

SUBJECT: Equal Employment Opportunity and Affirmative Action Policy Statement

APPLIES TO: All Employees and Applicants for Employment

DATE: January 1, 2015

Sotera Wireless is an equal opportunity employer and provides equal opportunity in employment for all qualified persons. Sotera Wireless makes employment decisions including, but not limited to, recruiting, hiring, promotion, demotion, training, compensation, benefits, disciplinary actions, and terminations on the basis of merit. Employment decisions are based on an individual's qualifications as they relate to the job under consideration. Employment decisions will be based on the principles of equal employment opportunity and with the intent to further Sotera Wireless's commitment to affirmative action and equal employment.

Sotera Wireless will take affirmative action to ensure that qualified minority group individuals, females, individuals with disabilities, or protected veterans are introduced into the workforce, encouraged to apply for promotion, and considered as promotional opportunities arise.

The policy prohibits unlawful discrimination based on gender (which includes pregnancy, childbirth, or related medical conditions, the actual gender of the individual or the identity, appearance or behavior of an individual, whether or not that identity, appearance, or behavior is different from that traditionally associated with the individual's gender or birth), sexual orientation, race, color, creed, religion, national origin, citizenship, ancestry, pregnancy, age, marital status, registered domestic partner status, medical condition (which includes genetic characteristics), physical or mental disability, status as a protected veteran, or any other consideration made unlawful by applicable federal, state or local laws, ordinances or regulations. Sotera Wireless also prohibits unlawful discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics. All such discrimination is unlawful.

Sotera Wireless is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in Sotera Wireless's operations and prohibits unlawful discrimination by any employee of Sotera Wireless, including supervisors, coworkers, and subordinates. To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, we will make a good faith effort to provide reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any applicant or employee who believes he or she requires an accommodation in order to perform the essential functions of the job should contact the EEO officer and request such an accommodation. The individual with the disability should specify what accommodation he or she needs to perform the job. Sotera Wireless will analyze the situation, engage in an interactive process with the employee, and respond to the employee's request.

If you believe you have been subjected to any form of unlawful discrimination, submit a complaint, preferably in writing, to your supervisor, Sotera Wireless's Human Resources Department, or the EEO officer. If these individuals are not available, or in the event you believe that one of these individuals has engaged in inappropriate behavior in violation of this policy, submit a complaint to any other supervisor as soon as possible. Supervisors must report any and all conduct of which they are made aware which violates, or may violate, this policy to myself or other upper-level managers, as appropriate. Your complaint should be specific and should include the names of the individuals and witnesses involved. We will promptly undertake an effective, thorough, and objective investigation and attempt to resolve the situation.

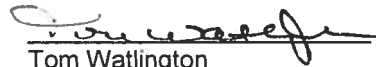
If we determine that unlawful discrimination or a violation of this policy has occurred, effective remedial action will be taken commensurate with the severity of the offense, up to and including termination. Appropriate action also will be taken to deter any future discrimination.

There will be no retaliation against any employee who brings a complaint under the equal employment opportunity policy or who assists in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven.

Employees and applicants are encouraged to identify their race, gender, disability status, and their protected veteran status. This self-identification is strictly voluntary, confidential, and will not result in retaliation of any sort.

The top executive of our corporation fully supports our equal employment opportunity and affirmative action efforts. As CEO of Sotera Wireless, I am committed to the principles of equal employment opportunity and affirmative action. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected Phyllis Balan as the EEO officer for Sotera Wireless. One of the EEO officer's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of our Affirmative Action Program.

In furtherance of Sotera Wireless's policy regarding equal employment opportunity and affirmative action, Sotera Wireless has developed a written Affirmative Action Program which sets forth the policies, practices, and procedures which the company is committed to applying to ensure that its policy of non-discrimination and affirmative action is accomplished. Any questions should be directed to me, your supervisor, or Phyllis Balan, EEO Officer.

A handwritten signature in black ink, appearing to read "Tom Watlington".

Tom Watlington
Sotera Wireless
1/1/2015