

**PIXELWORKS, INC.**  
**POLICY FOR COMPLAINT RECEIPT, RETENTION AND TREATMENT**

**I. GENERAL POLICY STATEMENT**

The Audit Committee (the “Committee”) of Pixelworks, Inc. (“the Company”) is committed to fostering a workplace conducive to open communication about the Company’s business practices. As part of this commitment, the Committee requires that management inform all employees, officers and directors of this policy and ensure the policy is available to such individuals and encourage such individuals and third parties to report complaints and concerns about compliance with applicable laws, regulations, rules and codes of conduct, including the following matters:

1. Accounting errors or misrepresentations;
2. Misrepresentations, omissions or errors made in information given to internal and external auditors;
3. Suspected violations of our Code of Business Conduct and Ethics;
4. Suspected violations of any other Company policies or procedures;
5. Violations of regulations or laws;
6. Fraud;
7. Misuse of property or records;
8. Theft or embezzlement;
9. Improper billing;
10. Sales side letters; or
11. Bribery or kickbacks.

The above list is not intended to be all-inclusive and the Committee encourages reports about any other unethical or improper business practices. If requested, the Committee also requests that employees and third parties provide truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body.

**II. REPORT SUBMISSION**

If an employee, officer, director or third party believes that any violation or fraudulent auditing and accounting activity has occurred or is occurring, the Committee encourages the following actions:

Employees may submit reports orally or in writing to a supervisor or a supervisor’s manager. If an employee is not comfortable speaking with a supervisor or a supervisor’s manager or believe that such person has not properly handled the concern, employees may also contact the Company’s designated member of management (the “Chief Compliance Officer”).

The Company has also established a hotline and website that employees, officers, directors and third parties may use to submit reports. The hotline number is 1-866-ETHICSP and the website address is [ethicspoint.com](http://ethicspoint.com). Reports made via the hotline or website may be made anonymously and confidentially, or reporters may choose to identify themselves.

In all cases, reporters are requested to provide as much information as possible including a description of the questionable practice or conduct, names, dates, places, events and why the

incident may be a violation. All reports submitted to the Ethicspoint hotline will go directly to the Chairman of the Committee.

### **III. REPORT RECEIPT**

The Chief Compliance Officer will receive reports of misconduct and will evaluate such reports to assess the nature, scope and impact of the potential misconduct, and to ensure adequate documentation of all reports for investigation.

All reports received will be logged and include, among other things: (1) the date the report was received, (2) a description of the report, including whether it involves accounting and auditing or non-accounting and non-auditing matters, (3) the reporting party (if provided), and (4) the status and disposition of an investigation of the report.

All reports that the Chief Compliance Officer deems “significant” will be sent directly and promptly to the Chairman of the Committee. The Chairman of the Committee is an independent member of the Board of Directors. Reports are considered “significant” if they allege actual or potential criminal or otherwise unlawful conduct; inaccuracies, omissions or misstatements (whether or not material) in the Company’s financial statements or SEC filings; fraud by any Company employee above a clearly *de minimis* level; or misconduct by management. In addition, the Chief Compliance Officer has the authority to communicate directly to the Chairman of the Committee, promptly, about all reports received under this policy if the Chief Compliance Officer believes such communication to be necessary.

A summary of all reports received will be reviewed by the entire Committee at each regularly scheduled quarterly meeting, or on a more frequent basis should conditions warrant more timely action.

### **IV. TREATMENT OF REPORTS**

All reports will be taken seriously and addressed promptly, discreetly and professionally. Requests to remain anonymous will be respected to the extent appropriate and as permitted by law. Should a reporter elect to identify him or herself, the recipient will communicate the steps that will be taken to address the report, as well as the results of any Company action initiated, to the extent the Committee deems appropriate.

The Committee will investigate, or cause to be investigated, all significant reports and all other reports that it determines require investigation. In its investigation, the Committee may interview employees, request and review all relevant Company documents and/or engage outside advisors to assist in the investigation at the Company’s expense. Upon completion of an investigation, the Committee may make recommendations as appropriate to the Board of Directors of the Company.

### **V. NO RETALIATION**

Retaliation, including discharge, demotion, suspension, threats, harassment, or discrimination, is strictly prohibited against any employee, officer, director or third party who, in good faith, files or participates in the investigation of a report concerning matters not involving the employee (a “Reporting Person”). Employees, officers, directors or third parties determined

to have engaged in retaliatory behavior against a Reporting Person, or who fail to maintain a Reporting Person's anonymity if requested, will be subject to disciplinary action, which could include termination of employment or any other working relationship that the offending party may have with the Company.

Any Reporting Person who feels that he or she has been subjected to behavior that violates this policy should immediately report such behavior to a supervisor, a supervisor's manager or via the hotline or website. Any supervisor who observes such retaliatory conduct must report the conduct to the Chief Compliance Officer or Chairman of the Committee so that an investigation can be made and corrective action taken, if appropriate.

Reporting suspected misconduct does not absolve an employee from responsibility if the employee participated in or condoned the event. Voluntary and truthful disclosure, however, may be taken into consideration in determining the appropriate disciplinary action.

## **VI. FALSE REPORTS**

Employees who knowingly file misleading or false reports, or file reports without reasonable belief as to truth or accuracy, will not be protected by this policy and will be subject to disciplinary action, up to and including termination of employment or other working relationship.

## **VII. REPORT RETENTION**

All reports received under this policy, and all documentation supporting the investigation and resolution of reports received under this policy, will be retained for a period of seven years or until resolved, whichever is longer. Reports retained remain anonymous unless the reporter elects to identify him or herself. Documentation will be retained in secure files to which only the Committee and authorized levels of Management have access.

Last amended: February 2020