POPSOCKETS

Modern Slavery and Supply Chain Transparency Disclosure

Fiscal Year 2019

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 victims[1]. The negative impact of modern slavery weaves a complex tapestry of socioeconomic and political challenges including poverty, discrimination, and forced migration[2], and is especially prevalent under repressive authoritarian regimes and during times of social unrest, conflict, and war[3].

In 2016, there were an estimated 25 million people in forced labor globally[4], roughly equal to the population of the city of Shanghai. Of that 25 million, 16 million were exploited in the private sector[5]. 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 part of our way of doing business. Addressing human rights risks is an integral part of our company's operations and culture, and in addition to meeting our legal requirements, we endeavor to incorporate best practices to protect human rights.

In order 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 2018, and encompasses activities undertaken during our most current fiscal year.

Current and Emerging Regulatory Framework

The regulatory framework for modern slavery and supply chain transparency reporting requirements for companies dates back 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. You will find a brief summary below.

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")[6] requires companies to publish a publicly facing disclosure covering 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 2015[7] 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 2018

The Australia Modern Slavery Act 2018[8] requires companies 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, the Act requires all statements to be published on a free, online registry maintained by the Australian government to facilitate public access. The Australia Modern Slavery Act is coming into force in 2020, with companies reporting on their 2019 fiscal year.

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 2016[9] to provide US Customs and Border Patrol (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)[10], 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. As other countries consider similar modern slavery disclosure legislation, we fully intend to keep ourselves ahead of any legal requirements and will leverage this document to meet them.

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[1] https://www.state.gov/j/tip/what/index.htm
[2] https://www.state.gov/documents/organization/282798.pdf page 3
[3] https://www.globalslaveryindex.org/2018/findings/executive-summary/
[4] https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm
[5] https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf
[6] https://oag.ca.gov/SB657
[7] https://www.gov.uk/government/collections/modern-slavery-bill
[8] https://www.legislation.gov.au/Details/C2018A00153
[9] https://www.cbp.gov/sites/default/files/assets/documents/2016-Apr/tftea-repeal-consumptive-demand-clause-faqs.pdf
[10] https://www.dhs.gov/news/2018/03/30/caatsa-title-iii-section-321b-faqs

About Us

PopSockets LLC is a mobile phone accessories company headquartered in Boulder, Colorado, USA. We were founded in 2010 by former University of Colorado professor David Barnett after he invented the PopSocket phone grip as a way of keeping corded headphones untangled. We sold our 100 millionth grip in 2018 and were named 2019 winner of Best Place to Work in Colorado.

Our Corporate Structure

PopSockets is a limited liability company (LLC) incorporated in the US state of Colorado. We are privately owned by members of the LLC. PopSockets owns several subsidiaries in the US and abroad including in Mexico, Colombia, Singapore, Japan, Finland, The Netherlands, Hong Kong, China, and South Korea. All our products are sold under "PopSockets" brand name. Globally, PopSockets has approximately 270 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 and sales 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 considering the young age of the company. These contracts are made directly with the suppliers; we do not use any intermediaries between us and the factories.

Our Supply Chain

PopSockets has suppliers across a wide range of countries in Asia, North America, and Europe. Our manufacturing sourcing countries include China, Vietnam, the United States, and Mexico where we procure finished goods and 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 subcontractors are located in China and the Philippines. PopSockets's subcontractors 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 also maintain relationships with logistics partners in Mexico and the Netherlands who print and fulfill customer orders, and we have one on-site printing and order fulfillment facility at our headquarters in Colorado. We are currently working on building a publicly facing factory list to be published in 2020.

Our Relevant Policies and Procedures

Our Standards

Our Code of Conduct

PopSockets first adopted a Supplier Code of Conduct (henceforth "COC") in 2016, with updates made in 2018 and 2019. As part of our affiliation requirements for the Fair Labor Association, a multi-stakeholder non-profit dedicated to improving workers' lives worldwide[11], our COC is aligned with the FLA's Workplace Code of Conduct[12] as well as International Labour Organization standards[13], 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:

> **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.*

Two supporting documents, our Labor and Health, Safety, and Environment 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, recruitment fees, treatment of migrant workers, labor brokers, 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, and Spanish for suppliers where the local language differs from English.

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[11] https://www.fairlabor.org
[12] https://www.fairlabor.org/our-work/labor-standards
[13] https://www.ilo.org/global/topics/decent-work/lang--en/index.htm

PopSockets's top management publicly commits[14] 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, logistics partners, and manufacturers, are required to adopt the COC and commit to making continuous improvement to meeting our standards.

Fair Labor Association

PopSockets is a Participating Company member of the FLA and are currently seeking accreditation of our headquarter-level social compliance program. The accreditation process evaluates our social compliance program's elements and activities, including those discussed in this document, against the FLA's Principles of Fair Labor and Responsible Sourcing/Production[15] to ensure our program's effectiveness in improving workplace conditions throughout our supply chain. While PopSockets is not yet accredited by the FLA, we have aligned our program with the Principles and are committed to the accreditation process.

Responsible Recruitment and Labor Brokers

PopSockets's Labor Standards outline our requirements for responsible recruitment, including the use of labor brokers. 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 Recruitment[16]. Our Standards currently stipulate that:

- No workers will be required to hand over passports or identity documents or pay recruitment-related fees.
- Migrant workers are to be treated the same as local workers in all conditions of employment and labor, including contract provisions and dormitories.
- Suppliers are required to ensure that any labor brokers or employment agencies used to recruit workers understands and aligns with all local applicable laws and PopSockets's Standards.

PopSockets monitors risks related to 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 Operations, who oversees the day-to-day operations of the company's social compliance program. The Social Compliance Manager's responsibilities include management of our monitoring and remediation process, working directly with suppliers on capacity-building, and ensuring all aspects of our program meet or exceed current best practice.

We also maintain a sustainability committee, comprised of representatives from many departments within PopSockets, that oversees the implementation of our sustainability and human rights-related goals throughout the company. Our supply chain team's purchasing practice policy also upholds our commitment to good purchasing practices by building in worker-friendly lead times, with the goal of reducing PopSockets's negative impacts on suppliers and workers cause by our purchasing activity.

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. Relevant policies and procedures covered include an internal grievance procedure and whistleblowing. The handbook is aligned with our COC, which applies to our on-site facility. 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. We verify our suppliers' efforts to comply with applicable local laws and our Standards through our monitoring program. Additionally, whenever updates to our COC are made, we require all suppliers to submit a form with a photo of the updated COC posted in the local language, and a signature verifying its placement. This serves as additional signals of commitment to the stipulations of our contractual agreement and to our social compliance work.

Our 2019 Progress

In 2019, we updated our COC to include a provision on Worker Voice and Protections focused on grievance mechanisms and added stronger language on responsible recruitment and anti-corruption. We also updated our Forced Labor section of our Standards to explicitly call for a pre-departure orientation for migrant workers that includes covering terms and conditions of employment. Our commitment letter to our COC from top executives was published on our website in June 2019.

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[14] https://www.popsockets.com/on/demandware.static/-/Library-Sites-popsockets-shared-library/default/dwbc90edc4/pdf/P01Q09_PopSockets%20Letter%20of%20Commitment%20to%20Social%20Compliance%20Jun%2019.pdf
[15] https://www.fairlabor.org/our-work/principles
[16] https://www.aafaglobal.org/AAFA/Solutions_Pages/Commitment_to_Responsible_Recruitment

Our Risks

PopSockets regularly reviews risk within its supply chain through its monitoring program and other due diligence activities. Identifying these 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, here 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, Vietnam, and the Philippines have all 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 2019. We also source from facilities in the manufacturing and electronics industries, both considered to be high-risk industries globally.

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 and California, 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.

Areas of Limited Visibility

While PopSockets has visibility into its supply chain down to the subcontractor level, 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.

Due Diligence and Remediation

Assessing and Addressing Risks

PopSockets deploys a variety of tactics through its monitoring and remediation program to assess and address risks of forced labor in its 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. This allows us to screen risks for all new known 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 State Dept Trafficking-In-Persons Report[17], Global Slavery Index[18], and the ITUC Global Rights Index[19].
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.

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[17] https://www.state.gov/wp-content/uploads/2019/06/2019-Trafficking-in-Persons-Report.pdf
[18] https://www.globalslaveryindex.org/
[19] https://survey.ituc-csi.org/ITUC-Global-Rights-Index.html?lang=en

Our pre-sourcing process for subcontractors involves evaluations on criteria from multiple departments within Operations. For social compliance, 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 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 Code of Conduct Audits

PopSockets conducts annual audits of all known entities in its supply chain on an annual basis, including subcontractors, gel/packaging, fulfillment centers, 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 Sumerra[20], an auditing and consulting firm specializing in environmental and social compliance, 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
- Opening meeting, covering the requirements and process for the audit
- Facility walkthrough
- Worker interviews
- 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.

In situations 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, which is reviewed by Sumerra. 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. Corrective action completion is tracked each month through updates to the CAP. 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 disclosed supply chain. The FLA deploys SCI assessments at

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[20] https://www.sumerra.com

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. 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.

Our 2019 Progress

In 2019, PopSockets implemented its subcontractor pre-sourcing process. We screened 8 new subcontractors, all of which were in China. No newly onboarded subcontractors were found to have elevated signs of forced labor.

During our COC audit season, which lasted from March to November, we conducted 14 announced annual audits of 13 facilities, of which 8 were tier 1 facilities and 6 were beyond tier 1. One tier 1 facility was audited twice to ensure remediation progress from their first audit earlier in the year. One facility in China received our annual FLA SCI assessment. Across all audits, we identified one finding at one facility regarding a lack of policies and procedures on forced labor. PopSockets has since terminated the relationship with the supplier for business and social compliance reasons. We also shortened our audit report turnaround time from 30 days to 18 days to more closely align with industry standards.

Measuring Due Diligence Effectiveness

Ensuring Proper Identification and Assessment of Risks

PopSockets's relationship with the FLA supports our efforts to ensure we 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 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 social compliance 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 2019 Progress
In 2019, we began adding flags in our pre-sourcing processes for risks identifies through FLA issue briefs. We also updated our monitoring procedures for auditors to clarify the inclusion of worker representative structures in the due diligence process.

Training and Capacity-Building
Staff Training
Training for PopSockets staff on our social compliance program, including our policy on forced labor, takes place at various concurrent levels throughout the year.

New Hires
All new hires to our Colorado and California 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 social compliance program, and FLA affiliation. 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.

Compliance 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 accountability policies. The VP Operations 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 social compliance 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.

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

Employees of Owned Entities
For our owned entities, employees are provided information about our forced labor policies through in-person trainings when visiting our Colorado office. 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. One of our Europe-based employees also sits on our Sustainability Committee.

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 the standards to which we hold our suppliers, including our forced labor policy.

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 social compliance-related topics. PopSockets also covers fees for any optional trainings undertaken as a reward for strong supplier scorecard performance.

Our 2019 Progress

For PopSockets staff, in 2019, the Social Compliance Manager logged a total of 20.25 hours of training, of which three hours or 15% were devoted specifically to forced labor, slavery, and human trafficking. 102 employees in our Boulder and San Francisco offices were trained on our social compliance program through our new hire orientation process. Our three highest-ranking China staff were trained on identifying forced labor and other egregious issues in factories in March. Our annual refresher training on our COC for all staff was conducted in August.

For suppliers, in 2019, 35 people across our tier 1 suppliers, subcontractors, gel and packing manufacturers, and our logistics partners attended our annual supplier summit. One of the two primary topics covered during the 2019 summit focused on grievance mechanisms, a crucial tool for worker voice and for suppliers to combat forced labor.

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David Barnett
CEO, PopSockets LLC

[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 social compliance program, please contact responsiblesourcing@popsockets.com.

To learn more about corporate social responsibility at PopSockets, please visit our corporate responsibility page.