

Conflict Free Minerals Policy of Sequans Communications SA

Sequans' policy regarding the responsible sourcing of minerals required for the production and manufacture of Sequans' products.

Our Conflict Free Minerals ("CFM") Policy is that our suppliers are expected to provide the Tin, Tantalum, Tungsten and Gold ("3TG") used in products we purchase which are supplied in conformance with the latest industry best practice, all related laws and governmental and or accredited NGO guidelines.

Sequans reserves the right to adopt more stringent measures should it consider such action necessary in the pursuance of its CFM policy.

Sequans looks to industry guidelines to help establish its programmes, such as the joint Electronic Industry Citizen Coalition ("EICC") and the Global e-Sustainability Initiative ("GeSI"), which is taking action to address responsible sourcing through the development of the Conflict-Free Smelter Initiative ("CFSI") programme aiming to enable companies to source conflict-free minerals.

In particular we refer suppliers to the adopted, standard, Conflict Minerals reporting templates established by the CFSI; EICC/GeSI initiatives and the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.

We demand of our suppliers that they use sources which themselves demand only 3TG which have been procured via Smelters and or Refiners ("SOR") participating in the CFSI.

We are continuously developing and implementing strategies to support the objectives of the U.S. regulations on the supply of "Conflict Minerals". Our commitment includes:

- Developing policies and processes designed to prevent the use of conflict minerals or derivative metals necessary to the functionality or production of our product(s) that finance or benefit armed groups in the "Conflict Region".
- Not knowingly procuring specified minerals that originate from facilities in the "Conflict Region" that are not certified as conflict free.
- Expecting suppliers whose products contain conflict minerals to establish policies, due diligence frameworks, and management systems consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas that are designed to accomplish this goal, and requiring their suppliers to do the same.

Sequans believes in establishing and maintaining long-term relationships with suppliers whenever possible. However, if we determine that any supplier is, or a reasonable risk exists that it may be, violating this policy, we will require the supplier to commit to devise and undertake suitable corrective action to move to a conflict free source. If suitable action is not taken, we will look to alternative sources for the product.

Sequans' intent is not to ban procurement of minerals from the DRC and adjoining countries, but to assure procurement from responsible sources in the region. If we determine that any of the components of our products contain minerals from a mine or facility that is "non-conflict free", we will work towards transitioning to suppliers who can certify that the relevant minerals are "conflict free".