



RAZER HUMAN RIGHTS & LABOUR POLICY

Date: 1 Jan 2026
Document Version: 1.1
Author: Global Head of People & Orgn

1. INTRODUCTION

Razer is committed to respecting and promoting human rights across our global operations and value chain. We believe every individual – employees, contractors, suppliers, customers, and community members – deserves to be treated with dignity, fairness, and respect. This policy outlines how we embed human rights and responsible labour practices into our culture, decisions, and day-to-day operations.

2. PURPOSE

This policy aims to:

- Define Razer’s commitment to human rights and ethical labour standards.
- Establish expectations for employees, managers, and suppliers.
- Support compliance with international norms and regulatory requirements.
- Strengthen our ESG performance and responsible business conduct.

3. SCOPE

This policy applies to:

- All Razer employees, contractors, and temporary workers.
- Third parties acting on behalf of Razer.

All parties must comply with this policy and applicable laws in every jurisdiction where we operate.

In addition, Razer expects its personnel to conduct business only with suppliers, agents, and other external parties who adhere to the key principles of this policy.

This policy is intended to support compliance with applicable laws and recognized international standards. Where local law, collective agreements, or internal company agreements provide stronger protections, those requirements prevail. This policy does not create contractual rights or obligations, nor does it form part of any employment contract or supplier contract unless expressly incorporated in writing.



4. OUR COMMITMENT

Razer upholds internationally recognized human rights and labour standards in our business activities. We integrate these principles into:

- Our culture and leadership behaviours
- Corporate and operational decision-making
- Selection criteria for suppliers and partners
- ESG strategy, reporting, and compliance

We prohibit forced labour, child labour, human trafficking, discrimination, harassment, and any conduct that undermines human dignity.

We also maintain zero tolerance for bribery, corruption, extortion, and embezzlement, consistent with our Anti-Bribery & Anti-Corruption Policy and global conventions.

5. INTERNATIONAL STANDARDS

This policy is guided by:

- Universal Declaration of Human Rights (UDHR)
- UN Guiding Principles on Business & Human Rights
- International Labour Organization (ILO) Conventions, including 29, 100, 105, 111, 138, and 182.
- OECD Guidelines for Multinational Enterprises
- UN Global Compact Principles
- UN Convention Against Corruption (UNCAC)
- UN Sustainable Development Goals (SDGs) related to labour rights, ethical conduct, and human well-being
- Responsible Business Alliance (RBA) Code of Conduct

6. CORE HUMAN RIGHTS & LABOUR PRINCIPLES

6.1. Equal Employment Opportunity

Razer is an equal employment opportunity employer and is committed to the communities in which we do business. This means that employment decisions are based on merit and business needs, and not based upon classifications or characteristics, including race, colour, ethnicity, citizenship status, religion (including religious beliefs, observances or practices, including religious dress and grooming practices), national origin, ancestry, sex, pregnancy, gender, gender identity or expression, sexual orientation, age, marital status or registered domestic partnership status, military or veteran status, physical or mental



disability, medical condition, genetic characteristics or information, or any other consideration made unlawful by applicable anti-discrimination laws.

Razer will provide reasonable accommodations to employees who have disabilities, victims of domestic violence, sexual assault or stalking, or individuals who have religious beliefs, observances or practices that impact their work as necessary and where required by law so long as the accommodation does not pose an undue hardship.

Razer adopts a strict non-discrimination approach across the entire employment lifecycle. This commitment applies to all stages of employment, including recruitment and hiring, onboarding, performance evaluation, compensation, promotion and progression, training and development, mobility opportunities, and separation.

All employment decisions are based solely on merit, qualifications, and legitimate business needs. We are committed to fair and equitable recruitment practices that ensure equal access to opportunities, including the use of objective criteria, relevant job requirements, and transparent selection processes.

Razer does not tolerate discriminatory behavior, bias, or unfair treatment in any employment practice. Leaders, managers, and employees are accountable for upholding these standards and contributing to an inclusive and respectful workplace.

6.2. Freely Chosen Employment

All work at Razer must be voluntary. We prohibit the use of forced, bonded, indentured, trafficked, or prison labour in any form. Workers must retain control of their personal identification documents at all times, and no recruitment fees may be charged to workers – whether directly or indirectly – by Razer or by recruitment agents acting on our behalf.

6.3. Child Labour & Young Workers

Razer strictly prohibits the employment of anyone below the legal minimum working age in any jurisdiction where we operate. Young workers who are of legal working age must not be assigned tasks that are hazardous or unsafe for their physical or mental well-being. We require suppliers to implement effective remediation processes where any risks or instances of child labour are identified within their operations or supply chain.

Any incidents involving the employment of underage workers will result in decisive disciplinary action against the responsible party.

6.4. Fair Wages, Benefits & Working Hours

Razer pays at least the legally required minimum wage and applicable overtime premiums in every location where we operate. Beyond compliance, we are committed to



progressively achieving a living wage that supports a decent standard of living for workers and their families. To deliver on this commitment, we will:

- Conduct periodic living wage gap analyses using recognized methodologies such as the Anker Methodology and guidance from the Global Living Wage Coalition.
- Establish measurable targets and timelines to close identified gaps in priority geographies.
- Engage with employees, suppliers, and stakeholders to promote wage transparency and continuous improvement across our value chain.

Our goal is to ensure that compensation practices are fair, lawful, and aligned with international expectations for human dignity and economic security.

6.5. Humane Treatment and Working Conditions

Razer prohibits harassment, bullying, intimidation, physical abuse, psychological coercion, and any form of inhumane treatment in the workplace. To promote humane working conditions, flexible work arrangements and overtime limits follow ILO standards. Remote work is offered where feasible, and overtime remains voluntary and compensated.

6.6. Freedom of Association

Where permitted by law, employees may form or join labour unions, elect representatives, and engage in collective bargaining. Razer does not tolerate retaliation or interference against employees who choose to exercise these rights.

6.7. Health & Safety

Razer is committed to providing safe and healthy workplaces for all employees, contractors, and visitors. We uphold global Occupational Safety & Health (OSH) standards and focus on preventing work-related injuries and illnesses through:

- Safe working conditions and proactive risk mitigation
- Compliance with applicable OSH laws and regulations
- Hazard identification and elimination across our operations
- Continuous improvement of our OSH management system
- Employee involvement in consultation, reporting, and safety practices

Razer's OSH approach reflects our commitment to responsibility and innovation, ensuring a safe working environment across all our locations.



6.8. Social Dialogue & Collective Bargaining

Razer recognizes the value of open communication, constructive dialogue, and meaningful worker representation.

Where applicable by law, employees have the right to:

- Participate in social dialogue processes such as works councils or employee committees
- Engage in collective bargaining through freely chosen representatives
- Receive information and consultation on significant workplace changes

Razer does not tolerate discrimination, retaliation, or interference against employees who participate in social dialogue or collective bargaining activities.

7. SUPPLY CHAIN HUMAN RIGHTS & LABOUR EXPECTATIONS

Suppliers must uphold this policy and the Razer Responsible Sourcing Program Compliance Manual. They are expected to:

- Implement corrective action plans where non-compliance is found
- Support Tier-2 and extended supply chain transparency
- Report labour, human rights, or ethical compliance incidents promptly

Razer maintains zero tolerance for forced labour, child labour, bribery, corruption, extortion, embezzlement, and unsafe working conditions within our supply chain.

8. DUE DILIGENCE

Where practicable, Razer encourages the use of risk-based and appropriate due diligence processes to ensure that third parties throughout the value chain adhere to human rights and labour principles. Examples of such due diligence processes include:

- ESG and compliance risk assessments
- Supplier onboarding and periodic evaluations
- Third-party social audits and monitoring
- Remediation processes where issues are identified
- Documented risk analysis on a regular and/or ad hoc basis where triggered by material changes (e.g., new geographies, new suppliers, major incidents).
- Escalation and decision-making for severe or repeated violations, including defined criteria for suspension/termination of relationships where remediation is not feasible.



- Effectiveness review of preventive and remedial measures (including corrective action closure and recurring issue tracking).
- Record-keeping and management reporting to evidence due diligence activities and outcomes.

We are committed to strengthening our due diligence practices as global expectations evolve.

9. GRIEVANCE & REPORTING CHANNELS

To allow for prompt resolution of any human rights or labour related issue and complaints, Razer provides confidential, accessible channels for employees, suppliers, and stakeholders to raise concerns through several channels – as outlined in Razer’s Whistleblower and Complaint Policy – including (i) email and (ii) postal reporting as set out below. Reports can be made in good faith and, where permitted by law, may be made anonymously.:

- Email: play.fair@razer.com
- Postal mail: Razer SEAHQ (Attention: Head of Legal / Head of HR)
- Internal processes under the Razer Whistleblower & Complaint Policy

Retaliation against individuals who report concerns in good faith is strictly prohibited. Process safeguards include confidential handling with access restricted to authorized personnel; non-retaliation for good-faith reports; appropriate triage, investigation, and a documented outcome; feedback provided to the reporter within a reasonable timeframe, subject to legal constraints; and personal data handled in accordance with applicable data protection requirements.

10. COMMUNICATION & ACCESSIBILITY

To ensure transparency and awareness across the organization and our value chain, this policy is made accessible through multiple channels. It is published on Razer SharePoint for employees and on Razer.com within our ESG disclosures. Razer may also conduct periodic training or provide updates to reinforce understanding and ensure consistent application of the policy across all teams and locations.

11. ROLES & RESPONSIBILITIES

Executive Management

Executive management has overall accountability for Razer’s commitment to respect human rights and uphold fair labour standards, and are answerable to the Board of Directors. This responsibility includes:

- Providing oversight for human rights and labour practices.



- Reviewing risks, compliance issues, and progress against commitments.
- Ensuring that human rights and labour considerations are integrated into business and strategic decision making.

Managers

Managers are responsible for implementing this policy within their areas of responsibility. They are expected to:

- Uphold Razer's human rights and labour expectations in daily leadership.
- Identify, assess and manage human rights and labour issues arising from operations which they oversee.
- Maintain a fair, respectful, safe work environment.
- Address and escalate concerns promptly.
- Ensure compliance among third-party workers under their supervision.

Employees, Contractors and Temporary Personnel

Each Razer personnel is individually expected to uphold the principles set out in this policy by:

- Complying with this policy and the Razer Code of Ethics & Professional Conduct.
- Treating colleagues, partners, and customers with dignity and respect.
- Reporting concerns promptly and in good faith.

Human Resources

- Owns, updates, and implements this policy globally.
- Integrates human rights commitments into HR processes.
- Ensures that working hours, wages, benefits and leave entitlements comply with applicable laws and standards.
- Ensures non-retaliation and proper and timely handling of grievances.
- Provides training and guidance to managers and personnel.

Ethics & Compliance

- Monitoring material legal/regulatory developments relevant to human rights, labour standards, due diligence, and reporting channels
- Advising on escalation, remediation, and relationship decisions for severe or systemic issues
- Overseeing the integrity of reporting channels and investigation governance (including confidentiality and non-retaliation)
- Supporting documentation and record-keeping requirements and coordinating required external reporting where applicable

Supplier Management, Procurement & Operations Teams

These functions are critical in ensuring adherence to the principles of this policy throughout Razer's supply chain. Their responsibility includes:

- Ensuring supplier compliance with this policy and the Responsible Sourcing Program.



- Integrating human rights and labour expectations into supplier selection, contracting and onboarding processes, and managing supplier due diligence, monitoring, and remediation
- Escalating non-compliance issues that pose risk to Razer’s operations or reputation.

12. MONITORING, EFFECTIVENESS REVIEW & POLICY REVIEW

Razer periodically reviews the effectiveness of our human rights due diligence and grievance mechanisms to assess whether they remain appropriate, accessible, and effective in supporting the objectives of this policy.

Findings from these reviews, together with relevant regulatory developments, stakeholder expectations, and business requirements, may inform updates to this policy, related processes, and supporting training initiatives.

This policy will be reviewed annually, or more frequently where necessary, to ensure its continued relevance and effectiveness.

Razer is committed to embedding human rights considerations into our decision-making processes across the organization and collaborating with employees, suppliers, and other stakeholders to advance responsible and sustainable business practices globally.

References

- i. Universal Declaration of Human Rights (UDHR)
- ii. UN Guiding Principles on Business & Human Rights
- iii. ILO Conventions 29, 100, 105, 111, 138
- iv. OECD Guidelines for Multinational Enterprises
- v. UN Global Compact Principles
- vi. Responsible Business Alliance Code of Conduct v8.0
- vii. Razer Code of Ethics & Professional Conduct (2025)
- viii. Razer Whistleblower & Complaint Policy (2025)
- ix. Razer OSH Policy Statement (2024)
- x. Razer Responsible Sourcing Program Compliance Manual (2024)

Document Version Control

Change Control Date	Version	Significant Changes
1 Jan 2025	Ver 1.0	General Policy Statement established.
1 Jan 2026	Ver 1.1	Expanded policy to include detailed guidelines, roles and responsibilities and references.