

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 our 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 Lighthouse

Lighthouse 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. Lighthouse forwards your anonymous tips and concerns to our Audit Committee. You will be provided with a private case number that You can use to anonymously communicate with our Audit Committee.

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.

Submissions Via Phone

Submissions can be made via phone by calling +1 (833) 442-6111.

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

Lighthouse’s skilled representatives 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.

Submissions Via Web

Submissions can be made via Lighthouse’s dedicated web reporting system at <https://www.lighthouse-services.com/immersion>.

Foreign Languages

Lighthouse's specialized representatives are available in English and Spanish as well as over 140 foreign languages. Web submissions can also be made in foreign languages.

What Happens After the Submission?

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

The Audit Committee is required to investigate all reports submitted. Immersion management will not be advised of any report, unless the Audit Committee expressly notifies management.

Anti-Retaliation Policy

It is Immersion's policy to promote and implement prompt and consistent enforcement of the Code of Conduct, fair treatment for persons reporting unethical behavior, objective and clear standards for compliance and a fair process by which to determine violations of the Code of Conduct and other Immersion policies. It is against Immersion policy to retaliate against any employee for good faith reporting of violations of the Code of Conduct.

Further, all Immersion personnel are protected by law from retaliation for reporting possible violations of the Code of Conduct or for participating in procedures connected with an investigation, proceeding, or hearing conducted by Immersion or a government agency with respect to such complaints. Immersion will take disciplinary action up to and including the immediate termination of employment of any member of Immersion personnel who retaliates against another member for reporting any suspected or actual violation of the Code of Conduct.

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.

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