



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.

BACKGROUND:

SEC rules related to the use of Conflict Minerals, defined as tin, tantalum, tungsten and gold, in the manufacturing process were issued in 2012 as part of U.S. legislation known as the Dodd-Frank Act. The rules require publicly-traded companies to report annually to the Securities and Exchange Commission (SEC) on their use of Conflict Minerals originating from the Democratic Republic of the Congo or an adjoining country (DRC Region). The goal of the SEC rule is to help end civil conflict and human rights abuses in the DRC Region committed by armed rebel groups by denying revenue to those groups that derive their funding from control of Conflict Mineral producing mines.

ORBCOMM'S POLICY:

ORBCOMM will comply with the SEC rule's requirements and expects our suppliers to do the same. 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 Office 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 to comply with the rules set forth by the SEC relating to Conflict Minerals.

ORBCOMM'S EXPECTATIONS OF ITS SUPPLIER'S

- ❖ Require our supplier's to work through each of their supply levels to ensure compliance with Section 1502 of the Dodd-Frank Act;
- ❖ Adopt a Conflict Minerals due diligence program that meets or exceeds the reasonable country of origin inquiry;



❖ Cooperate fully with requests for information, documentation and/or certification to allow ORBCOMM to fully comply with any customer requirements relating to the use of conflict minerals;

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.