

## **CONFLICT MINERALS POLICY OF IRIDIUM COMMUNICATIONS INC.**

*Effective and last updated March 1, 2019*

### **Background**

In recognizing that the trade of tin, tantalum, tungsten and gold ("Conflict Minerals" or "3TG") has been a primary source of funding for the Democratic Republic of Congo (DRC) government's armed conflict and human rights violations in the region surrounding the DRC, Congress enacted Section 1502 of the Dodd Frank Act to promote peace and security in the region. That Section provides, in part that effective January 1, 2013, companies that are regulated through the U.S. Securities and Exchange Commission (SEC) are required to disclose annually whether the Conflict Minerals (or their derivatives) in their products originated from the DRC region, and to disclose the due diligence conducted on the Conflict Minerals source and chain of custody.

### **Policy**

Iridium is committed to complying with the SEC regulations regarding the reporting of the use of certain Conflict Minerals originating in the Democratic Republic of the Congo and adjoining countries into its end user products.

Using the guidance provided by the Organization for Economic Cooperation and Development (OECD), Iridium has implemented a due diligence program to identify the source and chain of custody of 3TG minerals in our supply chain. Our due diligence program includes:

1. Establishing a strong supply chain management system to guard against using 3TG minerals mined or processed in the DRC and surrounding countries.
2. Identifying and assessing risk in our supply chain.
3. Designing and implementing a strategy to respond to identified risks.
4. Carrying out an independent third-party audit of the supply chain due diligence.
5. Reporting on supply chain due diligence.

At this time, some manufacturers are still not yet able to provide detailed information as to the smelters, refiners or ultimate sources of the 3TG minerals used in electronic devices, such as Iridium's subscriber equipment, because of the complex and fragmented supply chains involved.

As part of its commitment to comply with the SEC 3TG minerals disclosure requirements, on an annual basis, Iridium surveys all of its suppliers to identify where 3TG minerals used in the manufacture of Iridium subscriber equipment are mined, smelted or refined.

In its contracts, Iridium also requires that its manufacturers and suppliers agree to the following activities in support of Iridium's SEC Conflict Minerals compliance program:

- Developing a Conflict Minerals due diligence program consistent with OECD guidelines.
- Adopting a policy of responsible sourcing of 3TG minerals and require that their suppliers to do the same.
- To the extent available, use Electronic Industry Citizenship Coalitions (EICC) – Global e-Sustainability Initiative (GeSI) designated Conflict-Free Smelters Program list of compliant smelters as the source for any 3TG minerals used in the products supplied to Iridium.