



# TRANSPARENCY AND WORK ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS (TRANSPARENCY ACT)

## INTRODUCTION AND STRUCTURE OF THE ORGANISATION

Inmarsat Solutions AS is a Norwegian incorporated company, registered company number 964 823 138 (the "Company"). The Company meets the definition of a 'larger enterprise', as defined under the Transparency Act and is therefore required to carry out due diligence in accordance with the OECD Guidelines for Multination Enterprises. The Transparency Act's aim is to promote respect for fundamental human rights and decent working conditions and ensuring that customers, organisations and other interested parties have access to information.

We have policies and governance procedures in place to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure that general public access to information regarding how the Company addresses adverse impacts on fundamental human rights and decent working conditions.

### 1. STRUCTURE OF THE ORGANISATION

The Company is part of the Inmarsat group, which is a leading provider of global mobile satellite communications services headquartered in London. On 30 May 2023, ViaSat, Inc. acquired the Inmarsat group of companies via Connect Topco Limited, a holding company in the Inmarsat Group structure.

Since 1979, Inmarsat has been providing reliable voice and high-speed data communications to governments, enterprises and other organisations, with a range of services that can be used on land, at sea or in the air. Inmarsat operates around the world, with a presence in the major ports and centres of commerce on every continent.

The Company's headquarters in Norway are in Ålesund and it develops, supplies and supports maritime broadband and television solutions that give customers open internet access, email solutions and IP Telephony. Distribution and service is largely through dealer networks in Norway and abroad and customers include both Norwegian and foreign ship owners. The Company has two international subsidiaries with sales personnel, technicians and administrative personal in Iceland and Singapore.

This statement seeks to outline the actions and progress of the Company in response to the Transparency Act.

### 2. POLICIES AND PRACTICES RELATING TO HUMAN RIGHTS AND WORKING CONDITIONS

#### 2.1 Code of Business Conduct and Ethics

The Company uses both Norwegian and foreign dealer networks to services its customers, with suppliers ranging from small and medium sized companies to multinationals.

As the Company forms part of the Inmarsat group, the Company and its employees are required to adhere to the Inmarsat group's policies and procedures. The Inmarsat Code of Business Conduct and Ethics sets out the principles to which all staff and contractors are expected to adhere and advocate in meeting these standards. This applies to the Company and its subsidiaries including its directors, officers, employees and contractors and aligns the Inmarsat policies, culture and legal obligations into one document.

Inmarsat operates a mandatory Code of Business Conduct and Ethics training programme. Employees are required to complete this on an annual basis and it includes training on Ethics, Anti-Bribery and Human Rights.

## **2.2 Human Rights Policy**

The Company is obligated to adhere to the Inmarsat Human Rights policy, which reinforces the group's ongoing commitment to responsible business. This policy was introduced in 2019 and sets out a culture of respecting and protecting the communities in which the group works to provide a positive impact on human rights.

## **2.3 Speak Up Policy**

Inmarsat has a well publicised Speak up Policy, which, in conjunction with a whistleblowing hotline, is designed to encourage Inmarsat staff to highlight concerns in confidence – including any human rights concerns. Everyone who raises a concern in good faith is treated fairly, regardless of the outcome of any subsequent investigation. The Speak up Policy is overseen by the Compliance team and senior executives review each individual complaint reported. Any concern raised is formally, robustly and independently investigated and then monitored to verify any corrective action or remediation has been conducted.

During 2022 we ran a 'speak up' campaign designed to promote the existence and principles of the Speak up Policy. The campaign was publicised on company laptop lock screens reaching staff globally.

During 2022 there were 0 (zero) reports of human rights concerns via this hotline.

## **2.4 Environmental, Health and Safety Policy**

Inmarsat aims to ensure, as far as is reasonable practicable, the health, safety and wellbeing of all employees, contractors/consultants, visitors and other persons who may be affected by the Company's operations. This policy covers the management of environmental aspects and impacts and Inmarsat aims to achieve this by providing and maintaining a safe place of work with safe equipment, environmental governance and to provide suitable arrangements for the welfare of employees.

As part of this policy, senior executives receive regular updates on the environmental, health and safety update of activities across the Inmarsat group, including the Company, on an annual basis.

## **2.5 People Strategy**

Inmarsat has a defined People Strategy, which includes creating a compelling employee value proposition and delivering HR excellence. As part of this strategy, Inmarsat has implemented flexible and remote working for relevant roles and also strives to create innovative and market competitive

compensation and benefits packages, as well as implementing flexible benefits and a broader range of employee benefits.

## **2.6 Supplier Code of Conduct**

The Inmarsat Supplier Code of Conduct holds suppliers to account for standards of ethical behaviour, environmental awareness, health and safety and other relevant working practices and is available on the Inmarsat website. Our Supplier Code of Conduct is built into our purchase order processes to regularly refresh our suppliers' commitment to our working policies and ethical standards and suppliers confirm their acceptance during the sourcing process. Development and implementation of the Supplier Code of Conduct is led by the VP Global Procurement.

## **3. SUPPLY CHAIN DUE DILIGENCE**

### **3.1 Supplier and Business Partner Due Diligence**

The Inmarsat group relies on an international supply chain and our suppliers and business partners range from small and medium sized enterprises to multinationals.

The Company and the Inmarsat group are not a mass-market manufacturer and do not directly own or operate large factories or other production facilities. We do offer our customers a range of terminals that carry the Inmarsat logo, however these devices are manufactured on our behalf by third party suppliers according to our specifications. Neither the Company nor the wider group own, operate directly or control the manufacturing plants that make Inmarsat branded hardware, nor do they handle raw materials or commodities.

Procurement is a highly centralised function within the business. All of the supplier data (direct and indirect) is under the remit of the Inmarsat Global Procurement team. The procurement process is designed to ensure fair treatment of suppliers through our sourcing programme and once on-boarded, are managed by our VP Global Procurement.

Inmarsat takes seriously its responsibilities in ensuring its supply chain is robust, auditable and compliant with legislation. Factors such as locations, industries and activities with a history of poor labour standards are considered when determining whether a more detailed evaluation of the supplier is required.

Inmarsat requires every new supplier to confirm compliance with the relevant legislation, including human rights as well as any local legislation as applicable. Responses are reviewed and evaluated to ensure our suppliers mirror our values and culture in relation to these important practices.

A supplier providing an incomplete or unsatisfactory response triggers a review which may result in the supplier being rejected. If a potential new supplier is found to be non-compliant, where feasible we try to work with them to help enhance their capabilities and address the issues of concern, using corrective action plans.

In 2019, new supplier screening software was implemented to enhance Inmarsat's capabilities in supplier risk assessment and this will automatically monitor suppliers going forwards. This software monitors real time adverse media human rights concerns. Our compliance team who support the procurement function with these reviews, also undertake specific and enhanced screening checks where necessary. All existing and new suppliers continue to be screened using this software.

### **3.2 Terms and Conditions**

Inmarsat's standard contract templates include reference to supplier performance and this includes ongoing ethical standards and compliance with our policies. This ensures that any commitments made at the due diligence/pre-qualification stage are underpinned by a contractual requirement and are legally enforceable. Additional protection is provided by other contractual provisions such as the right to audit.

## **4. RISK ANALYSIS AND NEXT STEPS**

We continue to review all of our key suppliers to identify those operating in countries or within business sectors and industries at higher risk of human rights and poor working conditions. The vast majority of Inmarsat suppliers are located in very low risk areas, with most of those working in sectors that are not considered to be high risk sectors. We continue to use this risk-based approach in our procurement processes to minimise the risk. During 2022, we identified and produced a new framework of high-risk territories and sectors and will work to implement this framework into our procurement policy and risk assessment, to ensure that our approach remains robust.

### **4.1 Identification of Risk**

Inmarsat believes that identification of risk through both audit and observation is essential. We will ensure that this skillset is available both internally and also augmented, where necessary, by independent auditors. Inmarsat is aware a number of countries will be introducing mandatory Human Rights due diligence. We will continue to monitor these laws as they develop and take action where necessary.

### **4.2 Accountability**

Inmarsat will be accountable for its business relationships and will progressively work to eliminate vulnerabilities in its supply chains. Where human rights abuse is identified, it will take corrective action and work together with suppliers and business partners to ensure future risk is mitigated.

This statement covers the 2022 financial year and was approved by the Board of Directors on 30 June 2023.

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The board of directors of Inmarsat Solutions AS

Ålesund, 30 June 2023

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*Alison Cowpe*

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Alison Claire Cowpe  
(chair of the board)

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*Frank Asen Bjørnsen*

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Frank Asen Bjørnsen  
(board member)

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*Audra Drablos*

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Audra Sujatha Drablos  
(board member)

The CEO of Inmarsat Solutions AS

Ålesund, 30 June 2023

DocuSigned by:

*Frank Asen Bjørnsen*

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Frank Asen Bjørnsen  
(CEO)