



UNGC DESCRIPTION OF ACTIONS, August 1, 2016 to July 31, 2017

Human Rights

- Through several audits and random work area inspections we ensure our workers a safe, clean and suitable workplace and environment. Although not perfect we did make improvements where we found potential deficiencies like purchasing floor mats to avoid accidents on smooth floor manufacturing and office areas.
- Through various internal communication vehicles we continue place emphasis on the protection of our employees from workplace harassment, including physical, verbal, sexual or psychological harassment, abuse or threats. We communicate this in department meetings, company meetings, as well as in discussions among our Board of Directors.
- Our employees are continually monitored on safety practices and requirements to eliminate handling ingredients through procedures specifically developed to insure the safe handling of materials that could harm or threaten human life and health during manufacturing, usage or disposal of products. Our new employees are required to go through extensive training and become certified in the safe handling of all materials or other chemicals that are potentially dangerous if used, stored, or disposed of improperly.

Labor

- In our region of the United States where forced labor or unfairly compensated labor is sometimes used, Everspin has a policy against such activity and will not tolerate any violation of the policy. We utilize the United States E-Verify system on every hire we make to insure we are hiring people with the legal right to work in the United States. We also insure all those in our employ are paid fairly based on competitive salary and wage compensation data derived from third party expert firms.

- We comply with all State and Federal minimum wage laws and statutes. Upon the completion of our last internal audit we had no employees paid at or under minimum wage. We found all of our employees and Contractors were compensated well in excess of minimum wage standards.
- Every employee hired into Everspin Technologies, Inc. is hired based on relevant experience without regard to race, color, national or ethnic origin, sex, ancestry, age, religion, disability or any other such criteria that is not and should not be a factor in the selection of a person to perform a function in the company. We are also proud to say that the most highly compensated person in the company is female.

Environment

- Everspin Technologies Inc. is a very environmentally conscious company. Not only do we follow all EPA requirements on the disposal of chemicals or materials that could create an environmental hazard, we try and do our part to reduce as much waste as possible by recycling everything from printer cartridges to plastic containers and bottles in all the office areas. Each office area has two trash receptacles, one for non-recyclables and one for recyclables.
- As far as our manufacturing chemicals and materials; the disposal of these materials is monitored very closely to insure all safety precautions are followed to prevent unnecessary risk to our employees, as well as to insure the improper disposal of these material is not possible. Regular training is held and certifications are required to be completed.
- Our Corporate Code of Conduct specifically states that it is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We are committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

Anti-Corruption

- Our Corporate Code of Conduct also specifically highlights the Honest and Ethical behavior expectations we have of our employees, contractors, and suppliers, and

that we expect them to conduct their business dealings in an honest and ethical manner.

- Everspin Technologies, Inc. does not allow nor tolerate any activity or behavior that is used to gain improper advantage or favor with customers, governments, or governments officials.

Over the last year we have made progress in all of the measurable areas and we will continue to strive to make meaningful progress in the future.

Phill LoPresti

A handwritten signature in blue ink, appearing to read "Phillip LoPresti", with a long horizontal flourish extending to the right.

CEO

Everspin Technologies, Inc.

3. MEASUREMENT OF OUTCOMES

In late 2016 Everspins Board of Directors and its Officers developed and adopted a Corporate Code of Conduct that is 11 pages long and encompasses the following areas:

1. Honest and Ethical Conduct
2. Legal Compliance
3. Insider Trading
4. International Business Laws
5. Antitrust
6. Environmental Compliance
7. Conflicts of Interest
8. Corporate Opportunities
9. Maintenance of Corporate Books, Records, Documents and Accounts, financial integrity and public reporting.
10. Fair Dealing
11. Gifts and Entertainment
12. Protection and Proper Use of Company Assets.
13. Confidentiality
14. Media and Public Discussions.
15. Compliance Standards and Procedures.

This corporate Code of Conduct was distributed to all Everspin Employees, requiring that each employee sign having received and read the document with the understanding that this is how Everspin Technologies, Inc. expects business to be conducted by employees, contractors and suppliers alike.