STARTECH.COM LTD.

FY 2024 Statement Regarding Transparency in Supply Chains

May 15, 2025

Introduction

StarTech.com is committed to acting ethically in all our business dealings. We accept and agree with the role that global companies must play in combatting slavery and human trafficking in their supply chains and are working to enhance and improve our efforts in this area. We view this statement, and the efforts described herein as part of our wider framework of corporate social responsibility (referred to as "CSR"). We believe that StarTech.com's continuing efforts to be a socially responsible company are not only expected by our customers, our partners and our employees, but that they underpin the competitive abilities and ultimately the long-term sustainability of the company.

The UK Modern Slavery Act 2015 (the "Act") requires certain commercial organizations to prepare a slavery and human trafficking statement which details the steps taken during each financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement has been prepared in compliance with Part 6 of the Act for the fiscal year ended November 30, 2024. The statement applies to StarTech.com Ltd., a company incorporated pursuant to the laws of the Province of Ontario, Canada, and its global subsidiaries, including StarTech.com Limited (a company incorporated pursuant to the laws of England and Wales). Collectively, the StarTech.com entities are referred to in this statement as "StarTech.com" or the "Company". For the fiscal year ended November 30, 2024, StarTech.com Ltd. also reported under Canada's Fighting Against Forced Labour and Child Labor in Supply Chains Act.

Business, supply chains and organization structure

StarTech.com creates, distributes and sells a portfolio of IT accessories. The Company's purpose is to empower its customers, IT professionals, and business users to improve performance by easily creating the critical connection between them and their productivity tools. The Company's strategic intent is to make its products easy to identify, find, obtain and use, when and where they are needed, which it reflects in its proprietary expression "Hard to Find Made Easy."

Currently, StarTech.com has approximately 4,300 active SKUs which are in turn divided into product categories including the following: cables and network cables; computer cards and adapters; data storage; digital display cables; display and video adapters; display mounts; docking stations and hubs; keyboard/video/mouse switches; multiport adapters, networking cables and networking; racks and enclosures; video display connectivity; and workstation accessories. StarTech.com partners with approximately 123 suppliers in eight countries to manufacture its products. StarTech.com engages with these suppliers in an Original Design Manufacturer (ODM) arrangement, where the supplier designs and manufactures the product and then applies the StarTech.com brand.

StarTech.com is headquartered in London, Ontario, Canada. The parent company, StarTech.com Ltd. is responsible for identifying, sourcing and maintaining relationships with vendors and suppliers, and does so pursuant to inter-company arrangements with its global subsidiaries.

Procedures in relation to slavery and human trafficking

StarTech.com communicates its expectation that its supply chain is free of slavery and human trafficking to new suppliers and to suppliers with which it has ongoing relationships. In addition, as part of its annual Vendor Questionnaire process and CSR Vendor Audit Checklist, StarTech.com requests its suppliers make the following declarations regarding human rights and labour practices:

1. Vendor agrees to support and respect the protection of internationally proclaimed human rights; and make sure they are not complicit in human rights abuses.
2. Vendor agrees to uphold the elimination of all forms of forced and compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

StarTech.com expects its suppliers to cascade these requirements to their respective supply chains.

If a supplier does not make the declarations noted above in its annual Vendor Questionnaire, StarTech.com's Supply Chain organization will follow up with the supplier to determine the reasons why the declaration was or cannot be made. The risk assessment and management processes below detail the consequences of a non-declaration by a supplier.

StarTech.com continues to work at formalizing its expectations with respect to ethical sourcing, modern slavery, human trafficking, and human rights into formal policies. In 2024 StarTech.com rolled out a new employee Code of Conduct, a Modern Slavery and Human Trafficking Policy, and a Sustainable Procurement Policy. In the future, StarTech.com intends to record its supplier expectations in a formal Supplier Code of Conduct.

StarTech.com has base policies, including the Modern Slavery Policy, which all new employees are expected to review and sign upon entering the company, and annually thereafter. In addition, it has initiated a global ethics hotline for employees to report unethical behaviors. Employees are encouraged to report potential compliance violations to their supervisor or through the hotline, which would include reporting on any potential violations related to modern slavery and human trafficking.

Due diligence processes

In fiscal year 2024, StarTech.com employed or engaged a dedicated SA8000 Certified Social Systems Auditor, a Senior Supplier Quality Engineer (SQE), and a third party auditor, all located geographically close to its supply chain, to perform audits for compliance with various laws and the expectations set out in the Vendor Questionnaire and CSR Vendor Audit Checklist. These audits can include either (a) in person inspections of supplier facilities where StarTech.com products are manufactured; and/or (b) completion of the Vendor Questionnaire coupled with proof of CSR certification from a reputable third party certification body (certifications from bodies such as BSCI, SMETA, SA8000 or EICC are accepted). The results of those audits are communicated to senior employees in StarTech.com's Supply Chain organization and as appropriate, elevated to senior management in accordance with StarTech.com's risk escalation policies and procedures.

In addition to the regular audit process above, StarTech.com has developed specific procedures related to vendor sourcing and selection. As part of StarTech.com's vendor sourcing process, all potential new vendors must answer a vendor self-audit questionnaire, which includes CSR questions on modern slavery. The vendor sourcing process is only completed when all concerns on CSR which may be identified in the self-audit have been addressed to StarTech.com's satisfaction. The new vendor selection process also includes a manufacturing audit and a CSR audit by either a StarTech.com employee or representative or a third-party auditor. The vendor must have a passing score to be approved and added to StarTech.com's vendor database.

During the fiscal year ended November 30, 2024, StarTech.com performed the following activities in regard to its due diligence and management of modern slavery risks and CSR program:

- The SA8000 Certified Social System Auditor and Senior Supplier Quality Engineer (SQE) visited 6 existing vendors and 4 new vendors;
- Twenty third party vendor audits were completed at the request of StarTech.com; and
- 100% of the annual Vendor Questionnaire and corporate social responsibility (CSR) Vendor Audit Checklist were completed with existing vendors, with additional questions posed to various vendors throughout the year.

As at year end 2024, 35% of StarTech.com's current vendor base has provided CSR certifications from third-party certification bodies.

The fiscal year 2024 CSR self-audit process begins again in May/June 2025.

Risk assessment and management

StarTech.com has identified that the risk of slavery or human trafficking taking place occurs in its supply chain. As StarTech.com does not manufacture products directly and substantially all its global employees are located in Canada, the United States of America, the United Kingdom and the European Union, StarTech.com does not believe that it has any risk of modern slavery or human trafficking in any other area of its business.

Following each audit or annual Vendor Questionnaire cycle, results are analyzed, and an impact assessment is prepared by StarTech.com's Supply Chain organization. Depending on the impact, improvement plans will be launched with the supplier containing specific deliverables and timelines to complete the improvement activities. StarTech.com reserves the right to terminate a supplier relationship if its audits show the supplier has failed to adhere to the expectations set out in the Vendor Questionnaire or if the audit reveals slavery or human trafficking activities within a supplier relationship.

Effectiveness of steps being taken

StarTech.com assesses whether its expectations are being followed by suppliers through the annual Vendor Questionnaire and/or CSR Vendor Audit Checklist and audit process. StarTech.com continues to develop both a road map and internal measures to more formally assess the effectiveness of its current

procedures to combat modern slavery. It is intended that the analysis of StarTech.com's internal processes and incentive structures will also mature over time to ensure that overall business performance indicators do not unintentionally create or increase modern slavery risks within StarTech.com's supply chain.

Training on modern slavery and trafficking

StarTech.com has secured online learning resources for employees. In addition, employees involved in in supply chain activities have access and are encouraged to access widely available resources (such as those available through the Stronger Together initiative) to advance their understanding of modern slavery and trafficking issues, risks, and their role in combatting them. All new employees working from the London, Ontario head office are required to take training on the Ontario Human Rights Code which also increases their understanding of foundational principles underpinning the *UK Modern Slavery Act*.

In fiscal 2024, StarTech.com provided training on human trafficking including forced and child labour to employees in designated roles. In 2025, StarTech.com plans to launch sustainability training, including environmental and social themes, for the global buying team. This program will help buyers better understand environmental and social impacts across the supply chain and integrate sustainability criteria into purchasing decisions.

StarTech.com strives for continuous improvement. StarTech.com's goals include maintaining our record of zero (0) incidences of forced and child labour and actively tracking, requiring annual acknowledgement of the Code of Conduct which includes the Modern Slavery Policy, and training to formalize its expectations with respect to ethical sourcing, forced labour and/or child labour, human trafficking and human rights. In 2024 StarTech.com established a cross-functional Environmental, Social, and Governance (ESG) Committee. This group meets monthly to discuss opportunities for improvement, track progress, and guide strategy. Additionally, in December 2024 StarTech.com obtained an EcoVadis Gold badge. As we learn from our processes, policies, and stakeholders, we will update and improve annually, becoming more informed on how we can better protect those in our supply chain.

On behalf of StarTech.com Ltd.

"Paul J. Seed"
Paul Seed
Executive Chairman and Director
May 15, 2025

On behalf of StarTech.com Limited

In accordance with the U.K. Modern Slavery Act 2015, this FY 2024 Statement Regarding Transparency in Supply Chains has been signed by the undersigned director for and on behalf of StarTech.com Limited to the extent this statement relates to activities of that entity.

"Paul J. Seed"
Paul Seed
Director
May 15, 2025