will not allow corruption or bribery in any form. ViewSonic Corporation and all or any of its subsidiary, affiliates, related companies or partnership (“ViewSonic” or “We”) hereby formulate and adopt this Anti-Corruption Policy (this “Policy”) in alignment with this commitment.

All ViewSonic directors, officers, representatives, employees, contractors, consultants, agents, suppliers and business partners (“ViewSonic Members”) are required to abide by this Policy and any applicable laws and regulations on anti-corruption and anti-bribery of any applicable countries in which we operate.

## **1. Prohibition of Bribery, Corruption and Illegitimate Benefits**

ViewSonic Members are prohibited from giving to, receiving from, offering to, or authorizing the giving to or receiving from, any supplier, customer or government official, including the directors, officers, representatives, employees, consultants, agents, business partners and families of the aforesaid, any of the following, except that it is approved by the senior management under the principle of (a) conducting with transparency and openness, (b) at a low frequency, (c) by non-cash and (d) deemed as customary business practices (herein as “Approval Procedure”):

Any bribe, improper or illegitimate payment, promise of payment, offer of employment or promise to provide anything of value (including but not limited to gifts, travel, hospitality, charitable donations or employment) for any purpose related to obtaining or maintaining business or creating improper or illegitimate influence on official or company action in violation of any applicable laws and regulations on anti-corruption and anti-bribery of any applicable countries in which we operate.



## **2. Hospitality and Gifts under Proper and Legitimate Etiquette**

ViewSonic Members are prohibited from accepting gifts or entertainment as determined to be improper or illegitimate by any applicable laws and regulations on anti-corruption and anti-bribery of any applicable countries in which we operate.

ViewSonic Members must not allow gifts or entertainment to influence their business decisions and judgments, or cause others to perceive any undue influence.

ViewSonic Members may offer or accept, only if it is approved by the Approval Procedure, customary business amenities such as meals and entertainment, if the aforesaid are at a reasonable level and not prohibited by any applicable laws and regulations on anti-corruption and anti-bribery of any applicable countries in which we operate.

Examples of proper and legitimate business amenities include attendance at trade shows, sales events, product demonstration launches or professional seminars; provided that the planning, implementation and the expenses must be in compliance with the any applicable laws and regulations of any applicable countries in which we operate and shall be under the Approval Procedure.

## **3. Avoiding Conflicts of Interest**

Conflicts of interest arise when the personal or family interests of a ViewSonic Member influence — or even appear to influence — his or her ability or judgment to act in the best interests of ViewSonic. Any ViewSonic Member should avoid taking any actions or acquiring interests that may make it difficult for the aforesaid ViewSonic Member to perform his or her work for ViewSonic in an objective, loyal and effective manner. A ViewSonic Member should not engage in activities that may compete with current or proposed products or services of ViewSonic. A ViewSonic member should not own a significant interest in any business that does or is seeking to do business with ViewSonic. Other situations that may cause conflicts of interest include, among other things, a close relative who works for a ViewSonic Member or competitor or as a consulting or part-time position, except for obtaining, acquiring, having the prior approval



from the senior management, with such company. Other examples of conflict interest may include but not limited to the following:

- Using ViewSonic property or equipment (including use of our phone system, e-mail system, Internet connection, computer systems, copiers, fax machines and other business tools.) for non-ViewSonic uses;
- Using business opportunities discovered through his or her work at ViewSonic that may result in personal gain for himself or herself or for an immediate family member or other person with whom he or she has a close relationship.

#### **4. Charitable Donations**

Charitable donations shall not be used as a substitute for political payments. All charitable donations must be in compliance with any applicable laws and regulations of any applicable countries in which we operate, and must be fully recorded and authorized by the proper level of ViewSonic management before the donation is made. Proof of receipt of all charitable donations must be obtained from the recipient charity. No charitable donation may be made at the request of any party where that donation may result in improper or illegitimate conduct.

#### **5. Third Parties**

Individuals in charge of selecting third party agents (whether businesses or individuals) to act with or on behalf of ViewSonic should exercise appropriate assessments to ensure that only reputable parties will be engaged by ViewSonic. Individuals who manage, supervise or oversee the activities of third party agents should monitor their activities to ensure compliance with ViewSonic's ethical standards, including this Policy, and should report timely any violations.

#### **6. Reporting Potential or Actual Violations**

ViewSonic Members should immediately report any violation or potential violation of this Policy to [globalcompliance@viewsonic.com](mailto:globalcompliance@viewsonic.com).

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Any report will be taken seriously and will be subject to internal investigation and appropriate corrective actions.

## **7. Whistleblower Protection**

We prohibit any retaliation against any ViewSonic Member who in good faith reports an actual or potential violation of this Policy under Article 6.

If you have any suggestions or questions regarding ViewSonic Anti-Corruption Policy, please contact us at: [globalcompliance@viewsonic.com](mailto:globalcompliance@viewsonic.com).

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