



Iridium Satellite LLC Statement on Modern Slavery and Human Trafficking

This statement is made by Iridium Satellite LLC and on behalf of its UK subsidiary, Iridium Satellite UK Limited, and its Australia subsidiary, Iridium Australia Licensee Pty Ltd., (collectively “Iridium”) in compliance with the UK Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018. Iridium has a zero tolerance of modern slavery human trafficking and this statement sets out the steps we take to prevent modern slavery and human trafficking in our business and supply chain.

Our Business

Iridium is the only commercial provider of communications services offering true global coverage, connecting people, organizations and assets to and from anywhere, in real time. Our unique L-band satellite network provides reliable communications services to regions of the world where terrestrial wireless or wireline networks do not exist or are limited, including remote land areas, open ocean, airways, the polar regions, and regions where the telecommunications infrastructure has been affected by political conflicts or natural disasters.

We provide voice and data communications services to businesses, the U.S. and foreign governments, non-governmental organizations, and consumers via our satellite network, which has an architecture of 66 operational satellites with in-orbit and ground spares and related ground infrastructure. We utilize an interlinked mesh architecture to route traffic across our satellite constellation using radio frequency crosslinks between satellites. This unique architecture minimizes the need for local ground facilities to support the constellation, which facilitates the global reach of our services and allows us to offer services in countries and regions where we have no physical presence.

We sell our products and services to customers through a wholesale distribution network of Service Providers, Value-Added Resellers and Value-Added Manufacturers who sell our products and services to end users, either directly or indirectly. Our distributors often integrate our products and services with other complementary hardware and software and have developed individual solutions targeting specific lines of business. We also sell airtime services directly to the U.S. government, for resale to other government agencies, and the U.S. government and international government agencies may purchase additional services as well as our products and related applications through our network of distributors.

Policy on Human Trafficking, Modern Slavery and Human Rights

Iridium is strongly committed to supporting and maintaining the highest standards of ethical conduct and respect for human rights. As a responsible corporate citizen, Iridium fully supports the elimination of human trafficking and slavery, including from our supply chain at all tiers. Iridium does not tolerate trafficking in persons, including the procurement

of commercial sex acts and the use of forced or child labor. For further information about our responsible business practices refer to our [Code of Business Conduct and Ethics](#).

Acting with integrity includes being accountable for the highest standards of behavior. Our standard procurement terms and conditions contain provisions requiring our suppliers to comply fully with all applicable laws and regulations, including explicit obligations regarding anti-human trafficking.

Risk Factors

We assess our overall risk profile in relation to our operations and supply chain by examining several factors, including the geographic location of the supplier, the industry in which the supplier operates, the nature of the goods or services the supplier provides, and the supplier's past performance. Most of our direct suppliers are leading companies with whom we have successful and long-established relationships. Although we are not aware of any noncompliance with human rights or labor standards, we understand that some materials or components used in our supply chain may be identified as high risk, and some of the countries in which our suppliers operate may have higher risks of modern slavery due to weak governance or socio-economic factors.

Due Diligence / Verification of Supply Chain, Evaluation of Risk and Compliance

We require prospective suppliers to complete a due diligence process during which we collect information from the supplier, review the supplier's reputation and background, and conduct a risk-based assessment of certain suppliers operating in international locations. Should we become aware of any violations of law or policy, or issues related to modern slavery or human trafficking, we will consult with our Legal Department to ensure that appropriate measures are taken, which may include reporting to authorities and terminating our relationship with the supplier.

U.S. Government Contracts

As a U.S. Government contractor, we are also governed by and comply with Federal Acquisition Regulation ("FAR") 52.222-50 on Combatting Trafficking in Persons. We flow down the FAR 52.222-50 requirement to all covered subcontractors and suppliers requiring their compliance. Please refer to our policy on [Combatting Trafficking in Persons](#).

Reporting Violations or Concerns

We expect and ask our employees to raise concerns regarding potential violations of our values, policies or applicable law, and we provide multiple reporting avenues, including submitting concerns or questions anonymously through our Iridium Compliance Hotline at (833) 778-1524 or <https://iridium.ethicspoint.com>. We encourage our employees and third parties to raise concerns without fear of retaliation. We investigate allegations of misconduct and take appropriate steps, including corrective action when allegations are substantiated. These reporting opportunities include concerns that relate to human trafficking or other modern slavery practices.

Maintenance of Ethics and Compliance Program and Accountability

We maintain a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity in all we do, including the Modern Slavery Acts. Our officers, directors and employees are responsible for complying with our Code of Business Conduct and Ethics and other policies and procedures, including those that seek to combat human trafficking. Iridium employees found to be in violation of our Code are subject to discipline, up to and including termination.

Training of Relevant Employees and Suppliers

We provide targeted training and awareness on compliance matters through various methods, including online training modules, corporate communications, compliance posters at applicable work sites and postings on internal Iridium websites. All employees are required to certify annually that they have read and understand our Code of Business Conduct and Ethics. We monitor, track progress and enforce this requirement.

Review of Anti-Human Trafficking Efforts

We periodically review our anti-human trafficking mitigation efforts in light of our ongoing compliance obligations to monitor effectiveness and to ensure consistency with applicable requirements as well as with our mission and values. We will continue to review and enhance as appropriate our efforts to prevent human trafficking and other misconduct within our supply chain.

Next Steps

We will continue to look for opportunities to advance efforts to identify and address modern slavery risks and impacts in our supply chain. We plan to issue a Supplier Code of Conduct to convey the expectations we hold for our suppliers and mirror the standards we set for our own employees, board of directors and other business associates to ensure that we and our suppliers conduct ourselves with the utmost integrity, delivering high quality products and services while following all applicable laws, regulations, and standards of business conduct.

The above statement is made pursuant to Section 54 of the UK Modern Slavery Act of 2015 and Section 16 of the Australian Modern Slavery Act of 2018 for the fiscal year ended December 31, 2020.



Matthew J. Desch
Chief Executive Officer and Director