

# TURTLE BEACH CORPORATION

## GLOBAL HUMAN RIGHTS POLICY

### ***Commitment***

The Board of Directors (the “Board”) of Turtle Beach Corporation (“Turtle Beach”, the “Company”, or “we”) is committed to upholding human rights in our operations and value chain and has adopted this Global Human Rights Policy (this “Policy”) to establish standards to uphold this commitment.

This Policy applies to all directors, officers, employees, and contractors of the Company and its subsidiaries (collectively, “Covered Parties”), and all Covered Parties are expected to be familiar with this Policy and to adhere to the principles and requirements set forth herein. Human rights expectations of our suppliers are further set forth in our Manufacturer Code of Conduct and incorporated into our contracts with our suppliers.

We strive to align our commitment to upholding human rights and enforcement of this Policy with global human rights conventions, including:

- United Nations Declaration on Human Rights;
- United Nations Guiding Principles on Business and Human Rights;
- OECD Guidelines for Multinational Enterprises; and
- Code of Conduct of the Responsible Business Alliance.

We must also comply with applicable local laws and regulations. Where our commitment to human rights conflicts with local laws, we seek, within the bounds of such laws, to honor the principles of this Policy and global human rights conventions.

We will provide training to appropriate employees regarding matters in this Policy.

### ***Labor and Human Rights***

Turtle Beach is committed to ensuring the human rights of all workers and that they are treated with dignity and respect. This includes the following standards:

1. Freely Chosen Employment / Modern Slavery. Business shall be conducted in compliance with all applicable anti-human trafficking, forced labor, and Modern Slavery laws and rules. “Modern Slavery” includes slavery, servitude and forced or compulsory labor, and human trafficking. 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 in accordance with such worker’s employment contract or terms. Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons is not permitted in any of our business operations or by any of our suppliers.
2. Equal Opportunity and Non-Discrimination. The Company’s policy on equal employment opportunity prohibits discrimination on the basis of any legally-protected characteristic including, but not limited to: race (including traits historically associated with race, such

as hair type/texture or protective hairstyle), age, color, religion, sex/gender (including pregnancy, childbirth, lactation and related medical conditions), gender identity or expression, creed, marital or familial status, sexual orientation, genetic information or predisposing characteristics, national origin, physical or mental handicap or disability, medical condition (*e.g.*, health impairment related to or associated with diagnosis of cancer or record or history of cancer; genetic characteristics known to be a cause of the disease/disorder), ancestry, domestic violence victim status, citizenship, current or former membership or service in the U.S. Armed Forces or a state military unit, or veteran status. This policy applies to all terms, conditions and privileges of employment, including, but not limited to, recruitment, hiring, placement, promotion, departmental transfer, leaves of absence, discipline, demotion, termination, layoff, recall, compensation, benefits, opportunities for career advancement and training, all of which are based on individual qualifications, job performance, and other relevant job-related criteria. The Company expressly prohibits any form of unlawful employee harassment based on any of the above-described protected characteristics. The Company makes reasonable accommodations where required by law because of an individual's religion, disability, or pregnancy. The Company is committed to respecting and protecting the human rights of minorities and historically marginalized populations, including women, children and migrants, among others.

3. Workplace Health and Safety / Humane Treatment. Our business will be operated in a manner that protects health and safety. We will comply with all applicable laws, regulations and guidelines relating to employment, working conditions, and occupational health and safety. We will not tolerate inhumane treatment, violence, sexual or other types of harassment, or bullying.
4. Clean Water and Sanitation. We recognize the right to water as a fundamental human right and will work with our facilities to provide clean water and sanitation, and to prevent and mitigate pollution and overuse of local water supplies.
5. Child Labor. We prohibit the use of child labor and practices that inhibit the development of children, including any person who is younger than the minimum age required for employment under applicable local laws.
6. Working Hours. We and our suppliers will maintain working hours in compliance with all applicable laws and regulations. We will not require employees to work more than any limits on regular and overtime hours allowed under applicable law.
7. Fair and Equitable Compensation. Compensation paid to workers shall comply with all applicable local laws. Non-exempt workers shall be compensated for overtime at pay rates greater than standard hourly rates. People should be paid equitably for what they do, regardless of their gender, race, or other personal characteristics. We also recognize the importance of workers earning a wage that allows a safe and decent standard of living.

8. Freedom of Association and Collective Bargaining. In conformance with local laws, we respect the rights of all workers to freely associate or not associate with labor organizations, including unions, of their own choosing, and to bargain or not bargain collectively.

### ***Stakeholder Engagement and Reporting***

Turtle Beach wants to engage with our stakeholders in the evaluation, implementation, and enforcement of this Policy. This includes engagements with our team members, customers, suppliers, other business partners and the local communities where we operate.

In addition to engaging stakeholders through the normal course of business, we have also established a reporting mechanism for parties to report any breaches of this Policy. Within the Company, reports can be addressed to the Legal or Human Resources departments to be handled as confidentially as possible. Outside the Company, individuals can call our ethics hotline at (866) 869-3455 or contact us at <http://www.openboard.info//HEAR/>.

### ***Oversight and Governance***

The Nominating and Governance Committee of our Board has ultimate oversight of our human rights practices, goals and their implementation, and this Policy.