

Modern Slavery Act Statement

This statement is made pursuant to s.54 of the UK Modern Slavery Act 2015 and sets out the steps that Sierra Wireless has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. Sierra Wireless has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Sierra Wireless is an IoT pioneer, empowering businesses and industries to transform and thrive in the connected economy. Since our business began in 1993 with our first cellular embedded module, we have delivered a comprehensive portfolio of wireless devices, including 2G, 3G, and 4G embedded modules, routers and gateways which are seamlessly integrated with our secure cloud and connectivity services.

Our high-risk areas

Risks and uncertainties are detailed in our annual report available here: <https://www.sierrawireless.com/company/investor-information/annual-reports-and-regulatory-filings/>.

Our biggest exposure to Modern Slavery risks is in our product supply chains which are mitigated by due diligence actions taken with respect to our suppliers (section “Our suppliers”).

Our policies

We have internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Code of business conduct. This code explains certain rules and principles of ethical behaviour that support our commitment to the highest levels of customer service and a working environment based on mutual trust and respect and applies to all employees. Sierra Wireless has established mechanisms to receive reports of suspected or potential violations of our Code of Business Conduct or the RBA Code of Conduct. Reports may be received by Sierra Wireless directly via businessconduct@sierrawireless.com or the Business Conduct Helpline, which offers toll-free telephone and web access through sierrawireless.ethicspoint.com.
2. HR Recruitment and Selection Process. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Supplier handbook. The purpose of the Supplier Handbook is to assist our suppliers in understanding Sierra Wireless' business environment, policies, objectives, values, and expectations which drive our Sourcing, Purchasing, and Supplier Quality organizations.

Our suppliers

Sierra Wireless' adherence to ethical working practices is demonstrated by its participation in the Responsible Business Alliance (RBA). We expect any suppliers with which we do business to adhere to the same social, environmental, labour, health and safety and ethical standards that we apply to our business activities and to have in place programs and processes to ensure that our supply chain is free of any form of forced or child labour. Further, we contractually require our first-tier suppliers and primary contract manufacturers that are not already RBA members to acknowledge compliance with the RBA Code of Conduct which includes specific requirements about Freely Chosen Employment, Wages and Benefits among others. We require our other suppliers that they confirm to us that they perform their business activities in accordance with the laws in force in the countries in which they operate and the standards set out in either the RBA Code of Conduct or Supplier's own ethical standards and procedures, the contents of which are materially similar to those provided for in the RBA Code of Conduct. Upon written request Supplier will complete and share with Sierra Wireless a RBA Self-Assessment Questionnaire (SAQ) which will highlight any issues in Supplier's Labor risk and control elements or Labor management system. The assessment of more than 80% of our purchase spending is done using the RBA SAQ. We have implemented our own audit program, using trained auditors to monitor compliance with the RBA Code of Conduct. Suppliers are fully aware that any violation of the laws or of the standards outlined in the RBA Code of Conduct shall give



Sierra Wireless the right to terminate with immediate effect all business relationships with the Supplier. Sierra Wireless teams are based at the main assembly subcontractors.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the company on November 8, 2018.

Roy MacLean
Vice President