

HUMAN RIGHTS POLICY

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CLASSIFICATION: PUBLIC

CONTENTS

1.	INTRODUCTION	2
2.	OBJECTIVE	2
3.	SCOPE	3
4.	PROHIBITIONS	3
5.	MODERN SLAVERY	3
5.1.	Red Flag Checklist	4
6.	CORPORATE SOCIAL RESPONSIBILITY	4
7.	YOUR RESPONSIBLITIES	4

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1. INTRODUCTION

It is our policy to conduct business across the Inmarsat group respecting and protecting communities in which we work and providing a positive impact in relation to human rights. We are committed to developing and fostering a culture which thrives on diversity and inclusion. Our Code of Business Conduct & Ethics states that we must act in accordance with the highest standards of personal and professional integrity.

In carrying out this policy we are bound by the Guiding Principles on Business and Human Rights published by the United Nations in 2011 and committed to upholding number of international standards including but not limited to

- a. The International Bill of Human Rights (which consists of: Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- b. The International Labour Organizations Declaration on Fundamental Principles and Rights at Work

Should we encounter a situation whereby the national laws differ from the international standards set on human rights, we will where possible adhere to the higher standards. We are however, bound by the national laws set by the countries we serve, where these conflict for international standards will seek way to improve human rights whilst respecting these laws.

Alongside this, the company is committed to driving environmental protection and developing sustainability in all its business endeavours.

2. OBJECTIVE

The objective of this policy is to:

- c. Set out our responsibilities, and of those working for us, in observing and upholding our position on human rights and equality; and
- d. Provide information and guidance to those working for us on how to recognise and deal with any suspected breaches of such rights.

It is our responsibility to respect, protect and fulfil human rights and the associated fundamental freedoms that brings. We are to comply with all applicable regulations and laws in respect of this matter and to seek resolutions should these rights and freedoms be breached.

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. SCOPE

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Senior Director Global Compliance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

This policy applies to all persons working for us, or any Inmarsat Company, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

The company will encourage, through contractual obligations (if needed) all of the above mentioned parties to adhere to our values or to demonstrate they have a statement of principles in relation to protecting human rights.

4. PROHIBITIONS

In adhering to and upholding fundamental human rights, the company prohibits the following actions:

- e. Any discrimination based on gender, ethnicity, age, sexual orientation or religion
- f. Any use of any forced, coerced or compulsory labour
- g. The employment of any person under the age of 18
- h. Any involvement in any form of human trafficking
- i. Any form of degrading or harsh treatment
- j. Engaging with any such vendors or third parties who use child or forced labour

5. MODERN SLAVERY

Whilst upholding the fundamental principles of human rights consideration needs to be given to abiding by the Modern Slavery Act 2015. This act makes it a criminal offence to hold a person in slavery or servitude, force them to engage in forced or compulsory labour. Furthermore it makes a criminal offence of trafficking (facilitating the travel of) a person with a view that the person will be exploited.

Under this act, exploited means: slavery, servitude, forced labour, sexual exploitation, removal of organs and securing services of children or the vulnerable. A number of red flags

5.1. Red Flag Checklist

Signs of restricted freedoms

- k. Are they in possession of their own passports or are they being 'held' for safe keeping
- L. Are they living on-site rather than in their own homes?
- m. Do they have a home address or keys to it?

Poor Working Conditions

- n. Are they working excessive hours?
- o. Are they properly trained?

Behavioural Signs

- p. Do they look frightened?
- q. Do they speak when directly spoken too,
- r. Do they scavenge for food?

Physical Signs

- s. Are there any signs of physical abuse, bruising?
- t. Do they look dirty and / or dishevelled?
- u. Does there appear to be a lack of personal belongings?
- v. Are there signs of drug or alcohol addiction?

Any supply chain or social audits conducted by the company should be mindful of potential human rights / slavery abuses and suitably plan to address and question these areas when needed.

6. CORPORATE SOCIAL RESPONSIBILITY

CSR is built into our DNA – we were founded to provide life-saving communications services; today we continue to help save lives in emergencies, first responders bringing relief during manmade and natural disasters to search and rescue at sea and safety in the air, all these depend on our reputation for service and reliability.

7. YOUR RESPONSIBLITIES

You must ensure that you read, understand and comply with this policy.

You must notify your manager and the Senior Director Global Compliance, or the confidential helpline/website as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. Details of anonymous reporting can be found in the Speak Up Policy.