



CONFLICT MINERALS COMPLIANCE POLICY

ORBCOMM Inc., and its affiliates share the concerns of the international community about the conflict in the Democratic Republic of the Congo (DRC) and adjoining countries, and will, through this policy, work to ensure that our in-scope products do not contribute on any level to human rights violations. We will support the actions taken by governments and organizations to increase supply chain transparency in furtherance of the shared goal of ending conflict in the DRC and surrounding region.

ORBCOMM does not directly purchase raw material used in the manufacturing process of our products; however, we are working with suppliers of our in-scope products to trace the source of any Conflict Minerals in those products to the smelter or mine origin. ORBCOMM will exercise due diligence with relevant suppliers consistent with the Organisation of Economic Cooperation and Development (OECD) Due Diligence Guidelines for Responsible Supplier Supply Chains of Minerals from Conflict-Affected and High Risk Areas and encourage our suppliers to do likewise with their suppliers. ORBCOMM will continue to use the Electronic Industry Citizenship Coalition – Global e-Sustainability Initiative (“EICC-GeSI”) Reporting Template to ask our suppliers about the presence of Conflict Minerals in their products and, as applicable, the origin of any such Conflict Minerals.

While the effort is ongoing, it is our intention to do what we can to ensure that the products and components in our supply chain do not contain metals which have contributed to the conflict in the DRC Region and work with our suppliers to seek sustainable.

ORBCOMM is committed to the sourcing of materials from suppliers that share our concern about human rights violations in the DRC Region and we will continue our work with our suppliers to ensure continued efforts to drive towards complete conflict free sourcing.