



PLAY* WITH *PURPOSE



**ENVIRONMENTAL, SOCIAL
AND GOVERNANCE REPORT**
YEAR END 2022

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FORWARD-LOOKING INFORMATION AND STATEMENTS

Certain statements in this Environmental, Social and Governance Report for the year ended 2022 (this “Report”) constitute “forward-looking statements.” Forward-looking statements in this Report are made pursuant to the safe harbor provisions of Section 21E of the Securities Exchange Act of 1934 and other federal securities laws. These statements are based on management’s current opinions, expectations, beliefs, plans, objectives, assumptions, or projections regarding future events or results, including, but not limited to, our ESG commitments, strategies, and initiatives; our business plans and strategy; our technology and services; our opportunities for growth; and our stakeholder engagement efforts. These forward-looking statements are only predictions, not historical fact, and involve certain risks and uncertainties, as well as assumptions. Actual results, levels of activity, performance, achievements, and events could differ materially from those stated, anticipated, or implied by such forward-looking statements. While we believe that our assumptions are reasonable, there are many risks and uncertainties that could cause actual results to differ materially from forward-looking statements, including the risks discussed under the heading “Risk Factors” in the Company’s Annual Report on Form 10-K for the year ended December 31, 2022 filed with the U.S. Securities and Exchange Commission (“SEC”) as well as other factors described in Turtle Beach’s filings with the SEC. we undertake no obligation to update or revise any forward-looking statement contained in this Report, except as otherwise required by law.

This Report also contains trademarks and trade names that are property of their respective owners.



HEADS-UP DISPLAY (HUD)



Management and Board Commitment

Our ESG Committee identifies ESG risks and opportunities, establishes and measures progress against ESG goals, and implements ESG initiatives, each of which are ultimately overseen by our Board's Nominating and Governance Committee.

Reducing Our Carbon Footprint

We're taking steps to reduce and mitigate our carbon footprint, with the aim to **neutralize our carbon footprint across our corporate offices by 2025.**

Reducing Product Impacts

We're incorporating sustainability features into our products while maintaining the industry-leading quality that has always set us apart.

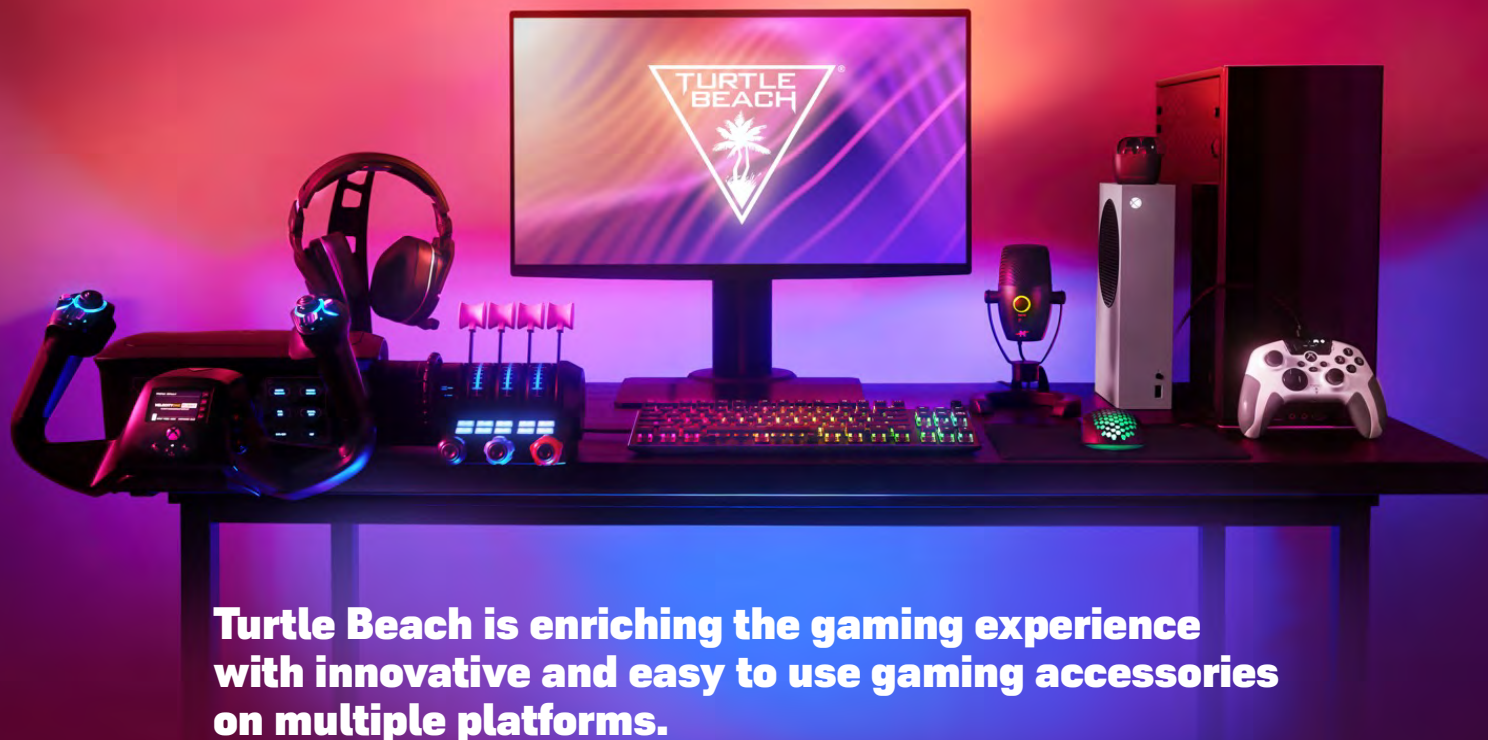
Diversity and Inclusion

We track diversity metrics through our recruiting process and include diversity statements in all job postings to **increase the diversity of our candidate pool.**



THE MISSION

Our sole mission is to help gamers play their best - at every level, in every game.



Turtle Beach is enriching the gaming experience with innovative and easy to use gaming accessories on multiple platforms.

ABOUT TURTLE BEACH CORPORATION

Turtle Beach Corporation's (the "Company") mission is to deliver the ultimate experience to gamers by providing high-quality, high-performance gaming accessories, including headsets, keyboards, mice, gamepad controllers, simulation hardware, microphones, and more. For nearly 50 years, Turtle Beach has been a pioneer and key innovator in audio technology, and today it is one of the most recognized brand names in gaming.

The Turtle Beach® brand has been the market share leader in console gaming headsets for 13-years running with a vast portfolio of headsets for Xbox, PlayStation, and Nintendo consoles, as well as for personal computers (PCs) and mobile/tablet devices. Turtle Beach Corporation's PC peripherals brand, ROCCAT®, creates PC gaming keyboards, mice and other gaming accessories focused on the PC gaming market. And in 2021, Turtle Beach expanded the brand beyond gaming headsets and began making game controllers and gaming flight simulation accessories. Turtle Beach also creates high-quality USB and analog microphones for gamers, streamers, professionals, and students that embrace cutting-edge technology and design.

Turtle Beach Corporation is headquartered in White Plains, New York. We design products in California and Germany and help gamers win across the globe. Shares of our common stock are traded on the Nasdaq Global Market under the symbol: HEAR.



A LETTER FROM TURTLE BEACH'S CEO

I am incredibly proud of our team's dedication and progress in making Turtle Beach's business sustainable and resilient over the past years, yet as proud as I am, there's still more to do. Looking ahead, we are leveling-up our commitment to operating sustainably and in the best interests of our fans and stakeholders, and I'm excited to share our initiatives and plans with you in this Report.

Some of our notable accomplishments thus far include reducing single-use plastics in our product packaging, with some models seeing up to an 90% reduction in plastic, baselining our greenhouse gas emissions footprint and setting a target of neutralizing our Scope 1 and Scope 2 emissions from our corporate offices by 2025, formalizing our Manufacturer Code of Conduct, and our board of directors (the "Board") formally adopting an Environmental, Social and Governance ("ESG") policy to better reflect our commitment to ESG issues and values as a global company.

As part of our strategy to accomplish these and future goals, we've established a management-level ESG Committee that meets regularly to identify ESG risks and opportunities, establish and measure progress against ESG goals, and implement ESG initiatives. The committee is led by our Senior Vice President of Marketing and includes leaders from across the organization, including supply chain, product, engineering, legal, human resources, operations, communications, and sales. The committee reports directly to me.

We believe sustainability should be an integral part of our company's strategy to reduce our environmental impact, minimize our exposure to risk, satisfy customers' expectations, and create long-term value. Having an organized sustainability program helps us achieve our corporate goals around developing innovative products, enhancing our customers' experience, and reducing resource use. These changes benefit our environment, our consumers, and our business, which in turn creates value for our stockholders.

This Report, along with our initiatives, places ESG even closer to the forefront of all our minds, and I look forward to sharing 2023's results where I'll once again be able to report back on everything Turtle Beach has achieved and is working toward. Until then, thanks for being part of the journey.

To a great and bright future,
Cris Keim
Interim Chief Executive Officer



LEVELING-UP

We believe that doing the right thing for the planet and society is important to the long-term success of our business. This means establishing an appropriate governance structure, assessing our environmental and social impacts, and reducing our negative environmental impacts while enhancing our positive social impacts whenever possible.

Based on an analysis of Turtle Beach's business, we have adopted specific ESG goals and initiatives to improve our ESG performance, meet our customers' expectations, and share relevant ESG information with our stakeholders.

Specifically, we seek to:

- 1** Develop innovative new products with lower environmental impacts while updating existing products to reduce environmental impacts.
- 2** Integrate relevant ESG targets and initiatives into our operations.
- 3** Identify potential areas of risk, such as climate change, and mitigate our exposure.
- 4** Promote transparency with customers, employees, investors, and other stakeholders by sharing our ESG goals, initiatives, and progress.



MISSION OBJECTIVES

Environmental sustainability is an integral part of Turtle Beach Corporation's strategy. By formalizing our sustainability goals, we will reduce our environmental impact, minimize risks, and meet customer expectations. In setting these goals, we reviewed our customers' expectations, conducted a materiality assessment, interviewed leaders and managers from various departments such as product, operations, supply chain, human resources, communications, and sales, assessed sustainability guidelines published by Nasdaq and Institutional Shareholder Services, and benchmarked our strategy and goals against industry standards. We believe it is important to use a continuous improvement model for our sustainability performance, and so we have established a set of clear and measurable goals demonstrating our commitment to managing our environmental impact.





LEADERBOARD



To accomplish our ESG goals, it's vital that our employees are engaged with the process and led by commitment from the top. This is a multiplayer campaign – not a single player one.

At the top, the Nominating and Governance Committee of our Board has oversight of our ESG practices, goals, and their implementation. The Nominating and Governance Committee reviews and assesses our ESG strategy, performance, risks, opportunities, and initiatives semi-annually. We have also established a management-level ESG Committee that meets regularly to set goals, assesses our sustainability progress, identify ESG risks and opportunities across our business, including those associated with climate change, assist in implementing initiatives, and ensure our goals are met. The committee is led by Turtle Beach's Global Senior Vice President of Marketing and features leaders from across the company, including legal, supply chain, product management, engineering, human resources, operations, communications, and sales. The committee reports directly to Turtle Beach's CEO, who briefs the Nominating and Corporate Governance Committee in a manner consistent therewith.

In addition to managers, leaders and experts across our business, we engaged an ESG consultant to review, enhance and help formalize our ESG strategy, to assist with implementation, and to provide an objective assessment of strategy and goals.

ESG Oversight

Ultimate Oversight	Board; Nominating and Governance Committee	→ Responsible for overall ESG strategy → Review results in this Report
Internal Direction	ESG Committee	→ Develop our ESG strategy and goals → Review ESG policies, practices, and initiatives, and propose improvements → Identify important ESG issues, risks, and opportunities for our business → Communicate ESG goals to all employees and ensure effective implementation thereof → Collect data and prepare this Report
Implementation	All Employees	→ Implement our ESG strategy → Provide continual feedback to management and ESG committee regarding ESG risks and opportunities
External Review	ESG Expert Consulting	→ Review ESG risks, opportunities, and initiatives across industries to benchmark our progress and goals → Assist with collecting and verifying data for this Report



FINDING THE TARGET



Materiality Assessment

ESG covers many different areas – knowing where to focus our efforts is critical. We partnered with ESG consultancy RPS Group to engage our stakeholders and create a materiality assessment to determine matters most important to our stakeholders. We interviewed leaders and managers from various departments from across the Company, including product, operations, supply chain, human resources, communications, and sales.

The goals of these conversations were to identify current ESG initiatives, assess risk and opportunities, identify ESG resources and tools to be developed, gauge interest in incorporating initiatives into each department, and highlight potential obstacles and challenges.

Alignment with Frameworks

In addition to conducting the Materiality Assessment, we referenced the following globally recognized frameworks to develop our sustainability and climate-related policies, initiatives, and goals: the United Nations Sustainable Development Goals (SDGs) and the Task Force on Climate-Related Financial Disclosures (TCFD). These are leading frameworks that we used to set meaningful climate related KPIs.



To support global sustainability efforts, we aligned our sustainability program with the United Nations Sustainable Development Goals (SDGs). These goals provide guidance for enterprises like ours to promote sustainable development of society in addition to supporting their own sustainability. Though we support all 17 goals, we selected goals where we believe we can make a meaningful contribution. We've marked sections in this Report with the SDG icons relevant to each of our efforts.



The Financial Stability Board established the Task Force on Climate Related Financial Disclosures (TCFD) to develop recommendations for more effective climate-related disclosures. They believe that better information will allow companies to incorporate climate-related risks and opportunities into their risk management and strategic planning processes. We developed our *Business Continuity Plan: Climate-Related Impacts* in line with the TCFD framework to ensure that we understand our financial and operational exposure to climate-related impacts.



CORPORATE GOVERNANCE

Principles and Guidelines



Our Board is responsible for the control and direction of the Company and is committed to the development of effective and transparent corporate governance practices. As part of this commitment, the Board adopted our [Corporate Governance Principals and Guidelines](#) to provide a framework for the Company's governance. Further, in 2021, our Board furthered our commitment to ESG matters by adopting our [ESG Policy](#).

Business Conduct and Ethics

Turtle Beach will continue to uphold the high levels of business ethics and personal integrity that it has heretofore displayed as it seeks to expand its presence in the global marketplace. Our [Code of Business Conduct and Ethics](#) (our "Code of Conduct") ensures we continue to operate our business in a way that is reflective of these values. While no document can answer all questions that may confront our employees during the performance of their duties and responsibilities, our Code of Conduct provides a framework for employees to conduct our business in an ethical manner and provides a mechanism for our employees to seek the advice of their manager and our Legal and Human Resources departments when needed to ensure their actions comply with the Code of Conduct and business standards. New employees are required to review and understand our Code of Conduct upon joining the Company, and the Code of Conduct is readily available on our corporate governance website. The Code of Conduct is reviewed from time to time to ensure it remains reflective of our expectations of business ethics and integrity.

Whistle Blower Policy

To ensure compliance with our Code of Conduct and our legal duties, we have adopted a whistle blower policy that creates confidential and anonymous channels for employees to voice their concerns. As set forth in the policy, if employees, officers or directors become aware of a violation of any law, rule or regulation by our Company, whether by its officers, employees, directors, or any third-party doing business on behalf of the Company, it is his/her responsibility to promptly report the matter to their manager or to our Human Resources department. If an individual prefers to report his or her concerns anonymously, the Company has established a governance hotline administered by an independent third party, where an anonymous report can be made by phone or by filling out a secure web form. Our whistle blower policy includes a statement on non-retaliation – the Company will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate (with respect to the terms and conditions of employment or otherwise) against an individual because he or she acts in good faith in accordance with the policy. Any director, officer or employee who violates the non-retaliation requirement is subject to disciplinary action, including termination of employment or removal from the Board.

Anti-Corruption

We have zero-tolerance for bribery and corruption in our business. We require strict compliance with all anti-corruption and anti-bribery laws from all those involved in our business. In addition to complying with the Code of Conduct, our employees are required to complete annual anti-corruption training. And our business partners, including our manufacturers, distributors, consultants and contractors are contractually obligated to comply with applicable anti-corruption laws.





OPEN WORLD: CLIMATE ACTION

Minimizing Our Carbon Footprint

As a global business, we are doing our part to reduce our carbon output by seeking to neutralize emissions associated with our operations. We target to become carbon neutral with regard to our Scope 1 and Scope 2 greenhouse gas emissions from our corporate offices by 2025. As a starting point, we began assessing our carbon footprint in 2021 to understand where our Company stands and set goals accordingly. Based on that assessment, we enlisted the help of an independent, international environmental consulting firm to calculate our carbon footprint and noted the absolute total emissions.



OUR CARBON FOOTPRINT		
2021*		
Scope 1**	Scope 2	Scope 1 & 2 Total
642 tonnes of CO2e	96 tonnes of CO2e	738 tonnes of CO2e
2022		
Scope 1	Scope 2	Scope 1 & 2 Total
363 tonnes of CO2e	95 tonnes of CO2e	458 tonnes of CO2e

* 2021 emissions figures have been revised to include emissions related to natural gas use at our White Plains, New York and Hamburg, Germany offices. Usage reporting from these offices is delayed due to reporting delays by the owners of the respective buildings as both offices are leased spaces in larger buildings where the Company indirectly pays for a percentage of usage based on its footprint within the building.

** Reduction in Scope 1 emissions from 2021 to 2022 primarily reflects a reduction in natural gas consumption at our office in Basingstoke, United Kingdom following a move to an office with no natural gas fittings in early fall 2022.

Methodology – Overview

Our carbon footprint review was conducted in accordance with *The Greenhouse Gas Protocol – A Corporate Accounting and Reporting Standard (Revised Edition - March 2004)*. The Greenhouse Gas (“GHG”) Protocol establishes comprehensive global standardized frameworks to measure and manage GHG emissions from private and public sector operations, value chains, and mitigation actions. It is the most widely used standard for measuring GHG emissions. We set boundary conditions to frame the GHG inventory’s breadth and depth by noting which facilities and emissions sources were included in the inventory.

Organizational Boundaries

The organizational boundaries determine which facilities will be included in the data collection effort. We gather emissions data from all of our facilities at a group level.

Data Collection Approach

We used a centralized data collection approach (i.e., each facility provided emissions data). We then calculated the emissions associated with each facility based on its Emissions and Generation Resource Integrated Database (eGRID) factor. eGRID is a comprehensive source of data from the U.S. Environmental Protection Agency’s (EPA) Clean Air Markets Division on the environmental characteristics of nearly all electric power generated in the U.S.



RELEVANT SUSTAINABLE DEVELOPMENT GOALS

Climate Risks and Opportunities

From our review, **we found that our overall contribution and exposure to climate change impacts is low.** Based on our review, we identified the below climate-related risks and opportunities. However, at this moment we do not believe that the climate-related risks described below are material to our business, financial results and results of operations, and therefore, to date, we have not included them in our public filings with the Securities and Exchange Commission.

Climate-Related Risks & Opportunities

Risks

Transition Risks:

- ➔ **Regulatory Uncertainty:** New laws or regulations in response to climate change could increase our cost of doing business and restrict our ability to operate our business or execute our strategies.
- ➔ **Technological Changes:** Increased regulatory requirements or demands for green products could increase our development costs to meet these requirements or demands.
- ➔ **Market Demands:** Changing consumer demand for green products could impact demand for our legacy products.

Physical Risks:

- ➔ **Acute:** These risks result from environmental incidents and events. For example, a tropical typhoon impacting our manufacturing partners in that location. We mitigate these risks by having multiple manufacturing partners (in multiple locations), developing business continuity plans with our preferred partners, and reallocating our production in response to these acute risks.
- ➔ **Chronic:** These risks result from long-term shifts in climate patterns, such as sea level rise and extreme weather patterns and the unforeseen logistical challenges that result. We help mitigate these risks through our efforts to reduce our climate impact and by adjusting our business in response to climate change.

Opportunities

- ➔ **Product Differentiation:** Newly developed sustainable products could help differentiate our products from our competitors.
- ➔ **New Customers:** Newly developed sustainable products could expand our customer base to those seeking green products.

Business Continuity Plan: Climate-Related Impacts

To evaluate our exposure to climate risks and ways to mitigate such risks, we developed our *Business Continuity Plan: Climate-Related Impacts* plan guided by the Taskforce on Climate-Related Financial Disclosures (TCFD) framework to ensure that we understand our financial and operational exposure to climate-related risks and opportunities. When creating this plan, we reviewed the potential impacts of climate change on our supply chain, facilities, and product availability and are assessing ways to mitigate risks and capitalize on opportunities to drive shareholder value.





UPGRADING THE EQUIPMENT: PRODUCTS AND PACKAGING

Reducing Our Products' Impacts

As one of the world's top gaming accessory providers, we understand that most of our environmental impacts are associated with the products that we sell. We want to continue our robust history of innovation by improving the sustainability features of our products while maintaining the industry-leading quality that has always set us apart. By taking steps to reduce the environmental impacts of our products and their packaging, we help ensure that our customers can make a choice supporting their sustainability goals, our employees can know that they are working for a company conscious of its impact on our world and our stockholders can rest assured that we will continue to create shareholder value.



Carbon Neutral Products

In 2023, we launched our first CarbonNeutral® gaming headsets – the new Pink & Teal colorways of Turtle Beach's best-selling Stealth 600 Gen 2 MAX series. The emissions generated by these headsets are reduced and offset in line with The CarbonNeutral Protocol, and through our partnership with Climate Impact Partners' Million Mangroves program where Turtle Beach contributes to the development of new Mangrove forests, which help combat carbon emissions.

Mangroves are a high-impact and carbon-dense natural climate solution that also provide important protection in coastal areas. They enable fish and water species to thrive, as well as create valuable timber products that resist rot and insects. Mangroves have been named the “wonder tree” due to their ability to store four times more carbon than a rainforest, yet unfortunately over 35% of the world's Mangroves have already been deforested. Climate Impact Partners, a well-respected specialist in carbon market solutions for climate action, created the Million Mangroves program so companies can commit financially to driving one of the highest impact climate and blue carbon solutions available.

Reducing Hazardous Substances

Our products are regulated by the laws on the Restrictions on Hazardous Substances (RoHS), Waste Electronic and Electrical Equipment (WEEE), the European Union Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), the European Union Directive on Packaging and Packaging Waste (94/62/EC), and California Proposition 65. As required, our products are marked with required regulatory labels and safe use information.

Eco-design of Products

Our team is investigating potential sources of post-consumer recycled plastics (“PCRs”) and ways we can best integrate PCRs into our products. Post-consumer recycled plastics are made from plastic that has repurposed from an item that is no longer used. Breaking down and using PCR plastics is a sustainable alternative to using virgin plastic materials because:

1. PCRs are estimated to be up to 60% more carbon efficient than traditional plastics; and
2. Waste that would otherwise be created from the use of traditional plastics is eliminated.



By 2024, we aim to incorporate at least 10% PCR into select products. These actions will not only reduce the environmental impact of our products but will also enable our customers to make informed purchasing decisions and integrate our products into a more sustainable lifestyle.

Sustainable Packaging

Smaller Box – Happier Planet

We have re-engineered our product packaging over time to reduce the overall size and allow for more efficient shipping, which reduces the carbon output associated with shipping our products.



Eliminating Single Use Plastics

We are proud to say that we have been actively working to reduce or eliminate single-use plastics from our packaging since 2015 and have effectively eliminated most of the plastic waste in packaging that cannot be recycled. Notable examples include replacing plastic blisters with a paper-pulp tray (the tray inside the box that holds the product) and eliminating plastic hang tags and plastic bags and twist ties that hold cables. Some plastic packaging materials remain where we have not found a solution that ensures delivery of a quality product to our customers, but we are continuing to research innovative ways to eliminate plastic completely.

As part of our ongoing efforts, in 2022, certain models of our headset range achieved a 90% reduction in plastic from their original packaging. For example, we reduced the plastic use in packaging by 88% (by weight) for our Stealth 600X Gen 2 model (as compared to our Stealth 600X Gen 1 model). With some of our other models, we reduced plastic use by 87%-96% (by weight). By 2024, we aim to eliminate plastic use in packaging in select products.



Responsibly Sourced Packaging

Not all packaging can be reduced or eliminated, so we are working to ensure that what remains is responsibly sourced. The Forest Stewardship Council® (FSC®) is a global, not-for-profit organization that works to promote responsible management of forests worldwide. FSC certified packaging from renewable materials helps us ensure that our paper packaging materials are sourced from sustainably managed forests. In 2022, we worked with our suppliers to begin transitioning our product packaging to FSC certified paper. Through these efforts, **we already have plans to ship 17 of our SKUs in packaging incorporating FSC certified materials in 2023.**



RELEVANT SUSTAINABLE DEVELOPMENT GOALS



RESPAWN! – RESPONSIBLE RECYCLING AND REFURBISHED GEAR



We design and build our products for a lifetime of play. However, we know there will come a time when you want to upgrade to the next level. We encourage end-of-life stewardship for our products and support our retail and distributing partners' recycling programs. The separate collection and recycling of our products at the time of disposal will help conserve natural resources and ensure that they are recycled in a manner that protects human health and the environment. For more information about how you can help support proper recycling of our products and where you can drop off our old products for recycling, please contact your local authority or the store where you purchased your product.



In addition to supporting responsible recycling of our products, we support resource responsibility and waste reduction through our refurbished product program. Through this program, we refurbish returned product so they can help our customers play at their best level, rather than sit in landfills. [Click here to learn about our refurbished products.](#)



RELEVANT SUSTAINABLE DEVELOPMENT GOALS



COOPERATIVE PLAY: OUR EMPLOYEES

Corporate Culture

Our employees are our greatest assets in our efforts to drive innovation. In 2022, **We remain committed to our fundamental goal of ensuring that Turtle Beach is a great place to work.**

Core Values

We are focused on continuing to build a corporate culture of integrity and respect, with the goal of working together to drive our business to be creative, innovative, and competitive. To achieve these objectives, we have adopted the following core values:

- Leadership: We take initiative and lead in our respective roles. We lead by example.
- Teamwork: We work as a team and value diversity. We win together and lose together.
- Excellence: We take pride in our work and seek excellence in everything we do.
- Integrity: We are honest, direct and transparent in all interactions.
- Innovation: We innovate to deliver better products and constantly improve every aspect of our company.
- Execution: We do what we say we will do and take personal accountability for our commitments.

Collaboration

We seek to create a highly collaborative culture in which employees feel a sense of pride that their input is sought after and valued. We believe that our culture is a long-term competitive advantage for us, fuels our ability to execute and is a critical underpinning of our employee talent strategy.



Employee Development

We are further committed to developing our employees professionally by leveraging our Intellectual Capital (“IC”) process. The IC process includes constructive reviews and various talent and leadership development initiatives conducted by the management team and provided throughout an employee’s career.

Employee Satisfaction

We conduct anonymous employee culture surveys annually to monitor employee engagement and satisfaction, while identifying matters that need to be addressed. In 2022, we scored 85% on overall satisfaction, exceeding our goal of 80% across the company. While we take pride in our strong employee satisfaction, we are always seeking to ensure our employees feel valued and proud to be a part of the Turtle Beach team.

Compensation and Benefits

Benefits

We provide competitive compensation and benefits programs for our employees. In addition to salaries, these programs (which vary by employee level and by the country where the employees are located) include, among other items, bonuses, equity-based compensation awards, retirement plans, healthcare and insurance benefits, health savings and flexible spending accounts, paid time off, advocacy resources, flexible work schedules and employee assistance programs.

Work-Life Balance

We have adopted and are committed to a hybrid work policy to provide for telecommuting and enhanced flexibility for our employees with the aim of supporting greater work-life balance. We have also supported employees seeking part-time work arrangements. In our 2022 culture survey, over 70% of our employees were happy with their work-life balance.

Health and Wellness

In the United States, we have launched periodic wellness workshops intended to improve and promote health and fitness.

Diversity and Inclusion

Supporting a Diverse and Inclusive Workplace

We believe diversity in the workplace creates an environment where different perspectives lead to improved creativity, productivity, team member engagement, and overall employee happiness. To embrace diversity in 2021 and 2022, we:

- Conducted bias training for the entire company (3 hours for employees, 6 hours for managers, 2 days for executives).
- Implemented and tracked diversity metrics through our recruiting process.
- Included diversity statements in all job postings on our Turtle Beach Careers website and social media channels, such as LinkedIn.

Turtle Beach expressly prohibits any form of unlawful discrimination, including harassment and sexual harassment. Our policy applies to all workplace-related situations, whether in the office, work assignments outside the office, office-sponsored social functions, or elsewhere. It covers all employees, interns, temporary workers, applicants for employment, contractors, and other persons conducting business with the Company. We will investigate all reported incidents and take appropriate actions to resolve the matter.

Board Diversity

As of July 6, 2023, our Board had seven members. Two identify as non-white. Three are female and chair each of our three standing committees (Audit, Compensation, Nominating and Governance).

Ethics and Compliance Training

All employees are annually required to complete anti-corruption and bribery training.



MULTIPLAYER MODE: OUR PARTNERS

We work closely with our component, manufacturing, and global logistic partners to build a supply chain that we consider predictable, scalable and efficient to provide high-quality, reliable products. We have worked with many of our manufacturing partners for multiple years to form stable, long-term relationships focused on similar goals. Through these relationships we have ensured our suppliers are adhering to the values and requirements we expect, including with respect to ESG matters. ESG matters are continually considered when working with our manufacturing partners, whether evaluating alignment to our ESG goals as part of the onboarding process for new manufacturers or assessing and auditing compliance with our ESG standards for our long-time manufacturers.

ISO Certified

Our production is completed by contract manufacturers. To produce the high-quality products our customers have come to expect from Turtle Beach, these contract manufacturers must adhere to high standards of quality assurance. As of Q1 2023, 100% of our contract manufacturing facilities are ISO 9001 (Quality Management Systems) certified; 94% of our contract manufacturing facilities are ISO 14001 (Environmental Management System) certified.

Conflict Minerals

We understand the importance of avoiding conflict minerals that directly or indirectly finance or benefit armed groups and audit the sourcing of conflict minerals used by smelters and refiners in our product supply chain.

Conflict minerals refers to columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives, which are limited to tantalum, tin, and tungsten. Trade of such minerals has contributed to armed conflict and human rights abuses in the Democratic Republic of Congo.

We survey our manufacturing partners using a variation of the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI). For 2021, approximately 85% of smelters and refiners that our manufacturing partners engage with successfully completed an assessment against the applicable RMI Responsible Minerals Assurance Process standard or an equivalent cross-recognized assessment. Click [here](#) to read out latest conflict minerals report.



Manufacturer Code of Conduct (MCoC)

In 2022, we formalized our Manufacturer Code of Conduct (MCoC) to help ensure that our vendors are operating in a manner that is consistent with our values and applicable regulations. Our MCoC is generally aligned with established industry frameworks and global standards, including standards regarding human rights, labor rights, the environment, and anti-corruption. Our manufacturers and their subcontractors are expected to, and our agreements with them generally require them to, comply with all applicable international, national, and local laws, rules, and regulations related to ESG matters. We expect our manufacturers to acknowledge and integrate the elements listed in our MCoC into their operations and across their own supply chains. In addition, we expect our manufacturers to adhere to our MCoC while conducting business with or on behalf of Turtle Beach, and we are updating agreements with our manufacturers to ensure they are contractually obligated to do so. Further, our manufacturing agreements allow us to audit compliance with these standards.

Under our MCoC, our manufacturing partners are expected to comply with the following, among others:

Environmental	• Seek ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, and minimize adverse impacts on the environment resulting from their operations • Maintain a policy to reasonably assure that the tantalum, tin, tungsten, and gold in our products does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country
Social	• Comply with all anti-human trafficking, forced labor, and modern slavery laws and rules • Do not engage in any acts which would be considered to constitute modern slavery, and take reasonable steps to ensure that there is no modern slavery in its own supply chain • Never use child labor or support practices inhibiting child development • Respect workers’ rights to associate freely • Maintain work hours in compliance with all applicable laws and regulations • Treat each of its employees with dignity and respect
Governance	• Comply with all applicable commercial and public anti-bribery and anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act of 1977 and the UK Bribery Act of 2010 • Do not retaliate against any employee who makes a good faith report of abuse, intimidation, discrimination, harassment or any violation of law or of the MCoC • Immediately notify Turtle Beach upon learning of any known or suspected improper behavior not in conformance with the MCoC



LOCAL AREA NETWORK: GIVING BACK

We are proud to serve the communities in which we work and live. Turtle Beach provides budgets for each global office to make local donations, which allows employees to decide how those donation dollars are best utilized in their respective communities. We believe these donations help our employees feel more connected to their communities through their work at Turtle Beach, ultimately helping with employee satisfaction and retention, which in turn creates long-term value for our business.

For example, in 2021 we became an official sponsor of the University of California, San Diego, Esports team. In each of 2021 and 2022, we provided the team with our top-of-the-line gaming equipment and a \$7,500 donation. In 2022, we provided a donation to the San Diego Fire Relief Association, an organization providing assistance to Firefighters in the San Diego area, and to Equality California, a non-profit organization advocating for the rights of LGBT people in California.



We also support the broader community by giving back to causes that we, our customers, and our partners care strongly about. For example, in 2020, in support of social justice reform we partnered with Roc Nation and Team Roc to provide financial support for The Gathering for Justice and Until Freedom; two organizations whose mission is to end systemic inequality and racial injustice. We also partnered with Shellback Tech to create custom-built gaming stations for America's disabled veterans and first responders.

In 2021, we sponsored a leadership event for 50/50 Women on Boards, an organization advocating for gender balance and diversity on corporate boards.

Additionally, our partnership with Gamers Outreach has enabled us to raise donations for multiple programs that create portable video game kiosks for hospitals to provide bedside recreation for children unable to leave their hospital rooms.

In 2023 and beyond, we plan to continue our efforts to support local organizations in our communities that share our common goals of bringing people together and giving back.

