

GLOBAL EAGLE ENTERTAINMENT INC.

CONFLICT MINERALS POLICY

EFFECTIVE MARCH 14, 2017

Purpose. Global Eagle Entertainment Inc. is committed to the highest standards of ethics and business conduct. It is our goal to ensure that any tantalum, tungsten, tin or gold (collectively, “3TG”) found in our products does not and will not directly or indirectly finance armed conflict or human rights abuses in the Democratic Republic of the Congo or adjoining countries, while at the same time continuing to support responsible mineral sourcing in that region. Achieving this goal includes identifying 3TG in our products and complying with Section 13(p) of the Securities Exchange Act of 1934, as amended, and Rule 13p-1 thereunder.

Policy. We do not currently buy any 3TG directly from mines or smelters, and therefore any 3TG that enters our supply chain would come from third-party supply sources. It is our policy to investigate our supply chain consistent with the OECD (Organization for Economic Cooperation and Development) Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas by engaging with our suppliers and requesting that they adhere to and enforce that guidance.

Pursuant to our General Supplier Quality Requirements, we require that our suppliers complete an Electronic Industry Citizenship Coalition’s Global e-Sustainability Initiative conflict minerals reporting template and deliver such report to us no later than January 31 of each year. We rely on the information reported to determine the origin of any 3TG in our products, and expect that our suppliers have policies and due diligence in place to reasonably ensure that products supplied to us are conflict-free.

Administration. The General Counsel or his or her designee shall be responsible for the administration of this policy.