

Iridium Satellite LLC Combatting Human Trafficking Policy

I. Purpose

This policy sets forth Iridium Satellite LLC's ("Iridium") approach to combatting human trafficking and documents how Iridium complies with the requirements of Federal Acquisition Regulation ("FAR") Subpart 22.17 and the implementing contract clause FAR 52.222-50, Combatting Trafficking in Persons. This policy is consistent with Iridium's policies, including the Iridium Code of Business Conduct and Ethics, and our core values to protect and advance human dignity and human rights in our global business practices.

This policy applies to all Iridium personnel, including directors, officers, and employees; and applies equally to Iridium's agents, subcontractors, independent contractors, product suppliers, distributors, vendors, and other firms that furnish supplies or services to or for Iridium for performance of a federal contract (collectively the "Covered Entities").

Per FAR 52.222-50(a), this policy covers Iridium subcontractors furnishing supplies or services for performance of a prime contract or a subcontract. This policy does not cover vendors or suppliers not directly engaged in the performance of work under the contract that have only a minimal impact on or involvement in contract performance. For example, this policy does not cover back-office vendor agreements (*e.g.*, building maintenance), general day-to-day supply agreements (*e.g.*, office or maintenance, repair, and operation supplies), or commercial agreements of an indirect nature that support all Iridium's services (*e.g.*, telecommunications suppliers that enable situations communications through their standard landlines).

The FAR 52.222-50 clause includes several definitions that apply to this policy, so please confer with the Compliance Officer at (703) 287-7441 if you have any questions about applying the policy in practice.

II. Policy

- A. Iridium's United States Government customer (the "customer") has a long-standing, zero-tolerance policy prohibiting trafficking-related activities. To facilitate that policy, Iridium and Covered Entities shall not:
1. Engage in trafficking in persons, which includes (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; and (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
 2. Procure commercial sex acts;
 3. Use forced labor in the performance of any contract;

4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
 5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
 6. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
 7. Charge employee recruitment fees (which are defined at length in the FAR 52.222-50 clause and serve as an example of an area for outreach and clarification with the Compliance Officer);
 8. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (some limited exceptions apply);
 9. Where housing is provided, provide, or arrange housing that fails to meet the host country housing and safety standards; or
 10. If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing.
- B. Iridium's directors, officers, and employees ("Employees"), and Covered Entities are responsible for complying with this Policy.
- C. Any violation of this Policy could result in disciplinary action, up to, and including, removal from a contract, reduction in benefits, termination of a business relationship (including subcontracts and similar arrangements), or termination of employment. Additionally, knowing violations of Government regulations or statutes regarding trafficking in persons could result in civil, administrative (i.e., suspension or debarment), and/or criminal sanctions against the individual employee.
- D. Iridium takes seriously its obligations to cooperate with contracting agencies and other responsible entities that address compliance with laws and regulations establishing restrictions trafficking in persons, the procurement of commercial sex acts, or the use of forced labor.

- E. Iridium will include the clause at FAR 52.222-50 in all contracts (subcontracts, purchase orders, and the like) with Covered Entities.

III. Reporting

- A. Credible information regarding a potential violation of this Policy, whether by an Employee or a Covered Entity, must be promptly reported to, the Iridium Human Resources Department, Compliance Officer, or the Iridium Chief Legal Officer by phone, email or in person.
 - 1. Alternatively, potential violations may be reported anonymously through the Company's toll-free Compliance Hotline at 877-874-8416 or on-line at <https://iridium.alertline.com/gcs/welcome>.
 - 2. Any manager or Human Resources personnel receiving notification of a potential violation of this Policy immediately shall report the matter to the Compliance Officer or Chief Legal Officer.
- B. Employees or Covered Entities aware of potential human trafficking violations by any persons or organizations may contact the National Human Trafficking Hotline (<https://humantraffickinghotline.org/>) directly at 1-888-373-7888, Text 233733 (BeFree), or email help@befree.org. For potential violations involving Iridium Employees or Covered Entities, these publicly-available reporting channels are in addition to the Iridium-specific channels identified above.
- C. Iridium policy and federal law prohibit retaliation against those who make reports of misconduct and prohibit interfering with employees' cooperation with Government authorities investigating allegations of prohibited activity.

For further information regarding this Policy, or if you have any questions about this policy or potential violations thereof, please contact the Compliance Officer at (703) 287-7441.