

CODE OF CONDUCT

Purpose

For the purpose of protecting Human Rights, promoting fair employment conditions, safe working conditions, responsible management of environmental issues and high ethical standards, the **CODE OF CONDUCT** shall be applied in the production, supply and support of NetComm Wireless products and services worldwide.

In addition to compliance with all relevant laws, regulations and standards in all of the countries in which they operate, all NetComm Wireless Group Entities and employees shall comply with the **CODE OF CONDUCT** even if it stipulates a higher standard than required by national laws or regulations.

NetComm Wireless requires suppliers and their subcontractors to comply with the **CODE OF CONDUCT** or similar standards and to verify compliance by providing information and allowing access to their premises.

NetComm Wireless supports the United Nations Global Compact initiative. In order to make this commitment clear to employees, suppliers, customers and other stakeholders, the **CODE OF CONDUCT** is based on the Global Compact's ten principles and shall be publicly available.

Code of Conduct *

Human Rights

- We support and respect the protection of internationally proclaimed human rights.
- We make sure that we are not complicit in human rights abuses.

Labor Standards

FREEDOM OF ASSOCIATION

- As far as any relevant laws allow, all employees are free to form and to join or not to join trade unions or similar external representative organizations and to bargain collectively.

FORCED LABOR

- Forced, bonded or compulsory labor is not used and employees are free to leave their employment after reasonable notice as required by national law or contract.
- Employees are not required to lodge deposits of money or identity papers with their employer.

EMPLOYMENT CONDITIONS

- Employees understand their employment conditions.
- Pay and terms are fair and reasonable, and comply at a minimum with national laws or industry standards whichever is higher.
- Working hours comply with national laws and are not excessive.

CHILD LABOR

- No person is employed who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 15 years (or not less than 14 years, in countries where educational facilities are insufficiently developed) as set out in Article 2.4 in the ILO Convention No.138 on Minimum Age.
- Children are not employed for any hazardous work, or work that is inconsistent with the child's personal development. A child means a person below the age of 18 years, as defined in Article 1 of the United Nations Convention on the Rights of the Child. Personal development includes a child's health or physical, mental, spiritual, moral or social development as described in the Article 32 of the United Nations Convention on the Rights of the Child.
- Where a child is employed, the best interests of the child shall be the primary consideration. Policies and programs that assist any child found to be performing child labor are contributed to, supported, or developed.

ELIMINATION OF DISCRIMINATION

- Employees are treated with respect and dignity. Corporal punishment, physical or verbal abuse or other unlawful harassment and any threats or other forms of intimidation are prohibited.
- All kinds of discrimination based on partiality or prejudice is prohibited such as discrimination based on race, color, sex, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership and any other characteristic protected by local law, as applicable.
- Employees with the same qualifications, experience and performance receive equal pay for equal work with respect to their relevant comparators.

WORKING CONDITIONS

- A healthy and safe working environment is provided for employees in accordance with international standards and national laws.
- Appropriate health and safety information and training is provided to employees. Safety includes e.g. clearly marked and unblocked exits, emergency exits and evacuation plans on each floor, regularly tested fire alarm and evacuation drills, first aid equipment, safe and correct handling, marking and labeling of chemicals, machinery and work processes.
- The workplace has tolerable temperature and noise level, adequate ventilation, sufficient lighting, clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.

Environment

- Finite resources are used responsibly and carefully.
- Operational practices that reduce any environmental burden associated with our activities are promoted.
- Innovative developments in products and services that offer environmental and social benefits are supported.

Anti-Corruption

- No form of extortion and bribery, including improper offers for payments to or from employees, or organizations, is tolerated.

* The NetComm Wireless **CODE OF CONDUCT** is based on the United Nations Global Compact's ten principles derived from:

The Universal Declaration of Human Rights, The International Labor Organization's Declaration of Fundamental Principles and Rights at Work, The Rio Declaration on Environment and Development and The United Nations Convention Against Corruption.

<http://www.unglobalcompact.org/>

Code of Conduct – Supplier Supplement

The **CODE OF CONDUCT** is applicable to all NetComm Wireless operations and to any party that contributes to NetComm Wireless products, services and other business activities ("Supplier").

Compliance

NetComm Wireless requires the Supplier and its subcontractors to comply with the **CODE OF CONDUCT**, which may request higher standards than required by national laws.

Upon request, a Supplier must, by way of providing information and/or allowing access to premises to NetComm Wireless or its representative, verify to NetComm Wireless' reasonable satisfaction, that the Supplier and its subcontractors comply with the **CODE OF CONDUCT**.

Obligation to inform

It is the responsibility of the Supplier to ensure that its employees and subcontractors are informed about and comply with the **CODE OF CONDUCT**.