

## **CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010 (SB657)**

Novatel Wireless is dedicated to conducting business consistent with the highest standards of business ethics. We have an obligation to our employees, our stockholders, our customers and suppliers, business partners and community to be honest, fair and forthright in all our business activities. Novatel Wireless is committed to aligning our operations and strategies with the ten universally accepted principles of the UN Global Compact in the areas of human rights, labor, environment and anti-corruption.

### **VERIFICATION**

Novatel Wireless uses internal resources to engage in verification of its supply chain to evaluate and address the risks of human trafficking and slavery. At this time verification is not conducted by a third party.

### **AUDIT**

At Novatel Wireless, we conduct business with suppliers who demonstrate a strong commitment to the Novatel Wireless corporate citizenship principles. We partner with suppliers who ensure their working conditions are safe, and their workers are treated with respect and dignity. Novatel Wireless conducts onsite audits of supplier facilities that produce products for Novatel Wireless to evaluate supplier compliance with our company standards for trafficking and slavery in our supply chain. Onsite audits may include a review of relevant supplier records, policies and work practices, as well as an inspection of the facilities. At the present time we accomplish this verification using internal (not independent) resources and during a scheduled audit. In the case of non-conformance, Novatel Wireless expects that suppliers will take all reasonable measures to address the issues raised in a diligent manner.

### **CERTIFICATION**

The Novatel Wireless Supplier Code of Conduct states that in all their activities, suppliers must conduct business in full compliance with the laws, rules and regulations of the countries in which they operate in, including laws against slavery or human trafficking. Suppliers are encouraged to go beyond legal compliance, drawing upon internationally recognized standards. When the country's laws and international standards address the same issues, we expect that the highest standards be applied. Suppliers must have a Corporate Social Responsibility Management System (CSR) in place that complies with the spirit of the EICC (Electronic Industry Citizenship Coalition). Supplier certifications relating to the laws regarding slavery and human trafficking of the country or countries in which they are doing business have not previously been obtained. However, in early 2016 we will be requiring our existing and new direct suppliers to provide such certification.

### **INTERNAL ACCOUNTABILITY**

Novatel Wireless requires all employees and contractors to sign and abide by the standards and principles set forth in the Novatel Wireless Code of Business Conduct and Ethics. To facilitate compliance with this Code, we have implemented a program of awareness, training and review with respect to this Code. We have established the position of Compliance Officer to oversee this program. The Compliance Officer is Novatel Wireless's Chief Financial Officer. This person is responsible for overseeing the compliance program and is the person to whom employees can address any questions or concerns. All concerns will be taken seriously by Novatel Wireless and, when appropriate, the Compliance Officer will fully investigate each allegation. Employees are expected to cooperate fully with internal investigations of wrongdoing or misconduct, and failure to cooperate fully with any such investigations will lead to disciplinary action, up to and including termination of employment. Novatel Wireless will not tolerate any retaliation against any employee for raising, in good faith, a possible violation of this Code or of a law, rule or regulation.

### **TRAINING**

Novatel Wireless provides annual interactive training on identifying and mitigating supply chain risks, including human trafficking and forced labor, to its managers and employees who have direct responsibility for supply chain management.