

# Code of Conduct and Ethics

SEPTEMBER 21 2022

In accordance with the requirements of the Securities and Exchange Commission (the “SEC”), Nasdaq Market Listing Standards, the Board of Directors (the “Board”) of CORSAIR Gaming, Inc., and its subsidiaries (the “Company”) has adopted this **Code of Conduct and Ethics** (the “Code”).

All directors, officers, and employees (each a “Covered Party” and, collectively, the “Covered Parties”) of the Company and all its subsidiaries and controlled affiliates are expected to be familiar with the Code and to adhere to those principles and procedures set forth below. Covered Parties must conduct themselves, accordingly, exhibiting the highest standard of business and professional integrity, and seek to avoid even the appearance of improper behavior.

Our Code establishes standards to ensure that our employees’ work environment, our factory working conditions, and the respective supply chain factories are safe, that workers are treated with respect and dignity, and that our business operations are environmentally responsible and conducted ethically.

Our Code follows and is derived from several specialized organizations that advance human rights. CORSAIR Gaming, Inc., through this published Code, specifically endorses the following international human rights conventions:

- > The “United Nations Guiding Principles on Business and Human Rights”
- > The “Code of Conduct of the Responsible Business Alliance”
- > The “OECD Guidelines for Multinational Enterprises”
- > The “United Nations Universal Declaration of Human Rights”

Our Code provides guiding principles that are grounded in the recognition of the important role of enterprise companies (CORSAIR Gaming) to first, recognize, and then advance human rights issues with company policies and actions. CORSAIR specifically recognizes that the UN Universal Declaration respects the rights of women and the rights of minorities.

The Code is divided into the following sections:

- A. LABOR AND HUMAN RIGHTS**
- B. HEALTH AND SAFETY**
- C. ENVIRONMENTAL IMPACT**
- D. ETHICS**
- E. MANAGEMENT SYSTEMS**
- F. COMPANY SUPPLIER CODE OF CONDUCT**
- G. BUSINESS AND EMPLOYEE CONDUCT**

## **A. LABOR AND HUMAN RIGHTS POLICIES** <sup>1</sup>

CORSAIR is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This Labor and Human rights commitment applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of workers and also applies to all persons who come into contact with CORSAIR workers including customers, the surrounding community, and our complete supply chain.

Our labor standards are:

### **1. Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted at our factories or any parts of our supply chain. 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 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 worker’s contract. Our managers, 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. We 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. These tracking mechanisms are used to report the results for our factory and supplier business reviews.

### **2. Young Workers**

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. We 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 th

at is likely to jeopardize their health or safety, including night shifts and overtime. We 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. We 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. 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. Workers shall be allowed at least one day off every seven days.

### **4. Fair Wages and Benefits**

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, non-exempt 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.

### **5. Humane Treatment**

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.

### **6. Non-Discrimination/Non-Harassment**

We are committed to a workplace free of harassment and unlawful discrimination. We and our suppliers 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.

### **7. Freedom of Association**

In conformance with local law, we shall respect the right of all workers to freely associate or not associate with labor organizations to bargain or not bargain collectively in accordance with local laws. We will respect employees' rights 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**

CORSAIR recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Our factory managers also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. Our primary factory operates under an occupational health and safety (OH&S) management system with **ISO 45001 Certification**.

The health and safety standards include:

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

### **2. Emergency Preparedness**

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 encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

### **4. Industrial Hygiene**

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, we 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.

### **5. Physically Demanding Work**

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

#### 6. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

#### 7. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by CORSAIR, or our labor agent are to be maintained 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

We 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 to which workers are exposed, 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. As noted above, our primary manufacturing facility operates under an ISO 45001 Certified occupational health and safety (OH&S) management system.

### C. ENVIRONMENTAL IMPACT

We recognize that environmental responsibility is integral to producing world-class products. We 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. **Our primary manufactory facility operates with ISO 14001 certification, the Environmental Management System.** The environmental standards include:

#### 1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals, 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. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment, are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

#### 4. Solid Waste

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

#### 5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely 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. We shall conduct routine monitoring of the performance of its air emission control systems.

#### 6. Materials Restrictions

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

#### 7. Water Management

We shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. We 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

We are working to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 GHG emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. We 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, CORSAIR Gaming, our agents, and our business partners throughout our supply chain, are to uphold the highest standards of ethics including:

#### 1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. We shall have a zero-tolerance policy to prohibit any-and-all forms of bribery, corruption, extortion, and embezzlement. We require honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest.

A conflict of interest occurs when the private interests of a Covered Party interfere, or appear to interfere, with the interests of the Company as a whole.

For example, a conflict of interest can arise when a Covered Party takes actions or has personal interests that may make it difficult to perform his or her Company duties objectively and effectively. A conflict of interest may also arise when a Covered Party, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position at the Company.

Item 404(a) of SEC Regulation S-K defines "immediate family member" as a person's child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law, or any person (other than a tenant or employee) sharing the person's household.

Conflicts of interest can also occur indirectly. For example, a conflict of interest may arise when a Covered Party is also an executive officer, a major shareholder or has a material interest in a company or organization doing business with the Company.

Each Covered Party has an obligation to conduct the Company's business in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company, should be disclosed promptly to the Company's Chief Financial Officer (the "Compliance Officer") or the General Counsel, as appropriate.

This Code does not attempt to describe all possible conflicts of interest that could develop. Other common conflicts from which Covered Parties must refrain are set out below.

Covered Parties may not engage in any conduct or activities that are inconsistent with the Company's best interests or that disrupt or impair the Company's relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.

Covered Parties may not accept compensation, in any form, for services performed for the Company from any source other than the Company.

No Covered Party may take up any management or other employment position with, or have any material interest in, any firm or company that is in direct or indirect competition with the Company.

## **2. No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

## **3. Disclosure of Information**

All business dealings should be transparently performed and accurately reflected on our business books and records. Information regarding our labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable. Full, fair, accurate, timely and understandable disclosure.

The information in the Company's public communications, including in all reports and documents filed with or submitted to the SEC, must be full, fair, accurate, timely and understandable.

To ensure the Company meets this standard, all Covered Parties (to the extent they are involved in the Company's disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to the Company commensurate with their duties. Covered Parties are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about the Company to others, including the Company's independent auditors, governmental regulators, and self-regulatory organizations.

## **4. Insider Trading**

Trading on inside information is a violation of federal securities law. Covered Parties in possession of material non-public information about the Company or companies with whom we do business must abstain from trading or advising others to trade in the respective company's securities from the time that they obtain such inside information until adequate public disclosure of the information. Material information is information of such importance that it can be expected to affect the judgment of investors as to whether or not to buy, sell, or hold the securities in question. To use non-public information for personal financial benefit or to "tip" others, including family members, who might make an investment decision based on this information is not only unethical but also illegal. Covered Parties who trade stock based on insider information can be personally liable for damages totaling up to three times the profit made, or loss avoided, by the respective Covered Party.

For additional information, please refer to the Company's Insider Trading Compliance Policy.

## **5. 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.

## **6. Fair Business, Advertising and Competition**

Standards of fair business, advertising, and competition are to be upheld.

## **7. Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. We should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## **8. Responsible Sourcing of Minerals**

We exercise due diligence on the source and supply chain of Tantalum, Tin, Tungsten, and Gold in the products we manufacture to reasonably assure that they are not derived from, or sourced from, mines in the conflict areas of the Democratic Republic of Congo, DRC Congo, or illegally taxed on trade routes, either of which are controlled by non-governmental military groups, or unlawful military factions.

CORSAIR submits the annual Conflict Materials Report to the SEC and we audit our suppliers using the industry standard CMRT (Conflict Materials Reporting Template) document on a periodic, unscheduled basis. This process supports the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas<sup>2</sup> for tracing and sourcing.

## **9. Privacy**

We are committed to protect the reasonable privacy expectations of personal information of everyone with whom we do business, including suppliers, customers, consumers, and employees. We shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. (Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.)

## **E. MANAGEMENT SYSTEMS**

CORSAIR shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to our operations and

products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

#### 1. Company Commitment

Corporate social and environmental responsibility policy statements affirming our commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.

#### 2. Management Accountability and Responsibility

The CORSAIR Board of Directors has clearly identified senior executives and company representative(s) responsible for ensuring implementation of the management systems and associated programs. The Board and senior management review the status of the management systems on a regular basis.

An external financial audit team ensures that our company complies to the Code of Conduct and Ethics with regards to our financial practices, contract compliance, and any unauthorized transactions, especially those that would provide personal financial gain or are discriminatory in nature. Our employees are audited annually by their managers and our Human Resources department to ensure that they comply to our Code through our Performance Management System.

#### 3. Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

#### 4. Risk Assessment and Risk Management

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

#### 5. Improvement Objectives

Written performance objectives, targets and implementation plans to improve our social, environmental, and health and safety performance, including a periodic assessment of our performance in achieving those objectives.

#### 6. Training

The training of all employees (managers and workers) to implement our Labor and Human Rights, Environmental, Ethics, and Anti-corruption policies, procedures, and improvement objectives.

#### 7. Communication

A process for communicating clear and accurate information about our policies, practices, expectations, and performance to workers, suppliers, and customers.

#### 8. Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess workers' 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.

#### 10. 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. Ensure that there is clear accountability for adherence to the Code, including fair process by which to determine violations; consistent enforcement of the Code, including clear and objective standards for compliance.

#### 11. Corrective Action Process

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

#### 12. Documentation and Records

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

### F. COMPANY SUPPLIER CODE OF CONDUCT <sup>3</sup>

The Company initiates communication of our Code requirements to suppliers and monitors their compliance to the Code. Third-party auditors are utilized to audit our factories and our supplier's factories. These unscheduled auditors have specific expertise with our Code and score each supplier periodically. Action is taken as needed to achieve compliance. Any abnormalities of violations of the Code are cited and a Corrective Action Plan is put in place. This audit process is also part of our supplier award process and quarterly business review process conducted by our Procurement Operations and accounts for suppliers.

Our primary factory operates under ISO Certifications 45001 (Occupational Health and Safety) 14001 (Environmental Management) and 9001 (Quality Management). Contracted suppliers, hereafter "Company Supplier", are subject to unscheduled audits of Quality Control, labor law, as well as health and safety laws and regulations. Company Suppliers are held by the Company as mandatory reporters of their own supply chain and responsible for any Code violations. As of 2022, Company Suppliers will also be accountable and subject to unscheduled audits on aspects of environmental impact, recycling, and waste management.

#### Environmental, Social, and Governance (ESG) Obligations of Company Suppliers

1. A Company Supplier represents and warrants that it shall comply, and ensure that its affiliated companies and subcontractors comply with the core tenets of the **United Nations' International Bill of Human Rights** and the **International Labor Organization's Declaration on Fundamental Principles and Rights at Work** and all applicable wage and hour, employment, anti-slavery and human trafficking laws and shall not engage in human trafficking or use child or forced labor in connection with its supply of Product(s) and/or its performance under this Agreement.

2. A Company Supplier shall develop and maintain an awareness program to inform, train, communicate clear and accurate information to Supplier's employees ensuring awareness about the policies, practices and procedures that have been put in place to facilitate proper

implementation of its policies. Supplier shall also ensure that there are policies and procedures in place to prevent any agents, sub-agents and subcontractors at any tier from engaging in slavery and trafficking in persons and to monitor, detect and terminate any agents, sub-agents, subcontractors, or subcontractor employees that have engaged in such activities.

3. A Company Supplier represents and warrants that it has not been convicted of any offense involving slavery and human trafficking or been the subject of any investigation, inquiry or enforcement proceedings regarding any offense or alleged offense of or in connection with slavery and human trafficking. Supplier is obligated by contract to notify Company as soon as it becomes aware of any actual or suspected slavery, child or forced labor, or human trafficking in any aspect of its supply chain accessed by Supplier in connection with this Agreement. Supplier further represents and warrants that it shall adhere to the principles of business ethics standard in the industry and the currently ratified RBA Code of Conduct Version 7.0, 2021.<sup>4</sup>

4. A Company Supplier represents and warrants that based on a good faith inquiry and except as otherwise separately disclosed in writing, the Product(s) do not contain (i) any conflict minerals (as such term is defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act<sup>5</sup>, hereinafter "Conflict Minerals") or (ii) any minerals or other resources that if included in the Product(s) would trigger a violation of U.S. Executive Order 13671.<sup>6</sup>

5. Company Suppliers outside of the U.S. shall, upon Company request, represent and warrant their compliance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

6. Company Suppliers shall maintain a complete set of records to trace the supply chain of all Product(s) provided to the Company in connection with this Agreement; and permit the Company and its third-party representatives to inspect Supplier's premises, records, and to meet the Supplier's personnel to audit Supplier's compliance with its obligations. Periodic self-evaluations will be conducted to ensure conformity to legal and regulatory requirements, and Supplier's contractual requirements related to social and environmental responsibility.

7. If at any time Supplier fails to fully comply with the legal and regulatory requirements or the Company has reason to believe that Supplier has failed to comply with the legal and regulatory requirements, then Supplier is responsible for the cost of any additional inspections or audits to verify Supplier's ongoing compliance. Company Suppliers shall also ensure that it has a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

8. Breach. For the avoidance of doubt, a Company Supplier's non-compliance with any of the clauses of this Code can be deemed a material breach of the Supplier agreement. This understanding is explicit in Supplier Contracts.

## G. BUSINESS AND EMPLOYEE CONDUCT

### 1. Reporting, Accountability and Enforcement

The Company always promotes ethical behavior and encourages Covered Parties to talk to supervisors, managers, and other appropriate personnel, including the officers, the Compliance Officer or General Counsel, outside counsel for the Company and the Board or the relevant committee thereof, when in doubt about the best course of action in a particular situation. The Company has also established a series of Ethics Hotlines that are available 24 hours a day, 7 days a week at:

#### Ethics Hotlines:

United States: 1-833-254-3349

China: 400 120 0217

Taiwan: 00801-49-1733

Vietnam: 1800 400490

Netherlands: 0800 0234308

Slovenia: 080 688912

United Kingdom: 0800 102 6471

Website: <https://secure.ethicspoint.com/domain/media/en/gui/85965/index.html>

Any reports submitted via the Ethics Hotlines will be reviewed by the Company's General Counsel and subsequently reported to the Audit Committee. You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Hotline, although providing your identity may assist the Company in addressing your questions or concerns.

Covered Parties should promptly report suspected violations of laws, rules, regulations or the Code or any other unethical behavior by any director, officer, employee, or anyone purporting to be acting on the Company's behalf to appropriate personnel, including officers, the Compliance Officer or General Counsel, outside counsel for the Company and the Board or the relevant committee thereof. Reports may be made anonymously. If requested, confidentiality will be maintained, subject to applicable law, regulations, and legal proceedings.

The Audit Committee of the Board or other appropriate officer or body shall investigate and determine, or shall designate appropriate persons to investigate and determine, the legitimacy of such reports. The Audit Committee or other appropriate officer or body will then determine the appropriate disciplinary action. Such disciplinary action includes, but is not limited to, reprimand, termination with cause, and possible civil and criminal prosecution.

To encourage employees to report any and all violations, the Company will not tolerate retaliation for reports made in good faith.

Retaliation or retribution against any Covered Party for a report made in good faith of any suspected violation of laws, rules, regulations, or this Code is cause for appropriate disciplinary action.

For additional information, please refer to the Company's Policies and Procedures for complaints.

### 2. Confidentiality

In carrying out the Company's business, Covered Parties may learn confidential or proprietary information about the Company, its customers, distributors, suppliers, or joint venture partners. Confidential or proprietary information includes all non-public information relating to the Company, or other companies, that would be harmful to the relevant company or useful or helpful to competitors if disclosed, including financial results or prospects, information provided by a third party, trade secrets, new product or marketing plans, research and development ideas, manufacturing processes, potential acquisitions or investments, or information of use to our competitors or harmful to us or our customers if disclosed.

Covered Parties must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Covered Parties must safeguard confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas. This prohibition includes, but is not

limited to, inquiries made by the press, analysts, investors, or others. Covered parties also may not use such information for personal gain. These confidentiality obligations continue even after employment with the Company ends.

### **3. Fair Dealing**

Each Covered Party should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors, and employees. No Covered Party should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice. Inappropriate use of proprietary information, misusing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is also prohibited.

### **4. Protection and Proper Use of Company Assets**

All Covered Parties should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets should be used only for legitimate business purposes. The obligation of employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.

### **5. Waivers**

Before an employee, or an immediate family member of any such employee, engages in any activity that would be otherwise prohibited by the Code, he or she is strongly encouraged to obtain a written waiver from the Board or other appropriate officer or body.

Before a director or executive officer, or an immediate family member of a director or executive officer, engages in any activity that would be otherwise prohibited by the Code, he or she must obtain a written waiver from the disinterested directors of the Board. Such waiver must then be disclosed to the Company's shareholders, along with the reasons for granting the waiver.

### **6. Accuracy of Business Records**

All financial books, records and accounts must accurately reflect transactions and events, and conform both to generally accepted accounting principles (GAAP) and to the Company's system of internal controls. No entry may be made that intentionally hides or disguises the true nature of any transaction. Covered Parties should therefore attempt to be as clear, concise, truthful, and accurate as possible when recording any information.

### **7. Corporate Loans or Guarantees**

Federal law prohibits the Company to make loans and guarantees of obligations to directors, executive officers, and members of their immediate families.

### **8. Gifts and Favors**

The purpose of business gifts and entertainment in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. Covered Parties must act in a fair and impartial manner in all business dealings. Gifts and entertainment should further the business interests of the Company and not be construed as potentially influencing business judgment or creating an obligation.

Gifts must not be lavish or in excess of the generally accepted business practices of one's country and industry. Gifts of cash or cash equivalents are never permitted. Requesting or soliciting personal gifts, favors, entertainment or services is unacceptable. Covered Parties should contact the Compliance Officer to discuss if they are not certain that a gift is appropriate.

The FCPA prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country. In addition, the promise, offer or delivery to an official or employee of the U.S. government of a gift, favor, or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules.

### **9. Personal Investments**

Covered Parties may not own, either directly or indirectly, a substantial interest in any business entity that does or seeks to do business with or is in competition with the Company without providing advance notice to the Compliance Officer. Investments in publicly traded securities of companies not amounting to more than one percent (1%) of that company's total outstanding shares are permitted without such advanced approval.

### **10. Antitrust Laws and Competition**

The purpose of antitrust laws is to preserve fair and open competition and a free market economy, which are goals that the Company fully supports. Covered Parties must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.

### **11. Political Contributions**

Covered Parties may participate in the political process as individuals on their own time. However, Covered Parties must make every effort to ensure that they do not create the impression that they speak or act on behalf of the Company with respect to political matters. Company contributions to any political candidate or party or to any other organization that might use the contributions for a political candidate or party are prohibited. A Covered Party may not receive any reimbursement from corporate funds for a personal political contribution.

### **12. Personal Conduct and Social Media Policy**

Covered Parties should take care when presenting themselves in public settings, as well as online and in web-based forums or networking sites. Each Covered Party is encouraged to conduct himself or herself in a responsible, respectful, and honest manner at all times. The Company understands that Covered Parties may wish to create and maintain a personal presence online using various forms of social media. However, in so doing Covered Parties should include a disclaimer that the views expressed therein do not necessarily reflect the views of the Company. Covered Parties should be aware that that even after a posting is deleted, certain technology may still make that content available to readers.

Covered Parties are prohibited from using or disclosing confidential, proprietary, sensitive or trade secret information of the Company, its partners, vendors, consultants or other third parties with which the Company does business. Harassment of other directors, officers or employees will also not be tolerated. A Covered Party may not provide any content to Company social media sites that may be construed as political lobbying or solicitation of contributions or use the sites to link to any sites sponsored by or endorsing political candidates or

parties, or to discuss political campaigns, political issues or positions on any legislation or law.

### **13. Discrimination and Harassment**

We do not tolerate discrimination or harassment against anyone on the basis of race, color, religion, gender, gender identity or expression, marital status, age, disability, veteran status, sexual orientation, national origin, citizenship, or other classification protected by applicable law.

### **14. No Rights Created**

This Code is a statement of certain fundamental principles, policies and procedures that govern the Company's Covered Parties in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity. The preceding discussion of Company policy on business conduct and ethics is not meant to be all-inclusive.

### **15. Employee Certification**

Certain employees of the Company will be requested to sign a certification at the time of their initial hiring and periodically thereafter, affirming a knowledge and understanding of this policy stating they have fully complied with the policy and, to the extent they have a knowledge of any violations of the policy, they have reported the same to the Compliance Officer.

<sup>1</sup> This section, with addendum, of the Code of Conduct and Ethics also serves as the **Global Human Rights Policy** for CORSAIR Gaming, Inc.

<sup>2</sup> <https://www.oecd.org/corporate/mne/mining.htm>

<sup>3</sup> This Section, with addendum, also serves as the **Company Supplier Accountability and Responsibilities** document, available separately.

<sup>4</sup> <http://www.responsiblebusiness.org/code-of-conduct>

<sup>5</sup> <https://www.sec.gov/rules/final/2012/34-67716.pdf>

<sup>6</sup> <https://www.govinfo.gov/content/pkg/FR-2014-07-10/pdf/2014-16360.pdf>