 belkin	Belkin Supplier Code of Conduct	Document Number SQD-00294	
		Date 7/26/23	Revision A03



Belkin Supplier Code of Conduct

Document Number: SQD-00294

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Belkin International, Inc. (“Belkin”) is committed to the highest standards of product quality and business integrity in its dealings with Suppliers and Service Providers (collectively, “Suppliers”) and ensuring that working conditions are safe, that workers are treated with respect and dignity, and that manufacturing and services processes are environmentally and socially responsible.

This Code of Conduct provides a framework of the expectations Belkin has for suppliers worldwide and explains actions and issues we need to be aware of as we do business globally. These guidelines are an important resource to guide your actions and answer your questions. All suppliers should read and be familiar with the Code of Conduct and comply with its terms as a condition of our business agreement.

To ensure our relationships with Suppliers meet and support these expectations, Belkin is endorsing the Responsible Business Alliance Code of Conduct as documented below. Belkin is also strongly encouraging our Suppliers to acknowledge and support our Code and seek to conform to its standards and provisions documented in detail below. In selecting qualified Suppliers Belkin will be giving preference to those that are socially and environmentally progressive. In addition, failure to comply with the standards and provisions set forth in our Code may result in Supplier disqualification.

Fundamental to adopting our Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. This Code encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility.

The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D outlines the elements of a minimally acceptable system to manage conformity to this Code. Section E adds standards relating to business ethics.

For the purposes of this document "Supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services, to Belkin including the Supplier's employees, agents, subcontractors and other representatives.

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A. Labor

Suppliers should recognize and be committed to upholding the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Standards such as the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI), Ethical Trading Initiative (ETI) and the Responsible Business Alliance were used as references in preparing the Code and may be a useful source of additional information. Supplier shall comply with all labor laws, including but not limited to 19 USC 1307, the Countering America's Adversaries Through Sanctions, the Uyghur Forced Labor Prevention Act, the California Transparency in Supply Chains Act, the UK Slavery Act, Australia Slavery Act, and any other laws prohibiting the use of convict and slave labor.

The labor standards are:

1. Freely Chosen Employment

U.S. federal law defines forced labor as all work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer work or service voluntarily. The International Labor Organization (ILO) indicators of forced labor include: Abuse of vulnerability, Deception, Restriction of movement, Isolation, Physical and sexual violence, Intimidation and threats, Retention of identity documents, Withholding of wages, Debt Bondage, Abusive working and living conditions, and Excessive overtime.

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment

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agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per the worker's contract. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents' or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

2. Child Labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Participants shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.

3. Anti-Discrimination

Suppliers should be committed to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment



practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. Suppliers shall provide reasonable accommodations for religious practices. Workers with disabilities will be provided with reasonable job accommodation as needed to perform their job function.

4. Anti-harassment and Abuse

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

5. Minimum Wages

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

6. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

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7. Freedom of Association

In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

B. Health and Safety


Suppliers should recognize that the quality of products and services, consistency of production, and workers’ morale are enhanced by a safe and healthy work environment.

Management systems such as RBA, OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information. Workers shall have the right to refuse unsafe work and are encouraged to report unhealthy working conditions.

The health and safety standards are:

1. Occupational Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and ‘nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those

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associated with their work assignments, and provide reasonable accommodations for nursing mothers.

2. Emergency Preparedness and Response

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

3. Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and d) facilitate return of workers to work.

4. Industrial Hygiene

If applicable, worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, participants shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

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5. Physically Demanding Work

Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6. Machine Safeguarding

If applicable, physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers. Production and other machinery shall be evaluated for safety hazards and used in accordance with the equipment manufacturers' operating guidelines.

7. Sanitation, Food and Living Conditions

Supplier shall provide workers with clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8. Health and Safety Communication

Supplier s shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. Environmental

Suppliers should recognize that environmental responsibility is integral to producing world-class products. Participants shall identify the environmental impacts and minimize adverse effects on the community, environment, and



natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

1. Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring) and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2. Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3. Chemical and Hazardous Materials

Chemical and other materials posing a possible hazard to the environment are to be identified, labelled and managed to ensure their safe use, safe handling, movement, storage, recycling or reuse and disposal. Any potential chemical hazards must be included in the supplier's emergency preparedness and response.

4. Solid Waste

Supplier shall implement a systematic routine approach to identify, manage, reduce, and responsibly dispose of or recycle solid non-hazardous waste.



5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Participants shall conduct routine monitoring of the performance of its air emission control systems.

6. Materials Restrictions

Suppliers are to adhere to applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing including labeling for recycling and disposal.

7. Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors all water consumption and discharge; Understand the use of water; Seek opportunities to conserve water; understand & control channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge. Accidental discharge procedure must also be included in this program. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8. Energy Consumption and Greenhouse Gas Emissions

Suppliers are to establish a corporate-wide greenhouse gas reduction goal. All relevant scope 1 and 2 greenhouse gas emissions are to be tracked, documented at the facility and/or corporate level, and publicly reported against the greenhouse gas reduction goal. Greenhouse gas emission calculation should be science based using trusted 3rd party emission factors. Emission factor should be in a number of CO2 equivalent/MWh. Source of emission factor can include local utility company and/or international databases such as World Resource Institute, International Panel on Climate Change, or US Environmental Protection Agency. Source of emission factor should be cited in document that holds the data. Periodic review of emission factors should be established in the event alternative energy sources use that would alter the calculation of greenhouse gas

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emissions. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. Ethics

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

1. No Corruption, Extortion, or Embezzlement

The highest standards of integrity are to be expected in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. These actions are strictly prohibited resulting in immediate termination and legal actions.

2. Disclosure and Privacy of Information

Means to effectively safeguard customer information regarding business activities, structure, financial situation, performance, and/or any other information deemed confidential shall be disclosed only in accordance with the guidelines specified within any agreed upon non-disclosure agreement between Supplier and Belkin and within the guidelines of all applicable laws and regulations. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

3. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. No supplier, or its representatives or employees, shall offer to any Belkin employee a kickback, favor, gratuity, entertainment or anything of value to obtain favorable treatment from Belkin. Belkin employees are similarly prohibited from soliciting such items. This prohibition extends to immediate family members of both Supplier and Belkin employees. Gifts of nominal value, not to exceed a total of \$100 per calendar year are acceptable as long as a gift is not intended to obtain favorable treatment for the Supplier and does not create the appearance of a bribe, kickback, payoff or irregular type of payment. Other exceptions include:

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- Infrequent, unsolicited meals or refreshments occurring in conjunction with seminars, meetings, presentations, or other business activities.
- Gifts bearing a supplier or customer logo, with a value of less than \$100.00, and which are distributed to the supplier's customer base in general may be excluded from the \$100.00 annual limitation.

Entertainment that is unusually frequent or expensive should not be accepted. Additionally, Belkin employees must carefully consider an offer to travel at another party's expense, since this may be considered excessive.

4. Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Suppliers to Belkin shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of federal or state antitrust laws.

5. Whistleblowers

Programs that ensure the protection of Supplier and employee whistleblower confidentiality are to be maintained. Belkin Suppliers shall promptly notify Belkin Supplier Quality Assurance of any known or suspected improper behavior by Suppliers relating to their dealings with Belkin, or any known or suspected improper behavior by Belkin employees. Suppliers should have a communications process for their personnel to be able to raise any concerns without fear of retaliation.

6. Community Engagement

Community engagement is encouraged to help foster social and economic development.

7. Protection of Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded.

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8. Accessibility

Inherent accessibility features will be a) considered at the time of (re)design and (re)development, and b) implemented where financially and technically feasible.

9. Responsible Sourcing of Materials

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

E. Management System

Suppliers must adopt or establish a management system whose scope is related to the content of this Code and in alignment with a Supplier's environmental and social accountability profile. The management system shall be designed to ensure (a) compliance with applicable laws and regulations; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

All Belkin suppliers must have a management system that allows auditing in accordance with the metrics in this code. In addition to Belkin and/or 3rd party audits, Belkin maintains a quarterly scorecard for each supplier that includes any findings from the Supplier Social Accountability Audit Report (SSAAR). As part of Belkin's continuous improvement program, Belkin will take remedial actions, if necessary, via Corrective Action/Preventative Action (CAPA) procedure. Any CAPA will be ranked by severity and shared with the supplier with a timeline to correct any issue.

The management system should contain the following elements:

1. Company Commitment

Corporate social and environmental responsibility statements that affirm the Supplier's commitment to compliance and continual improvement. This statement is signed by executive management and posted in the facility in

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the local language.

2. Management Accountability and Responsibility

Clearly identified company's senior executive & company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management has periodic reviews of the status of the management systems.

3. Legal and Customer Requirements

A process for identification, monitoring and understanding of applicable laws, regulations and customer requirements, including the requirements of this Code.

4. Risk Assessment and Risk Management

Process to identify the environmental, health and safety and labor practice and ethics risks associated with Supplier's operations. Areas to be included in a risk assessment are warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing /dormitories. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to ensure regulatory compliance and/or to control the identified risks.


5. Improvement Objectives

Written standards, performance objectives, targets and implementation plans including a periodic assessment of Supplier's social, environmental, and health and safety performance and efforts in achieving those objectives.

6. Training

Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

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7. Communication

Process for communicating clear, transparent and accurate information about Supplier’s performance, practices and expectations to workers, suppliers and customers.

8. Employee Feedback, Participation and Grievance

Ongoing processes to assess employees’ understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

9. Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

10. Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11. Documentation and Records

Creation, maintenance and security of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12. Supplier Responsibility

A process to communicate the Code requirements to downstream suppliers and to monitor supplier compliance to the Code.

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References:

The following standards were used in preparing this Code and may be a useful source of additional information. The following standards may or may not be endorsed by each Supplier.

Responsible Business Alliance

<http://www.responsiblebusiness.org/>

Eco Management & Audit System http://ec.europa.eu/environment/emas/index_en.htm

Ethical Trading Initiative www.ethicaltrade.org/

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001 www.iso.org

National Fire Protection Association www.nfpa.org/catalog/home/AboutNFPA/index.asp

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High Risk Areas

<http://www.oecd.org/corporate/mne/mining.htm>

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/investment/mne/1903291.pdf>

OHSAS 18001 <http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/>

Universal Declaration of Human Rights www.un.org/Overview/rights.html

United Nations Convention Against Corruption

www.unodc.org/unodc/en/corruption/index.html

United Nations Global Compact www.unglobalcompact.org

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United States Federal Acquisition Regulation www.acquisition.gov/far/

SA 8000 www.sa-intl.org/index.cfm

Social Accountability International (SAI) <http://www.sa-intl.org>

Kyoto Protocol http://unfccc.int/kyoto_protocol/items/2830.php

California Transparency in Supply Chains Act <https://oag.ca.gov/SB657>

UK Modern Slavery Act 2015 <http://services.parliament.uk/bills/2014-15/modernslavery.html>

Australia Modern Slavery Act 2018

https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r6148

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