NOVATEL WIRELESS

Novatel Wireless's Supply Chain Social and Environmental Responsibility

Novatel Wireless's commitment to Global Citizen extends to our supply base partners. We expect that Novatel Wireless supply partners conduct their operations in a socially and environmental responsible manner. At Novatel Wireless we expect our supply partners to comply with the following principles:

Legal and Regulatory Compliance: Suppliers are to ensure that their operations that produce products on behalf of Novatel Wireless comply with all national laws and international regulations in these areas.

Social Responsibility: Novatel Wireless has reviewed the Electronic Industry Code of Conduct[3] (EICC version 4.0) and is in full support of this global initiative. The EICC outlines best practices for global companies supporting the electronics industry. Novatel Wireless Inc. has created a Supplier Code of Conduct (EMS1020) requirements document and expects our Supply base to conform to this requirement.

Environmental Compliance: Supply partners are to understand and reduce the environmental impact of their operations in which Novatel Wireless products are produced. This will include programs that promote efficient use of energy and other resources, minimize the use of hazardous materials, promote reuse and recycling and reduce emissions to air, soil and water. Suppliers are encouraged to align with Novatel Wireless Environmental Policy (EMS-1003)

Conflict Minerals; Supply partners are expected to ensure that parts and products supplied to Novatel Wireless are DRC conflict-free (do not contain metals derived from "conflict minerals[2]"; Suppliers) and are to established policies, due diligence framework and management system to ensure that parts and or component are free of conflict minerals in accordance with the guidelines of the Global e-Sustainability Initiative written by (GeSI)[1] and the Electronic Industry Citizen Coalition (EICC)[2].

Management Systems: Suppliers are to maintain effective management systems that integrate environmental, occupational health and safety, human rights and labor policies, and ethics into their business and decision-making processes. This includes establishing appropriate objectives and targets, regularly measuring and assessing performance, and practicing continual improvement. Management system should be developed based on the ISO14001 standard.

[1]Global e-Sustainability Initiative (GeSi) - Conflict-Free Smelter program

[2] Electronic Industry Citizen Coalision (EICC) ‾ Mineral Extraction

[3] Electronic Industry Citizen Coalision (EICC) - EICC Code of Conduct