

ORBCOMM Inc.

Standards of Business Conduct

(Designed to comply with Item 406 of Regulation S-K)

Revised Effective September 1, 2019

ORBCOMM[®]

TABLE OF CONTENTS

	<u>Page</u>
Policy Statement	1
Waivers	2
Business Relationships.....	2
Doing Business Internationally.....	3
Conflict of Interest Policy.....	4
Government Contracting.....	5
Accuracy of Business Records.....	5
Public Communications and Disclosures.....	6
Securities Trading and Insider Information	6
Company Asset Protection.....	6
Personal Use of Company Property	7
Gifts, Business Courtesies and Gratuities.....	7
Government Investigations	8
Compliance and Reporting	8
Policy Prohibiting Unlawful Retaliation or Discrimination	10
Employee Hotline	10

CEO's Message

Standards of Business Conduct

Dear ORBCOMM Team Member:

ORBCOMM has a strong commitment to conducting our business affairs in accordance with the highest standards of integrity and ethical behavior. Honesty, fairness, respect, and integrity are guiding principles in all of our business. While establishing these principles because it makes good business sense, ORBCOMM is also subject to federal laws, SEC rules and regulations, and Nasdaq listing requirements regarding governance disclosure and non-retaliation. As such, please review these materials and reference them as needed during your course of business.

Our ability to achieve the goals we have set for ourselves depends on each and every one of us, including all senior level executives and financial officers, being committed to these values — and practicing them in every action we take. Moreover, these values apply wherever we do business around the world, in conjunction with local laws and regulations.

If an issue arises that you cannot answer, or if you know of or believe there might be violations of the company's policies, talk to your manager or our General Counsel, Christian Le Brun. If you prefer, you may also contact ORBCOMM's Employee Hotline via telephone at (844) 884-0119, or the Internet (<http://orbcomm.ethicspoint.com/>). International local numbers for the hotline are located on the ethicspoint website. All calls and internet submissions may be done anonymously.

ORBCOMM's reputation for integrity depends on every one of us continuing to make and keep our commitments to business conduct standards in all we do. As such, please be diligent in reporting any fraud, misconduct, or abuse that you may encounter. It is up to each and every one of us to maintain the company's standing in upholding the highest standards of conduct and ethics in all its business and professional dealings. Let's keep up the good work.

Sincerely,

Marc Eisenberg

Chief Executive Officer

Policy Statement

It is the policy of ORBCOMM Inc. (including its affiliates and subsidiary entities, the “Company”) to conduct its affairs in accordance with applicable laws, rules and regulations of the countries in which it does business. These Standards of Business Conduct (“Standards”) apply to the Company’s employees, officers and non-employee directors, including the Company’s chief executive officer, chief financial officer, principal accounting officer or controller, and persons performing similar functions (“Designated Executives”). These Standards are the Company’s “code of ethics” as defined in Item 406 of Regulation S-K. These Standards are designed to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely and understandable disclosure in the reports and documents the Company files with, or submits to, the Securities and Exchange Commission (the “Commission”) and in other public communications made by the Company;
- compliance with applicable governmental laws, rules and regulations;
- the prompt internal reporting to the appropriate person of violations of these Standards; and
- accountability for adherence to these Standards.

The Company has established standards for behavior that affects the Company, and employees, officers and directors should comply with those standards. The Company promotes ethical behavior and encourages employees to talk to supervisors or managers or to call the General Counsel when in doubt about the best course of action in a particular situation. Non-employee directors are encouraged to talk to the Chairman of the Board in such situations. Anyone aware of a situation that he or she believes may violate or lead to a violation of these Standards should follow the guidelines under “**Compliance and Reporting**” below.

Our Standards cover a wide range of business practices and procedures. They do not cover every issue that may arise, but they set out basic principles to guide you. Additional Company policies not found in this document as well as the Question and Answer section of this document are not part of these Standards or incorporated herein. Although there can be no better course of action than to apply common sense and sound judgment, do not hesitate to use the resources available whenever it is necessary to seek clarification.

Waivers

When provisions of these Standards require you to act, or refrain from acting, in a particular manner, and you believe that the Company's interests require you to act in a different manner, you should request a waiver of these Standards from the General Counsel. Waiver of those provisions relating to Designated Executives and directors may only be granted by the Company's Board of Directors, or a committee thereof, and must be promptly disclosed to shareholders. All other waivers may be granted by the General Counsel, or his designee. Changes in these Standards may only be made by the Board of Directors and must be promptly disclosed to shareholders.

Business Relationships

The Company seeks to outperform its competition fairly and honestly. The Company seeks competitive advantages through superior performance, not unethical or illegal business practices. Each employee should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees and should not take advantage of them through abuse of dominant position, abuse of privileged information, or misrepresentation of material facts.

The use of Company funds, facilities or property for any illegal or unethical purpose is strictly prohibited; provided, that certain facilitating payments discussed under "**Doing Business Internationally**" are permitted.

- You are not permitted to offer, give or cause others to give, any payments or anything of value for the purpose of influencing the recipient's business judgment or conduct in dealing with the Company other than facilitating payments (as defined below).
- You may not solicit or accept a kickback or bribe, in any form, for any reason.

Fair competition laws, including the U.S. antitrust rules, limit what the Company can do with another company and what the Company can do on its own. Generally, the laws are designed to prohibit agreements or actions that reduce competition and harm consumers. You may not enter into agreements or discussions with competitors that have the effect of fixing or controlling prices, dividing and allocating markets or territories, or boycotting suppliers or customers. U.S. and foreign antitrust laws also apply to imports and exports.

Executive officers and directors may not receive loans from the Company, nor may the Company arrange for any loan to any of them.

Doing Business Internationally

The Company is committed to the highest business conduct standards wherever it operates. The Company observes these standards worldwide, even at the risk of losing business. While no one can anticipate all the situations that may present challenges to the Company employees doing business in the worldwide marketplace, the following guidelines always apply:

- Observe laws and regulations, both U.S. and non-U.S., that are applicable to the Company's business abroad;
- Paying bribes to government officials is absolutely prohibited, even if those bribes are common practice, except for facilitating payments. You may not give, promise to give or authorize the giving to a foreign official, a foreign political party, or official thereof or any candidate for foreign political office any money or offer, give, promise to give or authorize the giving of anything of value to influence any act or decision, to induce such official, party or candidate to do or omit to do any act in violation of the lawful duty of such official, party or candidate, or to induce such official, party or candidate to use his or her influence with a foreign government or agency to affect or influence any act or decision of such foreign government or agency;
- Do not cooperate with illegal boycotts;
- Observe all applicable governmental licensing requirements and the requirements of applicable import and export control laws; and
- Do not enter into an agreement with an agent or consultant that relates to the Company's business outside the United States unless it has been approved by the Company's legal department.

In some countries, a very limited category of small payments to facilitate or expedite routine nondiscretionary governmental actions may be permitted as exceptions to antibribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"). The requirements pertaining to such payments are complex. The Company's employees engaged in international business activities must obtain prior approval of the General Counsel before making any such payment. These "facilitating payments" to non-U.S. governmental officials are distinguished from payments made to influence a discretionary decision or to cause violation of, or an act in conflict with, the interests of an individual's employer, which are strictly prohibited.

Conflict of Interest Policy

A conflict of interest arises when your personal interests, for example, your interests in a business other than the Company, interfere with your ability to act in the best interests of the Company. Employees must discharge their responsibilities on the basis of what is in the best interest of the Company independent of personal consideration or relationships. Non-employee directors must discharge their fiduciary duties as directors of the Company.

The Company recognizes and respects that you may take part in legitimate financial, business and other activities outside your positions with the Company. Employees must insure that these activities are lawful and free of conflicts with their responsibilities as employees of the Company.

It is the policy of the Company that no employee, nor any member of the employee's immediate family, shall have any direct or indirect material interest in, render any material service to, or represent in any material way, any outside concern that competes with the Company's business, unless the interest, service, or representation is disclosed and approved as provided in this policy. In addition, it is the policy of the Company that no corporate officer shall employ the company's outside auditing firm for personal tax or business matters.

The Company must have complete information regarding actual or potential conflicts of interest at all times. Accordingly, the Company requires that each employee disclose as set forth below any interest in, service to, or representation of any concern in which an employee or an employee's immediate family member is or may be involved that (i) creates an actual or potential conflict of interest whereby the employee or immediate family member personally benefits, or, (ii) has the appearance of adversely affecting the employee's judgment or actions in performing his or her duties for the Company. Non-employee directors may discuss concerns with the General Counsel.

For purposes of this policy, immediate family member is defined as spouse, child, parent, brother or sister of the employee.

Please note that this conflict of interest policy excludes federal credit unions, publicly owned insurance companies, and corporations other than the Company whose stock is listed on a national stock exchange or participation by employees or directors in otherwise generally held by the public, provided stock ownership or beneficial interest of such corporation by the employee or director or immediate family member of either is not more than **two percent (2%)** of the total stock outstanding.

New employees are required to complete a Standards of Business Conduct Statement when hired. Employees who later become aware of potential conflicts of interest must disclose them to the Company immediately. This disclosure may be done by contacting the General Counsel or the Employee Hotline.

Government Contracting

Detailed laws and regulations govern virtually every aspect of doing business with the U.S. government, its agencies, and its prime contractors. Activities that might be permitted when working with the private sector may be improper or even illegal when a national or local government or one of its prime contractors is the customer.

The Company employees should seek to adhere to the highest standards of honesty and integrity in their relations with government officials and employees. For example, employees should observe the following principles when bidding or performing government contracts as either a prime or subcontractor:

- Do not offer or provide meals, transportation, gifts or other consideration to government employees except as permitted under applicable law and Company policy.
- Obey the regulations governing current and post-government employee conflicts of interests. Obtain all appropriate government approvals prior to recruiting or hiring current or former government employees.
- Obtain appropriate licenses prior to exporting or even discussing certain technologies with citizens of other countries.
- Obey any requirements that may restrict access to source selection or competitive information.

Company employees who deal with government representatives or prime contractors are responsible for knowing and obeying the laws and regulations applicable to doing business with the U.S. government.

Accuracy of Business Records

You are responsible for the accuracy of your records, time sheets and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations and to compete effectively. The records and books of account of the Company must meet the highest standards and accurately reflect the true nature of the transactions they record. Destruction of any records, books of account or other documents except in accordance with the Company's document retention policy is strictly prohibited.

You must not create false or misleading documents or electronic records of accounting or financial matters for any purpose relating to the Company, and no one may direct an employee to do so. For example, expense reports must accurately document expenses actually incurred in accordance with the Company policies. You must not obtain or create “false” invoices or other misleading financial documentation or invent or use fictitious entities, sales, purchases, services, loans or other financial arrangements for any purpose relating to the Company. Employees are also responsible for accurately reporting time worked.

No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries may be made in the Company’s books for any reason. No disbursement of corporate funds or other corporate property may be made without adequate supporting documentation or for any purpose other than as described in the documents. All employees must comply with generally accepted accounting principles and the Company’s internal controls at all times.

Public Communications and Disclosures

The Company communicates with the press and with the financial community through official channels only. The Company provides accurate and timely information about its business to investors, the media and the general public.

Securities Trading and Insider Information

Securities laws and Company policy require that you do not trade in company stock and other securities based upon “inside information.” Please refer to the Company’s Policy on Insider Trading, which is not part of these Standards, and can be obtained from the General Counsel.

Company Asset Protection

You should protect the Company’s assets (both physical and intellectual property) and ensure their efficient use. Theft and carelessness have a direct impact on the Company’s profitability. All Company assets should be used for legitimate business purposes.

No Designated Executive or other employee may take for him or herself personal opportunities that are discovered through the use of corporate property, information or position without approval from the General Counsel or his designee. Without approval of the General Counsel or his designee, no Designated Executive or other employee may use corporate property, information or position for personal gain.

Personal Use of Company Property

All Company property, information systems, and telephones are intended primarily for use in connection with the Company's business. Minor personal use is permitted, with the understanding that:

- Use must not in any way interfere with or impede company business;
- Use must be minor;
- Use must be promptly discontinued at the request of the Company's management; and
- Use is expressly subject to all other applicable Company policies.

When in doubt, you should request approval from your manager to use Company property for personal use. The Company reserves the right to access, search, review, and copy all information in Company information systems, including information that the user may consider personal. The Company also reserves the right to turn over any information from Company information systems to law enforcement personnel.

Gifts, Business Courtesies and Gratuities

Use of Company funds or other Company property for illegal purposes is prohibited. The purpose of business entertainment and gifts in a commercial setting is to create goodwill and a sound working relationship, not to gain personal advantage with customers or suppliers.

Except as set out below, without approval by the General Counsel or his designee, employees should refrain from giving and receiving business-related gifts.

- No Designated Executive or other Company employee may solicit or accept a gift (including any payment, compensation, loan or other financial favor) to or from a person or organization with the intention of influencing the recipient's business judgment or conduct. Giving or accepting any unsolicited gifts having a value of not more than \$250 per employee per year per source is acceptable where there is a business benefit or purpose for the gift and any benefits received do not influence, or appear to influence, selection and purchasing decisions is permitted.
- It is never appropriate or permissible to accept or give cash or a cash equivalent from or to a vendor, supplier or customer outside the Company's

normal business. Cash equivalents include, among other things, checks, money orders and vouchers.

- Rules relating to U.S. and foreign government personnel are more stringent. See “***Doing Business Internationally.***”

In the event a valuable gift is received from a source other than a vendor (*e.g.*, a dignitary from another country), or under other circumstances where the return or charitable disposition may be interpreted as an insult based on local business custom, the gift should be accepted and acknowledged. In cases such as these where questions on compliance arise, the General Counsel must be informed.

Government Investigations

You must promptly notify the General Counsel of any government investigation or inquiries from government agencies concerning the Company. If you are aware of a government investigation or inquiry, you should not destroy any record, books of account, or other documents of the Company unless advised by the General Counsel or his designee, that you may continue to follow the Company’s normal document retention policy.

You must not obstruct the collection of Company information, data or records. The Company provides information to the government that it is entitled to during an inspection, investigation, or request for information. You must not lie to government investigators or make misleading statements in any investigation relating to the Company. You must not attempt to cause any employee to fail to provide accurate information to government investigators.

Compliance and Reporting

Questions regarding the policies in these Standards may be directed to the General Counsel. Managers and supervisors are also resources who can provide timely advice and guidance to employees on ethics and compliance concerns and are expected to promptly report any material concerns brought to their attention in their supervisory capacity to the General Counsel. Any employee having knowledge of, or questions or concerns about, an actual or possible violation of the provisions of these Standards is encouraged to promptly report the matter to his or her immediate supervisor or the General Counsel or the Employee Hotline. The contact information is set out below. Directors are encouraged to discuss any issues or concerns with the Chairman of the Board.

Employees may contact the Employee Hotline via telephone, the Internet or regular mail. While employees may wish to remain anonymous, anonymity cannot be assured in

certain circumstances. If employees wish to remain anonymous, they are urged to minimize the traceability of their correspondence by utilizing communications media such as the Employee Hotline. If possible, employees are encouraged to provide their names so that they may be contacted to obtain additional information or clarification, if needed, and for follow-up with the caller. To the extent possible, all communications are treated confidentially.

If you have concerns relating to the Company's accounting, internal controls or auditing matters, please refer to our Employee Complaint Policy for Accounting and Auditing Matters, which are not a part of these Standards. A copy may be obtained by contacting the General Counsel.

When submitting concerns, you are asked to provide as much detailed information as possible. Providing detailed, rather than general, information will assist us in effectively investigating complaints. This is particularly important when you submit a complaint on an anonymous basis, since we will be unable to contact you with requests for additional information or clarification.

We are providing these anonymous reporting procedures so that you may disclose genuine concerns without feeling threatened. Employees who choose to identify themselves when submitting a report may be contacted in order to gain additional information.

All conversations, calls, and reports made under this policy in good faith will be taken seriously. Any allegations that are knowingly false or without a reasonable belief in the truth and accuracy of such information will be viewed as a serious disciplinary offense.

Concerns relating to procedural or other matters such as understanding current Company practices, obtaining speech clearances, appropriate coding of time worked, security procedures, and general questions on how to comply with existing policies and procedures should be directed to your manager or the specific function or department. Questions or concerns relating to fair treatment, harassment, physical safety, and other employment matters should be directed to your manager.

Any employee who violates the provisions of these Standards will be subject to disciplinary action, up to and including termination. Willful disregard of criminal statutes underlying these Standards may require the Company to refer such violation for criminal prosecution or civil action.

Policy Prohibiting Unlawful Retaliation or Discrimination

Neither the Company nor any of its employees may discharge, demote, suspend, threaten or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee who in good faith:

- provides information or assists in an investigation relating regarding any conduct which the employee reasonably believes constitutes a violation of Fraud Laws (as defined below); or
- files, testifies participates or otherwise assists in a proceeding that is filed or about to be filed (with any knowledge of the Company) relating to an alleged violation of a Fraud Law.

This policy applies in any instance where such information or assistance provided to, or the investigation is conducted by, a federal regulatory or law enforcement agency, any member or committee of Congress, or any person with supervisory authority over the employee or the authority to investigate misconduct relating to potential securities violations by the Company or its employees. For purposes of this policy, a “Fraud Law” is a violation of federal criminal law involving:

- securities fraud, mail fraud, bank fraud or wire, radio or television fraud;
- violations of SEC rules or regulations; or
- violations of any federal law relating to fraud against shareholders.

Employee Hotline

Employees may report improper accounting matters directly to our General Counsel by phone, e-mail or letter. An employee who makes such a report may then be requested to document the report further.

Alternatively, any employee may raise those concerns anonymously by calling the Company's Employee Hotline at (844)-884-0119 or via the Internet (<http://orbcomm.ethicspoint.com/>). International local numbers for the hotline are located on the ethicspoint website . Employees may also raise their concerns anonymously by sending an anonymous letter to our General Counsel or to the Audit Committee at the address below.

If an employee has reason to believe that our General Counsel is involved in these matters, he or she should report those facts to the Audit Committee of the Board of Directors. The employee may do so by calling the Company's Employee Hotline or by

sending a letter to the Audit Committee of our Board of Directors addressed to ORBCOMM Employee Hotline, at the NJ headquarters address. No employee is obliged to give his or her name in any communication to the Audit Committee. Complaints submitted through this anonymous process will be presented to the Audit Committee at its next regularly-scheduled meeting, or earlier if appropriate.

When submitted a report, you are asked to provide as much detailed information as possible. Providing detailed information, rather than general comments, will greatly assist the Company in effectively investigating reports. This is particularly important where an employee submits a report anonymously because the Company will be unable to contact the reporting employee with requests for additional information or clarification.

This document is not an employment contract between the Company and its employees, nor does it modify their employment relationship with the Company.

These Standards are intended to clarify your existing obligation for proper conduct. The standards and the supporting policies and procedures may change from time to time in the Company's discretion. You are responsible for knowing and complying with the current laws, regulations, standards, policies and procedures that apply to the Company's work. The most current version of this document can be obtained from the General Counsel.