



VENDOR/SUPPLIER – CODE OF CONDUCT

ORBCOMM Inc. and its subsidiary and affiliated companies conduct business in an ethical, moral and fair approach with the goal of ensuring that these standards are complied with by our vendors, suppliers and business partners. ORBCOMM has developed this Code of Conduct with the goal of informing those parties with whom we do business with what minimum moral and ethical standards are to be practiced across all countries. While we acknowledge that there are different cultural and legal standards around the world, this code sets out the minimum core standards that are fundamental to the relationship ORBCOMM has with its Business Partners.

Failure to comply with this Code of Conduct may be sufficient cause for ORBCOMM to cease doing business with your organization. As a condition of doing business with ORBCOMM, we reserve the right and you agree to permit ORBCOMM to conduct periodic inspections of suppliers to verify compliance with this Code of Conduct. Business Partners agree to cooperate and to assist ORBCOMM with any and all requested information necessary to demonstrate your compliance.

1. General Legal, Moral and Ethical Behavior

ORBCOMM respects the legal, moral and ethical standards of the jurisdictions where and people with whom we do business. Business Partners are also expected to respect both ORBCOMM's rules and procedures, as well as those laws, rules, processes and procedures of the countries in which they operate. Further, Business Partners are expected to comply with laws, rules, regulations and conventions related to the conduct of business between countries. All types of fraud, bribery and corruption are forbidden regardless of the country in which they may be operating, or on whose behalf they may be acting. Minimally, Business Partners are expected to comply with the UK Bribery Act, the US Foreign Corrupt Practices Act, and the US Anti-Money Laundering rules. ORBCOMM has procedures for Business Partners to be able to confidentially report any suspected case of fraud, bribery or corruption. Compliance with US import/export laws are paramount for ORBCOMM. Business Partners importing and exporting products to, from or on behalf of ORBCOMM are expected to strictly comply with US export laws and must establish procedures and processes to ensure compliance. ORBCOMM also takes seriously its obligations and expects its Business Partners to cooperate with law enforcement in connection with enforcement and compliance related to the illicit/illegal drug trade.

2. Ban on Child Labor

Child labor is defined in various UN and ILO conventions and in national legislation. Use of child labor, as defined, is prohibited in the manufacture of products or provision of services. ORBCOMM views a violation of these laws as the employ of any child under the age of 16 or who is younger than the ages legally allowed to work outside compulsory school hours.

4. Ban on Forced Labour and Disciplinary Action

All forms of forced labor are prohibited. All forms of mental and physical coercion, verbal abuse and corporal punishment are prohibited. Indentured servitude, trafficked labor or the forced labor of individuals against their will or subject to coercion or under threat of any kind is prohibited.

5. Working Conditions and Remuneration

Business Partners are expected to comply with minimum compensation requirements including regular and overtime pay, as determined by applicable local legislation. In addition, working hours must conform to applicable local legislation. Working conditions must conform to minimum legal standards to ensure a safe and healthy working environment. Subcontractors within the Business Partner's supply chain are also expected to provide a safe and healthy working environment for its workers.

6. Ban on Discrimination

Discrimination against an employee on grounds of gender or sexual identity, age, religion or ideology, race, ethnic or national origin, social background or disability and/or any similar kind of discrimination is prohibited.

7. Freedom of Organization and Assembly

The right of employees to engage in collective action including collective bargaining and unionizing should not be restricted. Except where permitted by law, employees should not be penalized for engaging in these activities.

8. Health & Safety in the Workplace

Health and safety in the workplace must be respected. Contravening fundamental human rights in terms of working conditions, equipment and facilities in the workplace is prohibited. Adolescents in particular should not be subjected to dangerous, unsafe or unsanitary conditions that may put their health or development at risk. Employees should be given adequate, regular training on health and safety in the workplace.

A management executive must be appointed as the overall responsible person for regulating health and safety of employees and for implementing and maintaining health and safety standards in the workplace.

9. Environmental Protection

Business Partners are expected to take into consideration the environmental impact of their business operations and to notify the applicable regulatory authority in the event of an adverse environmental incident.

10. Operational Implementation

To help ensure compliance with this Code of Conduct, assist with the implementation, monitoring and support of the requirements described above, Business Partners should establish policies, procedures and codes of conduct related to each of these standards. In addition, Business Partners should have a reporting mechanism where employees can report breaches of these standards without retaliation for doing so.