

## **ANTICORRUPTION POLICY**

The Board of Directors (the “Board”) of Corsair Gaming, Inc., and its subsidiaries (the “Company”) takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally and ethically in all its business dealings and relationships wherever we operate.

We do not, and will not, engage directly or indirectly in or otherwise encourage bribery. The Company is committed to conducting business ethically and honestly, implementing and enforcing systems that ensure bribery is prevented, and expecting the same standards from all our Third Parties (as defined below). The Company associates and Third Parties (as defined below) will act professionally, fairly, and with integrity in all business dealings and relationships.

Third Parties shall mean channel members (distributors, resellers, service providers, sales and marketing consultants, logistics partners, and carriers) and any other third party working with the Company or on behalf of the Company worldwide.

### **1. Purpose**

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance to those working for and on our behalf on how to recognize and deal with bribery and corruption issues.

If you are unsure of the proper course of action, or whether something constitutes corruption, contact the Company’s Legal Department.

### **2. Who does this policy apply to ?**

This policy sets forth procedures to ensure that Company associates and Third Parties acting on Company’s behalf, including those located outside the United States or the UK do not violate or appear to violate the US Foreign Corrupt Practices Act 1977 (“FCPA”), the UK Bribery Act 2010, Anti Bribery laws of the People’s Republic of China, International Anti-Corruption Conventions, such as the Organization for Economic Co-operation and Development or any other anticorruption laws applicable to Company’s business and operations (Anti-Corruption Laws).

### **3. Objective of this policy**

This policy is intended to provide a coherent and consistent framework to enable Company associates and Third Parties to understand and implement arrangements enabling compliance with Anti Corruption Laws. In conjunction with related policies and key documents, it will also enable Company associates and Third Parties to identify and effectively report a potential breach.

#### **4. Bribery**

A bribe is offering or giving anything of value to any person for the purpose of obtaining or retaining business or securing an improper advantage. You cannot offer or receive bribes from any individual, regardless of whether that individual is a Government Official (as defined below) or a private party. Anything of value includes but not limited to cash, cash equivalents such as gift cards, gifts, meals, discounts, vouchers, loans, travel, accommodation, use of assets, preferential treatment, and entertainment, and can also include a promise, or guarantee of something of value. Anything of value can also include job offers.

“Government Official” refers to anyone who works for any government; any person acting in an official capacity on behalf of a government; any person who works for any company that is owned or controlled by any Government; any officer, director, associate, employee or official advisor of a government; any political party or any official thereof; personnel who are assigned to non-state owned corporations, enterprises, institutions, and social organizations by state-owned corporations, enterprises and institution, any candidate for public office; any person acting in an official capacity on behalf of a government; and any member of the military. For the avoidance of doubt, the term Government Official includes elected officials, civil servants, and military personnel, as well as employees of government-owned businesses. The term also includes Family members of any of these individuals. “Family member” includes the person’s spouse or domestic partner and the person’s spouse’s grandparents, siblings, children, nieces, nephews, aunts, uncles, and first cousins, the spouse or domestic partner of any of these people and any other individual who shares the same household with the person.

#### **5. Kickbacks**

Kickbacks are a type of bribery and occur when a person is offered money or something of value in exchange for providing something to a third party. The third party may be requesting information, a discount, or a favor. Like all other bribes, kickbacks may be in the form of cash or the equivalent, gifts, meals, and entertainment. Kickbacks are not permissible and are strictly prohibited by the Company.

#### **6. Facilitation Payment**

Facilitating payments are a type of bribe generally used to facilitate or expedite the performance of routine, non-discretionary government action. These are usually small payments made directly or indirectly to a Government Official to secure or speed up the performance of a routine action. Company associates and Third Parties are required to resist demands for facilitation payments and build realistic timelines so that the importation and delivery schedules allow time for resisting demands for facilitation payments. These payments are not permissible and are strictly prohibited by the Company.

Facilitation payments may be made to protect life, health or significant property damage if no other alternatives exist and it is impossible to consult the Company's General Counsel at the crucial time a decision has to be made. As soon as practicable a notice must be given to the Company’s General Counsel

including the specific circumstances of the payment and the payment must be recorded in the Company's book and recorded as a facilitation payment made under duress.

***\*China – Facilitation payments are strictly prohibited in China.***

## **7. Gifts and Entertainment**

- i. Gifts and entertainment to US Government Officials are strictly prohibited.
- ii. Other than US Government Officials, this policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, under limited circumstances;
  - Sponsorship, Marketing and Promotional Expenses – Under limited circumstances with the prior written approval of the Company's General Counsel and CEO and only to the extent permitted by local law, Company or Third Parties may pay for the costs of a Government Official's meal, lodging, and travel or fees and sponsorship in connection with attendance at a conference or similar gathering. The expenses must be legitimate, reasonable and directly related to the promotion, demonstration or explanation of Company products and services or related to the execution of a contract with a government. *\*Please refer below for additional requirement for China.*
  - In addition:
    - Travel expenses cannot be, lavish, include substantial "side trips" to non-business-related destinations, or cover a Government Official's family or friends;
    - Per diem payments (daily stipend) are not permitted;
    - Reimbursements cannot be made directly to Government Officials. Payments must be made to the relevant government entity in the official country;
    - Payments must be made within the home country of the government. No offshore payments are permitted;
    - Proper and complete records of such payments that clearly detail the nature, purpose and amount of the expense must be kept by Company associates and Third Parties making the payment.

***\*China – The following requirements are in addition to the above for China***

- (a) gift to the government should not exceed RMB 200 per person per occasion.
- (b) the cumulative value of all the gifts to public officials should NOT exceed RMB 600 per person per year.

## **8. Donations**

Any charitable donations made by Company and Third Parties must be ;

- (i) permitted under local law;
- (ii) made to legitimate charitable organizations; and
- (iii) must be made only upon the written approval of the respective Company General Counsel and CEO

Any charitable contributions made hereunder must never be made in an attempt to influence any decision or gain a business advantage and are always publicly disclosed.

## **9. Prohibition of Bribery**

Company prohibits any form of bribery on its behalf by its associates and Third Parties. Company associates and Third Parties must not provide, offer or accept bribes, kickbacks, corrupt payments, or inappropriate gifts, to or from anyone, regardless of local practices or customs.

It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that an advantage will be received, or to reward an advantage already given;
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain an advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that an advantage will be provided in return;
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy;
- engage in activity in breach of this policy

Payments that are considered improper when made directly by a Company associate or Third Parties may not be made indirectly. In particular, you cannot ignore signs that someone is going to make a bribe that may ultimately benefit Company.

If you are confronted with a demand to pay a bribe or are offered a kickback, you must refuse. Explain that these types of payments are illegal and are against Company policy, and report the incident to the Ethics Hotline [here](#).

## **10. Accurate Records and Internal Controls**

The company is legally required to make and keep accurate records that truthfully and accurately reflect all the transactions of the corporation and maintain an adequate system of internal accounting controls. This includes preserving supporting documentation and proper approvals. Ensure that all relevant records;

- including invoices, expense reports, and any other business records accurately reflect the transaction;
- do not misstate facts, omit information, or modify records or reports in any way;
- provide as much detail as possible;
- ensure that no unrecorded funds and assets are established for any purpose;
- implement a system of internal accounting controls; and

- when interacting with public officials or government agencies, ensure that you're providing a thorough description of the services being rendered, including details of services provided and/or tasks performed, government interactions, and detailed cost breakdown. Simply providing a limited description like "construction and project management", "product certification" or "design fee" is not acceptable.

All Company financial controllers and senior financial representatives must regularly consider the manner in which illegal, improper, or questionable payments could be made, determine whether existing internal controls provide appropriate protection to prevent such payments, and implement additional internal controls if needed. Any deficiencies discovered in Company's internal controls must be reported immediately to the Chief Financial Officer. The above requirements of record keeping are also applicable to Third Parties.

## **11. Reporting Potential or Actual Violations**

- (i) The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all. All Company associates and Third Parties are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- (ii) You must notify your line manager, the Company's General Counsel or the Ethics Hotline ([here](#)) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage, or indicates to you that a gift or payment is required to secure their business you are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- (iii) If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must contact the Company's General Counsel OR report it to the Ethics Hotline [here](#).
- (iv) If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your line manager, the Company's General Counsel.
- (v) All questions regarding the applicability of this policy should be directed to the Company's General Counsel or through the Ethics Hotline [here](#). As part of the Company's commitments to ethical and legal conduct, Company associates are required to report actual or suspected violations of this policy to the Company's General Counsel or the Ethics Hotline [here](#).

## **12. Training and communication**

- (i) Training on this policy forms part of the employment process for all individuals who work for us, and regular training will be provided as necessary.

- (ii) Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### **13. Retaliation Is Not Tolerated**

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

Company will not retaliate and will not tolerate retaliation against any individual for filing a good-faith complaint with management, HR, Legal, Internal Audit, or Finance at the Company, or for participating in the investigation of any such complaint.

### **14. Breaches Of This Policy**

- (i) Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- (ii) Company may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy

### **15. Ethics Hotline**

The Company has also established a series of Ethics Hotlines that are available 24 hours a day, 7 days a week at: Ethics Hotlines:

United States: 1-833-254-3349

China: 400 120 0217

Taiwan: 00801-49-1733

Vietnam: 1800 400490

Netherlands: 0800 0234308

Slovenia: 080 688912

United Kingdom: 0800 102 6471 Website:

And you can lodge a report at: <https://secure.ethicspoint.com/domain/media/en/gui/85965/index.html>.

Any reports submitted via the Ethics Hotlines will be reviewed by the Company's General Counsel and subsequently reported to the Audit Committee. You may remain anonymous and will not be required to

reveal your identity in calls to the Ethics Hotline, although providing your identity may assist the Company in addressing your questions or concerns, reports may be made anonymously. If requested, confidentiality will be maintained, subject to applicable law, regulations, and legal proceedings. The Audit Committee of the Board or other appropriate officer or body shall investigate and determine or shall designate appropriate persons to investigate and determine, the legitimacy of such reports. The Audit Committee or other appropriate officer or body will then determine the appropriate disciplinary action. Such disciplinary action includes but is not limited to, reprimand, termination with cause, and possible civil and criminal prosecution.

## Commitment Statement

The Board of Directors (the “Board”) of Company Gaming, Inc., and its subsidiaries (the “Company”) takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally and ethically in all its business dealings and relationships. The Company is committed to:

- (i) conducting our business fairly, honestly and with integrity;
- (ii) complying with the Anti Corruption Laws;
- (iii) identifying the bribery and corruption risks to which we are exposed on an ongoing basis, and taking appropriate measures to minimize such risks;
- (iv) not knowingly conducting business with any person or company who undertakes bribery and corruption;
- (v) ensuring that all our directors, managers and employees receive adequate training on their obligations and responsibilities regarding the prevention of bribery and corruption;
- (vi) encouraging an open and transparent reporting system which enables our staff to report any suspected instances of bribery and corruption - both within the Company, Third Parties and amongst our business partners;
- (vii) investigating all instances of bribery and corruption that directly affect us and reserve the right to notify the relevant investigatory and enforcement authorities where appropriate;
- (viii) taking disciplinary action against any director, manager or employee who is found to have committed any act of bribery or corruption; and
- (ix) severing ties with Third Parties, business partners who commit any act of bribery or corruption.

Should you have any enquiries relating to anti-bribery and corruption matters, or this Policy, you may contact the Ethics Hotline [here](#).