



VTech Holdings Limited

Responsible Marketing and Labelling Policy

1. Purpose

VTech Holdings Limited (“Company” and together with all its subsidiaries referred to as “we”, “VTech” or “Group”) respects and is dedicated to the protection of consumer rights. We are committed to providing and communicating to our customers with accurate and reliable information about our products and services. The marketing and labelling of our products and services likewise adopt this same principle. Besides outlining VTech’s commitment here, the principles and measures stated this policy (“Policy”) are extended to all our related stakeholders including without limitation our employees, customers and business partners (eg. retailers and e-commerce sites) and the local communities at which we operate (“Stakeholders” unless otherwise specified).

2. Principles of Our Commitment

VTech conducts its marketing and labelling activities (“Activities”) with the highest standard of business integrity and in an ethical and responsible manner.

This Policy takes into consideration the International Chamber of Commerce’s Advertising and Marketing Communications Code, the US Consumer Product Safety Commission’s labelling requirements, the requirements under the European Union’s CE marking, and other relevant international and local regulations (eg. the Hong Kong Toys and Children’s Products Safety Ordinance¹ and the US Children’s Online Privacy Protection Act (“COPPA”)²) as well as industry standards such as the British Toy and Hobby Association’s Code of Practice (collectively, the “References”).

We will allocate appropriate resources (for example, engaging and consulting local experts and professionals on specific local or sectoral requirements), and apply our best efforts to take all necessary actions to adhere to the major marketing principles and practices introduced in the References and embed them in our operations. Our operating locations have devised and implemented procedures and practices to ensure that the Activities are conducted in accordance with the relevant laws and regulations.

3. Activities

i. Responsible Marketing and Content

¹ This legislation stipulates the statutory safety standards to regulate the safety of toys and children’s products that are manufactured, imported or supplied for local use or consumption.

² A federal law that imposes specific requirements on operators of websites and online services to protect the privacy of children under 13.



It is our objective that all our marketing communications are lawful, decent, honest, truthful, transparent, free from exaggeration and not misleading. VTech respects human dignity and equality and will not incite or condone any form of discrimination, including discrimination based upon ethnic or national origin, religion, gender, age, disability or sexual orientation in its marketing contents. Product claims and environmental claims are based on scientific and substantiable evidence and data that are thoroughly studied and correctly represented. Equally, our information on pricing and sales promotions is presented clearly and transparently to all customers.

ii. Marketing Products for Children's Use

VTech recognizes the special nature of the child audience. We acknowledge that direct marketing to children requires special care and that not all marketing techniques are appropriate for children. Our aim is that all our marketing communications must be age appropriate and inclusive, taking into account children's levels of experience, sophistication and maturity.

In order to protect children from inappropriate marketing practices and safeguard their rights, we apply all necessary measures to ensure that the relevant laws and regulations governing marketing communication of children's products and children's privacy are duly observed. We go to great pains to avoid the use of any statements or visuals in our marketing information that could potentially mislead adult parents or guardians, or harm children in any way. Our product advertisements appear on third-party sites or platforms that are appropriate to children. Additionally, we support the role of parents and guardians in making responsible product choices for their children. To protect children's privacy, we also follow the requirements of COPPA and other relevant regulations related to the collection and use of children's personal data.

iii. Product Labelling & Warnings

Customers' health and safety are important considerations in the design, manufacturing and marketing of our products. We provide and place clear and comprehensive labels on our products, packaging, and manuals that contain plain and accurate information. All efforts are made to ensure our product labelling complies with all relevant laws and regulations. The contents of the description, labels and all other communications on our products, packaging and marketing communications including but not limited to safety standards and warnings, quality, green labels, disposal and recycle instructions, and copyright logos undergo routine internal review conducted by the marketing and quality teams which when necessary, will be guided by the legal team for accuracy and compliance with the References.

4. Compliance, Review and Monitoring

VTech reviews and updates this Policy periodically to ensure its effectiveness in fulfilling its objectives. Its Risk Management and Sustainability Committee, which has the oversight of the



implementation of the requirements in this Policy, receives recommendations for enhancement of the Policy from time to time. Changes to the References are also monitored on an ongoing basis.

We fully support the provision of the necessary internal and external training to employees responsible for preparation and conduct of the Activities.

Any suspected non-compliance of the Policy will be duly investigated and if found, appropriate corrective and remedial actions will be promptly taken.

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