



Living our Values

-STRAX Code of Conduct

Adopted by the Board on December 5, 2017

STRAX
WE DELIVER.

ABOUT STRAX

We are a global company specializing in mobile accessories and connected devices.

As a 'house of brands', we bring a unique combination of proprietary, licensed and partner-branded mobile accessories across key categories, including protection, audio and power.

Founded in 1995 in Miami, STRAX now has 14 regional offices strategically positioned around the world.



STRAX

THE VISION AND VALUES OF STRAX



A clear vision and shared values form the basis for our behavior and actions at STRAX. They are the expression of our corporate culture, which is in line with sustainable business principles. They also create a happy working environment in which people are productive.

Together we are strong, together we can achieve our goals, and together we can inspire our customers.

Our vision, our values, and our Code of Conduct reflect our entrepreneurial and social responsibility. They are our company's binding guidelines, providing specific instructions on forming relationships with customers, colleagues, and suppliers. But these guidelines can only take effect substantially and sustainably if all employees absorb and implement them in their everyday work. Every single person plays an important role in this respect.

After all, the sum of our actions is what makes STRAX a vibrant company in which change is perceived as an opportunity and everyone is committed to a continuous improvement process.

Every single STRAX employee is a disseminator of our corporate image. By internalizing these guidelines, we all contribute to ensuring that STRAX is seen as a consistent company.

Our goal is for our view of ourselves to be in harmony with the actual public perception of us.

A handwritten signature in black ink, reading "Gudmundur Palmason".

Gudmundur Palmason, Managing Director



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INTRODUCTION

The STRAX Code of Conduct is based on the ten principles provided by the United Nations (UN) Global Compact and supports the Universal Declaration of Human Rights by the United Nations and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. It is complemented by STRAX Anti-Bribery Policy, STRAX Code of Conduct for Suppliers, rules of corporate governance and other relevant policies.

Applies to everyone

STRAX requires all employees, board members, suppliers, contractors, and others who may be temporarily assigned to perform work or services for the company or any of its subsidiaries to know and follow the Code of Conduct.

Questions and concerns

The Code of Conduct cannot provide definitive answers to all scenarios. Employees are therefore encouraged to seek guidance and ask questions when a situation arises for which the answer is not clear, when they are concerned about violation, or when otherwise directed to the Code of Conduct. Employees may ask questions or report concerns by speaking directly with their manager, the HR Manager or the Chairman of the Board.



People

Human Rights

Non-Discrimination

Fair Labor Practices

Health and Safety

Product Safety



Human Rights

- ◆ Non-Discrimination
- ◆ Fair Labor Practices
- ◆ Health and Safety
- ◆ Product Safety

Human Rights

Human rights can be defined as universal rights that allow individuals the freedom to lead a dignified life, free from fear. These rights apply equally and universally in all countries. We support the protection and elevation of human rights around the world and are guided by fundamental principles of human rights, such as those in the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at work.

We have approximately 200 employees and 150 suppliers globally, and as a global institution, we can impact human rights as an employer and through our business relationships with clients and suppliers. We have established a set of policies and standards which reflect STRAX's vision and core values. Through these policies and standards, and related due diligence, we seek to implement our responsibility to respect human rights with regard to our employees, suppliers, clients, communities and host countries.

Conflict Minerals

STRAX supports the efforts of human rights organizations to end violence and atrocities in Central Africa. It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold, now referred to as "conflict minerals". Armed groups fight for control of mines in this region and use forced labor to mine and sell the minerals, which in turn funds ongoing violence. We undertake due diligence to ensure that 'conflict minerals' are not used in our products.

As part of the STRAX process for the implementation of new suppliers, our CSR questionnaires require confirmation that materials we purchase do not contain conflict minerals and suppliers are notified periodically to update this assurance.

In addition, we require of our suppliers that uses any of the four metals listed above to ensure that they are using approved smelters, as informed by the Conflict Free Sourcing Initiative.



People

- ◆ Human Rights
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- ◆ Product Safety

Non-Discrimination

We understand that workplace diversity contributes to the divergence and exchange of ideas, which is critical to our innovation process and contributes to a healthy management environment. We do not, and shall not, discriminate on the basis of race, color, religion (creed), gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, or military status, in any of its activities or operations. These activities include, but are not limited to, hiring and firing of staff, selection of volunteers and vendors, and provision of services. We are committed to providing an inclusive and welcoming environment for all members of our staff, clients, volunteers, subcontractors, vendors, and clients.

Furthermore, we regard gender equality of opportunity as an essential part of human resource management. While recognizing that differences between people must be acknowledged and reasonably accommodated, employment practices must ensure that differences do not lead to discrimination in the workplace.



People

- ◆ Human Rights
- ◆ Non-Discrimination
- ◆ **Fair Labor Practices**
- ◆ Health and Safety
- ◆ Product Safety

Fair Labor Practices

As a global brand providing electronic devices and accessories to a wide range of markets from many different suppliers, we recognize our responsibility to address our values when it comes to fair labor practices. STRAX must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees.

STRAX adopt the Responsible Business Alliance (RBA)'s Common Code of Conduct as a guideline for establishing standards within the organization and for our suppliers to ensure that working conditions in the electronics supply chain are safe, and that workers are treated with respect and dignity.

STRAX require all suppliers to sign up the Code of Conduct and to follow this as a matter of standard practice. All suppliers will additionally follow the Supply chain relationship, Health and safety and Labor standards/policies/codes of practice.

STRAX encourage:

Suppliers to act to reduce factors which increase the likelihood of modern slavery occurring, through community engagement, reducing widespread discrimination and poverty levels, monitoring the use of migrant workers and work in high-risk industries and supply chains sourcing from high-risk countries.

STRAX commits to:

Continually evaluate our supply chain process and policies to ensure we are working to eliminate modern slavery from the supply chain.

Strengthen knowledge, understanding and business processes throughout our supply chain so that our direct and indirect suppliers do not undertake actions which might increase the likelihood of modern slavery in the future.



People

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Health and Safety

We are committed to high standards of health and safety (H&S) management. Ensuring safety awareness, positive attitudes and continual improvement in safety performance requires the commitment and active involvement of all partners, managers, employees and regular contractors at all levels.

To achieve this we are committed to the following principles:

- ◆ Implementing effective H&S planning, monitoring and periodically reviewing H&S policies and procedures
- ◆ Setting ourselves targets and objectives to ensure continual improvement in standards of H&S management
 - Complying with relevant regional health and safety legislation and other requirements
- ◆ Encouraging the use of industry best practices wherever reasonably practicable

This Health & Safety Policy Statement, our Health and Safety Management System and our objectives and targets will be regularly reviewed to ensure that they continue to improve safety performance and reduce work related injuries and ill health.



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Product Safety

STRAX is dedicated to providing its customers with safe products that exceed their expectations for quality and safety, and are designed to comply with all regional and country-level statutory standards and regulations. We have assembled a Product Safety and Compliance Team which continually monitors product safety issues within our supply chain and reports directly to the Executive team, who together have developed robust procedures to deter, detect, and prevent non-compliant products from shipping to our customers.

The foundation of these procedures is based upon our quality management system and supplier partnership mechanism that ensures adherence to our strict standards throughout the supply-chain. Procedures have been established for product design and performance as well as raw material selection and regulatory requirements. We ensure the traceability along all instances leading up to the Design Approval Process, which enables us to track products and components to individual suppliers, ensuring supplier accountability and enables us to trace non-standard components that may have safety implications back to their source and implement root cause analysis and respective solutions.

For product safety certification we not only engage external experts to identify continual improvement areas and corrective actions, but we also cross-check final results with our internal testing facilities; additionally, we have protocol for product recalls should the need arise.



Planet

Environmental Management

Carbon Management

Circular Economy



STRAX

Planet

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Environmental Management

Environmental management is an important part of our culture of conservation at STRAX. Environmental aspects shall be considered in profitability and risk analyses, in business and product development, investments and in communication with stakeholders.

Within the context of our role as an electronic device and accessory brand and supplier, our ambition is to conduct business in a sustainable manner in all areas possible.

We also adhere to strict legal compliance across a range of legislative environments around the world, including directives such as RoSH, REACH and WEEE, and have a multi-layered approach to ensure that our suppliers do as well.

We work systematically to prevent, minimize and remedy adverse environmental impacts of our business activities through a proactive approach and responsible management of its environmental aspects. As part of our continuous improvement process for environmental management, we are further analyzing our environmental impacts to better understand how we can play a larger and more constructive role in contributing to a healthier global environment.



Planet

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Carbon Management

At STRAX, we recognize the impacts of global warming and work to be part of the solution. Carbon management is a relatively new initiative at STRAX, and we are currently in the process of measuring our baseline carbon footprint and setting specific targets. However, as a first step, we have engaged carbon reduction experts to identify 5 practical initiatives that we are focusing on now:

- ◆ Supplier engagement to reduce manufacturing energy and carbon emissions
- ◆ Reduce the environmental impacts of our products at the research and design stage
- ◆ Use less carbon-intensive materials, such as recycled materials, in our packaging
- ◆ Optimize transport emissions (shifting from air to ocean transport modes as much as possible)
- ◆ Avoid travel emissions by prioritizing alternative technology options (videoconferencing, virtual office use)

As part of our next carbon management phase, we are calculating our baseline CO₂e* footprint and setting short and long term reduction targets. We also aim to engage suppliers collaboratively to reduce CO₂ impacts throughout the product lifecycle.



Planet

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Circular Economy

Circular Economy

Within the context of rapidly reducing global resources, we aim to understand and optimize our role in contributing to a circular economy.

A circular economy aims to mirror the natural world's regenerative system by ensuring resources can be continually recycled and environmental impacts are minimized. This means making products that last longer, are made of environmentally friendly materials, and can be easily repaired or recycled. In this way, we hope to not only benefit the environment, but also achieve cost benefits for us at STRAX and to offer our customers an environmentally friendly product design and better end-of-life management.

We are currently investigating how we can better use the principles of circular economy to deliver value to our customers. Our current approach is summarized as follows:

- ◆ Use of biodegradable plastics in our products
- ◆ Use of recycled material in our packaging
- ◆ Ensure recyclability in line with WEEE regulations



Suppliers

CSR Engagement



STRAX

Suppliers

◆ CSR Engagement

CSR Engagement

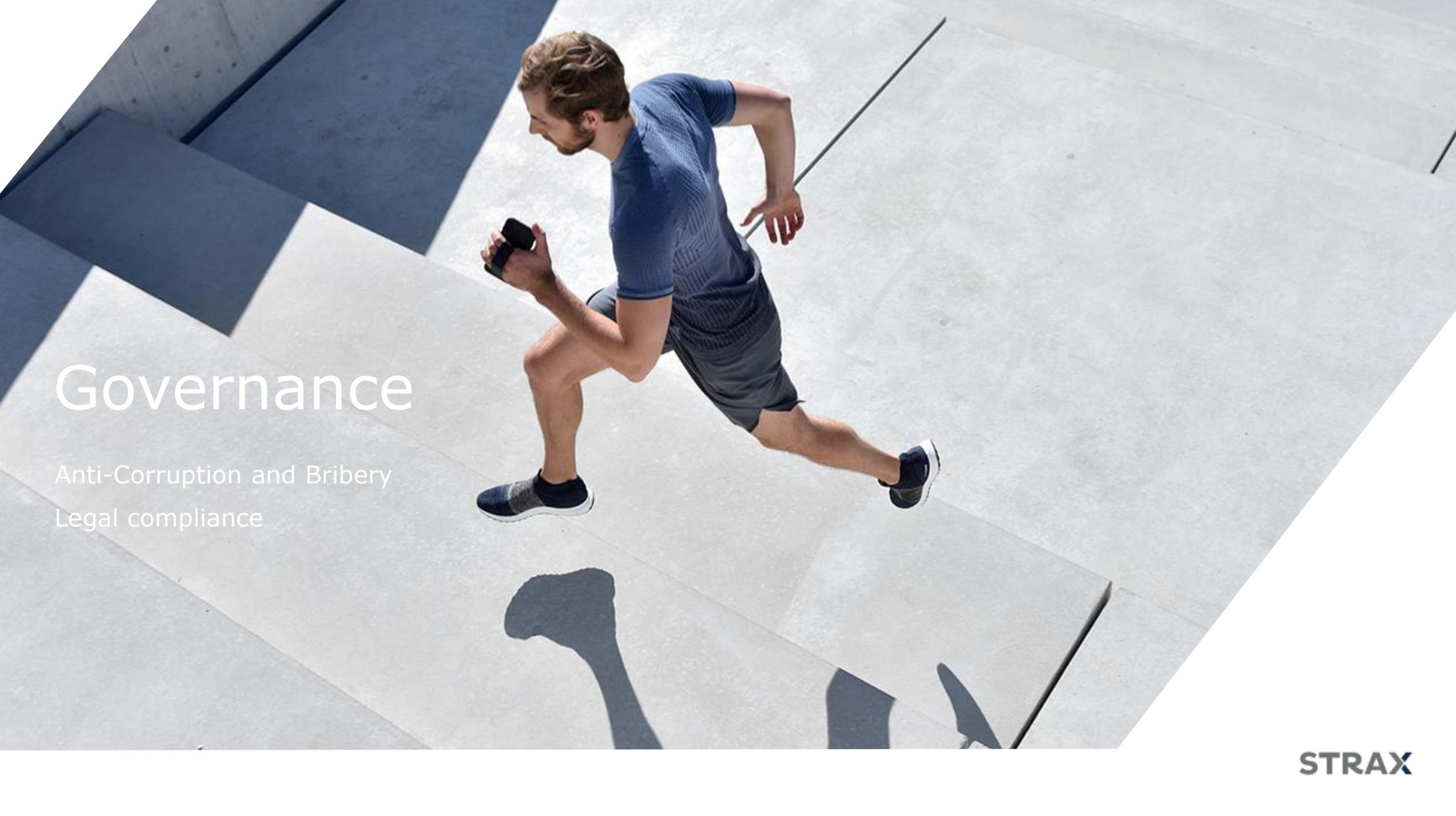
Some of the largest CSR risks and opportunities within our value chain are found our upstream suppliers. With over 150 suppliers globally, we recognize that continual improvement with our manufacturing partners on CSR issues is not only critical to ensuring the rights and conditions of the workers that make our products, but also to minimize the adverse environmental impacts of the production. At STRAX, we believe that good CSR is good for business, and we strive to promote that thinking with our suppliers.

We adopt the Responsible Business Alliance (RBA)'s common code of conduct as a guideline for standardizing our approach with suppliers on corporate social responsibility. We support the establishment of a CSR management structure and incorporate CSR performance as a part of our supplier evaluation criteria to further incentivize their participation in CSR activities.

At STRAX we expect our suppliers to operate ethically correct and in accordance with internationally recognized standards on Human Rights, Labor Rights, Environment and Anti-Corruption. We have implemented a Supplier Code of Conduct to ensure all of our suppliers know what we expect of them when it comes to corporate behavior. Together with the Code of Conduct we include an Anti-Bribery Contract with factories and other contractors in Asia with heavy penalties for any bribery or inappropriate influence on STRAX employees or representatives. We have amended employee contracts for all Asian employees giving the right to terminate employment immediately, and without notice period, should any bribes have been accepted.

We believe in a self-assessment system for the factories that over time corrects behavior and creates a sound culture of improvement. This is closely followed and checked through audits. We also implement third party validation of strategic suppliers' CSR performance to cross reference our internal findings. For suppliers in high CSR risk areas, we engage through a supplier development program that encourages their incremental improvement through the provision of best practice CSR improvement recommendations.





Governance

Anti-Corruption and Bribery

Legal compliance

Governance

- ◆ **Anti-Corruption and Bribery**
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Anti-Corruption and Bribery

STRAX has a zero-tolerance policy on corruption. Corruption, defined as the abuse of entrusted power for private gain can take many forms that vary in degree. Corruption implies both financial gain and non-financial advantages and some examples are bribes, fraud, facilitation payments and nepotism. All employees are made aware of their responsibilities in respect to Anti-Corruption and Bribery and they are empowered to act as a line of defence in the identification of any corrupt practices.

We fully support the requirements of the UK Bribery Act as well as similar legislation in all regions in which we conduct business. We have implemented policies and procedures to ensure we are prepared, to the extent possible, to prevent and deter corrupt practices across our business relationships. This also includes monitoring and preventing potential Corruption and Bribery and to deal with such practices appropriately if they are discovered. In high-risk regions we ensure that all of our approved vendors, as well as all staff working in those regions, have signed Anti-Corruption and Bribery agreements.

To ensure that we are able to fulfill our policy commitments, we have a special focus on:

- ◆ Training and education to our staff so that they are aware of their responsibilities
- ◆ Guidelines on gifts and hospitality
- ◆ Prevention of facilitation payments and kickbacks
- ◆ Encouraging whistle-blowing and communicating concerns
- ◆ Ensuring suppliers are clear about our policies and practices

We endeavour to conduct our business in accordance with established best practice in each of the countries in which we operate. We aim to be a responsible employer and adopt values and standards designed to help guide our staff in their conduct and business relationships to avoid bribery and promote a positive business environment.

Governance

- ◆ Anti-Corruption and Bribery
- ◆ **Legal Compliance**

Legal Compliance

Compliance

We are committed to compliance with the laws and regulations in each country in which we operate. Our products are designed and tested to meet the appropriate standards for product safety, electromagnetic compatibility, ergonomics and other regulatory compulsory requirements, when used for their intended purpose.

Whether in areas of corporate governance, fiduciary duty, employee responsibilities, consumer protection, partnership management, or environmental standards, we take our responsibilities seriously; in most cases, legal compliances acts as a starting point only, our own policies tend to be more strict than legal compliance requirements.

STRAX expects all its workers, suppliers and their subcontractors to respect this Code of Conduct and to actively do their utmost to achieve its standards.

Monitoring

The management is responsible for regular and documented monitoring and review of the compliance with this Code of Conduct by its unit. Management is also responsible for maintaining adequate documentation to demonstrate compliance by partners.

All suppliers are obliged to keep STRAX informed about where each order is produced. In addition to the self-assessment STRAX reserves the right to make unannounced visits to sites where people work directly or indirectly for STRAX. We also reserve the right to let an independent party make inspection, and report findings to STRAX, that will then take appropriate actions.

Reporting concerns

STRAX's employees and partners are encouraged and expected to report incidents of non-compliance with the Code of Conduct either directly with their manager, the HR Manager or the Chairman of the Board. Reported information will only be processed to the extent reasonably necessary for the investigation. There will be no retaliation or other negative consequences for individual reporting on such incidents.





**THANK
YOU.**