

IRIDIUM COMMUNICATIONS INC. HUMAN RIGHTS POLICY

At Iridium Communications Inc. and its subsidiaries (collectively, “Iridium”), we are committed to protecting and advancing human dignity and respect in our global operations. We recognize our impact on the world and always strive to lead by the ethics, principles and values outlined in our [Code of Business Conduct and Ethics](#). We have a large and diverse network of business partners and other external stakeholders and believe we all collectively have a role to play to respect human rights and dignity.

Iridium is committed to complying with all applicable local laws and regulations where we do business. We are also committed to upholding and respecting the fundamental rights and freedoms of all individuals with whom we engage across our operations. Our efforts are guided by the [United Nations \(UN\) Universal Declaration of Human Rights \(UDHR\)](#), the [UN Guiding Principles on Business and Human Rights](#), and the Organisation for Economic Cooperation and Development’s [\(OECD\) Due Diligence Guidance for Responsible Business Conduct](#).

I. SCOPE

This policy statement applies to Iridium, its affiliates, subsidiaries, directors, officers and employees wherever located.

II. GOVERNANCE

Identification and mitigation of human rights risk is a shared responsibility throughout Iridium and is overseen by our Board of Directors and senior management. Senior management, working with our Board of Directors, strives to implement the commitments reflected in this policy statement, in partnership with business and functional teams throughout Iridium.

III. HUMAN RIGHTS RISK FACTORS

We acknowledge the human rights risks in our industry, particularly around privacy and data security, discrimination, and forced labor.

A. PRIVACY AND DATA SECURITY

We know that our activities require particular attention to the rights to privacy, and we strive to understand and address the potential impacts of privacy, security and information risks as they relate to our technologies and business practices. Detailed information on how we handle and use customer information can be found in our [Privacy Policy](#) and further information on our cybersecurity framework can be found in our [Environmental, Social and Governance Report](#).

B. DISCRIMINATION

We prohibit discrimination in the workplace and work to foster an inclusive culture and promote diversity of people, thoughts, and ideas throughout Iridium. Every employee completes anti-discrimination and anti-harassment training. We also have a Diversity and Inclusion Council, co-chaired by our Chief Executive Officer, to advance opportunities for diverse recruitment, mentoring, engagement and career development.

C. FORCED LABOR

As a responsible corporate citizen, Iridium fully supports the elimination of human trafficking and modern 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 business practices, refer to our [Statement on Modern Slavery and Human Trafficking](#) and our [Combatting Human Trafficking Policy](#).

D. CONFLICT MINERALS

Iridium produces an annual [Conflict Minerals Report](#) on our efforts to identify and remediate use of conflict minerals (gold, tantalum, tin and tungsten) that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries. We also expect our suppliers to take steps to determine if their products contain conflict minerals and, if so, to take steps to identify sources of these minerals and support efforts to eradicate the use of such conflict minerals.

IV. TRAINING

Our employees annually review and acknowledge our ethical standards detailed in our [Code of Business Conduct and Ethics](#) to facilitate a culture of respect and awareness of potential risks in the business environment. Employee training covers relevant human rights topics, including anti-discrimination, anti-harassment, cybersecurity, equal employment, anti-corruption, and anti-bribery. We also 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.

V. REPORTING A CONCERN

We expect and ask our employees to raise concerns regarding potential violations of our values, policies or applicable laws, and we provide multiple reporting avenues, including submitting concerns or questions anonymously through our Compliance Hotline at (833) 778-1524 or online at <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 human rights violations.

VI. OUR CONTINUING COMMITMENT

We strive to continually advance the principles outlined in this policy statement and continue to work diligently to mitigate and manage relevant human rights risks to help ensure progress and adherence to our values. Our progress is disclosed annually, including in our [Environmental, Social and Governance Report](#), which aligns to leading industry standards and frameworks.