



2024 Statement on Modern Slavery and Supply Chain Transparency

OUR BUSINESS

We here at Belkin are dedicated to upholding human rights globally, not only within our operation but also across our business partnerships in our supply chain. Addressing issues like forced labor and child labor demand consistent effort, ongoing due diligence, stakeholder involvement, and continuous improvement. Our team, consisting of more than 850+ employees across 25 countries, is committed to these principles.

These efforts align with the foundational values of Belkin, which emphasize creating a beneficial, enduring, and sustainable impact on the environment, our employees, and the communities where we operate. Regulatory frameworks such as the California Transparency in Supply Chains Act of 2010, the United Kingdom's Modern Slavery Act 2015, Australia's Commonwealth Modern Slavery Act 2018, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 require that businesses disclose their strategies for mitigating the risks of modern slavery (including forced labor and human trafficking) and child labor in their operations and supply chains, as applicable. This statement from Belkin addresses these requirements and details our initiatives over the calendar year that concluded on December 31, 2023.

For ease of reference, we will use the following terms in this Statement:

Belkin, our, us or we mean (and the corresponding entity who will be the 'controller' of your Personal Information, or the equivalent term under local law); depending on where you are, is:

- Belkin International, Inc., of 555 Aviation Boulevard, Suite 180, El Segundo, CA 90245, USA, if you are in North America, Central America or South America.
- Belkin B.V. of Eduard van Beinumstraat 8, 1077 CZ Amsterdam, The Netherlands, if you are in the European Economic Area (EEA) or anywhere else in Europe except the United Kingdom;
- Belkin Ltd of Unit 1, Regent Park, Booth Drive, Park Farm South, Wellingborough, Northamptonshire NN8 6GR, United Kingdom, if you are in the UK, the Middle East or Africa;
- Belkin Asia Pacific Ltd of Room 2601, 26th Floor, Harbourside HQ, No.8 Lam Chak Street, Kowloon Bay, Kowloon, Hong Kong, if you are anywhere in Asia except the Middle East; and
- Belkin Ltd of Suite 11, 14 Pioneer Avenue, Tuggerah NSW 2259, Australia, if you are in Australia or New Zealand.
- Belkin Canada Corporation of 600-1741 Lower Water Street, Halifax, Nova Scotia, B3j 0J2, Canada

Belkin Ltd (UK) and Belkin Ltd (Australia) are wholly-owned subsidiaries of Belkin International Inc., acting as the distributor of Belkin products in the UK and EMEA, and Australia respectively. Belkin Canada is a wholly-owned subsidiary of Belkin International Inc. acting as the distributor of Belkin products in Canada.

OUR OPERATIONS AND SUPPLY CHAINS

The principal activities of Belkin consist of importing, distributing, marketing, selling, as well as providing before and after-sales services and support to customers of consumer electronics and accessories, networking devices, and peripherals.

Belkin's unique product range requires an extensive network of suppliers and partners, stretching across six continents. We work with over 50 manufacturing suppliers and several non-manufacturing suppliers who provide a broad array of goods and services critical to our operations. We employ a considerable number of outsourced manufacturers worldwide to produce Belkin-designed products, which enhances the flexibility of our supply chain and manufacturing operations. In certain cases, third-party suppliers manufacture products that Belkin then purchases and sells under our own brand. Additionally, we assemble finished goods products using components and sub-assemblies sourced from a diverse group of vendors. Our supply chain features direct business relationships with suppliers spanning up to four tiers of manufacturing, which include raw materials, components, sub-assemblies, branded components, and final assembly suppliers.

Belkin's operations are not only limited to manufacturing but also encompass design and product development, supply chain management, marketing, sales, customer support, and administrative functions. These operations are further supported by non-manufacturing suppliers who provide essential services and facility management.

BELKIN GOVERNANCE

The Belkin Sustainability Committee with executive sponsorship from both our CEO & CTO oversees Belkin's significant strategies, policies, positions, and goals relating to human rights, including but not limited to renewing the results of our ongoing human rights assessments and approving Belkin's annual company-wide Forced Labor in Supply Chain statement. The Committee is regularly updated on human rights-related topics. In FY23, this included supply chain surveys and assessments, supply chain transparency, and an overview of governance and regulatory trends. The Committee is also updated when any salient human rights issues are identified in our social accountability audit and risk assessment.

The Committee consists of department heads including VP of Supply Chain Operations (based in the UK), Global Procurement, Sales, Communications, Technology, Engineering and Sustainability. Regional sustainability teams include the Managing Director of the Australia/New Zealand region. The Committee oversees the implementation of our company-wide human rights commitments found within our annual [impact report](#) and the ethical sourcing practices that include conflict minerals policy, supplier engagement, and supplier partnerships approach to prevent, mitigate, and remediate any related potential and actual human rights impacts, including any relating to modern slavery and child labor.

There are also many business functions across Belkin that contribute to addressing risks associated with modern slavery and child labor. To prepare this statement, the Head of Global Sustainability collaborated with several global and regional departments located in North America, Australia, and UK to craft this comprehensive integrated statement. They also worked with senior management of Belkin and its subsidiaries to ensure that local and global statements meet the required standards.

The Belkin Sustainability Committee and its regional committees convene regularly to review ongoing human rights assessments and devise strategies for continuous improvement. The sustainability committee includes members of the Belkin executive team including the VP of Operations based in the UK and the Director of Global Procurement. The regional committee in Australia includes the

Managing Director of the Australia/New Zealand region. Their contributions will help enhance the integration of human rights due diligence both regionally and globally.

INTEGRITY AT BELKIN

Respect for fundamental human rights is integral to integrity at Belkin, which promotes strong ethical and anti-corruption standards within our operations and across our value chain. The People team oversees this program, guided by our framework employee code of conduct, ensuring all employees uphold high ethical standards and comply with applicable laws and regulations wherever we operate. This commitment extends our influence to advance human rights and ethics globally, integrating these principles throughout our operations.

Policies

Employee Code of Conduct

Belkin's Employee Code of Conduct is applicable to all employees who perform services for Belkin, whether at a Belkin site, from a home office, Belkin customer premises, or other Belkin-approved locations. The code holds fundamental principles that include respecting others, safety and health, diversity, and teamwork.

Supplier Code of Conduct

Belkin's Supplier Code of Conduct sets forth our expectations for all contracted suppliers, integrating international labor and human rights standards consistent with the Responsible Business Alliance (RBA) Code of Conduct. It is mandatory for contracted suppliers to adhere to international standards and applicable laws and regulations concerning forced labor, child labor, and human trafficking, in addition to the stipulations of Belkin's Supplier Code of Conduct.

The supplier code details Belkin's commitment to ensuring that suppliers involved in Belkin services and production respect worker rights, including (i) the right to freely chosen employment; (ii) the right, in accordance with local laws, to voluntarily join labor unions, to bargain collectively, and to engage in peaceful assembly; and (iii) the right to a workplace free from harassment and unlawful discrimination.

Furthermore, the Supplier Code of Conduct mandates that suppliers not only acknowledge but actively implement this code within their operations. Contracted suppliers are also required to establish a management system that includes mechanisms for monitoring compliance with the Supplier Code of Conduct.

Risk of Modern Slavery and Child Labor

Belkin actively monitors the risk of modern slavery and child labor through our comprehensive social accountability audit program. This program encompasses human rights risk assessments, impact assessments, and rigorous audit and assurance processes, aligning with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our due diligence program assesses risks associated with our direct operations – such as Belkin offices, manufacturing, and distribution activities – as well as the suppliers that support these operations, identifying where we might cause or contribute to adverse human rights impacts.

In 2023, Belkin conducted annual human rights risk and impact assessments, to perform a global evaluation. Given our industry's experiences and insights into identifying and mitigating risks of modern slavery and child labor, certain business contexts require enhanced due diligence:

Within Belkin Operations: The risk of modern slavery is primarily linked to non-manufacturing suppliers who provide services such as janitorial, facilities management, and security at Belkin sites.

Historically, risks have been observed with foreign migrant hourly workers employed by these suppliers, although Belkin does not employ such workers directly.

Within Our Supply Chain: Risks are more acute among manufacturing suppliers in countries with significant numbers of foreign migrant workers and insufficient legal protections or enforcement regarding migrant and child labor. Specific issues include the payment of recruitment fees by migrant workers, retention of workers' passports, lack of employment contracts in workers' native languages, and failure to provide transportation back to their home countries.

Deeper in Our Materials Supply Chain: Risks may also arise with entities far removed from Belkin. Here, we adhere to international guidelines, such as those from the Organization for Economic Co-operation and Development (OECD) on responsible mineral sourcing, to help mitigate risks of modern slavery and child labor in challenging operational contexts.

Risk Detection

Belkin upholds a culture of open communication, encouraging stakeholders, including employees, business partners, and suppliers, to voice concerns without fear of retaliation. Multiple communication channels are available to facilitate easy reporting of concerns or inquiries, underscoring our zero-tolerance policy for retaliation against anyone who speaks up. Responses to such grievances are handled by thorough and objective investigations, insulated from management or business influences, and adhere to a structured process to ensure consistency and fairness. These investigations, which may involve interviews, formal reporting, and recommendations, are conducted under the oversight of the Sustainability Committee, People team, Legal, and relevant management.

Belkin is extremely diligent when engaging with a new supplier. We will carry out a thorough assessment to ensure the potential supplier conforms to the Supplier Social Accountability Audit Checklist (SSAAC). Belkin's stringent audits are performed by Belkin's internal staff. In addition, Belkin is now part of the Responsible Business Alliance (RBA) through its parent company Foxconn, which is a member. In compliance with the RBA, Belkin has also incorporated third-party agency audits. The results of this due diligence are then further scrutinized by Belkin's compliance and on-boarding teams who decide whether the potential supplier conforms to the requirements of Belkin.

Our supply chain onboarding program aims to protect and empower workers, benefiting not only these rightsholders but also our customers and us. This program uses our supply chain policies and standards as a foundation to detect and address risks of modern slavery and child labor, forming part of a broader strategy to mitigate social and environmental concerns.

To prioritize audits for existing suppliers, a supplier self-assessment questionnaire is often utilized. Scheduled audits assess the supplier's adherence to the Belkin Supplier Code of Conduct and/or specialized labor standards, conducted by independent third-party auditors through the RBA Validated Assessment Program or by Belkin-approved audit programs, both announced and unannounced.

Contracted suppliers are expected to demonstrate compliance with the Belkin Supplier Code of Conduct. To assess the risks of modern slavery and child labor, we analyze indicators such as the employment of vulnerable worker groups and the use of third-party agents in worker recruitment or management. The risk assessment for foreign migrant workers considers factors like supplier location, the nature of the manufacturing processes or services provided, and supplier reputation. For suppliers considered high-risk, a risk assessment is conducted evaluating aspects of the Belkin Supplier Code of Conduct.

Findings of non-conformance with Belkin standards or policies might indicate potential gaps in operations or procedures aimed at preventing instances of modern slavery. Such findings require that suppliers immediately cease the non-conforming practice, implement corrective actions, and report

back within 30 days of the audit. These findings are re-examined during follow-up site visits by a third party or Belkin auditor to confirm resolution. We continuously assess our audit findings to refine our approaches to identifying and mitigating risks in our supply chain.

Any salient risks identified are communicated to the highest levels of the relevant management team. A summary of any findings and corrective actions relating to modern slavery and child labor risk is reported to relevant leaders in management and the Sustainability Committee.

EFFECTIVENESS IN ADDRESSING MODERN SLAVERY RISKS

Operational Grievance Mechanism

Belkin has an EthicsPoint hotline which is accessible to all employees globally. There is an online portal for submission where an employee can submit online or find a toll-free local number to call for their specific region. Concerns can be made anonymously and will be held confidential to the degree possible. Belkin does not tolerate retaliation against any person who reports an unlawful or unethical act by strict enforcement of our Anti-Retaliation Policy. During FY23, our operational grievance mechanism, accessible to all, we received a total of 0 formal contacts. During FY23, our operational grievance mechanism, we received a total of 0 formal contacts.

Audit and Assessments

Belkin conducted 89 audits and assessments done via a combination of 3rd party audits and/or internal audits within the last two (2) years. 77% of these audits were carried out by third-party auditors. Both audit types include the ability for corrective actions to be identified and mitigated.

	2022	2023	Total	Percentage
Active & Semi-Active Supplier	62			/
Belkin SA audit	22	19	41	66.13%
3rd party SA Audit	19	29	48	77.42%

Our audit strategy employs a risk-based approach to prioritize audits, focusing on suppliers with historical performance data and inherent risk factors. Suppliers demonstrating consistent high performance and low risk are subjected to less frequent audits, allowing us to allocate resources more effectively and maintain compliance with our program. Audit findings are assessed and ranked by their potential impact on workers, legal compliance, and adherence to our code of conduct, which determines the audit frequency and prioritization. This dynamic scheduling ensures that our audit resources are concentrated where they are most needed, fostering continual improvement and maintaining the integrity of our supply chain.

Our strategy in combating modern slavery and child labor primarily involves engaging directly with suppliers under contractual relationships. We maintain multi-year agreements with many suppliers, both manufacturing and non-manufacturing. These agreements are instrumental in raising supplier awareness and capability in meeting our expectations for supply chain responsibility, including adherence to policies designed to mitigate risks of modern slavery and child labor. These agreements also stipulate that our expectations are to be communicated down the line to upstream suppliers.

SUPPLIER PERFORMANCE AND CONTINUOUS IMPROVEMENT

The Belkin Supplier Scorecard ("Scorecard") measures supplier performance across various factors, including audit results. Suppliers that excel in these areas benefit in their commercial relationship with Belkin. Supplier Quality Assurance and Supply Chain Management are regularly briefed on suppliers' Scorecard outcomes. The Scorecard is updated periodically to align with Belkin's evolving expectations, fostering ongoing supplier improvement.

OTHER INITIATIVES

External Stakeholder Engagement

Aligned with the UNGPs, Belkin enhances its influence in supplier relationships by collaborating with key stakeholders through initiatives like the Responsible Business Alliance (RBA). We actively monitor the RBA's Responsible Labor Initiative (RLI), which focuses on ensuring workers' rights are respected and promoted across industries. Together with other RLI and RBA members, we have committed to long-term strategies that aim to transform recruitment markets, provide timely and effective remedies through collaboration, and reduce the risk of forced labor throughout recruitment and employment processes.

APPROVAL

Belkin's commitment to combating modern slavery is rooted in our core values of creating a positive impact on our planet, people, and communities where we do business. Global policies, practices, and procedures to assess and address the risk of modern slavery are tailored to local contexts and regional needs, in consultation with each reporting entity. The Belkin Sustainability Department leads the consultation process, overseeing and equipping the Belkin business with tools to manage modern slavery risks in our global operations and supply chains. The Belkin Sustainability Department collaborates continuously with Belkin entities worldwide to identify risks and implement and monitor our modern slavery strategy. Learn more at <https://www.belkin.com/company/sustainability/>.

This statement was prepared by Belkin's subject matter experts who support efforts to address human rights in our supply chains. During its development, key functions worldwide including those in jurisdictions with regulatory requirements were actively engaged and consulted. This collaborative approach involved discussing reporting requirements and presenting relevant updates and materials on an ongoing basis. This statement was reviewed by cross functional stakeholders, including representatives and leaders from our global and local legal departments, supply chain departments, sustainability as well as directors from each reporting entity. I attest that I have reviewed the information provided in this report on behalf of Belkin International Inc. (US), Belkin Canada Corporation (Canada), Belkin Limited (UK and Australia) and its regional entities is true, accurate and complete in all material aspects for the reporting year listed above. This statement was approved by Belkin Limited board of directors on May 15, 2024 for and on behalf of Belkin Ltd.



Stephanie Caulfield
Managing Director, ANZ



Christopher Baldwin
Director, ANZ