

POPSOCKETS

Modern Slavery and Supply Chain Transparency Disclosure

Fiscal Year 2021



Introduction

Modern slavery and human trafficking impact people in every country, including in the United States, and across every sector of the global economy. “Trafficking in persons,” “human trafficking,” “forced labor,” and “modern slavery” are umbrella terms often used interchangeably to describe the phenomenon of forced labor, bonded labor or debt bondage, involuntary domestic servitude, and sex trafficking, with the primary emphasis on the traffickers’ aim to exploit their victims¹. The negative impact of modern slavery weaves a complex tapestry of socioeconomic and political challenges including poverty, discrimination, and forced migration, and is especially prevalent under repressive authoritarian regimes and during times of social unrest, conflict, and war².

In 2016, there were an estimated 25 million people in forced labor globally³, roughly equal to the population of the city of Shanghai. Of that 25 million, 16 million were exploited in the private sector⁴. These staggering numbers offer a glimpse into the importance of private sector action in addressing modern slavery, and why governments around the world are enacting laws requiring companies to report on their identification, prevention, and mitigation of modern slavery risks in their supply chains.

As a growing company with global operations and sales, PopSockets is committed to addressing these risks as an integral part of our company’s operations and culture. In addition to meeting our legal requirements, we endeavor to incorporate best practices to protect human rights.

To streamline our public reporting, this disclosure is structured to meet requirements set forth in existing laws including the California Transparency in Supply Chains Act, UK Modern Slavery Act of 2015, and Australia Modern Slavery Act of 2018. The disclosure encompasses activities undertaken during our most current fiscal year starting 1/1/2021 and ending 12/31/2021.

Current and Emerging Regulatory Framework

The regulatory framework for modern slavery and supply chain transparency reporting requirements for companies dates to the 2010 passage of California Senate Bill 657 as the Transparency in Supply Chains Act. Since then, several countries have either passed similar legislation, or have similar legislation pending in their respective lawmaking bodies.

California Senate Bill 657 – California Transparency in Supply Chains Act

Passed in 2010 and effective January 1, 2012, the California Transparency in Supply Chains Act (“CA Supply Chain Act”)⁵ requires companies to publish a publicly facing disclosure about their efforts around verification, audits, certification, internal accountability, and training related to modern slavery. The CA Supply Chains Act applies to all companies operating as a retail seller or manufacturer in California with annual worldwide revenues exceeding USD \$100 million.

UK Modern Slavery Act of 2015

The UK Modern Slavery Act of 2015⁶ requires all companies doing business in the UK with annual revenues in excess of GBP 36 million (about USD 46 million) to publish a publicly facing disclosure that details “the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.”

Australia Modern Slavery Act of 2018

The Australia Modern Slavery Act of 2018⁷ requires all companies doing business in Australia with revenues over AUD 100 million (about USD 70 million) in total annual revenues “to publish annual statements explaining their actions to assess and address modern slavery risks in their operations and supply chain.” Unlike predecessor legislation in other jurisdictions, the Act

¹ <https://www.state.gov/j/tip/what/index.htm>

² <https://www.globallslaveryindex.org/2018/findings/executive-summary/>

³ <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>

⁴ https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575540.pdf

⁵ <https://oag.ca.gov/SB657>

⁶ <https://www.gov.uk/government/collections/modern-slavery-bill>

⁷ <https://www.legislation.gov.au/Details/C2018A00153>

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requires all statements to be reviewed by the Australian Border Force and published on a free, online registry maintained by the Australian government to facilitate public access. The Australia Modern Slavery Act came into force in 2020.

The Uyghur Forced Labor Prevention Act

Signed by US President Joe Biden in December 2021, and coming into force in June 2022, the Uyghur Forced Labor Prevention Act (“UFLPA”)⁸ establishes a “rebuttable presumption” that any goods produced in the Chinese province of Xinjiang, or outside of Xinjiang by “certain entities”, are made with forced labor. This assumption allows US Customs and Border Patrol to halt any goods suspected of being made with forced labor from entering the country⁹.

Other Current and Pending Legislation

As an American company, PopSockets is subject to modern slavery requirements under various US laws regarding trade and imports. The US Trade Facilitation and Trade Enforcement Act was amended in 2016¹⁰ to provide US Customs and Border Protection (CBP) agents with wider power to halt and inspect goods suspected of being made with forced labor or child labor. Passed in 2017, the Counter America’s Adversaries through Sanctions Act, Title III Section 321(b)¹¹, requires that companies importing goods into the United States be prepared to demonstrate upon request by CBP that they conducted sufficiently stringent due diligence activities to ensure that North Korean forced labor was not used in the manufacture of its imported products. 2020 saw the onset of new reporting laws in various European countries such as France, The Netherlands, and Germany, and, as of the time of writing, a European Union directive on the subject is being debated. Based on initial understanding of the new country-level laws and pending EU directive, PopSockets is not currently required to report under these legislations. As other countries consider similar modern slavery disclosure legislation, we fully intend to keep ourselves ahead of any applicable legal requirements.

About Us

PopSockets LLC is a privately owned digital lifestyle brand headquartered in Boulder, CO, that specializes in producing phone grips and other products such as cases, wallets, chargers, and mounts. Launched by CEO David Barnett in 2014, PopSockets has finished its eighth year of business, sold over 235 million phone grips in 75 countries, and has 230 employees globally. PopSockets sources from eight contract facilities and one owned facility across six countries.

Our Corporate Structure

PopSockets is a limited liability company (LLC) incorporated in the US state of Colorado. PopSockets is privately owned by members of the LLC and led by founder, member, manager, and CEO David Barnett. PopSockets owns several subsidiaries in the US and abroad, including in China, Colombia, Finland, Japan, and Mexico. All our products are sold under “PopSockets” brand name. Globally, PopSockets has approximately 200 employees.

Our Operations

PopSockets’s operations include sales, marketing, research and development of products, printing of products, and supply chain and operational planning and logistics of our products. Our international offices are engaged in marketing, sales, and distribution logistics in their respective regions. Since the quality of our relationships with our suppliers is crucial to how we do business, our direct contractual relationships with our suppliers tend to be long-term in nature. These contracts are made directly with the suppliers; we do not use any factory-related intermediaries.

Our Supply Chain

PopSockets has suppliers across a wide range of countries in Asia, North America, and Europe. Our manufacturing sourcing countries are China, the United States, and Vietnam, are what we consider to be “tier 1”, where we procure finished goods and

⁸ <https://www.congress.gov/bill/117th-congress/house-bill/6256>

⁹ <https://www.cbp.gov/trade/forced-labor/UFLPA>

¹⁰ <https://www.cbp.gov/sites/default/files/assets/documents/2016-Apr/tftea-repeal-consumptive-demand-clause-faqs.pdf>

¹¹ <https://www.dhs.gov/news/2018/03/30/caatsa-title-iii-section-321b-faqs>

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component parts including our mobile phone accessories such as phone grips and car mounts, phone chargers, lip balm products, beverage sleeves, packaging, and gel. Our suppliers beyond tier 1 are in China. PopSockets's suppliers beyond tier 1 are involved in activities such as the creation of specialty design inlays for our phone grips, which are then shipped to our manufacturers in China for final assembly. We maintain relationships with logistics partners, who we also consider as tier 1 suppliers, in Mexico, Japan, China, and the Netherlands who print and fulfill customer orders and have one on-site printing and order fulfillment facility at our headquarters in Colorado. Our public factory list is currently available on our website¹².

Our Relevant Policies and Procedures

Our Standards

Our Supplier Code of Conduct

PopSockets first adopted a Supplier Code of Conduct (henceforth "COC") in 2016, with updates made each year since 2018. As part of our affiliation requirements for the Fair Labor Association (henceforth "FLA"), a multi-stakeholder non-profit dedicated to improving workers' lives worldwide¹³, our COC is aligned with the FLA's Workplace Code of Conduct¹⁴ as well as International Labour Organization standards¹⁵, with additional elements and enhancements above and beyond these documents.

The COC dictates PopSockets's policy stance on forced labor, the term we use to encompass modern slavery and human trafficking, and child labor:

Forced Labor, Slavery, & Human Trafficking – Suppliers will prohibit the use of forced, bonded, indentured or prison labor, which is defined as any work or service extracted from a person under the threat of penalty and which the worker does not offer voluntarily. No workers will be required to hand over passports or identity documents or pay recruitment-related fees. Any form of slavery and human trafficking is strictly prohibited.

Child Labor – Suppliers will not employ any person under the age of 17 or under the age for completion of compulsory education, whichever is higher. All local child labor laws concerning work hours, wages, minimum education, internship and apprenticeship, and working conditions will be followed. The supplier will maintain "proof of age" documents.

Two supporting documents, our Labor¹⁶ and Health, Safety, and Environment¹⁷ Standards (henceforth "the Standards"), provide detailed requirements for each element of the COC. The Standards also serve as the basis of our monitoring program and are currently being updated to support our newly refreshed COC. Our Standards on forced labor cover freedom of movement, treatment of migrant workers, and training staff on forced labor policies and procedures.

The COC and Standards are provided to all suppliers in English. We also provide translations of the COC in Chinese, Vietnamese, Spanish, Japanese, and Somali for suppliers where the local language differs from English.

PopSockets's top management publicly commits¹⁸ to the COC and to ensuring its adoption and implementation throughout the PopSockets supply chain. All known entities within our supply chain, including subcontractors, gel/packaging partners, logistics partners, and manufacturers, are required to adopt the COC and commit to making continuous improvement to meeting our standards.

¹² <https://www.popsockets.com/on/demandware.static/-/Library-Sites-popsockets-shared-library/default/dw3ed9817d/pdf/PopSockets%20Factory%20List%20September%202020.xlsx>

¹³ <https://www.fairlabor.org>

¹⁴ <https://www.fairlabor.org/accountability/standards/>

¹⁵ <https://www.ilo.org/global/topics/decent-work/lang--en/index.htm>

¹⁶ https://www.popsockets.com/on/demandware.static/-/Library-Sites-AutobahnSharedLibrary/default/dw5a0992fc/pdfs/POPSOCKETS%20LABOR%20STANDARDS_FEB%202022_V2_FINAL.pdf

¹⁷ https://www.popsockets.com/on/demandware.static/-/Library-Sites-AutobahnSharedLibrary/default/dw17eeb8f2/pdfs/POPSOCKETS%20HSE%20STANDARDS_FEB%202022_V2_FINAL.pdf

¹⁸ https://www.popsockets.com/on/demandware.static/-/Library-Sites-popsockets-shared-library/default/dwbc90edc4/pdf/P01Q09_PopSockets%20Letter%20of%20Commitment%20to%20Social%20Compliance%20Jun%202019.pdf

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Fair Labor Association

PopSockets is an accredited Participating Company member of the FLA. The accreditation process evaluates our labor rights program's elements and activities, including those discussed in this document, against the FLA's Principles of Fair Labor and Responsible Sourcing¹⁹ to ensure our program's effectiveness in improving workplace conditions throughout our supply chain. The FLA's Principles are among the most stringent in the labor rights field in terms of requirements for company labor rights programs, and we are proud to be among those who have received accreditation.

Responsible Recruitment and Labor Brokers

The Employment Relationship section of PopSockets's Labor Standards outlines our requirements for responsible recruitment, including recruitment fees and the use of labor brokers. The language from our Standards is included in Appendix III. Although we are not a member of the American Apparel and Footwear Association (AAFA), we have based our responsible recruitment standards on the AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment²⁰. PopSockets monitors risks related to responsible recruitment and labor brokers through our monitoring and remediation program. Our audit tool contains multiple questions regarding employment agency use, and any suspected issues regarding employment agencies are triangulated through our audit process.

Internal Policies and Accountability

Dedicated Staff

PopSockets employs one Social Compliance Manager, reporting to VP Sourcing & Sustainability, who oversees the day-to-day operations of the company's labor rights program. The Social Compliance Manager's responsibilities include management of our monitoring and remediation program, working directly with suppliers on capacity-building, and ensuring all aspects of our labor rights program meet or exceed current best practice.

Several other functions within the organization are responsible for developing and executing impact-related goals, including labor rights. The Director of Environmental and Social Impact, Chief Operating Officer, and President/Chief Financial Officer develop and execute related goals jointly with the Social Compliance Manager and VP Sourcing & Sustainability.

Our Employee Handbook

For workers based in our on-site production facility, the PopSockets Employee Handbook contains all policies and procedures related to employment relationship. The handbook is aligned with our COC, which applies to our on-site facility. Relevant policies and procedures include internal grievance procedures and whistleblowing. Any suspected violation of the COC at the headquarter level can be reported through this mechanism and is resolved by our Human Resources team.

Supplier Certification

PopSockets requires all tier 1 suppliers to self-certify their commitment to the adoption and implementation of our COC and to our monitoring program through a specific provision in our contracts. Any egregious violation of these terms can be considered breach of contract. Egregious violations include, but are not limited to, confirmed instances of forced labor or child labor. We verify our suppliers' efforts to comply with applicable local laws and our Standards through our monitoring program. We require all suppliers to submit a form with a photo of the updated COC posted in the local language whenever updates to our COC are made, and a signature verifying its placement. This serves as an additional signal of commitment to the stipulations of our contractual agreement and to our labor rights work.

Our 2021 Progress

In 2021, we updated our COC and Standards to align with best practice more closely regarding gender inclusivity. We also updated our Supplier Success Manual to reflect updates made to our monitoring and remediation program.

¹⁹ <https://www.fairlabor.org/accountability/standards/manufacturing/mfg-principles/>

²⁰ https://www.aafaglobal.org/AAFA/Solutions_Pages/Commitment_to_Responsible_Recruitment

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Our Risks

PopSockets regularly reviews risk within our supply chain through our monitoring program and other due diligence activities. Identifying risks allows us to take more targeted and concrete actions to address, prevent, and mitigate them throughout our supply chain. While we do not know of any modern slavery or human rights violations in our operations, and we have installed policies, practices, monitoring, reporting, and other steps to actively discover, remediate, and prevent any such future activities, below is a summary of potential risks.

Risks We May Cause

PopSockets has identified risks we may cause related to the geographic and sectoral mix of our operations and supply chain. China and Vietnam have been identified as high-risk countries for forced labor by international NGOs. The United States and Mexico have also been identified as medium-risk countries, and we increased our sourcing from these two countries in 2021. We also source from facilities in the manufacturing and electronics industries, both considered to be high-risk industries.

An additional identified risk in our operations that we may cause relates to the use of labor brokers and employment agencies. PopSockets uses third-party employment agencies based in the United States to hire contract workers at our on-site facilities in Colorado, including janitorial services. We also use third-party employment agencies to staff our overseas owned entities. The use of agencies puts workers at risk of precarious employment situations and is considered a high-risk activity for forced labor.

Risks We May Contribute To

PopSockets's operations and supply chain may contribute to forced labor risks through our purchasing practices. As a fast-growing company, our relationships with our suppliers may be impacted by shortened lead times and tight turnaround, which could lead to exploitation of labor to meet customer demands.

Risks We May Be Directly Linked To

One of the biggest forced labor risks we may be linked to concerns labor brokers. Many of our suppliers leverage labor brokers and employment agencies to hire contract or temporary workers; this may put workers at risk of exploitation and forced labor.

We may also be at risk of being linked to North Korean forced labor. The electronics manufacturing industry in China, where PopSockets has suppliers, is a top destination for North Korean laborers, who are sent by the government to work overseas only to have their wages repatriated upon their return home. Vietnam is another destination for North Korean laborers.

Additionally, we may be at risk of being linked to forced labor related to the Xinjiang region of China. While PopSockets maintains no sourcing relationships directly tied to Xinjiang, including beyond tier 1, workers from Xinjiang may be present in PopSockets's supply chain through a system of worker exchange programs. Through these programs, workers from Xinjiang are sent to participating workplaces in other parts of China. Electronics manufacturing is a sector at high risk for these exchange programs.

Areas of Limited Visibility

While PopSockets has visibility into our supply chain to tier 3, we currently lack that same visibility beyond this point, particularly regarding the chemical manufacturing and raw materials of our plastics. Oil and gas, as with all extractives, is a relatively high-risk industry for forced labor.

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Due Diligence and Remediation

Assessing and Addressing Risks

PopSockets deploys a variety of tactics through our monitoring and remediation program to assess and address risks of forced labor in our supply chain. We maintain an internal standard operating procedure document covering pre-sourcing, annual COC audits, and our remediation process, as outlined below.

Pre-Sourcing

Pre-sourcing activities cover both potential new tier 1 suppliers and new subcontractors nominated by our manufacturers. Any new supplier, whether in tier 1 or beyond, must go through our pre-sourcing assessment process and be granted approval by PopSockets for sourcing to commence. This allows us to screen risks for all new supply chain entities and map our supply chain beyond tier 1.

The Social Compliance Manager conducts pre-sourcing activities for new tier 1 suppliers. Our evaluative criteria include:

1. A country-level risk score based on the US Department of State's Trafficking-In-Persons Report²¹, Global Slavery Index²², and the ITUC Global Rights Index²³.
2. Qualitative review of a potential supplier's existing code of conduct, grievance mechanism policies and procedures, and any active collective bargaining agreements, if applicable.

A general risk score combining these factors is presented to top management when deciding whether to move forward with a supplier.

Our pre-sourcing process for subcontractors involves evaluations on criteria from multiple departments within Operations. For labor rights, we evaluate potential subcontractors against our COC at a high level, with an emphasis on health and safety conditions, any indicators of child labor or forced labor, and grievance mechanisms available for workers on-site. All relevant internal stakeholders must sign off on a subcontractor's performance before a manufacturer may start using them.

Any instance of forced labor found during the pre-sourcing process is reported immediately to the Social Compliance Manager through a dedicated channel in our intra-company chat program. The Social Compliance Manager assesses the severity of the situation on a case-by-case basis and will recommend corrective actions range from creating a root cause-focused remediation plan to termination of the relationship exploration process.

Annual Supplier Code of Conduct Audits

PopSockets conducts annual audits of all known entities in its supply chain on an annual basis, including subcontractors, gel/packaging partners, logistics partners, and manufacturers, except subcontractors generating less than USD 1 million in value annually. We base our audits on our COC and accompanying Standards, both of which are provided at the initiation of the sourcing relationship.

PopSockets works with Sumerra²⁴, an auditing and consulting firm specializing in environment and labor rights, to manage the logistics of our audits. PopSockets audits are announced, and the supplier works with Sumerra to set the audit date. Sumerra does not conduct the audits themselves; independent auditors must complete and pass a proprietary elearning course covering PopSockets's audit standards and tools before being approved to conduct our audits. This gives an additional layer of independence between PopSockets and the auditor.

PopSockets audits include the following components:

- Pre-audit research, where previous zero-tolerance findings such as forced labor will be identified for the auditor's edification

²¹ <https://www.state.gov/reports/2022-trafficking-in-persons-report/>

²² <https://www.globallslaveryindex.org/>

²³ <https://survey.ituc-csi.org/ITUC-Global-Rights-Index.html?lang=en>

²⁴ <https://www.sumerra.com>

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- Opening meeting, covering the requirements and process for the audit
- Facility walkthrough
- Worker interviews, including migrant workers and union representatives, if present
- Management interviews
- Interviews with union/worker representatives, if applicable
- Document review
- Closing meeting, to discuss findings and engage in root cause analysis

Audit findings are identified and verified through a triangulation process based on the facility walkthrough, worker interviews, and document review. Findings are submitted to PopSockets through a report and scorecard that undergoes quality control by Sumerra.

Remediation

Any incidence of forced labor or child labor triggers a protocol called a Critical Incident Notification (CIN). Auditors report CINs to PopSockets staff within 24 hours of the conclusion of the audit with information about the incident and the supplier's response to the auditor. The Social Compliance Manager contacts the supplier or subcontractor's manufacturing partner immediately and requires the supplier to begin correcting the situation with the workers' best interests as the primary focus. PopSockets then works with the supplier and any on-site worker representative structures to assesses next steps on a case-by-case basis. Potential actions taken range from creating a robust remediation plan focused on root cause and preventative measures, to termination of the sourcing relationship.

Following audits without egregious issues, remediation begins with a review of findings by the auditor during the closing meeting with facility management to create a Corrective Action Plan (CAP). Auditors explain the findings and engage in root cause analysis to facility management to ensure focusing remediation efforts on preventing future findings. The Social Compliance Manager receives a copy of the CAP with the facility manager's signature as recognition of the findings.

Receipt of the audit report and CAP kicks off a 120-day remediation period during which the facility submits evidence of remediation. The Social Compliance Manager hosts an initial call with the facility before the first submission deadline at 30 days post-audit to review the CAP with the facility and engage in root cause analysis for each finding. For the 60, 90, and 120-day submission deadlines, Sumerra reviews the quality of evidence submitted for remediation. The Social Compliance Manager independently reviews these submissions and discusses them with facilities during bi-weekly follow-up calls. Tier 1 suppliers are contractually required to ensure active participation by their subcontractors in the remediation process. Any CINs, such as an incidence of forced labor, and their root causes are given top priority in remediation action taken. At the conclusion of the 120-day remediation period, the Social Compliance Manager schedules a wrap-up call with the supplier covering remediation progress and efforts to address any outstanding items.

Fair Labor Association Due Diligence

FLA due diligence adds an additional layer of risk identification and assessment. As part of our affiliation requirements, PopSockets is subject to annual FLA audits, called SCI assessments, for 5% of our tier 1 supply chain. The FLA deploys SCI assessments at facilities selected through a proprietary risk assessment methodology. For PopSockets, the size of our supply chain means we receive one SCI assessment per year. Following an SCI assessment, the FLA requires brands to submit a CAP developed collaboratively between the brand and supplier that includes root cause analysis and target completion dates for each item. Companies are then required to submit remediation updates every six months following the audit.

Worker Voice and Protections

PopSockets aims to prevent and mitigate risks through informing workers of their rights and supplier training, which is discussed further in the Training and Capacity-Building section below.

PopSockets takes a two-pronged approach to ensure workers are informed of their rights. First, we require all suppliers to post our COC in a place easily accessible by workers, such as a frequented notice board or in canteens, in the language(s) most frequently spoken by workers. Our auditors verify the posting of the COC and worker training during our audit process.

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We also require all suppliers to train workers on their rights as enshrined in both local law and our COC as part of new hire training and on an annual basis.

Workers in our supply chain have access to multiple channels through which they can submit grievances. We require all suppliers to develop policies and procedures around worker access to grievance mechanisms, the process for addressing and resolving grievances, and tracking related data. We also require all suppliers to maintain at least one anonymous mechanism, such as a suggestion box. Workers at our on-site production facility also have access to the same confidential grievance mechanisms through our Human Resources department as all employees.

If a worker would like to contact someone other than factory management, PopSockets provides an email address at the bottom of its COC through which any worker in our supply chain can submit a grievance directly to us. We have internal policies and procedures in place for addressing and tracking submissions through this channel. Workers can also submit grievances directly to the FLA through their third-party complaint mechanism. Third party complains are resolved through collaboration with the supplier, brand, and FLA. At the conclusion of the grievance resolution process, the FLA publishes a publicly available report detailing the process. At certain facilities, workers also have access to a grievance hotline hosted by Ulula²⁵, a third-party service provider of grievance hotlines and worker surveys. Workers can submit grievances anonymously, and PopSockets staff can track worker engagement and grievance resolution through Ulula's online platform.

Our 2021 Progress

In 2021, we made additional updates to our subcontracting pre-sourcing assessment tool to adjust for changes made to our COC and Standards. We onboarded one tier 1 manufacturer, one tier 1 logistics partner, and nine tier 2 subcontractors. No newly onboarded suppliers were found to have signs of forced labor or child labor.

PopSockets resumed our normal auditing program in 2021 following reductions made in 2020 due to COVID-19. We conducted 13 audits at seven tier 1, four tier 2, and two tier 3 facilities. These audits took place in China, Mexico, The Netherlands, Vietnam, and the United States. Our logistics partner in Mexico received our 2021 FLA SCI assessment.

We updated our remediation program to incorporate a process wherein suppliers and the Social Compliance Manager discuss each line item in a CAP to conduct collaborative root cause analysis. The supplier also updates the action taken, responsible person, and due date for each line item in the CAP during the call to reflect the outcome of root cause analysis. Suppliers then submit this updated CAP to Sumerra for review and leverage it throughout the remainder of the 120-day remediation period.

PopSockets's relationship with Ulula began in earnest in 2021. We deployed surveys and a grievance hotline to two tier 1 facilities and three tier 2 facilities in China. We conducted three rounds of surveys and received 20 grievances. We will continue our relationship with Ulula into 2022.

Measuring Due Diligence Effectiveness

Ensuring Proper Identification and Assessment of Risks

PopSockets's relationship with the FLA supports our efforts to properly identify and assess risks, particularly as they emerge. The FLA frequently publishes issue briefs and notifications on emerging egregious issues for affiliates. The goal of these issue briefs and notifications is to spur action on the part of brands to engage in risk mitigation and prevention within their supply chains. PopSockets saves all issue briefs within our company files, adds relevant analysis based on the briefs to pre-sourcing and annual audit activities, and distributes them to all staff through our intra-office chat program.

To ensure our due diligence procedures capture risks effectively, we undertake an annual review of our pre-sourcing tools to ensure back-end data is up to date and includes the most up to date and relevant quantitative risk identifiers. We also annually review all policies and procedures related to due diligence, remediation, and training to reflect lessons learned from qualitative

²⁵ <https://ulula.com/>

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experiences from the previous year. This includes review of our Work Instruction for auditors to properly execute our audit protocols.

Ensuring Effectiveness of Our Actions

PopSockets tracks effectiveness of our actions through our key performance indicator (KPI) reporting process. We report KPIs monthly by department; the Chief Operating Officer oversees the reporting of our labor rights data. The Social Compliance Manager compiles relevant data from our due diligence activities, including:

- Audit scores by facility and functional grouping
- Audit scores of subcontractors
- Top issues and findings in audits
- The amount of issues violating local law versus violating our COC

Due to the low number of grievances currently received through our grievance mechanisms, we report these on a case-by-case basis. Any CINs flagged during our audit process, including any incidence of forced labor, would be included in our KPI reporting process on a case-by-case basis as we track it to resolution.

We also report on data related to the remediation process. This data includes:

- Changes to recommended remediation completion dates if the Social Compliance Manager and the facility agree to a reprioritization of an issue
- Whether the root cause of an issue has been updated
- The completion status of remediation items throughout the 120-day remediation period
- Year-on-year changes in finding types and audit scores
- Percentage of workers in our supply chain earning a living wage

Our 2021 Progress

In 2021, we updated our pre-sourcing assessment tool to align with newly released country risk ratings from the US Department of State's Trafficking-In-Persons Report and ITUC Global Rights Index. To ensure effectiveness of grievance resolution, we developed a new set of internal procedures regarding the receipt of grievances through the Ulula hotline. Of the 20 grievances submitted, 17 were tracked to completion through collaborative efforts with the facility.

Training and Capacity-Building

Staff Training

Training for PopSockets staff on our labor rights program, including our policy on forced labor, takes place at various concurrent levels throughout the year.

New Hires

All new hires to our US offices must participate in a two-day new hire orientation. Orientation includes a mandatory hour-long session taught by the Social Compliance Manager introducing the concept of responsible sourcing, PopSockets's Code of Conduct and Standards, PopSockets's labor rights program, FLA affiliation, and PopSockets's sustainability and social impact initiatives. We assess new hires on their learnings and training effectiveness through pre- and post-training questionnaires. We include data on training effectiveness in our KPI process described above and use it to make improvements to the new hire training session.

Dedicated Staff

The Social Compliance Manager is trained on all PopSockets internal policies and procedures regarding labor and human rights risks during their first week, including our COC and accompanying Standards, monitoring and remediation policy, and internal

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accountability policies. The VP Sourcing & Sustainability is responsible for ensuring the training of the Social Compliance Manager.

As per the FLA's requirements, the Social Compliance Manager also receives training year-round on labor rights topics through webinars, training opportunities from our memberships with the FLA and Outdoor Industry Association, and eLearning courses.

All Staff

PopSockets conducts annual refresher training for all staff in our headquarters and other US offices through our bi-weekly all-staff meeting. Meetings are recorded, and recordings are distributed to all staff, including to our international offices. Training covers the PopSockets COC, an overview of our relationship with the FLA, and our monitoring program. PopSockets does not currently collaborate with any organizations for the annual training of our staff.

Our China team also receives training on identifying and investigating zero-tolerance issues such as forced labor and child labor in our factories. The training covers an internal reporting mechanism to inform the Social Compliance Manager of zero-tolerance issues.

Employees of Owned Entities

For our owned entities across the globe, employees are provided information about our forced labor policies either through in-person trainings when visiting our Colorado office, or through ad hoc virtual training sessions. Employees of our owned entities also leverage our intra-company chat program, where the Social Compliance Manager provides updates on forced labor risks such as the ones provided by the FLA. They are also encouraged to bring forward forced labor risks either directly to the Social Compliance Manager or through our intra-company chat program. For the purposes of consultation for the creation of this statement, our owned entities, which all exist for financial reasons only, are informed of its publication and are provided a copy upon release.

Supplier Training and Capacity-Building

Suppliers receive annual training on our COC during our annual supplier summit. All entities in our Asia-based supply chain are invited to participate, including subcontractors and logistics partners. Each supplier summit begins with a review of the COC and Standards, including our forced labor policy, and any changes or updates made to the COC and/or Standards in the past year.

Additional supplier capacity-building occurs during bi-weekly check-ins between the Social Compliance Manager and our riskiest tier 1 suppliers. Bi-weekly check-ins focus on post-audit remediation, beyond-compliance work such as living wages, and promoting additional training opportunities on labor rights-related topics. PopSockets also covers fees for any optional trainings undertaken as a reward for strong supplier scorecard performance.

Our 2021 Progress

In 2020, the Social Compliance Manager logged a total of 135 hours of training, of which 8.5 hours or approximately 6.3% were devoted specifically to forced labor, slavery, and human trafficking. 16 employees in our US-based offices were trained on our labor rights program through our new hire orientation process. Annual all-staff training, which included employees of owned entities and our owned production facility, took place in July 2021.

For suppliers, PopSockets hosted our supplier summit virtually over the course of three days in October 2021. This year's summit took a different form content-wise compared to past summits. Content was generated around one centralized theme, employee engagement. It included a general overview of employee engagement and specific ways suppliers could engage workers on health and safety, climate change, and living wages. Polls and breakout rooms for group exercises were leveraged to make the virtual experience more engaging. Suppliers responded positively to the virtual format and the content through a post-summit survey.

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The above statement has been approved by the principle governing body of PopSockets, its limited liability company, comprising solely of CEO and Founder David Barnett.

David Barnett
CEO, PopSockets LLC

7/29/22
Date of Signature

[Signature as required by the UK Modern Slavery Act and Australia Modern Slavery Act]

Australia Tax Number: 3000 1631 7146
US Employer Identification Number (registered office details): 27-3935248

Contact Us

If you have any questions about the contents of this disclosure, or about our labor rights program, please contact responsiblesourcing@popsockets.com.

To learn more about purpose at PopSockets, please visit our [purpose page](#).

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Appendix 1: Our Standards on Child Labor

Child Labor

Standard

Suppliers will not employ any person under the age of 17 or under the age for completion of compulsory education, whichever is higher. All local child labor laws concerning work hours, wages, minimum education, internship and apprenticeship, and working conditions will be followed. The supplier will maintain “proof of age” documents.

Definitions

- Child labor: Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.
- Hazardous work: Work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of persons under the age of 18.
- Juvenile or young worker: Workers who are of school age but are legally permitted to work certain hours with permission from their local school or labor authority in non-hazardous jobs. They are typically between the minimum age for work and the age of 18.
- Apprenticeship: Any system through which an employer undertakes, by contract, to employ a young person and train them or have them trained systematically for a trade for a period the duration of which has been fixed in advance, and in the course of which the apprentice is bound to work in the employer’s service.

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 the prohibition of child labor. At a minimum, policies and procedures related to child labor should cover:

- Child labor
- Age verification
- Juvenile or young workers and apprentices
- Remediation

CL.1 Child Labor

CL.1.1 Policies and procedures related to child labor must be written, either on paper or digitally, and supported by proper and accurate records.

CL.1.2 Management does not employ anyone under the age of 17 or under the age of compulsory education, whichever is higher.

Apprentices or vocational students are not under the age of 17 or under the age for completion of compulsory education, whichever is higher.

CL.1.3 Children, even if accompanied by a parent or worker, are not allowed onto the premises during work hours or onto any work area, except for within a childcare facility.

CL.1.4 Applicable legal or regulatory requirements regarding conditions of employment, such as parental consent, are followed by management, and compliance documentation is kept on-site for inspection at all times.

CL.2 Age Verification

CL.2.1 Management maintains all documentation necessary to verify date of birth of all workers.

- Management takes reasonable measures to ensure such documentation is complete and accurate.

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CL.2.2 If the law does not specify required documentation, management keeps a copy, not an original (see FL.2.6), on file of at least one of the following at a minimum:

- Birth certificate
- Government-issued personal identification card
- Driver's license
- Voting registration card
- Official stamped copy of a school certificate
- Affidavit from local government representative
- Foreign national work permit
- Doctor's certificate (may be accepted in combination with a school certificate)

CL.2.3 If proof of age documentation is not reliable or readily available, management takes all necessary precautions that can reasonably be expected of them to ensure workers meet the minimum age requirement.

- This can include requesting and maintaining medical or religious records, or through an approach that is effective considering local context.

CL.2.4 Copies of age documentation are kept on file in personnel records throughout the employment period and for a minimum for three years after the worker has left.

CL.3 Juvenile or Young Workers and Apprentices

CL.3.1 Management meets all legal requirements that apply to juvenile or young workers and apprentices, including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime, as well as conditions set forth by the PopSockets Supplier Code of Conduct.

- Juvenile or young workers and apprentices do not undertake hazardous work.
- Juvenile or young workers and apprentices do not undertake nighttime work, which is work done between 10 pm and 5 am, unless there are country regulations that define nighttime work differently.
- Apprentice and vocational training programs are exclusively for workers who lack necessary training or experience which prevents them from being hired as regular workers.

CL.3.2 Management develops and maintains an internal system or database that documents the following at a minimum:

- Identifies all juvenile, apprentice, or vocational workers;
- The type of work they are legally able to do;
- Legally allowable working hours;
- The expiration date for the work permit or parental permission granted (if applicable);
- The legally recognized work program (if applicable);
- Identifying work functions they can and cannot perform within the facility; and
- Parts of the facility where they are not permitted to enter.

CL.3.3 Supervisors are responsible for ensuring juvenile or young workers and apprentices do not work on any other jobs outside of those designated, or outside of the working hours specified.

CL.3.4 Periodic meetings are held with managers and supervisors who have juvenile or young workers and apprentices to remind them of related policies, procedures, and requirements.

CL.3.5 No informal work arrangements for juvenile or young workers and apprentices are allowed (see ER.3.2).

CL.3.6 Apprentices receive wages and benefits that match the legal minimum wage or the industry prevailing wage for regular workers, whichever is higher, and all legally mandated benefits for participation in training.

- If local law allows for a lower minimum wage for apprentices/trainees, this lower minimum wage may only be applied for the first 30 days, if that time is dedicated primarily to training and not to production or other essential tasks.

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- Apprentices are subject to all conditions contained within these Standards and any applicable national laws and regulations.

CL.4 Remediation

CL.4.1 If management knowingly or unknowingly employs child labor, they must take appropriate steps to address the issues when is discovered, including the following at a minimum:

- Facilitating the underage worker's safe returned to a relative or caretaker.
- Providing financial support so the underage worker may attend school or vocational training.
- When the worker reaches the minimum legal working age, providing them with the opportunity to regain employment.

CL.5 Documentation

CL.5.1 The following documentation related to policies and procedures for child labor should be kept at a minimum:

- Policies related to compliance with PopSockets's requirements on minimum working age, compliance with applicable child labor laws, working hours not interfering with educational requirements, and preventing the assignment of dangerous work to young workers.
- Procedures related to verifying the age of all workers, verifying age verification documents, verifying consent to work, ensuring young workers do not perform hazardous work, and ensuring young workers are not deprived of education due to work.

CL.5.2 The following documentation related to child labor should be kept at a minimum:

- Copies of worker contracts for all workers, including contracts for young workers.
- Records of parental consent for young workers.
- Copies of age verification documentation for all workers.
- Records of employee grievances related to child labor.
- An inventory of jobs and tasks that cannot be assigned to the young workers because of inherent health and safety hazards.

CL.5.3 The following documentation related to training on child labor should be kept at a minimum:

- Logs, slides, or post-training quizzes demonstrating worker training on workplace policies and procedures that assist with detecting child labor.

Evidence of training for recruitment and hiring staff on policies, procedures, and legal requirements for child labor prevention.

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Appendix 2: Our Standards on Forced Labor

Forced Labor, Slavery, and Human Trafficking

Standard

Suppliers will prohibit the use of forced, bonded, indentured or prison labor, which is defined as any work or service extracted from a person under the threat of penalty and which the worker does not offer voluntarily. No workers will be required to hand over passports or identity documents or pay recruitment-related fees. Any form of slavery and human trafficking is strictly prohibited.

Definitions

- **Bonded labor:** Used interchangeably with debt bondage. A form of labor where the worker signs a contract either with a supplier or labor broker to work for a specific period of time for which they are paid only with accommodation and sustenance through their wages.
- **Forced labor:** All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. Used interchangeably with modern slavery, various forms of debt bondage and prison labor, and human trafficking. (Source: International Labour Organization)
- **Human trafficking:** The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. (Source: US code – title 22: foreign relations and intercourse – chapter 78)
- **Indentured labor:** A form of labor where the worker signs a contract to work for another person for a definite period of time, typically without pay in exchange for free passage to a new country.
- **Migrant worker:** Worker who leaves their home country or place of origin for employment. The term applies to both domestic (intra-country) and foreign (inter-country) workers.
- **Prison labor:** any instance where incarcerated individuals are used to perform work. This includes government-sponsored work programs and labor where incarcerated individuals are compensated for their work.
- **Receiving locale:** Geographic location (city, country, etc.) to which a migrant worker arrives to work for a supplier.
- **Sending locale:** Geographic location (city, country, etc.) from which a migrant worker departs to work for a supplier.

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 the prohibition of forced labor, slavery, or human trafficking in the workplace. This includes bonded labor, indentured, and prison labor. At a minimum, policies and procedures related to forced labor cover:

- Forced labor
- Freedom of movement
- Treatment of migrant workers

FL.1 Forced Labor

FL.1.1 Policies and procedures related to forced labor must be written, either on paper or digitally, and supported by proper and accurate records.

FL.2 Freedom of Movement

FL.2.1 Management and supervisors do not restrict worker freedom of movement. All workers can freely enter into and terminate their employment and exit the premises within reason at any time with legal and reasonable notice.

FL.2.2 Except where necessary for worker safety, management will not restrict movement within the workplace.

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- Management will not restrict access to drinking water or toilets, including the limiting of toilet breaks or the use of non-payment toilet breaks.
- Management will not restrict freedom of movement via security personnel and/or use intimidation against workers.

FL.2.3 Management provides unrestricted exit at all times if the workplace is locked or guarded to prevent non-employee access.

FL.2.4 Dormitories and other facilities provided to workers are adequate, clean, safe, and identical for all workers regardless of employment situation or place of origin.

- Management will not unreasonably restrict the freedom of movement for workers living in dormitories.
- Management does not require or influence workers to live in dormitories as a condition of recruitment, continued employment, or to receive equal terms of employment or working conditions as other similarly employed workers.
- Workers have the right to use or refuse accommodation, and there is no attempt by management to influence their decision.
- Management will only set curfew and visitor policies where necessary for worker safety and privacy. Curfews, if necessary, are reasonable and allow adequate time for workers during non-working hours to take part in personal activities.

FL.2.5 Workers maintain possession of their passports, identity papers, travel documents, work visas, or other personal legal documents at all times.

- The only time management may possess a personal legal document is to make a copy for record-keeping.
- Management will not withhold or restrict access to personal legal documents in any way, including to ensure workers remain in employment in the workplace.
- Management provides secure, lockable, disaster-resistant storage options for workers who wish to voluntarily leave their personal legal documents with management.
- Worker access to storage options should be immediate, available at all times, and without barriers or the need for management assistance.

FL.2.6 Management, employment agencies, or intermediaries do not engage in any practice or terms that restricts freedom of movement, free transit, or the ability of a worker to terminate their employment. Forbidden practices include the following at a minimum:

- Physical or mental coercion or the threat of such coercion (see HA.1.2);
- Setting unrealistic piece rate or production targets that mandate work outside of regular hours to complete (excluding overtime) to be able to earn the legal minimum wage or prevailing industry wage (see WB.1.13);
- Charging deposits or imposing any kind of financial penalty;
- Denying, impeding, or hindering access to or renewal of personal legal documents (see FL.2.5);
- Requiring deposits or recruitment and/or employment fees (see ER.2);
- Providing precarious employment (see ER.8); or
- Using false information to recruit workers.

FL.2.7 The imposition of overtime where workers are unable to leave the work premises constitutes forced labor.

- Management does not retaliate against any worker for refusing overtime. Workers are free to refuse overtime.

FL.3 Treatment of Migrant Workers

Migrant workers are one of the most vulnerable group of workers within any supply chain and often end up in situations of precarious employment (see ER.8).

FL.3.1 Management will establish and implement policies and procedures specific to the protection and fair treatment of migrant workers. All conditions of employment and labor are identical to that of a local worker.

FL.3.2 Management performs due diligence on respective employment agencies to ensure it contracts with those committed to complying with any applicable laws and regulations in both the sending and receiving locales and these Standards.

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FL.3.3 All stipulations in these Standards on responsible recruitment, including recruitment fees and conditions of employment (see ER.2, ER.3), are equally applicable to migrant workers.

FL.3.4 Management ensures migrant workers receive a pre-departure briefing in a language understood by workers prior to signing their employment contract and prior to departure from their sending locale. The briefing can be conducted by management or the employment agency, and should include the following information at a minimum:

- Management's workplace conditions and rules;
- The requirements set forth in these Standards;
- Travel and visa logistics;
- Legal protections and rights protected under both the sending and receiving locale; and
- Information on the sending locale's embassy or consulate if applicable.

FL.3.5 Migrant worker employment contracts contain the same conditions of employment on working hours, overtime, wages, bonuses, and personal leave as local, permanent workers. Additionally, the contract is:

- Legally enforceable in the host country;
- Provided in a printed copy to the worker prior to leaving their home country (by a third-party recruiter if applicable) and upon arrival in the country of employment; and
- Amended only if the terms of employment are still met with the revision. If this is the case, the worker signs to accept the changes under no threat or fear of penalty.

FL.3.6 All stipulations in these Standards on freedom of movement, dormitories, and personal legal documents are equally applicable to migrant workers.

FL.3.7 Migrant workers have equal and unrestricted access to grievance mechanisms available to other workers (see WV.1). Management follows its policies and procedures related to grievance mechanisms equally for all workers, including migrant workers.

FL.3.8 In the event of repatriation, management arranges and pays for any travel or other costs related to the termination of a contract for any reason, except in situations of documented misconduct or illegal activity on the part of the worker.

- Management is not required to pay repatriation-related fees to workers who are legally permitted to remain in the receiving locale and choose to remain, or workers exempted through an authorized official of a US contracting agency.

FL.4 Debt and Bonded Labor

FL.4.1 Management, employment agencies, or intermediaries will not bind workers to employment as a condition of fulfilling terms of a debt to a third party or to their employer.

FL.4.2 Management, employment agencies, or intermediaries may provide loans directly to workers only if they are a component of a larger loan program available to all workers, such as housing or education loans.

- Lending and savings programs provided to workers by management, employment agencies, or intermediaries must comply with all national laws and regulations for such programs.

FL.4.3 The continuance of loans is not dependent on continued employment at the workplace.

- No penalties may be assessed on the loan for workers ending employment at the workplace.

FL.4.4 Interest may not exceed the cost of administering the loan program and any tax liabilities incurred by the program, and according to legal limits.

FL.5 Documentation

FL.5.1 The following documentation related to policies and procedures for forced labor should be kept at a minimum:

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- Policies related to recruitment fees, accurate terms and conditions of employment for migrant workers, worker retention of personal legal documents, and freedom of movement.
- Procedures related to accurate job postings, providing employment contracts in a language understood by workers, timely reimbursement of any recruitment-related fees, and due diligence for employment agencies.

FL.5.2 The following documentation related to forced labor should be kept at a minimum:

- Copies of worker contracts for all workers, including contracts for migrant workers.
- Copies of migrant worker personal identification documents, work permits, visas, medical certificates and any other records required by law.
- Contracts with employment agencies.
- Evidence of due diligence for employment agencies ensuring compliance with all relevant laws and the PopSockets Supplier Code of Conduct.
- Evidence of payment or reimbursement of recruitment or repatriation-related fees.
- Pre-departure briefing documents.
- Records of employee grievances related to forced labor.

FL.5.3 The following documentation related to training on forced labor should be kept at a minimum:

- Logs, slides, or post-training quizzes demonstrating worker training on workplace policies and procedures that assist with detecting forced labor, and policies and procedures communicated to employment agencies.
- Evidence of training for migrant workers on contract terms before departing their sending locale.

Evidence of training for recruitment and hiring staff on policies, procedures, and legal requirements for forced labor prevention.

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Appendix III: Our Standards on Responsible Recruitment

ER.2 Responsible Recruitment

ER.2.1 Policies and procedures related to responsible recruitment must be written, either on paper or digitally, and supported by proper and accurate records.

ER.2.2 Written policies and procedures related to responsible recruitment cover the following at a minimum:

- The hiring process, including conditions for hiring contract/contingent/temporary workers and migrant workers (see ER.8, FL.3);
- Conditions for working with employment agencies (see ER.2.4, ER.2.5); and
- Rules regarding recruitment fees (see ER.2.6, ER.2.7, ER.2.8).

ER.2.3 Workers are hired directly whenever possible. When using a third-party labor broker, agent, sub-agent, or intermediary is necessary, management ensures that the party fully understands and aligns with all PopSockets, legal, and regulatory requirements of the worker's sending and receiving countries. Specifically, third parties used:

- Are legally approved and licensed or registered;
- Provide legitimate and true information and the employment opportunity promised; and
- Follow all requirements outlined regarding freedom of movement, recruitment fees, fair and equal treatment, and non-discrimination as outlined in both local law and these Standards. (see ER.2.6, ER.2.7, ER.2.8, FL.2, ND.2)

ER.2.4 Management will not work with employment agencies engaged in the following practices, at a minimum:

- Using false information to recruit workers;
- Restricting workers' freedom of movement;
- Requiring workers to pay recruitment and/or employment fees;
- Providing inadequate housing;
- Restricting transit of workers;
- Providing precarious employment; (see ER.8)
- Withholding from workers a copy of their employment contract in their native language that sets forth the general terms and conditions of engagement and employment;
 - For migrant workers, a copy should be provided prior to departure from their hometown;
- Retaining possession or control of workers identification and other documents like passports, identity papers, work permits, and other personal legal documents;
- Providing for financial penalties; or
- Punishing workers for terminating employment.

ER.2.5 Contracts with employment agencies state the following at a minimum:

- The employer directly pays wages to all workers it employs through the agency.
- Ensuring equality of compensation and standards under the PopSockets Supplier Code of Conduct and national laws and regulations.

ER.2.6 All fees and other costs associated with employing any worker will be paid by the employer.

- Workers will not pay recruitment-related fees of any kind at any time or phase in the employment cycle as part of application, recruitment, hiring, placement, processing, transportation, or re-location.

ER.2.7 Fees to be paid by either the employment agency or management, but not workers, include the following at a minimum:

- Any third-party (labor broker, agent, sub-agent, or intermediary) fees for assistance in hiring and re-location;
- Travel documents required for employment;
- Permits and certifications;
- Transportation and lodging; or
- Repatriation (see FL.3.8).

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ER.2.8 If it is unavoidable to have the worker pay a fee at the time it is due, management will work with any other appropriate party to repay the fee as soon as possible and no later than within 30 days of the start of employment. Receipt of re-payment is documented and available for review upon request.

ER.2.9 Management checks all documentation, including proof of age documents (see CL.2), before work begins to confirm they are allowed to work according to relevant national laws and workplace rules.

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