



**United Nations Global Compact description of actions
August 1, 2018 July 31, 2019**

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 moved some of our domestic production into a facility of our design where we spent time and financial resources to insure the facility is as safe as possible for our employees. Everything from fire suppression systems to chair mats were considered in the build out.
- We continued our 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 added a course on managing personal bias as well. Everspin requires that all employees, contractors, consultants, temps and new hires complete and pass these training classes. Progress is monitored, and we have maintained 100% compliance.
- We continued monitoring safety practices and requirements to eliminate poor handling of ingredients and chemicals used in manufacturing. We do this to insure the safe handling of materials that could harm or threaten human life and health during manufacturing, usage or disposal of products. All new employees are still required to go through extensive training and become certified in the safe handling of all materials.

Labor

- In our region of the United States where forced labor or unfairly compensated labor is sometimes used, Everspin maintains its 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 added a formal identification and background investigation service to insure we know who we are hiring. By utilizing various industry compensation surveys, we insure all those in our employ are paid fairly.

- 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 standards. In fact, all of our hourly employees and contractors are compensated 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 and now in our Design Center in Austin, Texas we have installed RO and filtration systems, and distributed large, refillable sports type bottles resulting in the elimination of our use of plastic bottled water and the plastic waste that results. We have successfully continued the practice of each of our geographic locations having two trash receptacles, one for non-recyclables and one for recyclables.
- Our Corporate Code of Conduct specifically states that it is our policy to conduct our business in an environmentally responsible way that minimizes environmental impact. 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, training 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. To that end we have instituted a formalized classroom/online training program in conjunction with our harassment training program that covers anti-

corruption 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. We continue to require these trainings as a condition of employment and completion of these course trainings 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.

This past year we have made progress in all of the measurable areas under the United Nations Global Compact's ten principles, and we will continue to strive to make meaningful progress in the future.

Kevin Conley

A handwritten signature in black ink, appearing to read "K. Conley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

CEO

Everspin Technologies, Inc.
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MEASUREMENT OF OUTCOMES:

In 2018 Everspin continued to drive 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
7. Diversity and Inclusion in the Modern Workforce
8. Managing Personal Bias.

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 and ratified for 2018 and 2019 our adopted Corporate Code of Conduct that covering the following:

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 on line, 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, temps, new hires and all suppliers or vendors.

