



Global Violence & Harassment Policy

Purpose

ORBCOMM is committed to providing a work environment free from all forms of violence, discrimination and harassment. In pursuit of this goal, ORBCOMM does not condone and will not tolerate acts of violence, harassment or discrimination against or by any employee.

Scope

This policy applies to all ORBCOMM employees, including full-time, part-time, temporary, contract, volunteers, co-op students, interns and apprentices.

This policy applies to all aspects of ORBCOMM's internal and external practices and each ORBCOMM subsidiary and wholly owned affiliate. Sources of workplace harassment may include customers, clients, management, workers and members of the public where such harassment occurs in the workplace.

For the purpose of this policy, harassment, violence and discrimination can occur at any place where you are representing ORBCOMM or any personal outings with other ORBCOMM employees.

Definitions

Discrimination: Workplace discrimination means unequal treatment based on a protected ground or class and is prohibited by this policy.

Workplace violence or bullying: Workplace violence or bullying is the exercise or threat of physical force against a worker. Examples of such behavior include, but are not limited to:

- Physical acts to persons or property;
- Any verbal or non-verbal threat, behavior or action, which can be reasonably interpreted to result in a physical act to persons or property; or
- Disruptive behavior that is not reasonably appropriate to the work environment in which it occurs.

Harassment/Sexual Harassment: Harassment/Sexual Harassment means a course of conduct that is known or ought reasonably to be known to be unwelcome and is prohibited by this policy. It can involve words or any unsolicited, unwelcome, disrespectful, or offensive behavior and can be typified as:

- Behavior that is hostile in nature, or intends to degrade an individual or group (whether or not the person or group is the subject of the behavior) based on personal attributes including; age,

race, color, national origin, disability, family status, religion, gender, sexual orientation, gender identity or expression, military service or affiliation, bankruptcy, genetic information, record of offence or any other protected ground under applicable local legislation;

- Unwelcome or insulting gestures, remarks, jokes, innuendos, propositions or taunting based on a protected ground under applicable human rights legislation;
- Refusing to speak to or with someone or treating someone differently because of a protected ground under applicable local legislation;
- Sexual solicitation or advance made by a person to another person, where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome;
- Sexual solicitation or advance made by a person in a position to confer, grant, or deny a benefit or advancement, either directly or indirectly, by nature of their position (such as by a manager to any junior employee), to the person are prohibited, and are deemed a violation of this policy;
- Physical contact such as touching, patting, or pinching, with an underlying sexual connotation;
- Sexual assault;
- Any actions that reasonably creates a hostile, intimidating or offensive workplace.

Reporting Violation of Our Policy

If you are either directly affected by or witness to any violation of this policy, it is imperative for the safety of all employees that the incident be promptly reported.

ORBCOMM may:

- Investigate all reported acts and incidents of violence, and as necessary, consult with other parties (e.g., legal counsel, health & safety consultants, employee assistance provider, local police services);
- Take any/all reasonable measures to eliminate or mitigate risks identified by the incident;
- Document the incident, its investigation and corrective action taken;
- Review annually this policy in conjunction with the review of the hazard assessment, the effectiveness of actions taken to minimize or eliminate workplace violence and make improvements to procedure, as required.

Process for Reporting Violations of our Policy

Any employee who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to report it by doing one or more of the following:

- Contact Human Resources to discuss and/or report the incident.
- Discuss the situation with the harasser's manager, your manager or any member of the management team.
- If you feel comfortable, address the harasser personally or in writing pointing out the unwelcome behavior and requesting that it stop.

Any employee who believes they have been discriminated against or harassed can and should in all confidence and without fear of reprisal or retaliation by management, discuss and report to HR and/or management.

ORBCOMM will respond to all complaints or incidents of workplace harassment in a fair and timely manner. Harassment should not be ignored, as silence can and often is interpreted as acceptance, as well as the goal of the harassment. Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they lodged a complaint when they believed they were the victim of a violation of this policy.

ORBCOMM will take reasonable measures to ensure that all information obtained during the course of an investigation will not be disclosed, unless the disclosure is necessary for the purposes of investigating or taking corrective action, or as otherwise required by law.

While an investigation is ongoing, all parties involved are reminded of the importance of maintaining confidentiality. Employees are expected to refrain from discussing the complaint, incident or the investigation with other employees or witnesses unless necessary to obtain advice about their rights.

An investigation may include;

- Informing the respondent of the complaint;
- Interviewing the complainant, any person involved in the incident and any identified witnesses;
- Statements from all parties involved will be taken and documented;
- If applicable and/or when necessary ORBCOMM may employ outside assistance or request the use of legal counsel; and
- Upon completion of the investigation, ORBCOMM, will inform both the complainant and respondent of the findings of the investigation.

ORBCOMM will inform both the complainant and respondent in writing, where applicable, of the findings of the investigation and any corrective action that has been or will be taken as a result of the investigation. ORBCOMM will keep records of all complaints or incidents of workplace harassment for at least one year from the conclusion of the investigation.

If the complainant decides not to make a formal complaint, it may be decided that a formal complaint is required (based on the investigation of the incident) and will file such documents with the respondent.

Fraudulent or Malicious Complaints

This policy must never be used to bring fraudulent or malicious complaints. It is very important to realize that unfounded or frivolous allegations of violations of this policy may cause both the accused person and ORBCOMM significant damage. If it is determined by ORBCOMM that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action, including up to termination, will be taken.

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Policies, practices and procedures may be added, amended or deleted by ORBCOMM, in its sole discretion, as it considers appropriate based on operational needs or in accordance with applicable laws. Significant updates to policies, practices and procedures will be communicated to employees. Employees bear the responsibility of reading, understanding and abiding by updated policies, procedures and practices. All ORBCOMM policies are subject to minimum legislation/statutory requirements as applicable.