

**ARLO's Statement Regarding the  
California Transparency in Supply Chains Act of 2010  
and the  
UK Modern Slavery Act of 2015**

**BACKGROUND**

Arlo Technologies, Inc. ("Arlo") was incorporated in Delaware in July 2018. Arlo combines an intelligent cloud infrastructure and mobile app with a variety of smart connected devices that transform the way people experience the connected lifestyle. Its cloud-based platform creates a seamless, end-to-end connected lifestyle solution that provides users visibility, insight and a powerful means to help protect and connect with the people and things that matter most to them. Arlo enables users to monitor their environments and engage in real-time with their families and businesses from any location with a Wi-Fi or a cellular network internet connection. To date, Arlo has launched several categories of award-winning smart connected devices, including wire-free smart Wi-Fi and LTE-enabled cameras, advanced baby monitors and smart security lights.

Arlo is committed to combating all forms of forced labor and human trafficking. Arlo takes several steps in order to ensure and verify the absence of such practices in our supply chain and operations.

As a part of doing business in the State of California as a manufacturer of goods, Arlo is required to comply with SB 657 – The California Transparency in Supply Chains Act of 2010. This law was designed to increase the amount of information available to consumers with regard to companies' efforts to eradicate forced labor and human trafficking.

Similarly, the UK Modern Slavery Act of 2015 requires companies to disclose 1) the steps taken to address modern slavery in the business and supply chain, 2) the overall organizational structure and supply chain relationships, 3) policies on slavery and human trafficking, 4) areas of the business and supply chain at risk for slavery and human trafficking, 5) the effectiveness of the review and 6) any training offered to staff.

This Statement also applies to the following of Arlo's subsidiaries, and is made by Arlo on their behalf -- Arlo Technologies Australia Pty Ltd, Arlo Technologies Canada Limited, Arlo France SAS, Arlo Germany GmbH, Arlo Hong Kong Limited, Arlo Asia Limited, Arlo Technologies International Ltd, Arlo Technologies B.V., Arlo Sweden AB, Arlo Taiwan Co. Ltd, Arlo Technologies UK Limited, Arlo Italy Srl, Arlo Technologies Services India Private Limited, Arlo Avaak China Representative Office, Avaak, Placemeter Inc., and Placemeter France SAS.

**ARLO'S STATEMENT AND COMMITMENT**

**Core principles**

Arlo is committed to respecting the labor and human rights of our suppliers while continuing to improve working conditions. Arlo seeks to achieve this goal through the following principles:

- Freely chosen employment
- No child labor
- Respect for working hours and rest days
- Fair compensation, wages and benefits
- No harassment and abuse
- Equal opportunity and no discrimination
- Freedom of association
- Health and safety standards

### **Membership of relevant organizations and platforms**

Arlo is a member of the Responsible Business Alliance (“RBA”), the world’s largest industry coalition dedicated to corporate social responsibility in global supply chains. As part of this membership, Arlo is committed to supporting the RBA’s Code of Conduct and conducting verification audits of its supply chain.

In 2019, Arlo also joined the Supplier Ethical Data Exchange (commonly referred to as “SEDEX”), which is one of the world’s leading ethical trade service providers, working to improve working conditions in global supply chains. SEDEX is home to one of the world’s largest collaborative platforms for sharing responsible sourcing data on supply chains. Arlo supports the SMETA audit (SEDEX Members Ethical Trade Audits) protocols which covers SEDEX’s four pillars of: labor, health and safety, environment, and business ethics.

### **Internal policies and procedures**

Arlo maintains a Supplier Code of Conduct, which is modelled after the RBA Code of Conduct and specifically prohibits involuntary, bonded, exploitative labor, slavery or trafficking by its members.

Arlo further maintains a Corporate Social Responsibility (“CSR”) Committee comprised of members from Operations, Supply Chain, Legal, Finance and Internal Audit to monitor various initiatives associated with CSR efforts. The CSR Committee is responsible for monitoring compliance with various laws and regulations associated with Arlo products & supply chain, including slavery and human trafficking laws.

### **Due diligence and training**

Arlo has taken following steps to combat forced labor and human trafficking:

- 1) **Supplier Chain Verification:** Arlo assesses the risk related to its supply chain through various means, including obtaining information on the factory policies and procedures, business practices and other publicly available information for its direct commercial suppliers. The assessment is conducted by Arlo employees under the oversight of the CSR Committee.
- 2) **Independent Supply Chain Audits:** Arlo conducts independent audits of its major manufacturers to assess the risks of human trafficking and slavery. The CSR Committee provides oversight of

these audits through 1) reviewing the results, 2) monitoring progress to closing the results and 3) ensuring sufficient coverage of Arlo's manufacturing footprint.

- 3) **Supplier Assurances and Management Systems:** Arlo maintains regular communication with its suppliers to ensure our expectations are clear with regard to responsible legal, social, ethical and environmental conduct. In addition, Arlo requests suppliers to acknowledge to its Supplier Code of Conduct which requires suppliers to comply with: a) compliance with applicable laws, regulations, and customer requirements related to supplier operations and products, including trafficking and slavery; and b) conformance with the Supplier Code of Conduct. Arlo requests suppliers to sign a certification acknowledging that they make efforts to combat slavery and human trafficking in their supply chain.
- 4) **Monitoring:** Arlo conducts independent third party onsite audits of major suppliers with corrective action plans should any exceptions be found. Arlo reviews the results of the audits with factory senior management and monitors the progress towards correcting the exceptions. Suppliers are selected using a risk based approach to ensure Arlo is focusing on the most significant areas in its supply chain for review.
- 5) **Training and Awareness:** Arlo employees who manage supply chain activities are offered training related to slavery and human trafficking. Employees are encouraged to complete this training at least annually to ensure they are knowledgeable and aware of issues and concerns surrounding supply chain risks of human trafficking and slavery. Suppliers are provided with the Arlo Supplier Code of Conduct annually that includes prohibitions against human trafficking and slavery.

This Statement constitutes Arlo's (and its specified subsidiaries') slavery and human trafficking statement for the financial year ending December 31<sup>st</sup>, 2019.

It was approved by Arlo's Board of Directors on June 18, 2020.

DocuSigned by:  
  
D0508B45D7CF464...

Matthew McRae, Chief Executive Officer

**ARLO TECHNOLOGIES, INC.**