

POPSOCKETS

Ethical Business Conduct Standards

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Anti-Corruption and Transparency Standard

Suppliers conduct business in compliance with applicable anti-corruption laws and regulations. Bribes, kickbacks or other similar unlawful or improper payments are strictly prohibited. Suppliers will be transparent, accurate and ethical in reporting their operations, policies, procedures, and records. Suppliers will allow inspection of their facilities and records and those of subcontractors by approved 3rd party inspectors to verify compliance with this Code and legal requirements.

Definitions

- **Bribery:** The offering, giving, accepting, or soliciting of advantages—either monetary or otherwise—for the purpose of influencing the actions to obtain preferential status or treatment.
- **Transparency:** Full disclosure of business practices and records, without hidden agendas or conditions, for auditing, remediation of non-compliances and decision-making.

Standard Expectations

Management will establish and implement policies and procedures ensuring compliance with PopSockets's requirements, as well as all national laws, regulations, and procedures concerning anti-corruption. At a minimum, policies and procedures related to anti-corruption and transparency should cover:

- Rules regarding types of gifts and entertainment that management and workers may give or receive
- Guidelines for reporting gifts and entertainment
- Management behavior and cooperation during the audit and remediation processes
- Providing access to the facility, workers, and documentation to auditors during the audit process

AT.1 Anti-Corruption Ethics and Compliance Program

AT.1.1 Policies and procedures related to anti-corruption must be written, either on paper or digitally, and supported by proper and accurate records.

AT.1.2 Written policies and procedures related to the anti-corruption ethics and compliance program cover the following at a minimum:

- Bribery of national public officials;
- Bribery of foreign public officials and officials of public international organizations;
- Bribery in the private sector;
- Embezzlement of property in the private sector;
- Trading in influence;
- Abuse of function;
- Illicit enrichment;
- Laundering of proceeds of crime;
- Concealment of proceeds of crime; and
- Obstruction of justice.

AT.1.3 The highest level of management maintains responsibility for the design and review of the anti-corruption ethics and compliance program.

- Management publicly posts its policy committing to a zero-tolerance approach to corruption, signed by the highest level of management.
- Management expressly states workers will not be retaliated against for whistleblowing or submitting a grievance related to corruption.
- Management maintains a procedure outlining how it intends to remain aligned with all applicable legal requirements and the operation of its internal controls related to the program.

AT.1.4 An accountable person is assigned responsibility for the implementation of the program and any related policies and procedures.

- The accountable person should be a specific qualified staff member, such as a General Counsel.
- The accountable person's tasks include serving as the primary point of contact for the program, completing any revisions needed to relevant documentation, communicating to and training relevant staff and employees on the content of the program, and collecting data and reporting to relevant parties on the effectiveness of the program.
- Responsible tasks as outlined above are integrated into the accountable person's job description.
- The accountable person's performance review includes metrics related to the oversight of the program.

AT.1.5 All systems, policies, procedures, and their implementation are subject to an annual review and revision process to ensure they meet legal requirements and the PopSockets Supplier Code of Conduct.

- Where relevant, management and the accountable person solicit feedback from workers and other stakeholders on the effectiveness of policies and procedures. Worker feedback can be provided anonymously and is integrated into the written review process.



AT.1.6 Management posts all legally required notices and any workplace rules, policies, and practices in areas easily accessible to workers and in a language understood by workers.

- Workers are trained as new hires and annually on the anti-corruption ethics and compliance program.

AT.1.7 Management provides a channel for workers to report anti-corruption violations without fear of retaliation (see WV.1.2).

AT.1.8 Management extends its anti-corruption ethics and compliance program to its subcontractors.

AT.2 Bribery

AT.2.1 Any and all forms of bribery, corruption, extortion, or embezzlement are prohibited.

AT.2.2 Facilitation payments to government officials are prohibited.

AT.2.3 Management maintains policies and procedures to prevent bribery in all commercial dealings.

AT.3 Gifts and Hospitality

AT.3.1 Management maintains accurate accounting records related to gift and entertainment expenses.

AT.3.2 In the event of a gift from PopSockets, management maintains a letter of confirmation from PopSockets staff indicating that no government officials were involved in the transaction, and that the transaction meets all legal requirements and management rules.

AT.4 Conflicts of Interest

AT.4.1 Any and all conflicts of interest that arise as a result of conducting business with PopSockets, including with subcontractors, are declared to PopSockets to allow PopSockets to take appropriate action.

AT.4.2 Any ownership or beneficial interest in a supplier's business by a government official or a representative of a political party are declared to PopSockets prior to the beginning of a sourcing relationship with PopSockets.

AT.4.3 Management maintains accurate accounting records related to political expenditures.

AT.5 Transparency in the Audit Process

AT.5.1 Policies and procedures related to transparency must be written, either on paper or digitally, and supported by proper and accurate records.

AT.5.2 Management is transparent, accurate and ethical in reporting all operations, policies, procedures, and records.

- Document falsification and double bookkeeping are strictly forbidden.

AT.5.3 Management does not interfere with the work of auditors, by threatening, intimidating, or offering bribes.

AT.5.4 Management provides auditors with full and unrestricted access to the factory as necessary to complete the scope of the audit.

- The entire factory site, including all production buildings and non-production buildings including dorms and warehouses, are available for inspection.
- Relevant management and factory personnel are available for support throughout the audit.
- Production workers are available for interviews and questions.
- Management provides a private space for worker interviews to be conducted.
- Management makes available at least 12 months of documentation related to wages and benefits, working hours, and otherwise as related to the business and HSE.

AT.5.5 Management will not coach workers on what to say during worker interviews.

AT.5.6 Management will not force any worker to sign documentation against their will.

AT.5.7 Management conducts itself in a cooperative manner during the remediation process following audits.



AT.6 Documentation

AT.6.1 The following documentation related to policies and procedures for anti-corruption should be kept at a minimum:

- Policies related to anti-bribery.
- Procedures related to reporting gifts and entertainment either provided or received, and whistleblowing or grievance submission allowing workers to report violations of anti-bribery policies.

AT.6.2 The following documentation related to training on anti-corruption should be kept at a minimum:

- Logs, slides, or post-training quizzes demonstrating worker and management training on business exposures to bribery, procedure for reporting gifts and entertainment, and reporting violations of the company policy or legal code.



Unauthorized Subcontracting Standard

Suppliers will disclose and receive our authorization in advance of subcontracting any product, component, or related work. Subcontractors will commit to upholding the standards in this Code. It is the direct supplier's responsibility to ensure its subcontractors' compliance with this code.

Definitions

- Direct supplier: Any facility with which PopSockets has a direct contractual relationship.
- Subcontractor: Any secondary facility engaging in the manufacture or embellishment of all or part of a PopSockets product on behalf of a PopSockets direct supplier.
- Unauthorized subcontracting: The use of a secondary facility to manufacture or embellish all or part of a PopSockets product without the prior approval of PopSockets.

Standard Expectations

Management will establish and implement policies and procedures ensuring compliance with PopSockets's requirements, as well as all national laws, regulations, and procedures concerning unauthorized subcontracting. At a minimum, policies and procedures related to unauthorized subcontracting should cover:

- Adherence to PopSockets's subcontracting approval process
- Due diligence of subcontractor adoption and implementation of the PopSockets Supplier Code of Conduct

US.1 Unauthorized Subcontracting

US.1.1 Policies and procedures related to unauthorized subcontracting must be written, either on paper or digitally, and supported by proper and accurate records.

US.1.2 Direct suppliers must comply with the PopSockets subcontracting authorization procedure.

- To request authorization for a new subcontractor, direct suppliers must submit a completed Factory Information Form to PopSockets staff.
- PopSockets staff then conducts an on-site visit and evaluation of the potential subcontractor based on production capacity, quality control, HSE, and social compliance.
- At the conclusion of the process, PopSockets notifies the direct supplier of its approval or denial of the subcontractor.

US.1.3 Direct suppliers must not engage in unauthorized subcontracting to produce products in violation of business authorization agreements or requirements of buyers, or knowingly and purposefully illegally transport products.

US.1.4 Direct suppliers must disclose all subcontractors that are considered in-scope for PopSockets audits. In-scope subcontractors include:

- A facility embellishing a PopSockets product on behalf of a PopSockets direct supplier.
- A facility applying intellectual property on behalf of PopSockets.
- A facility manufacturing parts to be sent to a PopSockets direct supplier for final assembly.

US.1.5 Direct suppliers are required to inform their subcontractors about PopSockets's requirements and conduct due diligence to ensure subcontractor compliance.

US.1.6 All subcontractors must display the PopSockets Supplier Code of Conduct in the facility common areas.

US.2 Documentation

US.2.1 The following documentation related to policies and procedures for unauthorized subcontracting should be kept at a minimum:

- Policies related to the prohibition of unauthorized subcontracting.
- Procedures related to reporting new subcontractors to PopSockets staff.

US.2.2 The following documentation related to unauthorized subcontracting should be kept at a minimum:

- Records of all subcontractors that the factory uses for any part of its production.
- Documented due diligence systems used to verify subcontractors operate legally and ethically.

US.2.3 The following documentation related to training on harassment and abuse should be kept at a minimum:

- Logs, slides, or post-training quizzes demonstrating manager training on PopSockets's subcontracting expectations.