

## 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. 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. In particular, 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”).

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

On an annual basis we will contact our relevant suppliers to gather data that confirms that the tantalum, tin, tungsten and gold in our products are DRC conflict free. The primary data gathering tool will be 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 *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)*,<sup>1</sup> and the related supplements, published by the Organization for Economic Cooperation and Development (“OECD Guidance”) to establish within reason that materials, components or supplies purchased do not contain conflict minerals originating from the conflict region or, if the materials originate within the conflict region, 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 at:

[www.sierrawireless.com/company/corporate-social-responsibility/](http://www.sierrawireless.com/company/corporate-social-responsibility/)

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

### **3.0 Definitions**

Conflict Minerals Report – an annual report that identifies the use of 3TGs in products that were manufactured or contracted for manufacture.

3TGs – Tungsten, Tantalum, Tin and Gold

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<sup>1</sup> OECD (2016), *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition*, OECD Publishing, Paris, <https://doi.org/10.1787/9789264252479-en>.



## 4.0 Related Policies and Forms

1. Sierra Wireless Code of Business Conduct
2. RBA Code of Conduct

## 5.0 Frequency and Revision History

This policy will be reviewed every year unless otherwise required.

Revision #	Date Released	Purpose of Revision and Summary of Changes
1.0	Oct 2017	Initial Release
2.0	May 2021	Updated reference to <i>Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)</i> , to current edition (third)