



STARTECH.COM LTD.

FY 2018 Statement Regarding Transparency in Supply Chains

June 2019

Introduction

StarTech.com is committed to acting ethically in all our business dealings. We accept and agree with the role that global companies must play in combatting slavery and human trafficking in their supply chains and are working to enhance and improve our efforts in this area. We view this statement and the efforts described herein as part of our wider framework of corporate social responsibility. We believe that StarTech.com's continuing efforts to be a socially responsible company are not only expected by our customers, our partners and our employees, but that they are a foundational element of our competitive abilities and ultimately, of the long-term sustainability of the company.

The UK Modern Slavery Act 2015 (the "Act") requires certain commercial organizations to prepare a slavery and human trafficking statement which details the steps taken during each financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement has been prepared in compliance with Part 6 of the Act for the fiscal year ended November 30, 2018. The statement applies to StarTech.com Ltd., a company incorporated pursuant to the laws of the Province of Ontario, Canada, and its global subsidiaries, including StarTech.com Limited (a company incorporated pursuant to the laws of England Wales). Collectively, the StarTech.com entities are referred to in this statement as "StarTech.com."

Business, supply chains and organization structure

StarTech.com creates, distributes and sells a portfolio of IT accessories. The company's stated purpose is to empower its customers, IT professionals, and business users to improve performance by easily creating the critical connection between them and their productivity tools. The company's strategic intent is to make its products easy to identify, find, obtain and use, when and where they are needed, which it reflects in its proprietary expression "Hard to Find Made Easy."

Currently, StarTech.com has approximately 3,400 active SKUs which are in turn divided into the following product categories: cables, computer cards and adapters, data storage, adapters, docks and hubs, mounts and ergonomics, keyboard/video/mouse switches, networking, racks and enclosures and video display connectivity. StarTech.com partners with approximately 100 suppliers in seven countries to manufacture its products. StarTech.com engages with these suppliers in an Original Design Manufacturer (ODM) arrangement, where the supplier designs and manufactures the product and then applies the StarTech.com brand.

StarTech.com is headquartered in London, Ontario, Canada. The parent company, StarTech.com Ltd. is responsible for identifying, sourcing and maintaining relationships with vendors and suppliers, and does so pursuant to inter-company arrangements with its global subsidiaries.

Procedures in relation to slavery and human trafficking

StarTech.com communicates its expectation that its supply chain is free of slavery and human trafficking to new suppliers and to suppliers with which it has ongoing relationships. In addition, as part of its

annual Vendor Questionnaire process. StarTech.com requests its suppliers make the following declarations regarding human rights and labour practices:

1. Vendor agrees to support and respect the protection of internationally proclaimed human rights; and make sure they are not complicit in human rights abuses.
2. Vendor agrees to uphold the elimination of all forms of forced and compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

StarTech.com expects its suppliers to cascade these requirements to their respective supply chains.

If a supplier does not make the declarations noted above in its annual Vendor Questionnaire, StarTech.com's Vendor Management group will follow up with the supplier to determine the reasons why the declaration was or cannot be made. The risk assessment and management processes below detail the consequences of a non-declaration by a supplier.

StarTech.com is currently working to formalize its expectations with respect to ethical sourcing, modern slavery, human trafficking and human rights into formal policies. StarTech.com expects to capture, clarify and expand on its supplier expectations into a Supplier Code of Conduct later in 2019.

StarTech.com currently has a Code of Conduct which all new employees are expected to review and sign upon entering the company. In addition, it has initiated a global ethics hotline for employees to report unethical behaviors and is in the process of completing training with all employee groups on the implementation of such hotline. Employees are encouraged to report potential compliance violations to their supervisor or through the hotline, which would include reporting on any potential violations related to modern slavery and human trafficking.

Due diligence processes

StarTech.com employs dedicated staff, geographically located close to its supply chain, to perform regular audits, at least annually, for compliance with various laws and the expectations set out in the Vendor Questionnaire. These audits include in person inspections of supplier facilities where StarTech.com products are manufactured. The results of those audits are communicated to senior employees in StarTech.com's Vendor Management team and if and as appropriate, elevated to senior management in accordance with StarTech.com's risk escalation policies and procedures.

Risk assessment and management

StarTech.com has identified that the risk of slavery or human trafficking taking place occurs in its supply chain. As StarTech.com does not manufacture products directly and substantially all its global employees are located in Canada, the United States of America, and the European Union, StarTech.com does not believe that it has any risk of modern slavery or human trafficking in any other area of its business.

Following each audit or annual Vendor Questionnaire cycle, results are analyzed, and an impact assessment is prepared by StarTech.com's Vendor Management team. Depending on the impact, improvement plans will be launched with the supplier containing specific deliverables and timelines to complete the improvement activities. StarTech.com reserves the right to terminate a supplier relationship if its audits show the supplier has failed to adhere to the expectations set out in the vendor Questionnaire or if the audit reveals slavery or human trafficking activities within a supplier relationship.

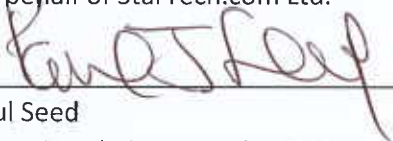
Effectiveness of steps being taken

StarTech.com assesses whether its expectations are being followed by suppliers through the annual Vendor Questionnaire and audit process. StarTech.com is in the process of developing both a road map and internal measures to more formally assess the effectiveness of its current procedures to combat modern slavery. It is intended that the analysis of StarTech.com's internal processes and incentive structures will also mature over time to ensure that overall business performance indicators do not unintentionally create or increase modern slavery risks within StarTech.com's supply chain.

Training on modern slavery and trafficking

StarTech.com is in the process of sourcing online and in person training for specific compliance matters and ethical behaviours generally. It is intended that the new resources will include training on modern slavery and trafficking legislation and related global initiatives. Currently, employees involved in supply chain activities are encouraged to access widely available resources (such as those available through the Stronger Together initiative) to advance their understanding of modern slavery and trafficking issues, risks and their role in combatting them.

On behalf of StarTech.com Ltd.



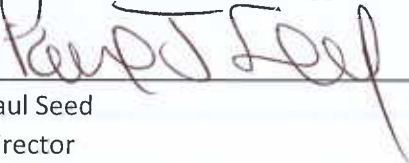
Paul Seed

Executive Chairman and Director

June 19, 2019

On behalf of StarTech.com Limited

In accordance with the U.K. Modern Slavery Act 2015, this FY 2018 Statement Regarding Transparency in Supply Chains has been signed by the undersigned director for and on behalf of StarTech.com Limited to the extent this statement relates to activities of that entity.



Paul Seed

Director

June 19, 2019