



May 31, 2024

**iRobot hereby submits its report for the year ending December 31, 2023, as required by the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.**

iRobot Corporation has engaged several different types of due diligence processes, management practices and control measures to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods that are imported by iRobot into Canada, and throughout the world.

**Central to these efforts is iRobot Corporation's Human Rights policy**

As a global company, iRobot has employees, customers, shareholders, and suppliers, all over the world. Fostering inclusion and a respect for basic human rights is a fundamental value of iRobot. We are committed to ensuring our employees, customers and suppliers are treated with dignity and respect.

**Our Approach**

Human rights are the fundamental rights, freedoms and standards of treatment to which all people are entitled. Respect for human rights is one of our core values and applies wherever we do business. We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees, manufacturers, and distributors. iRobot's Human Rights Policy formalizes this commitment, and applies to our company, employees, contractors, and business relationships.

**Diversity and Inclusion**

iRobot values the diversity and inclusion of the people in our workforce, as well as in our manufacturers and distributors. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. We encourage the exchange of unique ideas and perspectives; we believe that both employees and business results benefit from valuing diverse experience, backgrounds, and ideas. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at iRobot is qualifications, performance, skills, and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

**Workplace Health and Safety**

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

**Workplace Security**



We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. We strive to comply with all applicable regulatory requirements as a minimum, and implement programs and processes to achieve greater protection, where appropriate.

### **Work Hours, Wages and Benefits**

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. Furthermore, we respect our employees' right to join or not join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives and we are committed to bargaining in good faith with such representatives. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws.

### **Privacy and Security**

We are committed to the right of privacy and freedom of expression, and we seek to protect against unauthorized access, use, destruction, modification, or disclosure of personal information and data. We strive to foster trust in the use of smart home technologies by helping to enable responsible information privacy and data security practices. We incorporate privacy and security considerations into our robots in the earliest stages of design so that our customers can use our robotic technologies with confidence.

### **Anti-Corruption**

We are committed to complying with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), other U.S. laws and the anti-corruption laws and regulations of the countries where we do business.

### **Prevention of Human Trafficking, Forced labor and Child Labor**

We will not use or tolerate the use of forced, debt bonded, indentured labor, involuntary prison labor, slavery or human trafficking in our business, and we expect our manufacturers and distributors to uphold the same standards.

### **Structure, Activities and Supply Chains**

iRobot is a publicly traded corporation based in United States of America. iRobot is a global consumer robotics company that designs and builds thoughtful robots and intelligent home innovations that make life better. iRobot introduced the first Roomba robot vacuum in 2002. Today, iRobot is a global enterprise that has sold more than 50 million robots worldwide. iRobot's product portfolio features technologies and advanced concepts in cleaning, mapping, and navigation.

iRobot manufactures products in China and other countries in southeast Asia but utilizes components and materials from many other places in the world. A risk-based approach designed and maintained by the International Labor Organization (ILO) and the Responsible Labor Initiative (RLI) is used to identify the suppliers that pose the greatest risk of forced and child labor practices. The following processes are used to assess, prevent and manage these areas of greatest risk.

### **Supply Chain Process Disclosure**

iRobot Corporation is pleased to share our guiding principles and the work we do to ensure the integrity and dignity of those who make the robots that empower our customers to do more with their lives. We comply with applicable laws and regulations in the countries where we



manufacture products, and we expect our business partners to comply with applicable laws in the countries in which they operate. iRobot has committed itself and its suppliers to comply with the internationally recognized minimum social and labor standards as laid out in the Conventions of the International Labor Organization (ILO). We would never knowingly do business with any partner who engages in human rights violations whether it involves the use of child labor, forced labor, discrimination, harassment, occupational health and safety, requiring excessive working hours, human slavery or human trafficking issues.

iRobot works with our contract manufacturers, suppliers and vendors (collectively “Suppliers”) to maintain fundamental labor and human rights standards. Specifically, we include policies in our key supplier agreements specifying that each Supplier: “represents and warrants that it and its subcontractors/suppliers will comply with all applicable local government regulations regarding minimum wage, living conditions, overtime, working conditions, child labor laws and the applicable labor and environmental laws.” In addition, each key Supplier “represents and warrants that it and its subcontractors/suppliers do not use any form of forced prison labor and/or child labor under the age of 15 or the minimum age required by local government, whichever is older.” iRobot is also committed to individuals’ rights to work freely, bargain collectively and be compensated fairly and we do not permit discrimination against or harassment of our colleagues who chose to be represented by a trade union. Suppliers failing to meet these standards would be in breach of our supplier agreements. At this time, we do not require our Suppliers to certify that all materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Our internal audit team, in conjunction with our manufacturing oversight function, invests significant time and resources to audit our contract manufacturers and the factories that build our robots. Our internal audit team performs an independent audit and verification of key non-U.S. manufacturing facilities for compliance with our supplier agreements. Audits are announced and scheduled, which helps us build trust with our key manufacturing partners. Our manufacturing oversight team, located in Guangzhou, China, makes unannounced visits to our key manufacturing partners and suppliers. Third party audit reports and certifications from industry specialists (e.g. Responsible Business Alliance (RBA)) assessing minimum wage, living conditions, overtime, working conditions, child labor laws and the applicable labor and environmental laws are also periodically obtained for key manufacturing partners.

Finally, we maintain standards and procedures for employees and Suppliers in the iRobot Code of Business Conduct & Ethics which includes the identification of accountability. All employees receive training on the iRobot Code of Business Conduct & Ethics. Failure by an employee to follow the standards set forth in the iRobot Code of Business Conduct & Ethics may subject such employee to disciplinary action up to and including termination of employment.

### **Supply Chain Training**

The Supply Chain team manages annual required training which includes forced labor and child labor along with all other aspects of the iRobot Supplier Code of Conduct. This training is required for 100% of the Supply Chain team and is tracked and verified every year.

### **Labor Practices**

We regularly assess and monitor the labor practices of our contract manufacturers and suppliers through various methods including surveys and third-party audits, which assess a contract manufacturer’s policies and practices for labor, occupational health and safety, environment, ethics, and management systems. Based on the results, the contract manufacturer must provide a corrective action plan for any non-conformances which includes a follow-up by iRobot. Even



prior to iRobot's membership in the RBA, certain iRobot contract manufacturers were already members of the RBA and iRobot has encouraged its other contract manufacturers to become RBA members while consistently advocating that its contract manufacturers disclose the results of third-party audits where applicable, consistent with RBA best practices.

We are committed to protecting human rights and ensuring the integrity and dignity of all those involved in making our robots through our Human Rights Policy and our compliance with the California Transparency, UK Modern Slavery Act and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. iRobot is committed to working with contract manufacturers that strive to provide safe and respectful work environments and that make positive contributions in the communities in which they operate. iRobot insists that its contract manufacturers adhere to applicable labor laws and allow third-party oversight of their labor practices.

### **Remediation for Loss of Income**

iRobot Corporation does not currently take any measures to remediate the loss of income to manufacturers employees that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains.

### **Supplier Code of Conduct**

iRobot joined the Responsible Business Alliance in April 2020. The RBA is a coalition of the world's leading electronics companies working together to improve efficiency and social, ethical, and environmental responsibility in the global supply chain. iRobot's values are well-aligned with the vision and mission of the RBA to create sustainable value for workers, the environment and business through collaboration with our suppliers in ways that improve working and environmental conditions. iRobot's membership in the RBA is enabling us to engage efficiently with our contract manufacturing partners, direct suppliers and broader supply chain. Through this engagement, iRobot administers a supplier code of conduct, leverages tools and resources that drive supply chain sustainability performance and stays informed about key trends and emerging issues. iRobot has rolled out the Supplier Code of Conduct, aligned with the RBA, to all direct material suppliers (including contract manufacturers). In addition, the top suppliers have agreed to abide by the RBA Code of Conduct.

### **Supplier Adherence to Our Values**

iRobot works with our contract manufacturers, suppliers and vendors (collectively "Suppliers") to maintain fundamental labor and human rights standards. Specifically, we include policies in our key supplier agreements requiring compliance with all applicable local government regulations regarding minimum wage, living conditions, overtime, working conditions, child labor laws and the applicable labor and environmental laws. In addition, we also require our suppliers to warrant that they (and their subcontractors/suppliers) do not use any form of forced prison labor and/or child labor under the age of 15 or the minimum age required by local law, whichever is older. iRobot is also committed to individuals' rights to work freely, bargain collectively and be compensated fairly and we do not permit discrimination against or harassment of our colleagues who chose to be represented by a trade union. Suppliers failing to meet our standards would be in breach of our supplier agreements, allowing us to take action accordingly. iRobot remains committed to upholding human rights and safety in our business and supply chains and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.



In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for iRobot Corporation.. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

With authority to bind iRobot Corporation  
Signed by:

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Name: Julie Zeiler

Title: EVP & Chief Financial Officer

Date: May 28, 2024 | 4:15 PM EDT

