

United Nations Global Compact description of actions August 1, 2017 to July 31, 2018.

Human Rights

- Continued the practice of audits and random work area inspections to ensure our
 workers a safe, clean and suitable workplace and environment. We did make some
 very minor improvements where we found potential deficiencies. One example was
 setting aside a more suitable are to stack incoming materials boxes where they were
 more stable and less likely to cause an incident.
- We stepped up our game and placed an emphasis on the protection of our employees from workplace harassment, including physical, verbal, sexual or psychological harassment, abuse or threats by making it mandatory for all employees, contractors, and consultants to attend formal harassment training. We required all existing employees, contractors and consultants to go through this formalized training class. Progress was monitored, and we are at 100% compliance today. All new hires as well as newly engaged contractors and consultants are given 10 days to complete this training.
- 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 this 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. In fact, 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. At our headquarters in Chandler, Arizona we have installed RO and filtration systems to reduce our reliance on bottled water and subsequently the plastic waste that results. We are following this practice in our Austin, Texas Design Center as well with installation of systems scheduled for later this summer. We have successfully continued the practice of each of our geographic locations having 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.

- 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. To that end we have instituted a formalized classroom/online training program in conjunction with our harassment training program that covers anticorruption practices not just in the United States but abroad as well. There is also a module in this training that extensively covers the United States Foreign Corruption Practices Act. These are required trainings that are monitored to insure compliance.
- Everspin Technologies, Inc. does not allow, nor will it tolerate any activity or behavior that is used to gain improper advantage or favor with customers or governments, either foreign or domestic.

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.

Kevin Conley

CEC

Everspin Technologies, Inc. 5670 W. Chandler Blvd.

Suite 100

Chandler, AZ 85226

MEASUREMENT OF OUTCOMES:

In 2017 Everspin adopted a process whereby every employee, consultant, and contractor is required to attend and complete the following courses:

- 1. Harassment and Discrimination Prevention
- 2. Code of Conduct: Business Ethics in the United States
- 3. Anti-Corruption and Bribery, Global
- 4. FCPA: Foreign Corruption Practices Act
- 5. United States Insider Trading education
- 6. Data Security and Privacy

Each of these courses are offered in multiple languages to ensure that our workers in Europe and Asia can successfully take these courses in their native language.

Everspin's Board of Directors and its Officers have reviewed our adopted Corporate Code of Conduct that covers the following areas as well:

- 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 is distributed to all Everspin Employees in our company handbook, requiring that each employee sign off that they have 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.