



**CODE OF CONDUCT  
2020**

# CODE OF CONDUCT

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## ***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* 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 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 policy. 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 manager or supervisor 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 Violations” section below. Any violation of this Code, Globalstar’s employee handbook, or the laws and regulations cited in this

Code 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 employee who ignored or deliberately failed to timely report a violation as required by this Code;
- Any employee 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 will be a mitigating factor if any disciplinary action is otherwise required.

### ***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 an employee who, in good faith, reported a suspected violation.

If you believe that you have been subject to retaliation for reporting a violation or possible violation, you should immediately follow the reporting avenues set out below at page 17 and a prompt investigation will be conducted.

### ***Employee 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 directors, officers, and employees, share responsibility for identifying training 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 "Reporting Violations" section below.

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

Globalstar's directors, officers, and employees must observe high standards of conduct and integrity in their relationships with outside organizations. 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. Failure to disclose any actual or perceived conflict of interest is a violation of this Code.

We must all refrain from having any financial or other interest in, or relationship with, an organization that competes with or does business 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.

In addition, you may not use non-public information obtained about Globalstar in the course of your employment or board service for your own private gain or advantage, nor may you disclose such information to enable others to profit from it. Importantly, any Globalstar director, officer, or employee who has non-public information that could be expected to affect the price of the Globalstar stock or stock of another company with which Globalstar does business may not buy or sell that stock. Non-public information is information that has not been released to the public by Globalstar or otherwise become widely available to the public.

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.\*

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\* 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 executive officers or directors may only be granted with the approval of 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 (a) the outside work will interfere with your work for Globalstar, or (b) 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 Human Resources.**
- 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 a 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.
- You may not use facilities or equipment of Globalstar in the pursuit of personal interest or profit. While you are on paid Globalstar time, you may be involved only in the business of Globalstar.

## ***Compliance With Laws***

### Work Environment

Globalstar strives to provide a productive work place 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.

Globalstar is committed to achieving the highest standards of safety, health, and environmental performance at all of 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 any information or data possessed by and in the control of the Company that may be valuable to it in its business. 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: (1) disadvantage Globalstar competitively or financially; (2) hurt or embarrass customers, suppliers, joint venture partners, or the Company; or (3) 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 or other employees' compensation information; or
- Information disclosed to you in your capacity as a Globalstar employee or consultant by other parties pursuant to a nondisclosure agreement.

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 on confidential and proprietary information and intellectual property, including Globalstar's Intellectual Property and Trade Secrets Policy and Employee Handbook.

### 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 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 (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.

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.

### 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.

### 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”)

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.

### **Export Administration Regulations (“EAR”)**

The Export Administration Regulations govern the export of certain products and technologies (including commercial products and technologies) to foreign persons inside or outside of the

United States. The Department of Commerce's Bureau of Industry and Security administers the EAR and requires licenses to export certain items and technologies. 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

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 protect consumers and competitors against unfair business practices and to promote and preserve competition. 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. 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 is one of 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 this core principle. 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, or any other unfair-dealing practice.

### Insider Trading

Insider trading means entering into a transaction to buy or sell securities, such as shares of stock, while in possession of material information that is not known to the public. Information is “material” if a reasonable investor would attach importance to the information in deciding

whether to buy, sell, or hold the securities, or if the information could cause a change in its market price. Examples of information that is generally considered "material" include financial results and pending corporate transactions.

The trading of securities while in possession of material, nonpublic information is illegal and, if the trades are made in the Company's stock, it is a violation of Globalstar policy. Material, nonpublic information obtained concerning other companies, including our suppliers and customers, as a result of employment with Globalstar, also may not be used to trade in such other company's securities. We also prohibit communicating any such information to others who might trade on the basis of that information (i.e., "tipping"). Globalstar directors, officers, or employees that have regular access to material, nonpublic information concerning the Company or another company must take special care when planning your stock trades.

The laws against insider trading are complex. If you are uncertain about the constraints on your purchase or sale of Globalstar securities or the securities of any other company that you are familiar with by virtue of your relationship with the Company, you should consult with the Legal Department before making such purchase or sale. Note that certain employees are subject to

"blackout" periods where they are strictly prohibited from trading. These generally coincide with the announcement of the Company's quarterly financial reporting.

### ***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, and employee, or any entity acting for or on its behalf, may solicit, directly or indirectly, any gift, favor, or other gratuity 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, and 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, ball point pens, coffee cups, or other promotional materials with a company's logo, that has 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, 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.

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 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 only information to which the Company is legally entitled. 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 and property by following procedures to prevent their loss, theft, or unauthorized use. Company funds and property 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, 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 Director, Public and Investor Relations.

As a public Company, Globalstar will receive 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 will be more 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 Director, Public and Investor Relations. 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.

### ***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, 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 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 or any member of local management. If you prefer not to go to your supervisor, or your concern was not adequately addressed by your local supervisor, other options may be available.
2. Good faith reports relating to banking, accounting, finance, internal accounting controls, bribery or anti-corruption, 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;
  - or
  - Legal Department

L. Barbee Ponder IV  
General Counsel, Vice President - Regulatory Affairs,  
and Assistant Secretary

Richard S. Roberts  
General Counsel  
The Thermo Companies

[barbee.ponder@globalstar.com](mailto:barbee.ponder@globalstar.com)  
(985) 335-1503

8076 Beechmont Avenue, Suite B,  
Cincinnati, Ohio 45255-3161  
[rick.roberts@globalstar.com](mailto:rick.roberts@globalstar.com)  
(513) 474-7900,

- For the matters described in the next section of this Code, the Chairman of the Audit Committee of the Board of Directors:

William A. Hasler  
[wahasler@sbcglobal.net](mailto:wahasler@sbcglobal.net)  
(415) 797-2039

3. In addition, depending on the nature and location of the concern, reports may be made through EthicsPoint, a third party hotline. The hotline is available by phone at 1-866-297-0224 or online at [www.ethicspoint.com](http://www.ethicspoint.com). Because the manner in which reports may be made varies from country to country, EthicsPoint 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, EthicsPoint will direct you back to local management. EthicsPoint 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, Employees are uncomfortable identifying themselves, they 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 Sarbanes-Oxley Act of 2002 requires the Company to create, maintain, evaluate, and correct internal controls over financial reporting and financial disclosure controls. It also requires persons who have knowledge of legal or internal control violations to notify designated Company officials of these violations, and guarantees protections for the persons who make these reports. At the time of your hire you should have signed an acknowledgement of the Company's expectation that you will comply with this law.

Compliance with this law 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 of the Board of Directors 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 Violations has been adopted by the Board of Directors to provide a means by which 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 EthicsPoint to report evidence of a questionable Accounting Matter. The EthicsPoint 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. 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 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 Globalstar Employee 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.

### ***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 EthicsPoint. 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 and 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, 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. Relevant provisions of the Code will also 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, as well as by the Company's Employee Handbook, and by the various laws, rules, and regulations discussed in the Code of Conduct. I realize that a violation of this Acknowledgement, which includes not reporting a possible infraction by me or by others, could result in disciplinary action.