

Conflict Minerals Policy

1.0 Purpose and Scope

Sierra Wireless is committed to conducting business in accordance with the highest standards of business conduct and integrity. We promote this commitment in our everyday business practices and in our [Code of Business Conduct](#). As part of this commitment, Sierra Wireless is committed to sourcing materials and components from environmentally and socially responsible suppliers.

In common with many other entities in the electronics industry, Sierra Wireless produces products that rely on components that include certain minerals such as tantalum, tin, tungsten, and gold (“3TGs”). The US Congress has designated these as “conflict minerals” and, under the provisions of Section 1502 of the [Dodd-Frank Wall Street Reform and Consumer Protection Act](#) (“Dodd-Frank”), US listed companies, including Sierra Wireless, are required to report on the use of conflict minerals in their supply chains. US listed companies must disclose if they use conflict minerals that originate in the Democratic Republic of Congo (DRC) or countries adjoining the DRC (collectively, “DRC region”). We are also guided by [Regulation \(EU\) 2017/821 of the European Parliament](#) to recognize that conflict minerals may also originate, more generally, from Conflict-Affected and High-Risk Areas (“CAHRAs”).

It is our policy that we do not knowingly purchase materials, components or supplies which contain conflict minerals that originate from CAHRAs – including those that directly or indirectly finance, or benefit armed groups in the DRC region – and that are not certified as conflict-free by an independent third-party. We expect our suppliers to adhere to the same standard and to have programs and processes in place to ensure conflict-free supply chains. Further, we expect our suppliers to comply with the Responsible Business Alliance (“RBA”) [Code of Conduct](#) and to have policies and due diligence measures in place that are designed to provide reasonable assurance that products and components supplied to us originate from facilities whose sources of conflict minerals are conflict-free.



We contact our relevant suppliers on an annual basis to gather data to ascertain the extent to which the 3TGs in our products are conflict-free. The primary data gathering tool is the Responsible Mineral Initiative's Conflict Minerals Reporting Template ("CMRT") as amended from time to time. This process is intended to satisfy the Securities Exchange Commission requirement to conduct a Reasonable Country of Origin Inquiry.

Where necessary, Sierra Wireless will exercise due diligence that is consistent with the Organization for Economic Cooperation and Development's [Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas \(Third Edition\)](#), and the related supplements ("OECD Guidance") to establish within reason that materials, components or supplies purchased do not contain conflict minerals originating from CAHRAs, or if the materials originate within CAHRAs, that the mines or smelters involved have been certified as conflict free by an independent third party.

While it is our policy to use only materials that are conflict free in our products, we nevertheless recognize that our suppliers may not have immediate knowledge of their supply chains that is deep enough to fully understand the origin of the minerals that are used in their products. Because mining and smelting activities are multiple steps removed from the manufacture of market-ready products, we recognize that for some suppliers it will take some time to fully comply with our requirements. As part of the implementation of this policy, we are committed to providing regular updates on our progress to relevant stakeholders, including our customers and the public through our website. Current information on our conflict minerals program and reporting is available on [our website](#).

The Supply Chain, Customer Engagement, Corporate Quality and Corporate Sustainability teams drive the Sierra Wireless conflict minerals program under the leadership of the Chief Financial Officer. The program will be subject to review by the Board of Directors on a regular basis to ensure that the program meets the external disclosure and regulatory filing requirements of the Company.



2.0 Related Policies and Forms

1. [Sierra Wireless Code of Business Conduct](#)
2. [RBA Code of Conduct](#)
3. [Dodd- Frank Wall Street Reform and Consumer Protection Act](#)
4. [Regulation \(EU\) 2017/821 of the European Parliament](#)
5. [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas \(Third Edition\)](#)