

of Conduct

At Snap One we aspire to meet the highest ethical and social standards and strive to conduct business with partners who share this approach of operating responsibly and respectfully. This code of conduct reinforces our commitment to excellence through the pursuit of integrity and ethical business practices working together with our business partners. This reflects our expectations for our employees and trusted partners. Adherence to these standards helps ensure the delivery of high quality and satisfaction to our shared customers.

Our respective reputations, as well as our shared successes, rest on our willingness to operate ethically and with integrity.

Thank you for your trust in Snap One and your continued commitment to delivering the best products, services, and customer experiences.

John Heyman, Chief Executive Officer

Our values inform everything we do as a company. When we and our Partners operate responsibly, professionally, competently and in compliance with applicable rules and regulations, we earn the trust of customers, investors, partners, representatives, government agencies, employees, and each other. We expect our third-party business partners, including dealers, distributors, suppliers, vendors, and developers ("Partners") to join us in abiding by the principles outlined below. We view adoption of these values as essential to the success of our industry.

Ethics & Business Conduct

Business Ethics and Integrity

Partners are expected to act in an honest, fair, and ethical manner, and must not engage in misleading or fraudulent business practices.

Professional Conduct

Partners are expected to operate with high standards of professionalism at all times and to treat others with respect and dignity. Partners should not use or condone threats, abuse, or harassment of others, including employees, customers, and other Partners.

Technical Competency

Partners are expected to perform their work with technical competence, ensure employees are appropriately trained and certified to perform relevant tasks, and maintain familiarity with new product features and capabilities.

Diversity and Inclusion

Partners must not engage in unlawful discrimination, including on the basis of race, color, gender, gender identity or expression, sexual orientation, age, religion, disability, marital status, veteran status, national origin, or cultural or religious beliefs.



Legal Compliance

Compliance with Laws

Partners should comply with all applicable laws and regulations that govern their business operations.

Anticorruption and Bribery

Partners must comply with applicable anticorruption laws and regulations, including the U.S. Foreign Corrupt Practices Act. Partners should avoid all forms of corruption, including offering or providing bribes to, or otherwise improperly influencing the decisions of government officials, customers, Snap One employees, or any other person.

Antitrust and Fair Competition

Partners must comply with all competition and antitrust laws. Partners should not agree with competitors and suppliers to fix or control prices, rig bids, or divide or segment markets.

Trade

Partners must comply with all applicable global trade laws and regulations, including laws that govern the import, export, and re-export of goods and information, as well as laws that restrict business dealings with certain nations, entities, and persons. Snap One does not permit the use of slavery, child labor, or human trafficking in any part of its business or supply chain, and Partners should take steps to ensure such practices do not occur.

Privacy and Information Security

Partners should observe all applicable data privacy laws and standards. Partners should also safeguard information provided by customers and be careful to ensure that all access to customer locations, property, and information technology systems is authorized.

Intellectual Property

Partners must respect intellectual property rights of Snap One and third parties, including patented technologies, copyrighted materials and software, trademarks, trade secrets, data sources, and trade secrets.

