

**Globalstar**   
**CODE OF CONDUCT**

# **CODE OF CONDUCT**

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# GLOBALSTAR, INC. CODE OF CONDUCT

## *Introduction*

The purpose of this *Code of Conduct* (the “Code”) is to guide our day-to-day work and our interactions with each other as well as our customers, suppliers, competitors, partners, and members of the public. All directors, officers, and employees of Globalstar, Inc., and its worldwide affiliates (“Globalstar” or the “Company”) should become familiar with this Code and abide by its requirements. Among other things, the Code references key portions of Globalstar’s *Employee Handbook* (the “Employee Handbook”) which is distributed to all employees. If you have any questions or desire additional guidance, you are encouraged to consult with your immediate supervisor or with Globalstar’s Human Resources Department.

## *Statement of Policy*

It is Globalstar’s expectation and express policy that all our dealings with each other and our customers, suppliers, partners, competitors, U.S. and foreign government agencies, and members of the public will be conducted with the highest level of ethical behavior and in complete compliance with the spirit and the letter of applicable laws and regulations.

Improper activities, or even the appearance of impropriety, could result in serious consequences to Globalstar and the individuals involved in those activities. Consequently, adherence to this Code is a significant indicator of the judgment and competence of all Globalstar directors, officers, and employees, and will be taken into consideration when evaluating past performance, future assignments, and promotions. Insensitivity to, or disregard for, the principles set forth in this Code may be grounds for appropriate disciplinary action, including dismissal.

Globalstar’s objective is to excel as a responsible and reputable supplier of satellite communications services and equipment. **In pursuing this objective, no person, on behalf of Globalstar or while a Globalstar director, officer, or employee, shall knowingly engage in any conduct that violates any law or this Code or is otherwise inconsistent with the highest levels of honesty and integrity.** This Code applies to all Globalstar directors, officers, and employees.

Employees who work with any business partners acting for or on Globalstar’s behalf, such as its agents, consultants, distributors, and resellers, must inform such business partners of Globalstar’s compliance policies and ethical behavior standards. The environment in which Globalstar does business, particularly in light of its status as a public company, is governed by complex laws and regulations. This Code outlines key aspects of those laws and regulations as well as associated Globalstar policies. If at any time you are in doubt about whether a particular provision of the Code applies to your conduct, or about any aspect of your responsibilities to comply with this Code, you should contact your immediate supervisor or Globalstar’s Human Resources department, or use the other resources described below to address your concern(s).

## ***Violating the Code***

All known or reasonably suspected violations of this Code should be reported. Such reports can be made through the methods outlined in the “Reporting Concerns” section below. Any violation of this Code, Globalstar’s Employee Handbook, or applicable laws and regulations may constitute grounds for disciplinary action, including discharge for cause. Disciplinary action may be taken, consistent with applicable law, not only against those who authorized or participated directly in the violation, but also against:

- Any officer or employee who ignored or deliberately failed to timely report a violation as required by this Code;
- Any officer or employee who failed to cooperate in any Globalstar internal investigation or who ignored or deliberately withheld material and relevant information concerning a violation; or
- Any supervisor or manager to the extent that there was inadequate leadership, supervision, or diligence.

## ***Reporting Environment***

Globalstar is committed to maintaining an environment in which you may raise questions or report violations or possible violations of this Code and applicable government laws and regulations in good faith without fear of retaliation. If you report your own violation, you may still be subject to disciplinary action; however, your voluntary disclosure may be a mitigating factor if any disciplinary action is otherwise required.

## ***Cooperation***

All directors, officers and employees are expected to cooperate fully with any inquiry or investigation by the Company regarding an alleged violation of this Code, the Employee Handbook, other Company policies or applicable laws, rules and regulations. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, including discharge.

## ***Protection from Retaliation***

Globalstar prohibits retaliation against employees who report violations in good faith and/or cooperate in any investigation regarding improper conduct. Directors, officers, or employees shall not discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any person covered by this Code who, in good faith, reported a suspected violation and/or cooperated in any investigation regarding improper conduct.

If you believe that you have been subject to retaliation for reporting a violation or possible violation or cooperating in any investigation, you should immediately follow the reporting avenues set out below in the “Reporting Concerns” section below and a prompt investigation will be conducted.

## ***Responsibilities***

It is the responsibility of each Globalstar director, officer, and employee to read, understand, and comply with this Code and know what it takes to comply with the Code or any applicable laws, rules, or regulations relating to the performance of our job. Globalstar's Human Resources Department, in collaboration with the Legal Department, is responsible for developing training programs relevant to the performance of our job duties and complying with this Code. To obtain guidance on the interpretation or application of this Code or applicable laws, rules, and regulations, Globalstar employees may at any time contact any of the sources listed under the "Seeking Guidance and Reporting Concerns" section below.

## ***Avoidance of Conflicts of Interest***

Globalstar's directors, officers, and employees must act in the best interests of Globalstar and exercise sound judgment when working on Globalstar's behalf. This includes remaining free of conflicts of interest in the performance of our responsibilities on behalf of Globalstar. A conflict of interest may occur if our outside activities or personal interests influence (or appear to influence) our ability to make objective decisions in the course of performing our job responsibilities or otherwise interfere (or appear to interfere) with Globalstar's interests as a whole. Conflicts of interest also may arise when a director, officer, or employee (or a member of their family) receives improper personal benefits as a result of their position with Globalstar.

Globalstar personnel at all levels must not only avoid unethical business practices and favoritism, they should also avoid outside activities and financial interests that might create that perception. It is Globalstar's policy to respect the rights of directors, officers, and employees to engage in outside activities that do not conflict with their positions with Globalstar. However, when an outside activity or financial interest involves an organization with which Globalstar either competes or does business, good judgment is required to avoid any basis for a conflict of interest.

Among other things, you may not, unless granted a written exception, acquire, or retain, either directly or indirectly, the following financial interests in an organization that competes with, does business with, or seeks to do business with Globalstar:

- Any interest as a proprietor or partner in the organization;
- The ownership of, or right to acquire, stock or bonds of the organization if it is a privately held entity; or
- The ownership of, or right to acquire, stock or bonds in an amount in excess of the lesser of (i) \$25,000 or (ii) 1% of the total securities of the organization if it is a publicly owned entity.\*‡

\* ‡ This restriction does not apply to an employee who comes to Globalstar from another company and who holds shares of that company's securities in a savings plan or stock ownership plan. This exception only applies to securities owned by the employee prior to his or her employment with Globalstar, and that are held in those investment instruments. Subject to the terms of the plan document, such employees may retain the securities and any stock

dividends paid on them while still held in those investment instruments.

Any Globalstar employee seeking an exception to these restrictions should report the details of any financial interests described above that they or an immediate family member hold or acquired, directly or indirectly, to Globalstar's Human Resources Department. For purposes of this Code, an "immediate family member" includes a spouse or partner, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, and brothers and sisters-in-law. Exceptions for officers or directors may only be granted with the approval of the Audit Committee or the Board of Directors.

Additionally:

- Without prior approval, you may not serve as an officer or director of any firm that competes with, does business with, or seeks to do business with Globalstar.
- You may not undertake employment with, or furnish services as a consultant or other representative to, another firm if either (i) the outside work will interfere with your work for Globalstar, or (ii) the outside firm competes with, does business with, or seeks to do business with Globalstar.
- Employment of a spouse or other immediate family member by an organization with which Globalstar competes or does business **must be disclosed to the employee's immediate supervisor or to Globalstar's Human Resources Department.**

If you discover that a personal activity, investment, interest or association could compromise—or even appear to compromise—your objectivity or your ability to make impartial business decisions, seek guidance from Globalstar using the channels described in this Code. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed. Failure to disclose any actual or perceived conflict of interest is a violation of this Code.

### ***Business Opportunities***

Employees, officers, and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. You should not place yourself in a situation in which you may profit from a business opportunity if the circumstances indicate that the opportunity might reasonably be expected to be of interest to Globalstar. If any such business opportunity should arise, you must immediately bring it to the attention of your immediate supervisor, who will obtain a decision on whether Globalstar wishes to pursue it.

In addition, you may not use property or information of, or your position with, Globalstar in the pursuit of personal interest or profit and you are prohibited from taking for yourself opportunities that are discovered through your position at Globalstar or through the use of Globalstar property or information. While you are on paid Globalstar time, you may be involved only in the business of Globalstar.

## ***Fraternization***

Globalstar encourages positive working relationships among its employees. Globalstar also desires to avoid misunderstandings, complaints of favoritism, possible claims of sexual harassment, employee morale issues, and conflicts of interest potentially resulting from romantic, dating and/or ongoing social relationships involving supervisors and non-supervisory employees. For these reasons, in order to promote a fair and professional working environment for all, Globalstar prohibits employees in a management or supervisory position from romantic, dating and/or other similar ongoing social relationships with an employee whom they directly or indirectly supervise or whose terms or conditions of employment they may influence. Employees are required to disclose any such relationships to Globalstar's Human Resources Department as soon as it develops or becomes an actual or potential violation of this policy as a result of organizational reporting changes. Upon being informed of or learning of the existence of these types of relationships, Globalstar may take any steps that it deems appropriate, including but not limited to, moving either party to a different department or job, or, if necessary, terminating either party's employment. A supervisor or manager who has had a previous romantic, dating or other similar ongoing social relationship with a direct or indirect report or employee whose terms and conditions they may influence will not be involved in decisions relating to that employee's promotions, raises, termination, or other terms and conditions of employment.

## ***Compliance With Laws***

Directors, officers, and employees should comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities, states and countries in which the Company operates. Although not all employees, officers and directors are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. Questions about legal compliance should be addressed to Globalstar's Legal Department or as otherwise provided in this Code.

## **Work Environment**

Globalstar is committed to maintaining a respectful, safe, and inclusive working environment for all employees. The Company is also committed to holding all individuals responsible for their actions, and ensuring that, where appropriate, those individuals hold others accountable too.

Globalstar strives to provide a productive workplace free from all types of discrimination and harassment. Discrimination based on any unlawful factors will not be tolerated. Unlawful discrimination in recruiting, hiring, pay practices, employee benefit programs, promotions, transfers, career development, terminations, or layoffs will not be permitted within Globalstar. Conduct that creates an offensive or intimidating work environment is unacceptable at Globalstar. Such conduct may include, but is not limited to, racist, sexist, or ethnic comments or jokes; sexual advances or inappropriate physical contact; or sexually oriented gestures, pictures, jokes, or statements. You must immediately report any incident of discrimination or harassment in accordance with the "Reporting Concerns" section below or in accordance with the anti-harassment and anti-discrimination sections of the Employee Handbook.

Globalstar is committed to achieving the highest standards of safety, health, and environmental performance at all its facilities. We are all responsible for following the rules and procedures established at each facility to achieve these safety, health, and environmental goals. You must immediately report any incident of non-compliance or any unsafe condition to the facility's environmental, health, and safety coordinator.

### Proprietary Information

Globalstar's proprietary information consists of all non-public information or data possessed by and in the control of the Company that may be valuable to it in its business, or that may be of use to competitors, or that may be harmful to Globalstar or its customers, if disclosed. Examples of proprietary information are given below. This information must not be disclosed to others except as required by law or expressly permitted by Globalstar policy. Some of the reasons for non-disclosure are that unauthorized disclosure could: (i) disadvantage Globalstar competitively or financially; (ii) hurt or embarrass customers, suppliers, joint venture partners, or the Company; or (iii) involve the disclosure of information that belongs to others and that we have agreed to keep private. When there is a legitimate business need to disclose proprietary information outside Globalstar a nondisclosure agreement should be executed. For more information, and prior to disclosure, contact Globalstar's Legal Department.

Proprietary information includes, but is not limited to:

- Globalstar research and development, such as inventions, patent applications, and engineering and laboratory notebooks (see below);
- Customer and other employees' employee records, including, but not limited to, e-mail addresses and other contact information;
- Business strategies, business results, unannounced products or services, marketing plans, pricing information, and all non-public financial data;
- Non-public information about products or services, including hardware and software specifications and designs;
- Confidential organizational information, the disclosure of which is not legally protected, and confidential customer information; or
- Information disclosed to you in your capacity as a Globalstar employee or consultant by other parties, including customers, suppliers, or partners.

Proprietary information may exist as reports, manuals, charts, computer disks, drawings, specifications, photographs, films, and correspondence. Hardware, equipment, or materials embodying proprietary information and data also may be treated as proprietary information.

We must each ensure that all proprietary information entrusted to or known by us is protected from theft, damage, unauthorized disclosure, or inappropriate use. Always store such information in a safe place and follow security procedures for the computer systems used.

Remember that we can be overheard in public places such as train stations, airplanes, and airports, and when using portable communications devices. We should not discuss Globalstar proprietary information with, or otherwise disclose it to, family or friends, even if they assure us they will keep it confidential.

### *Patents*

Patents and ideas for patents constitute both proprietary information and valuable intellectual property that must be protected from inadvertent or premature disclosure. A “patentable” invention is one that constitutes a new, useful, and non-obvious machine process, article of manufacture, composition of matter, or improvement thereof (including software). All inventions made or conceived by Globalstar employees in the course of, or as a result of, Globalstar employment are the exclusive property of Globalstar. They must be promptly disclosed in writing and all rights in them must be assigned to the Company.

Globalstar employees are responsible for maintaining a laboratory notebook to record concepts, ideas, and related work, together with the recording of progress on technical efforts, in order to establish priority of invention, provide a basis for patent coverage, and protect future proprietary rights of the Company.

Licenses and copyrights obtained in the course of, or as a result, of employment or other service on behalf of Globalstar, are also the exclusive property of Globalstar, and must be promptly disclosed in writing and assigned to the Company.

### *Copyrighted Works*

Copyright laws protect the original expression in, among other things, written materials, works of art, and music, and prohibit their unauthorized duplication, distribution, display, and performance. This means that Globalstar and its personnel may not reproduce, distribute, or alter copyrighted materials from books, trade journals, computer software, magazines, records, tapes, discs, or videotapes without permission of the copyright owner or its authorized agents.

Software used in connection with Globalstar’s business must be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement. For more information, and prior to the download or use of unlicensed software, contact Globalstar’s Information Services Department.

### *Data Privacy and Data Protection*

The collection, use, storage, and international transfer of personally identifiable information about individuals is increasingly subject to regulations in the U.S. and other countries. Globalstar is committed to complying with all applicable data protection and privacy laws in the countries where we operate. You should carefully protect all personal information you acquire or have access to by virtue of your employment with the Company. This includes personal information about Globalstar employees, customers, vendors, suppliers, partners, and other third parties with whom the Company does business.

In addition, employees must abide by all other Company policies and procedures regarding confidential and proprietary information and intellectual property, including Globalstar's Intellectual Property and Trade Secrets Policy, Employee Handbook and Reg FD Policy.

### Anti-Corruption and Anti-Bribery

As a global company, Globalstar must comply with the anti-corruption and anti-bribery laws and regulations of every country in which it operates. Generally, these laws prohibit the payment of bribes and other illegal payments to government officials anywhere in the world. Moreover, as a U.S. company registered as an issuer in the U.S. securities market, Globalstar is subject to the stringent requirements of the U.S. Foreign Corrupt Practices Act, the anti-corruption statute most actively enforced against U.S.-registered companies operating globally. We are also, however, required to comply with all other relevant laws and regulations against bribery and corruption in the countries where we conduct business around the world, including, but not limited to, the U.K. Bribery Act 2010 and other applicable statutes and their implementing rules and regulations.

Accordingly, Globalstar prohibits its directors, officers, and employees, as well as its business partners acting for or on Globalstar's behalf, such as its agents, consultants, distributors, suppliers, contractors, and resellers from directly or indirectly offering, promising, providing, or authorizing anyone to provide, money or anything of value, to a "Government Official" (as defined below), or any private individual or entity, for the purpose of obtaining or retaining any improper advantage. As part of this policy, Globalstar also requires all business partners with which it conducts business to successfully complete anti-corruption compliance due diligence risk screening before they may be engaged to provide goods or services to Globalstar. An offer or a promise of a bribe, even if the Government Official rejects the offer or the offer fails to bring about the desired outcome, is also prohibited. Similarly, offering, promising, or providing money or anything of value to a family member of a Government Official can also be considered an inappropriate payment to the official.

The term "Government Official" is broadly defined to include not only officials or employees of government agencies at any level (e.g., legislators, tax authorities, police officers, judges), but also employees of state-owned/controlled enterprises (e.g., state-owned universities, hospitals, or infrastructure organizations); political parties and officials of political parties; employees of public international organizations like the United Nations or the World Bank; other people who act in an official capacity on behalf of any of the above; and candidates for public office. This includes U.S. officials, as well as foreign officials.

The commitment of all Globalstar directors, officers, and employees to compliance with this important policy is key to our success and competitiveness in the international business environment in which we function. Details relating to Globalstar's requirements with respect to anti-corruption compliance are set forth in detail in Globalstar's Global Anti-Corruption Policy. That Policy must be read in conjunction with this section of the Code.

Any questions relating to the high standards Globalstar maintains with respect to anti-corruption and anti-bribery compliance should be directed to the Legal Department.

### Anti-Kickback Statute

Globalstar requires compliance with the Anti-Kickback Statute, which is a U.S. law that prohibits any individual or company from providing, attempting to provide, soliciting, accepting, or attempting to accept, any kickback. A “kickback” is defined as any money, fee, commission, credit, gift, gratuity, thing of value (e.g., trips, tickets, transportation, beverages, personal services), or compensation of any kind, that is provided directly or indirectly to any individual or company for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or subcontract/supplier relating to a prime contract. Many of the countries in which we operate have similar and, in some cases, even more expansive anti-kickback laws. You are expected to understand and comply with these laws and to seek guidance from the Legal Department if you are not familiar with them.

### Facilitating Payments

“Grease” or facilitating payments are small payments to low-level Government Officials to expedite routine governmental actions that Globalstar is entitled to and which the Government Officials do not have discretion to deny. Globalstar prohibits facilitating payments.

### Political Contributions

Globalstar directors, officers, and employees may not contribute or donate Globalstar funds, products, services, or other resources to any political cause, party, or candidate. However, we may make voluntary personal contributions to lawful political causes, parties, or candidates as long as such contributions are not represented as coming from Globalstar.

### Charitable Contributions

Charitable donations may raise anti-corruption issues and implicate anti-corruption laws, particularly where a donation is to a charity with which a Government Official is associated. Charitable donations should only be made to registered and respected charities, must not be made to gain or retain a business advantage, and must be approved in advance.

### Sponsorships

Sponsorships are contributions in money or in kind towards an event organized by a third party in return for the opportunity to advertise. All sponsoring contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and commensurate with the consideration offered by the event host. Sponsorships must not be made to gain or retain an improper business advantage and must be approved in advance.

### Anti-Money Laundering

Globalstar is committed to complying with all applicable anti-money laundering laws, rules and regulations of the U.S., the U.K., and other countries where Globalstar operates. Anti-money laundering laws and their implementing rules and regulations generally prohibit companies from engaging in any financial transactions involving funds derived from illegal activities. If you believe

that Globalstar or another party to a business transaction is engaged in any illegal activity or is using or transferring proceeds derived from an illegal activity, immediately contact the Legal Department to notify them so they can consider the appropriate response.

### Arms Export Control Act and International Traffic in Arms Regulations (“ITAR”)

Some commercial satellites, components, and related technical data are subject to the U.S. Arms Export Control Act and the ITAR in the Code of Federal Regulations, Title 22, Parts 120-130. The Directorate of Defense Trade Controls, U.S. State Department, administers the ITAR. Corporate and individual violators of provisions of the ITAR are subject to both civil and criminal penalties. Among other things, the ITAR prohibits the transfer or export of any ITAR-controlled hardware or technical data to any foreign person inside or outside the U.S., or to any U.S. person employed by a foreign company, except as authorized in an approved agreement or license.

If you are a Globalstar employee or contractor, you must be a U.S. citizen or lawful permanent resident to have access to ITAR-controlled items, including defense articles, services, or technical data. If you believe that your job might require you to have such access, contact Globalstar’s Legal Department. If you are a U.S. citizen or lawful permanent resident, you may not transfer ITAR-controlled items, including defense articles, services, or technical data, to foreign persons without prior approval. Consult your supervisor or Globalstar’s Legal Department if you believe that you are engaged in activities that may be ITAR-controlled, particularly if you do not understand, or have not yet been briefed on, the appropriate ITAR requirements.

### Economic Sanctions

The U.S. Department of the Treasury, Office of Foreign Assets Control (“OFAC”) administers and enforces economic and trade sanctions against countries, regions, entities, and individuals based on U.S. foreign policy and national security goals. OFAC’s regulations are in the Code of Federal Regulations, Title 31, Chapter V. For instance, OFAC may impose embargoes against targeted countries or regions, restrict certain activities with companies operating in sectors of a country’s or region’s economy, or restrict transactions involving certain targeted individuals, including terrorists, international narcotics traffickers, and weapons of mass destruction proliferators. In some cases, OFAC regulations require U.S. persons to freeze the assets of targeted persons and to file reports with OFAC when those assets come into the U.S. person’s possession or control.

U.S. sanctions laws prohibit or restrict U.S. Persons<sup>1</sup> from engaging in or facilitating transactions or activities involving specified countries, regions, entities, and individuals, including entities and individuals that are on the List of Specially Designated Nationals and Blocked Persons (“SDN List”), the Sectoral Sanctions Identifications List (“SSI List”), or other OFAC sanctions lists, or which are otherwise the target of U.S. sanctions laws. U.S. sanctions laws may prohibit trade, block (i.e., freeze) assets, prohibit certain types of commercial and financial transactions, and/or involve a combination of these measures.

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<sup>1</sup> The term “U.S. Person” means: (i) any U.S. citizen, wherever located (including dual citizens); (ii) any lawful permanent resident of the United States, wherever located; (iii) any person located in the United States; and (iv) any entity organized under the laws of the United States or a U.S. jurisdiction, including such entity’s overseas branches or divisions (this does not include foreign subsidiaries that are owned or controlled by a U.S. Person unless the transaction involves Cuba or Iran, or in the case of U.S. financial institutions, Cuba, Iran, or North Korea).

OFAC's sanctions programs are generally divided into two types: comprehensive sanctions and targeted sanctions. OFAC's comprehensive sanctions prohibit virtually all trade and commercial transactions with certain countries and regions. As of the date of this Sanctions Compliance Program, the countries and regions subject to comprehensive sanctions are Cuba, Iran, Syria, North Korea, and the Crimea, so-called Donetsk People's Republic, and so-called Luhansk People's Republic regions of Ukraine. While there are differences among the regulations applicable to each country or region, as a general matter, these sanctions prohibit U.S. Persons, wherever located, from providing goods or services to persons where the benefit of such services is received in any of these countries or regions. U.S. Persons are prohibited from importing or exporting, directly or indirectly, goods or services to or from any of these countries or individuals or entities in these countries, absent an applicable license or exemption. Certain governments of, and other persons in, sanctioned jurisdictions (and all Cuban nationals, except those that have been unblocked) are blocked; if any asset in which any of these blocked parties has an interest comes into the possession or control of a U.S. Person, the U.S. Person must block the asset and report the transaction to OFAC, unless a license or exemption applies.

OFAC also maintains targeted sanctions on designated terrorists, narcotics traffickers, weapons of mass destruction proliferators, transnational criminal organizations, and certain other categories of actors and adds such individuals and entities to the SDN List.

U.S. Persons are generally prohibited from engaging in any transactions with a person on the SDN List or other blocked person or an entity owned in the aggregate, directly or indirectly, 50 percent or more by one or more persons on the SDN List or other blocked persons (the "50 Percent Rule"). As a general matter, U.S. Persons must block any property in which a person on the SDN List or other blocked person has an interest that comes into their possession or control. The SDN List is updated regularly, and the cumulative list is available on OFAC's website.

Consult with your supervisor or Globalstar's Legal Department if you believe that you are engaged in activities that may violate trade sanctions, particularly if you do not understand, or have not yet been briefed on, the appropriate OFAC requirements.

#### Export Administration Regulations ("EAR")

The Export Administration Regulations, Code of Federal Regulations, Title 15, Parts 730-774, govern the export, reexport, and transfer of certain products, software, and technologies (including commercial products, dual use items, and certain munitions) to foreign persons inside or outside of the United States. The Department of Commerce's Bureau of Industry and Security ("BIS") administers the EAR.

The EAR require licenses to export, reexport or transfer certain items and technologies, depending on the item or technology, its destination, and its end users and end uses. The EAR also apply ten general prohibitions to other specific export and related activities (for example, US person support of proliferation or certain military and military intelligence end uses and end users). US companies may also be required to obtain licenses before they provide access to controlled source code or technology to foreign nationals in the US, including employees. This is referred to as the deemed export rule. In these situations, the transfer of controlled source code or technology to foreign nationals in the US is considered an export to the individual's home country.

Consult with your supervisor or Globalstar's Legal Department if you believe that you are engaged in activities that may be subject to the EAR, particularly if you do not understand, or have not yet been briefed on, the appropriate EAR requirements.

#### Procurement Integrity (Federal Procurement Policy Act of 1988)

The Federal Procurement Policy Act and Amendments of 1988 impose certain restrictions on contractors, their employees, representatives, agents, and consultants during the conduct of any federal agency procurement. In general, the Act prohibits the following:

- Discussions or offers of future employment or business opportunities to any procurement official;
- Offers of gratuities, money, or anything of value to any procurement official;
- Attempts to obtain, or possession of, source-selection or proprietary information from any agency employee.

The Act requires that you complete a certificate that you will comply with the Act and report any violations if you participate substantially in the preparation of a proposal or contract negotiations to which the Act applies.

If any doubt exists as to whether a particular piece of information that has not been publicly released can be rightfully obtained, you must first seek the advice of the contracting officer or the head of the agency.

Further, unauthorized offers to provide proprietary or source-selection information must be refused and immediately reported to Globalstar's Legal Department.

Because government procurement integrity provisions are complex, any questions should be presented to your supervisor or manager to obtain appropriate advice and guidance. Globalstar requires that its employees, representatives, agents, and consultants comply with this Act.

#### Truth in Negotiations Act

All proposals submitted to the U.S. government must comply with the Federal Acquisition Regulations ("FAR") and the proposed contract requirements.

Where cost or pricing data are required to be submitted, such data must be accurate, complete, and current as of the date of final agreement on price. Whether you are the contract negotiator, the cost estimator, or the person responsible for furnishing the data to the cost estimator, you must ensure that the data meet these FAR requirements:

- Accurate means free from error;
- Complete data means all facts that a prudent buyer or seller would reasonably expect to have

an effect on price negotiations, e.g., historic cost data, vendor quotations, “make or buy” decisions, and other management decisions that could have a significant bearing on cost; and

- Current data means data that are up to date. Because many months may pass after the original proposal and price were submitted, data should be updated through the close of negotiations to ensure they are current.

If you have any questions as to whether information is cost or pricing data that must be disclosed to the government, you should seek advice from Globalstar’s Legal Department.

It is Globalstar’s intention that all relevant and required cost or pricing information will be disclosed to the government. Falsely certifying facts or data used in government contracts, whether unintentionally or deliberately, is a violation of U.S. laws and contract requirements and may subject the Company and you, if you are involved, to criminal action, civil penalties, or administrative action.

### Fair Competition and Fair Dealing

Our business is subject to U.S. antitrust laws and the competition laws of countries in which we operate. Our policy is to compete vigorously and ethically while complying with all applicable antitrust and competition laws. Antitrust and competition laws are designed to promote and preserve competition for the benefit of consumers. These laws, among other things, prohibit or restrict activities related to fixing, coordinating, or controlling prices and allocating or dividing customers, territories, or markets. As a result, you should not communicate with competitors about any aspect of Globalstar’s business, unless you have a legitimate business reason and you have obtained approval from the Legal Department. You are required to avoid any actions that violate or even create an appearance of violating antitrust laws and should address your questions and concerns with the Legal Department.

Honest and ethical conduct and fair dealing are among our core principles. We are committed to dealing honestly, ethically, respectfully, and fairly with each other and our competitors, customers, and suppliers. We expect behavior consistent with these core principles. Do not make false, misleading, deceptive, or fraudulent statements regarding the Company’s products and services. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

### Insider Trading

Federal and state securities laws prohibit the purchase or sale of securities while aware of material nonpublic information as well as the disclosure of material nonpublic information to others who then trade in a company’s securities (sometimes called “tipping”). You should not trade in the Company’s securities (including common stock) if you are aware of material non-public information about the Company or disclose such information to others. In addition, if in the course of working for the Company, you learn of material nonpublic information about a company with which the Company does business, you should not trade in such company’s securities, until the information becomes public or is no longer material.

Information is “material” if there is a substantial likelihood that a reasonable investor would consider the information important in deciding whether to purchase, sell or hold a security, or if there is a substantial likelihood that the information would be viewed by a reasonable investor as significantly altering the total mix of publicly available information about the Company. Any information that could reasonably be expected to affect the market price of a security is likely to be considered material. This determination is made based on the facts and circumstances of each particular situation and is often evaluated by enforcement personnel with the benefit of hindsight. Material information can be positive or negative and can relate to any aspect of the Company’s business or to any type of GSAT’s securities, whether debt, equity or a hybrid.

The Company has adopted an Insider Trading Policy to assist its personnel in avoiding insider trading violations. The Insider Trading Policy contains additional restrictions on trading in the Company’s securities, including (i) a requirement that certain key personnel pre-clear any transactions in the Company’s securities, (ii) a ban on any trading by key personnel at the beginning of each fiscal quarter, and (iii) prohibitions against the hedging or pledging of any Company securities. A copy of the Insider Trading Policy is also available on the Company’s website.

Violations of insider trading laws can, and often do, result in criminal investigations, prosecutions, disgorgement of ill-gotten trading profits, fines and prison sentences, as well as Company-imposed disciplinary actions, including termination. A violation of law, or even questionable conduct leading to federal investigation that does not result in prosecution, can tarnish an individual’s reputation and irreparably damage a career. Accordingly, your compliance with the Insider Trading Policy is of the utmost importance for both you and the Company.

The above information is a brief summary of the Insider Trading Policy, which is subject to change from time to time, and it is your obligation to review, understand and comply with the Insider Trading Policy. If you are concerned that the Insider Trading Policy has been violated, or have any questions about the Insider Trading Policy, you should discuss it with the General Counsel or the Chief Financial Officer.

### ***Entertainment, Gifts, and Gratuities***

Globalstar’s business transactions should always be free from even a perception that favorable treatment was solicited, offered, or received through gifts, favors, entertainment, or similar forms of hospitality. While there are certain circumstances under which it is permissible to give or accept such items, all Globalstar personnel are expected to follow certain guidelines.

No Globalstar director, officer or employee, or any entity acting for or on its behalf, may offer, give, or solicit, directly or indirectly, any gift, favor, or other gratuity to or from a person or organization Globalstar does business with or that seeks to do business with Globalstar in order to obtain a benefit for Globalstar or another person. In addition, no Globalstar director, officer, or employee, or any entity acting for or on Globalstar’s behalf, may accept any gift, favor, or gratuity (with the exception of items of nominal value) from a person or organization that conducts business with, or seeks to do business with, Globalstar.

Items of nominal value include promotional, advertising, or publicity items, such as a company calendar, ballpoint pens, coffee cups, or other promotional materials with a company's logo, that have a retail value no greater than \$50 USD. Globalstar's Legal Department may authorize modest exceptions on a case-by-case basis. The use of Globalstar's funds or assets to give gifts, favors, or gratuities to employees or anyone else is prohibited, except to the extent such gifts are in compliance with applicable law, not in cash, are insignificant in amount, infrequently provided, and not given in consideration or expectation of any action by the recipient.

Globalstar employees may accept a meal, drink, or entertainment in the ordinary course of business only if these courtesies are unsolicited, infrequently provided, and of nominal value. Use common sense and moderation when you engage in business entertainment on behalf of Globalstar. Except for restrictions that apply when dealing with government officials, as explained below, you may pay for reasonable, business-related meals, refreshments, or entertainment expenses that are incurred only occasionally, are not requested, or solicited by the customer, and are not intended to, and could not reasonably be perceived as, affecting business decisions.

All entertainment, gifts and gratuities must comply with the Anti-Corruption and Anti-Bribery sections of this Code, above. Any questions relating to whether the giving or receipt of a gift or favor or other gratuity is appropriate should be directed to the Legal Department.

#### Special Requirements in Dealings with Governments

Globalstar must comply with special standards of conduct when dealing with government officials. Government officials must not be offered or given, either directly or indirectly, anything of value that they are prohibited from receiving by applicable agency regulations. When dealing with representatives of a particular agency, you are responsible for complying with that agency's standards of conduct. Where there is a question as to a particular agency's requirements under its standards of conduct, you must contact Globalstar's Legal Department for guidance.

Furthermore, except as otherwise permitted by law or regulation, you are generally prohibited from paying for meals, refreshments, entertainment, travel or lodging expenses for any Government Official or their family members without express permission from the Legal Department. This is a stricter requirement than is discussed above under "Entertainment, Gifts, and Gratuities." For example, an exception may be made for meals provided on-site to accommodate continuing business meetings with Government Officials. Any such exception, however, should be documented in writing and, when possible, approved in advance by your supervisor. If you do business with state or local Government Officials, you are responsible for knowing and adhering to the specific (and perhaps additional) rules that may apply to those state or local Government Officials.

Details relating to Globalstar's requirements with respect to gifts, entertainment, and hospitality for Government Officials are set forth in Globalstar's Global Anti-Corruption Policy. That policy must be read in conjunction with this section of the Code.

Finally, in certain instances where customs in foreign countries require the exchange of gifts, the Company will provide the gift. Any gift, other than those of nominal value, received by you from representatives (i.e., officials) of these countries must be surrendered to the Company.

## ***Marketing Activities***

Globalstar supports vigorous competition. It is our intention to win business through excellent products and services. We believe that enduring customer relationships are built on integrity and trust. We seek to gain advantage over our competitors only through superior research, engineering, manufacturing, marketing, and customer service.

The marketplace requires the gathering of a wide range of information in a systematic and legal manner. This information provides an understanding of the industry structure and customer requirements for existing or potential products and services of Globalstar.

It is the policy of Globalstar that its directors, officers, and employees, as well as its contractors, consultants, agents, and other business partners acting for or on its behalf, will gather information only through lawful means. Globalstar will neither seek nor accept any information that is known to its representatives at the time of receipt to be prohibited from disclosure by law, regulation, or policy of the customer.

For example, you should not:

- Seek special treatment or data that you know or have reason to believe is restricted;
- Attempt to improperly influence a customer's specifications for the purpose of gaining an unfair advantage or unfairly limiting competition;
- Seek unauthorized access to classified or officially restricted information; or
- Offer to, or participate in, exchanges of unauthorized, or so-called "inside information," or attempts to induce a competitor's employees or the government to violate their own standards of conduct by seeking information they cannot properly provide.

## ***Accuracy of Information and Documentation***

Complete and accurate records are needed to make effective strategic decisions, identify opportunities, and demonstrate our integrity to stockholders, regulators, and others. As a public company, it is of critical importance that Globalstar's public filings are accurate, timely, complete, fair, and understandable.

Depending on your position, you may be called upon by others in the Company to provide necessary information in connection with the Company's public filings with the U.S. Securities and Exchange Commission ("SEC"). All Globalstar employees, contractors, officers, directors, and other representatives must take this responsibility very seriously and provide prompt and accurate answers to inquiries related to our public disclosure requirements. In addition, you must not knowingly make a false or misleading statement to an accountant in connection with any audit, review, examination of the Company's financial statements, or the preparation or filing of any document or report with the SEC.

Globalstar's books and records must be maintained so that they accurately and fairly reflect the Company's transactions and conform to generally accepted accounting principles. You may not establish or maintain unrecorded funds or falsify our books and records. If you are uncertain about the validity of an entry or process, you must consult with your immediate supervisor, the supervisor's immediate supervisor, or Globalstar's Legal Department.

Globalstar employees create various forms of records including reports and correspondence which may be in hard copy or electronic media. Whenever you create such a record, you must follow Globalstar's Communications, Information, and Technology policies relating to electronic mail and document retention. Business records may become subject to public disclosure for a variety of reasons. You should prepare documents that include objective and verifiable factual information and that are free from speculation, rumor, and ambiguous or misleading statements.

Globalstar is subject to licensing by the U.S. Federal Communications Commission and other governmental bodies around the globe and provides products and services to numerous governmental agencies. It is critical that statements made, and claims submitted to any governmental agency are accurate. Both you personally and Globalstar may be subject to severe penalties for false statements or false claims. If you are in doubt about a matter, consult with Globalstar's Legal Department.

#### Reporting Expense Reimbursements

Those who submit expense accounts and other forms requesting reimbursement must follow Company policies regarding Travel and Other Reimbursable Business Expense, Section 500 of the Manual. Violations of these policies are also violations of this Code.

#### Reporting Labor Charges

The accurate reporting of labor by employees and contractors is mandatory. You must comply with Globalstar's policies regarding Payroll Practices as well as local applicable laws of your workplace. You should consult with your immediate supervisor or Globalstar Human Resources if you are uncertain about which policies and laws apply to your particular work situation.

### ***Company Funds and Property***

We are all responsible for safeguarding and making proper and efficient use of Company funds, property, and other assets by following procedures to prevent their loss, theft, or unauthorized use. Theft, carelessness, and waste have a direct impact on Globalstar's profitability and are prohibited. Company funds, property and other assets include, but are not limited to, cash, checks, drafts, and charge cards; land and buildings; records; vehicles; equipment, including fax machines, copiers, and telephones; and computer hardware and software. You may only use the Company's assets and resources for legitimate business purposes of the Company and not for your personal benefit. The following are recommended ways to protect Company funds and property:

- Adhere at all times to Globalstar's published procurement procedures;

- Make sure expenditures are for legitimate business purposes before incurring them;
- Keep accurate and complete records of funds spent;
- Use corporate accounts only for business purposes or as specified in Company instructions;
- Make sure computer and communications equipment and systems, including passwords or other methods used to access or transmit data, and the information they contain, are protected against unauthorized access, use, modification, destruction, or disclosure; and
- Use Globalstar's trademarks and service marks in accordance with Company policy.

Actual or suspected loss, damage, misuse, theft, embezzlement, or destruction of Company funds or property should be reported immediately to your supervisor and to Globalstar Human Resources.

### ***Following Security Guidelines***

We must always be sensitive to keeping our workplace and our information and equipment secure. Furthermore, we may, from time to time, contract with the U.S. government or its prime contractors and other governments. These contracts require the Company to implement and maintain a specified system of security controls to prevent unauthorized access to confidential information. Here are some key rules to follow:

- Wear your badge prominently;
- Notify your supervisor of any circumstances that might embarrass or damage the Company;
- Adhere to the Globalstar, Inc. Information Security Policy, which was distributed to you, is available through your supervisor and is posted on the Internal Globalstar Website;
- Adhere to the Globalstar Data Breach Response Policy, which was distributed to you, is available through your supervisor and is posted on the Internal Globalstar Website;
- Adhere to all Company policies regarding confidentiality, including the Employee Handbook, the Intellectual Property and Trade Secrets Policy, Reg FD Policy, and this Code of Conduct;
- If you have access to confidential files, establish a system to ensure that these files are always locked and that your computer is secured when you are away from your work area; and
- If you use or have access to materials that the U.S. government considers to be "classified" or sensitive Company technology, you must be aware of and comply with all applicable federal laws and regulations, including those governing the dissemination or "export" of "technical data." Questions about these types of materials should be directed to the Legal Department or Globalstar Human Resources.

U.S. government classified information may not be transported via regular mail. Additionally, classified information or confidential Company business with the U.S. government should not be discussed with family, friends, or other unauthorized persons.

You should be particularly careful when using phones of any type, especially cellular phones, for sensitive or classified conversations. This also applies to the use of computer terminals, facsimile machines, microwave equipment, and other equipment used to transmit information or data.

If you have any questions about security matters, contact your immediate supervisor, security representative, or Globalstar Human Resources.

### ***Communications with Persons Who Are Not Employees, Officers, or Directors of Globalstar***

It is Globalstar's policy that all responses to inquiries from investors (including current stockholders), analysts, money managers, the press, and other third parties be made only by, or under the direction of, the Company's Chief Executive Officer, Chief Financial Officer, or General Counsel.

As a public company, Globalstar receives frequent inquiries from various persons and entities, some of whom may be seeking to gain an advantage by learning undisclosed information that could be relevant to the value of the Company's stock. There also are frequent requests for information from the press.

It is extremely important that the confidentiality of Company information be maintained until the Company discloses the information in accordance with the requirements of the SEC. These requirements govern the way in which information is disclosed, even if the disclosure is voluntary and not otherwise required by SEC rules. If material nonpublic information about the Company is disclosed selectively, either intentionally or inadvertently, to certain third parties – including, among others, stockholders, analysts, and money managers – SEC rules require that the Company release the information immediately to the public at large, regardless of whether the information is ripe for disclosure and regardless of any resulting harm to the Company.

Moreover, it is crucial that any Company disclosures be accurate and not subject to misinterpretation. Off-the-cuff responses to inquiries, including those from the press, may not present a complete picture and often can be misunderstood or mischaracterized.

Therefore, unless you have been expressly authorized to respond, you must refer any third-party inquiries to the Company's Chief Executive Officer, Chief Financial Officer, or General Counsel. Although these inquiries frequently relate to financial information (and can be also seemingly innocuous, such as "how's the quarter going?"), many other types of business information are also material to the Company. *Under no circumstances* should you take it upon yourself to decide that there is no harm in responding to any inquiry.

See Globalstar's Reg FD Policy for the requirements and procedures applicable to communications

with persons who are not employees, officers or directors of the Company.

## ***Training***

To support Globalstar's commitment to the highest level of ethical behavior, Globalstar requires all of its directors, officers, and employees – as well as, as necessary and appropriate, its suppliers, contractors, and other business partners acting for or on its behalf (such as its agents, consultants, distributors, and resellers) – to periodically complete training on the Code to help ensure familiarity with the Code, Globalstar policies and procedures, and the laws, regulations, and requirements pertaining to our jobs. From time to time, and at the discretion of Globalstar's Human Resources Department, certain Globalstar employees may be required to complete additional training. Failure to comply with required training may result in disciplinary action.

## ***Seeking Guidance and Reporting Concerns***

You are responsible for conducting all business legally and ethically. This may mean that, from time to time, you will have a question about the law, the Code or Company policy, or suspect in good faith that a violation of law, the Code, or Company policy has occurred. The Company has multiple resources in place to help respond to both questions and concerns.

### **Asking Questions**

You may encounter situations where you have a question or are unsure of the best course of action. You should always seek guidance if you are uncertain about a particular situation. When you have a specific question, you may reach out to the appropriate resource listed below:

- Your immediate supervisor or your local Human Resources representative; or
- Human Resources Department; or
- Legal Department

These contacts are familiar with the laws, regulations, policies and procedures that relate to our work, and they will be able to address employee questions.

### **Reporting Concerns**

In contrast to a question, we recognize that there are times when you may become aware of or in good faith suspect that a violation has occurred. If you suspect a violation of any laws, rules, regulations, or the Code, you should report it, using the appropriate channel described below. Because the manner in which reports of Code or other violations may be made varies from country to country, please consider the appropriate method by which to report, according to the following options:

1. Bring it to the attention of your local supervisor or local Human Resources representative, or any member of local management, as appropriate. The most immediate resource for reporting good faith concerns of suspected violations is almost always a local supervisor, local Human Resources representative or any member of local management. If you prefer

not to go to your supervisor or local Human Resources representative, or your concern was not adequately addressed by your local supervisor, other options are available.

2. Good faith reports relating to banking, accounting, finance, internal accounting controls, bribery or anti-corruption, export compliance, antitrust/competition violations, discrimination or harassment, workplace health, hygiene and safety and environmental protection may also be made directly to the following:

- Chief Executive Officer;
- Chief Financial Officer; or
- General Counsel

Paul Jacobs  
CEO  
[paul.jacobs@globalstar.com](mailto:paul.jacobs@globalstar.com)  
(858) 429-9050

Rebecca Clary  
Vice President and CFO  
[rebecca.clary@globalstar.com](mailto:rebecca.clary@globalstar.com)  
(985) 335-1562

L. Barbee Ponder IV  
General Counsel, Vice President – Regulatory Affairs and Assistant Secretary  
[barbee.ponder@globalstar.com](mailto:barbee.ponder@globalstar.com)  
(985) 335-1503

- For reports concerning a director or officer or for matters involving accounting or auditing matters, the Chairman of the Audit Committee:

William A. Hasler  
[Bill.Hasler@outlook.com](mailto:Bill.Hasler@outlook.com)  
(415) 797-2039

3. In addition, depending on the nature and location of the concern, reports may be made through NAVEX, a third-party hotline. The hotline is available by phone at 1-866-297-0224 or online at [www.NAVEX.com](http://www.NAVEX.com). Because the manner in which reports may be made varies from country to country, NAVEX will give you further instructions on how and to whom to report a particular concern. If you are calling about a matter that should be handled locally in accordance with local legal requirements, NAVEX will direct you back to local management. NAVEX is operated by an independent third party and is available 24 hours a day, 7 days a week.

#### Confidentiality and Self-Identification

Information that employees report will be treated as confidentially as possible. You are encouraged to share your identity when you report because this permits the Company to conduct

the most thorough investigation possible and because it may be more difficult to thoroughly investigate anonymous reports. If, however, you are uncomfortable identifying yourself, you may report anonymously.

### After You Make a Report

Regardless of how you choose to report, all reports of actual or suspected misconduct will be taken seriously and addressed promptly. The appropriate personnel will carefully investigate the reports and the relevant Company entity will take appropriate and necessary action. The Company will not tolerate retaliation for reporting a concern or participating in an investigation in good faith. Conversely, a malicious allegation that the person knows to be unfounded, will be dealt with as a disciplinary matter, consistent with applicable law.

### Reporting Violations Regarding Accounting and Auditing Matters

The Company is required to create, maintain, evaluate, and correct internal control over financial reporting and disclosure controls and procedures. Persons who have knowledge of legal or internal control violations are required to notify designated Company officials of any violations, and reporting persons are protected from retaliation for making good faith reports.

Compliance means it is important to have your active support by bringing to the attention of, as appropriate, immediate supervisors, other designated Company officials, or the Audit Committee any known or suspected case of fraud or other financial impropriety involving any employee or contractor at any level, including, without limitation, the Company's outside accountants and auditors. Your good faith reports will be treated confidentially and *always* without fear of retaliation. You can be assured that the Company will take steps to investigate and correct any confirmed problems.

Globalstar's policy on Reporting Concerns has been adopted by the Board of Directors to provide a means by which directors, officers and employees can communicate, on a confidential and/or anonymous basis, any concerns or complaints ("complaints") regarding the Company's accounting, internal accounting controls, and auditing practices ("Accounting Matters") to the Audit Committee of the Board.

### *Scope of Matters Covered by This Policy*

You are encouraged to report, either orally or in writing, any complaint regarding a questionable Accounting Matter including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company;
- Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- Deficiencies in, or noncompliance with, the Company's internal accounting controls;

- Misrepresentations or false statements to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, or audit reports of the Company; or
- Deviation from full and fair reporting of the Company's financial condition.

#### *Procedure for Submitting Complaints*

You always have the ability, and are encouraged, to discuss an issue with, or report evidence of a questionable Accounting Matter to, any executive officer of the Company. Additionally, you may submit a complaint directly to the Audit Committee if you in good faith reasonably believe that what is being reported constitutes a questionable Accounting Matter.

Use NAVEX to report evidence of a questionable Accounting Matter. The NAVEX administrator will refer your complaint to the chair of the Audit Committee. If you prefer to speak with the Chair of the Audit Committee, Globalstar's Legal Department can provide you with the phone number to the extent it differs from the number in the "Reporting Concerns" section above. You are encouraged to provide as much specific information as possible, including names, dates, places, and events that took place, your perception of why the incident(s) may be a violation, and what action you recommend be taken.

Upon receipt of a complaint, the Chair of the Audit Committee will determine whether the complaint, in fact, pertains to an Accounting Matter. Whether or not you choose to identify yourself, you will receive an acknowledgement of your submission and, after investigation, will receive notice of the complaint's disposition. If a complaint involves a matter outside the scope of this section of the Code, the Audit Committee may refer the complaint for investigation by such Company personnel as it determines to be appropriate.

#### *Investigation of Complaints*

The Audit Committee's internal procedures are designed to protect the confidentiality of employee complaints to the fullest extent reasonably possible, consistent with the need to conduct an adequate investigation and with the requirements of law. The Audit Committee may utilize Company staff to support and assist the Committee in its investigation of complaints and also may engage such internal or external counsel and other advisers as it determines to be necessary to carry out its duties and responsibilities.

Prompt and appropriate corrective action will be taken when and as warranted.

#### *Retaliation Prohibited*

No person subject to this Code will discharge, demote, suspend, threaten, harass, or in any other manner retaliate or discriminate against you in the terms and/or conditions of your employment based upon any lawful act by you with respect to good faith reporting of a questionable Accounting Matter.

Protected disclosures by you include, but are not limited to, providing information or other

assistance in the investigation of conduct that you in good faith reasonably believe constitutes a questionable Accounting Matter. Other protected conduct includes filing, testifying for, participating in, or otherwise assisting in a proceeding involving alleged violations of the law. In addition, you may not be adversely affected in your employment in any manner because you refused to carry out a directive which, in fact, constitutes fraud or is a violation of applicable law, rule or regulation.

### *Document Retention*

The Audit Committee will maintain a log of all complaints it receives, tracking their receipt, investigation, and resolution. The destruction of any documentation relating to a matter that is the subject of a known, or ongoing governmental investigation or other official proceeding, or that is relevant to a Chapter 11 bankruptcy proceeding, is prohibited.

### *Disclosure*

Nothing in this Code, the Employee Handbook or elsewhere limits or prohibits a Globalstar employee from filing a charge or complaint with, participating in any action, proceeding, inquiry or investigation conducted by, voluntarily disclosing documents of information or documents to, or otherwise voluntarily communicating or cooperating with, any state, federal or local law enforcement agency, legislative body, governmental agency or self-regulatory organization. Notwithstanding any other policies in this Code or elsewhere, employees are not required to obtain authorization from the Company prior to disclosing information to, or communicating with, such agencies, nor are employees obligated to advise the Company as to any such disclosures or communications.

### *Interpretations and Waivers*

Globalstar's General Counsel, Vice President – Regulatory Affairs, and Assistant Secretary, serves as the Company's Ethics Officer and as the administrator for NAVEX. You should contact him if you are uncertain about any provision of this Code or its applicability to you.

A request by a director or executive officer for a waiver of any provision of this Code requires approval of the Audit Committee or the Board of Directors. Certain waivers must, and will be, promptly disclosed in an appropriate filing with the SEC.

### *Dissemination and Amendment*

This Code shall be distributed to each new employee, officer, and director of the Company upon commencement of his or her employment or election to the Board of Directors, and each employee, officer and director shall certify that he or she has received, read, and understood the Code and has agreed to comply with its terms. The Code shall also be distributed annually to each employee, officer and director of the Company, each of whom will certify their continued compliance with the Code. Relevant provisions of the Code also will be provided to contractors and other applicable third parties.

The Company reserves the right to amend, alter, or terminate this Code at any time for any reason.

The most current version of this Code can be found on the Company's Intranet.

### ***ACKNOWLEDGEMENT***

I have read and understand that I have a responsibility to abide by the Globalstar Code of Conduct (the "Code") and by the various policies, laws, rules, and regulations discussed in the Code. I realize that a violation of the Code (including this Acknowledgement), which includes not reporting a possible infraction by me or by others, or a violation of other Company policies or applicable law, rules, or regulations, could result in disciplinary action, including discharge. This Code replaces any previously issued code of conduct.

Note Regarding Employees: I further understand that nothing in the Code is intended to create any express or implied contract of employment for any specific duration. The Code does not in any way alter my at-will employment status and I may quit or have my employment terminated at any time, with or without cause or notice (except as provided below for Puerto Rico employees).

Note Regarding Puerto Rico Employees: References to "at-will" employment in this Acknowledgement do not apply to Puerto Rico employees. Employment in Puerto Rico is based on mutual consent with Globalstar. That means that employees in Puerto Rico may leave Globalstar at any time, or for any reason, with or without prior notice. That also means that Globalstar may terminate their employment at any time for just cause under applicable law, and with or without prior notice. Puerto Rico employees should contact Globalstar's Human Resources Department with any questions.