

Roku, Inc. Conflict Minerals Policy Statement

Background

In 2012, the United States Securities and Exchange Commission (the "SEC") adopted rules (the "Conflict Minerals Rules") implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Conflict Minerals Rules require public companies to make annual disclosures about the use in their products of tin, tantalum, tungsten and gold ("Conflict Minerals") from certain "Covered Countries." "Covered Countries" for the purposes of the Conflict Minerals Rules means the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. The purpose of these rules is to encourage the responsible sourcing of Conflict Minerals, out of concern that the proceeds from the sale of Conflict Minerals from the Covered Countries have, in some cases, been used to finance armed conflict and human rights abuses.

Policy Statement

Roku, Inc. ("*Roku*") is committed to the responsible sourcing of Conflict Minerals. As part of that commitment, Roku will work to identify, reduce and eliminate the use in its products of Conflict Minerals that directly or indirectly finance armed conflict in the Covered Countries, following guidelines described by the Responsible Minerals Initiative.

We expect our suppliers to be similarly committed to responsible Conflict Minerals sourcing. Specifically, we encourage our suppliers to:

- Work with their own supply chain to ensure that Conflict Minerals used in Roku products are not being used to finance armed conflict or human rights abuses in the Covered Countries (such Conflict Minerals referred to herein as "Conflict-Free");
- Establish their own policies, due diligence frameworks and management systems on Conflict Minerals in order to ensure the Conflict-Free status of those Conflict Minerals; and
- Cooperate with Roku's efforts to ensure the Conflict-Free status of Conflict Minerals used in Roku products, including by providing Roku information annually about their sourcing of Conflict Minerals and their Conflict Minerals policies.