

Immersion Corporation – Whistleblower Policy and Hotline

Our Whistleblower policy is designed to provide all Immersion officers, managers, full and part time employees, and contract workers (“You”) with a secure and confidential way of reporting any acts which violate the Code of Business Conduct and Ethics (the “Code of Conduct”) or any complaints or concerns relating to Immersion’s accounting, internal accounting controls or auditing matters.

Introduction to ComplianceLine

ComplianceLine is an external and completely independent service. They provide You multiple options for safely and anonymously reporting wrongdoing – via phone and web. You will be treated with the utmost respect. ComplianceLine forwards your anonymous tips and concerns to our management. You will be provided with a private case number that You can use to anonymously dialogue with our management.

This service can also be used to seek clarification on ethical dilemmas. This doesn’t in any way replace our preference for You to speak out on an identified basis. We encourage You to speak with the person You report to or with Human Resources face-to-face about Code of Conduct violations. Immersion does not retaliate against people who speak out, and we encourage You to bring issues forward in good faith at any time. While we always prefer the “open door” approach, we realize that every now and then confidentiality is the only way important issues will be raised.

In addition, Immersion has committed that our management will not attempt to learn the identity of anonymous submitters, so know that You are safe in contacting ComplianceLine.

Submissions Via Phone

(Calls will be answered in English. If you’d prefer a language interpreter, please say, “I’m from Immersion, [LANGUAGE] please”.)

ComplianceLine’s skilled Listeners are prepared to speak with any level of employee, about any topic, and are adept at handling sensitive issues. They are waiting every minute of every day of the year to take your call. See below for country specific phone numbers.

Submissions Via Web (www.MyComplianceReport.com and enter in the access ID: IMRS)

ComplianceLine invites web submissions in a free-text format.

Foreign Languages

ComplianceLine will provide anyone requiring the use of a foreign language with a live interpreter for the phone or a translator for written messages. Over 180 foreign languages are accommodated.

What Happens After the Submission?

Using your private case number and password, You may follow up with ComplianceLine, via phone or web, to access management responses or follow-up questions.

Summary

We all want to build a stronger organization. To do that, each of us needs to speak up when we see or hear something that we believe is unethical, unsafe, or just plain wrong. This applies to everyone.

ComplianceLine contact information will also be posted on our intranet and bulletin boards for easy reference.

When You need a confidential way to speak out, ComplianceLine is ready to hear You.

Phone Numbers

US/Canada Dedicated Line:	888-893-9065
Greater China:	400-120-9077
Japan:	0800-919-5833
Korea:	080-808-0622
Ireland:	353-766805105