



Modern Slavery and Human Trafficking Statement (FY 2023)

This statement is made on behalf of Roku, Inc., Roku UK Limited, Roku DX UK Ltd. and Roku International B.V. (collectively, “Roku”), pursuant to Section 54 of the Modern Slavery Act 2015, and constitutes Roku’s modern slavery and human trafficking statement for the fiscal year ended December 31, 2023. It sets out the steps Roku has taken and is taking to ensure that slavery and human trafficking are not taking place in its supply chain or in any part of its business.

For the purposes of this statement, the term “modern slavery” encapsulates slavery, servitude, forced or compulsory labor, and human trafficking.

About Roku and Its Supply Chains

Roku is a TV streaming platform that connects consumers, content publishers, and advertisers through its streaming platform, TVs powered by Roku OS, Roku-branded TVs, streaming players, TV-related audio products, and smart home products. Roku designs its hardware but contracts with third parties to manufacture these products. Headquartered in San Jose, California, Roku is a global company with worldwide operations, including research and development, sales, service, and support capabilities.

Due to Roku’s worldwide operations and varied product offerings, its supply chain provides a range of goods and services in support of operations (including the provision of IT and technology, professional services, and business travel) and marketing services.

Roku’s Efforts to Prevent Modern Slavery and Human Trafficking

Roku is focused on ensuring that modern slavery and human trafficking are not taking place in its business or supply chains. We have no reason to suspect that modern slavery is present in our business, but recognize that there are potential risks within our supply chain. Roku views modern slavery and human trafficking as zero-tolerance issues and has implemented worldwide policies and established due diligence processes to prevent them. We expect the same standards from our suppliers and contractors.

1. Internal Policies Against Modern Slavery and Human Trafficking

All Roku employees must follow and comply with its Code of Conduct and Business Ethics, which requires compliance with all applicable laws, rules, regulations, and Roku internal policies and procedures. Roku has instituted internal compliance procedures to allow for reporting and immediate investigation of any suspected violations of these policies. These policies also prohibit punishment or retaliation for reporting concerns related to these topics.

2. Supplier Code of Conduct

Roku maintains a Supplier Code of Conduct that is incorporated by reference into Roku’s master service agreements with its key suppliers. The code requires key suppliers of Roku to comply with all applicable laws, including without limitation those laws which ensure that: (i) all employment arrangements are voluntary; (ii) suppliers avoid the use of child labor; (iii) work hours comply with applicable maximum work hour limitations; (iv) compensation complies with all applicable wage requirements; (v) all employees receive humane treatment free from unlawful discrimination; and (vi) risks associated with workplace hazards are appropriately mitigated. Roku also uses a standard clause in its agreements that requires other suppliers to ensure that their own supply chains are free from modern slavery and human trafficking.

3. Responsible Business Alliance (“RBA”) Membership

Roku is a supporting member of the RBA, the world’s largest industry coalition dedicated to corporate social responsibility in global supply chains. The RBA, its members, suppliers, and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

4. Conflict Minerals

Roku supports ending the violence and human rights violations, including forced and child labor, that are associated with the mining of certain minerals in conflict regions. Roku publicly posts a statement of this commitment describing the program covering its suppliers, including the suppliers of Roku UK, on its [website](#).

5. Supplier Audit Rights

Roku retains audit rights pursuant to its agreements with its key manufacturing suppliers such that Roku or its representatives may conduct announced or unannounced audits of facilities to verify compliance with Roku’s Supplier Code of Conduct and applicable laws. Roku may terminate its relationships with any supplier found to be in violation and/or require corrective action to cure any non-compliance within a reasonable time.

6. Staff Training

Employees are trained on an ongoing basis on topics relating to ethics and compliance. We will continue to identify ways to improve employee and supplier awareness of our efforts to eliminate modern slavery from our business and supply chain.

7. Effectiveness in Eliminating Modern Slavery

We will periodically review the effectiveness of the measures we take in ensuring that there is no modern slavery in our supply chain, and we will use the results of that review to inform the development of our procedures and best practices.

Over the past year, we have reviewed and updated our supplier selection process to continue to align it with our commitments and standards set forth in this statement, including, for example, requiring our key suppliers to engage in more robust self-assessment and audit processes.

Over the coming year and beyond, we will continue to focus on the following:

- Periodically reviewing our Supplier Code of Conduct, and
- Continuing to evolve our antislavery approach and leveraging guidance from available best practices and experts where possible and appropriate.

This Modern Slavery and Human Trafficking Statement for the 2023 fiscal year was approved by the Board of Directors of Roku, Inc. on June 26, 2024.

/s/ Anthony Wood

Anthony Wood

President, Chief Executive Officer and Chairman

June 26, 2024