

Code of Business Conduct and Ethics



Code of Business Conduct and Ethics

Table of Contents

WHO WE ARE

A Message from Our CEO	3
Introduction	5

HOW WE REMAIN COMPLIANT

<i>Compliance Resources and Reporting Obligations</i>	7
Iridium's Compliance Program	8
You Have a Duty to Report	
You Have an Obligation to Ask Before Acting	
Who Can You Contact with Questions or to Report Violations?	
Your Supervisor	9
The Compliance Officer	
Director of Human Resources	
The Compliance Hotline	
A Note on Confidentiality	

HOW WE SUPPORT OUR EMPLOYEES

<i>Iridium's Commitment to a Respectful and Professional Workplace</i>	10
Respect and Inclusion in the Workplace	11
Discrimination and Harassment	
Professionalism in the Workplace	
Violence	12
Retaliation	
Drugs and Alcohol	
Privacy and Data Inspection	

HOW WE SUPPORT THE MARKET

<i>Iridium's Commitment to Integrity and Fair Play in the Market</i>	13
Relationships with Competitors	14
Competitor Information	
Unfair Trade Practices	
Relationships with Suppliers and Other Companies	

Table of Contents

Gifts and Entertainment	
Selecting Suppliers	
Confidential Third-Party Information	15
Conflict Minerals Due Diligence and Compliance Program	
Prohibited Telecommunications Equipment	
Human Trafficking	
Relationships with Customers	
Acquiring, Performing, and Invoicing for Business	16
Gifts and Entertainment	
Customer Privacy	
Relationships with Government Customers	17

HOW WE PROTECT IRIDIUM

<i>Iridium's Commitment to Protecting its Reputation and Assets</i>	18
Compliance with the Law	19
Insider Trading	
Anti-Bribery Laws and the Foreign Corrupt Practices Act	
U.S. Embargos and Sanctions Laws and Regulations	20
Antiboycott Regulations	
Export / Import Controls	
Communications Laws and Regulations	
Antitrust Laws	21
International Business Laws	
Financial Recordkeeping Obligations	
Integrity of Our Financial Records	
Integrity of Our Reports and Disclosures	22
Conflicts of Interest	
Protection and Proper Use of Company Assets	23
Iridium Physical Property	
Iridium Trademarks	
Iridium Information Systems	
Confidential Information	24
Media and Public Disclosures	
Waivers	
Key Contact Information	25



A Message From Our CEO, Matt Desch

Leadership. Trust. Respect.

“ It’s been more than 30 years since we had the initial idea to connect the whole world from low earth orbit satellites – and it’s amazing what we’ve accomplished over that time. We are a recognized leader in the satellite communications sector. We are a trusted partner and resource for those seeking truly global, innovative and unique communication services with the highest reliability and value. We have earned the respect of individuals, enterprises and governments all over the world by providing safety and security, creating efficiency and solving challenging connectivity requirements.

Leadership. Trust. Respect. These are characteristics that stand out to me as both the causes, and the evidence, of Iridium’s success. They are also characteristics that are directly attributable to Iridium’s culture of integrity and excellence. As we look forward to our next chapter, we must recognize the extent to which our culture has become a critical strategic asset and take steps to preserve it.

I view the development of this updated Code of Business Conduct and Ethics as a critical step to ensuring integrity remains at the very core of Iridium’s culture. This Code, while reflecting the same foundational values as its predecessor, is a completely new document that is shorter, simpler and should be more accessible to everyone at Iridium. Accessibility of course is critical, as Iridium’s culture depends on every single person’s understanding of and embracing the high expectations for integrity articulated in the Code.

To that end, I ask that you please read this Code and develop a working knowledge of the laws, policies and ethical standards that you must abide by while working at Iridium.

In addition, since the Code cannot cover every situation, it’s important that you read other Iridium policies and procedures relevant to your role.

The senior management team and I will always act with integrity and expect that you will do the same, even when doing so is hard (or not in Iridium’s immediate financial interest). If you are not confident about a decision, seek guidance. If you suspect a legal or ethical violation has occurred, report it so we can pursue the matter and take appropriate disciplinary action if warranted. While Iridium strictly prohibits any form of retaliation against anyone who make good-faith reports, failing to report a violation is just as bad as committing one.

Similarly, I ask that all Iridium leadership embrace this Code and continue to foster a culture in which ethical conduct is recognized, valued and demonstrated by all team members. We must set the tone and example for all.

Each one of you has a role to play in preserving our culture of integrity and promoting our continued success. Reading, internalizing and abiding by this Code is a critical step to maintaining Iridium’s reputation as a respected and trusted industry leader for the future.



Introduction

At Iridium, we are a team; we value and respect each other; we are innovative, we make a difference, we are visionary. This Code of Business Conduct and Ethics (the Code) provides guidance about how we – Iridium employees, officers, directors and contractors – apply these values to maintain a safe and respectful workplace, promote integrity and fair play in our marketplace, and protect Iridium’s assets and reputation. Our Board of Directors has adopted this Code, and all Iridium team members are expected to read it, ask questions to understand it, and abide by it.

The Code addresses expectations for conduct, but it is only a glimpse into our commitment to compliance and integrity. It is not a super-policy or a handbook. Iridium’s compliance program includes detailed policies and procedures designed to incorporate our culture of compliance into daily operations – some referenced in this Code, some not – that you are expected to follow. You must also follow all applicable laws. If local laws conflict with the Code or an applicable Iridium policy, you must comply with the local law, unless the applicable Iridium policy or the Code imposes obligations that are more restrictive or specific than the law. For example, if a locality prohibits corporations from giving or offering government employees any benefit, Iridium personnel are not permitted to provide any benefit – even if such a benefit would typically be in accordance with Iridium policy. Conversely, Iridium personnel are not allowed to bribe a foreign official, even if the bribe is legally permissive in that foreign country.

You are expected to remain vigilant; if you see or suspect a violation of the Code, or applicable law, you must promptly report it. Iridium takes reports seriously and will investigate appropriately. If you do not feel as if your question or report is being addressed, you must escalate it. This is not optional, as reporting is an important way Iridium can spot and address issues before they become problems. Information about reporting – including key contacts – is available below and on the back page of this document.

You must apply your common sense and high personal ethical standards when making business decisions where there is no guideline in the Code or specific policy. You may not take unethical actions simply because they are not specifically addressed in this Code, the law, or policy. We do not condone an “ask forgiveness” approach to gray areas – you must raise concerns with your supervisor, the Compliance Officer, or another appropriate resource.

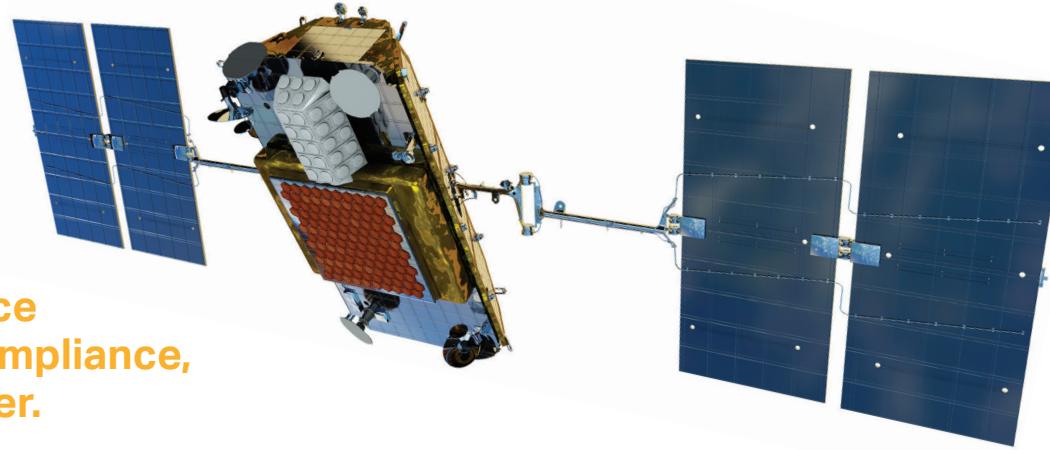
While the Code applies to all employees, Iridium officers, directors, and personnel holding supervisory positions have an enhanced duty to set a good example and ensure that others – including agents and contractors – are abiding by the letter and spirit of the Code. Importantly, Iridium prohibits retaliation against anyone submitting a concern or cooperating with an investigation.

Iridium’s reputation depends on the honesty, fairness and integrity that each of us brings to our job. Unyielding personal integrity is the foundation of corporate integrity. To that end, Code violations will not be tolerated. Anyone who violates the Code, or acts contrary to the values articulated in the Code, may be subject to disciplinary or legal action up to and including termination from employment.

01

Compliance Resources and Reporting Obligations

The Code is one part of Iridium's Compliance Program. It works with Iridium's policies, guidelines, and related trainings. If at any time you think that you would benefit from additional training on Iridium's policies, please contact your manager.



William "Bill" Conner, Vice President, Legal and Compliance, is our Compliance Officer.

You Have a Duty to Report

If you are aware of a suspected or actual violation of Code standards, you have a responsibility to report it. You are expected to promptly provide your manager, the Compliance Officer or the Human Resources Department with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time and circumstances of the violation.

Iridium has established policies and procedures for investigating reports. If you have questions or concerns regarding these policies or your duty to report, please contact the Compliance Officer.

You will not be retaliated against for reporting; but you may face disciplinary action – up to and including termination – if you fail to report. You are also legally protected under applicable laws from reprisals for reporting fraud, waste or abuse on government programs or other violations of law to certain government officials.

You Have an Obligation to Ask Before Acting

If you encounter a situation or are considering a course of action and its appropriateness is unclear, discuss the matter promptly with your supervisor or the Compliance Officer; even the appearance of impropriety can be very damaging and should be avoided.

Who Can You Contact with Questions or to Report Violations?

Your Manager

Your supervisor is your most immediate resource for any matter related to the Code. They may have information you need or may be able to refer the issue to another appropriate resource. Additionally, there may be times when you prefer not to go to your supervisor. In these instances, you should discuss your concern with one of the resources listed below.

Vice President of Human Resources

The VP of Human Resources is available to discuss any questions or concerns.

She is reachable by:
(703) 724-8231 (office)
(571) 246-6079 (mobile)
melissa.ferguson
@iridium.com

The Compliance Officer

The Compliance Officer, is available to field questions or concerns with respect to potential violations of the code.

He can be reached at:
(703) 287-7441 (office)
(571) 396-1292 (mobile)
william.conner@iridium.com

The Compliance Hotline

Iridium has established a Compliance Hotline and website for those who wish to seek guidance on specific situations or report violations of Iridium policy and/or the Code:

(833) 778-1524
<https://iridium.ethicspoint.com>

Iridium has engaged an independent third party to host its Iridium compliance hotline and webpage. Both the hotline and the webpage provide all members of the Iridium team an opportunity to either openly or anonymously submit or follow up on questions or concerns regarding ethical conduct or behavior. However, if you choose to report anonymously, please be sure to provide as much detailed information as possible to facilitate an investigation and check the compliance hotline website periodically to respond to any questions or requests for additional information.

A NOTE ON CONFIDENTIALITY

Whether you identify yourself or remain anonymous, your Iridium compliance hotline report will be kept confidential to the extent reasonably possible within the objectives of the Code. Please know, however, that Iridium does keep records of the content of such communications. As part of its compliance program, Iridium regularly reviews the types of compliance questions asked and incidents reported so that it can assess whether its policies need to be clarified or amended, or additional training is needed. A compliance program is only effective if it actually addresses the risks facing the business – reviewing your questions and reports is the best way Iridium can assess the risks its personnel regularly encounter and evaluate whether its compliance program needs to be adjusted to maximize its effectiveness in preventing and detecting misconduct.

02

Iridium's Commitment to a Respectful and Professional Workplace

Iridium is committed to creating a positive and safe working environment for all our employees. To make that happen, all Iridium personnel are expected to adhere to our policies and exhibit integrity when interacting with each other, individuals outside Iridium, and in the performance of their responsibilities.



EMBRACING OUR DIFFERENCES

At Iridium, we provide global connectivity to individuals, enterprises and governments across the world. We recognize that attracting and retaining top talent who will bring a wide range of skills, backgrounds, experiences and perspectives is critical to the important global work we do.

We strive to foster a welcoming and inclusive work environment that values what everyone brings to the table. We are committed to providing equal opportunities for all employees, and to ensuring that our practices are free from discrimination and bias.

By focusing on individual contributions and fostering a culture of respect and fairness, we aim to create a workplace where every employee can thrive based on their unique skills and talents.



RESPECT AND INCLUSION IN THE WORKPLACE

It is essential that we maintain an atmosphere of open discourse, collegiality, and cooperation. To accomplish that, personnel are expected to treat each other fairly, with dignity and respect, in accordance with the highest ethical and moral standards. Third parties are to be treated with the same respect and dignity.

DISCRIMINATION AND HARASSMENT

Iridium is committed to providing its employees with a work environment that is free of unlawful discrimination, including any harassment on the basis of any legally protected status. We will not tolerate any form of unlawful harassment against our employees, whether by executives, managers, supervisors, co-workers, or by vendors, board members or other third parties with whom employees interact.

We are committed to hiring, promoting, and retaining employees on a fair basis, without regard to race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin, ancestry, citizenship status, physical or mental disability, genetic information, veteran status, uniformed servicemember status or any other status protected by federal, state or local law. In the event you believe Iridium or anyone associated with Iridium has violated this commitment or any of our equal opportunity requirements, the Compliance Officer or the Human Resources Department should be promptly notified.

VIOLENCE

Violence in the workplace is fundamentally at odds with Iridium's culture and values. It will not be tolerated. If you are aware of any instance of violence, or threats of violence in the workplace, you must report it.

DRUGS AND ALCOHOL

The use of illegal drugs, abuse of legal drugs or abuse of alcohol in the workplace is inconsistent with Iridium's commitment to a healthy and safe workplace. Accordingly, Iridium maintains and strictly enforces a drug-free workplace in furtherance of the health and safety of our employees. An employee convicted of a drug or alcohol offense may be required to notify Iridium consistent with Iridium policy and local law.

PRIVACY & DATA INSPECTION

Data Inspection

To create a true culture of compliance, respect, and integrity we periodically conduct reviews, audits or investigations. All data residing on or transmitted through our computing and communications systems, including email, Internet and other documents and information, is the property of the company and subject to inspection, retention, review and production by Iridium, with or without an employee's or a third party's knowledge, consent or approval, in accordance with applicable law.

Personnel Records

Iridium limits internal access to personnel data and records to persons on a "need to know" basis. If you are someone who has access to such data, you must treat it as confidential and only provide it to those with a legitimate business use for the information. Further, you may not transmit personnel records outside Iridium, unless you have the relevant employee's consent, you are legally required to do so, or you are directed to do so by management for a legitimate business reason.



03

Iridium's Commitment to Integrity and Fair Play in the Marketplace

To protect Iridium's reputation with our customers, suppliers and the public, and thus foster commercial success, our policies require us to conduct our affairs in an honest and ethical manner. Advantages over our competitors are to be obtained through superior performance, not unethical or illegal business practices. You must deal fairly with all customers, suppliers, and anyone else with whom you have contact in the course of performing your job.

RELATIONSHIPS WITH COMPETITORS

We must earn business honestly and on our own merits. We treat our competitors with the same integrity and respect as we treat our customers, even if they do not return the favor.

COMPETITOR INFORMATION

Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited. If you find yourself in possession of such information, or if you suspect someone else has possession of such information, you must inform your supervisor or the Compliance Officer.

GIFTS AND ENTERTAINMENT

You may not give any gift to any customer, prospective customer, or U.S. or foreign federal, state/provincial, or local government official without advance written approval from the Compliance Officer. You may not accept gifts or entertainment that affects or may reasonably be perceived to affect your judgment or actions in the performance of your duties. If you have any questions about whether the acceptance of a gift or entertainment is appropriate, please contact your supervisor or the Compliance Officer.

RELATIONSHIPS WITH SUPPLIERS & OTHER COMPANIES

Our business does not work without suppliers and others in the marketplace. To preserve those strong relationships our interactions must be grounded in integrity and respect.

UNFAIR TRADE PRACTICES

Unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce are unlawful and forbidden by Iridium. You may not engage in any deceptive, unfair or unethical practice, or make a misrepresentation in connection with a sales activity.

SELECTING SUPPLIERS

For the benefit of our customers, including the government, we adhere to principles of fair competition in the purchase of products and services. You must select suppliers based exclusively on routine commercial considerations, such as quality, cost, availability, service and reputation. You may not select a supplier based on the receipt of special favors or based on personal relationships.

CONFIDENTIAL THIRD-PARTY INFORMATION

Because we interact with other companies and organizations, you may learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat Iridium's confidential and proprietary information. There may be times when you must treat as confidential the fact that Iridium has an interest in, or is involved with, another company or is seeking a contract or relationship with a particular government agency or program.

CONFLICT MINERALS DUE DILIGENCE AND COMPLIANCE PROGRAM

In line with its commitment to maintaining the highest standards of business conduct and ethical behavior, Iridium has adopted a compliance program designed to help ensure we responsibly source minerals known to be mined and sold in furtherance of human rights violations – namely, tin, tantalum, tungsten and gold – and comply with applicable disclosure policies. Iridium has established a due diligence program designed to, as best as practicable, identify the source and chain of custody of these minerals and conducts an annual survey of all its suppliers to identify where these minerals used in the manufacture of Iridium subscriber equipment are mined, smelted or refined. Please contact your supervisor or the Compliance Officer with any questions or concerns you may have regarding Iridium's compliance.

PROHIBITED TELECOMMUNICATIONS EQUIPMENT

Iridium is also committed to ensuring it does not procure equipment that could jeopardize U.S. national security. To that end, Iridium requires that all telecommunications equipment purchased from suppliers be evaluated against lists and regulations generated by the U.S. federal government to ensure that they are not manufactured by a prohibited party. While Iridium understands that lists of prohibited suppliers and manufacturers will change from time to time, it is expected that people in charge of procurement will work closely with Iridium's Legal Department to ensure proper compliance. Please contact your supervisor or the Compliance Officer with any questions or concerns you might have with regard to this issue.

HUMAN TRAFFICKING AND MODERN SLAVERY

One of Iridium's core values is to protect and advance human dignity and human rights in our global business practice. Accordingly, Iridium has zero tolerance for human trafficking and slavery which extends equally to agents, subcontractors, independent contractors, product suppliers, vendors and any other firms that furnish supplies or services to Iridium. We have adopted a Combatting Human Trafficking Policy, and provide an annual Statement on Modern Slavery and Human Trafficking, available on Iridium's website, which forbid trafficking in persons, using forced labor, denying any employee access to their identity or immigration documents, using recruiters that do not comply with local labor laws, charging employees recruitment fees, not paying for transportation for employees who travel to a foreign country to perform a Government contract, failing to provide an employment contract where required by law, and using misleading or fraudulent practices during employee recruitment with respect to key terms and conditions of employment. If you are engaged in activities that could violate Iridium's commitment to combatting human trafficking and modern slavery, you must review the policy and contact your supervisor or the Compliance Officer with any questions. Any violations or suspected violations of that policy by the Company, Company employees or by

subcontractors, suppliers, vendors, or any of their respective employees should be reported either as described in that policy or directly to your supervisor or the Compliance Officer.

ACQUIRING, PERFORMING AND INVOICING FOR BUSINESS

Iridium cannot succeed without customer trust. Obtaining business via inaccurate or misleading representations about Iridium's products and services, making misrepresentations to the public or to partners about the services or products they purchase, or providing inaccurate or undocumented invoices can irreparably damage Iridium's reputation and fracture customer relationships. Iridium expects and requires that personnel treat customers with integrity at all times. When interacting with customers and prospective customers, you must always be open and transparent about Iridium products and services. You must submit only accurate and well-supported invoices and other claims for payment to customers. In short, we require that all communications in connection with business dealings be accurate and free of false statements or deception.

GIFTS AND ENTERTAINMENT

Business gifts and entertainment are meant to create goodwill and sound working relationships, not to gain improper advantage with customers. We must be thoughtful about our gift-giving practices to avoid any perception that favorable treatment was sought, received or offered.

Unless express permission is received from a supervisor or the Compliance Officer, gifts and entertainment cannot be offered or provided by any employee and can never be made if (a) made in cash, (b) susceptible of being construed as a bribe or kickback, (c) made or received on a regular or frequent basis, or (d) in violation of any laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business."

Before providing a customer with a gift or entertainment opportunity, you must inquire about any applicable prohibitions imposed by that customer's organization. If you have any questions about whether a courtesy is appropriate, please contact the Compliance Officer in advance.

CUSTOMER PRIVACY

Iridium understands and values its customers' and partners' privacy and has adopted a Privacy Policy (available on Iridium's website) that specifies how Iridium handles and protects personal information and other information that may be shared with Iridium. Iridium has also adopted policies and procedures addressing how it handles requests for user information or call data records from governmental entities (foreign or domestic) or other third parties. Any questions regarding compliance or potential non-compliance with the policies Iridium has implemented to protect customer or user privacy should be directed to your supervisor or the Compliance Officer.



RELATIONSHIPS WITH GOVERNMENT CUSTOMERS

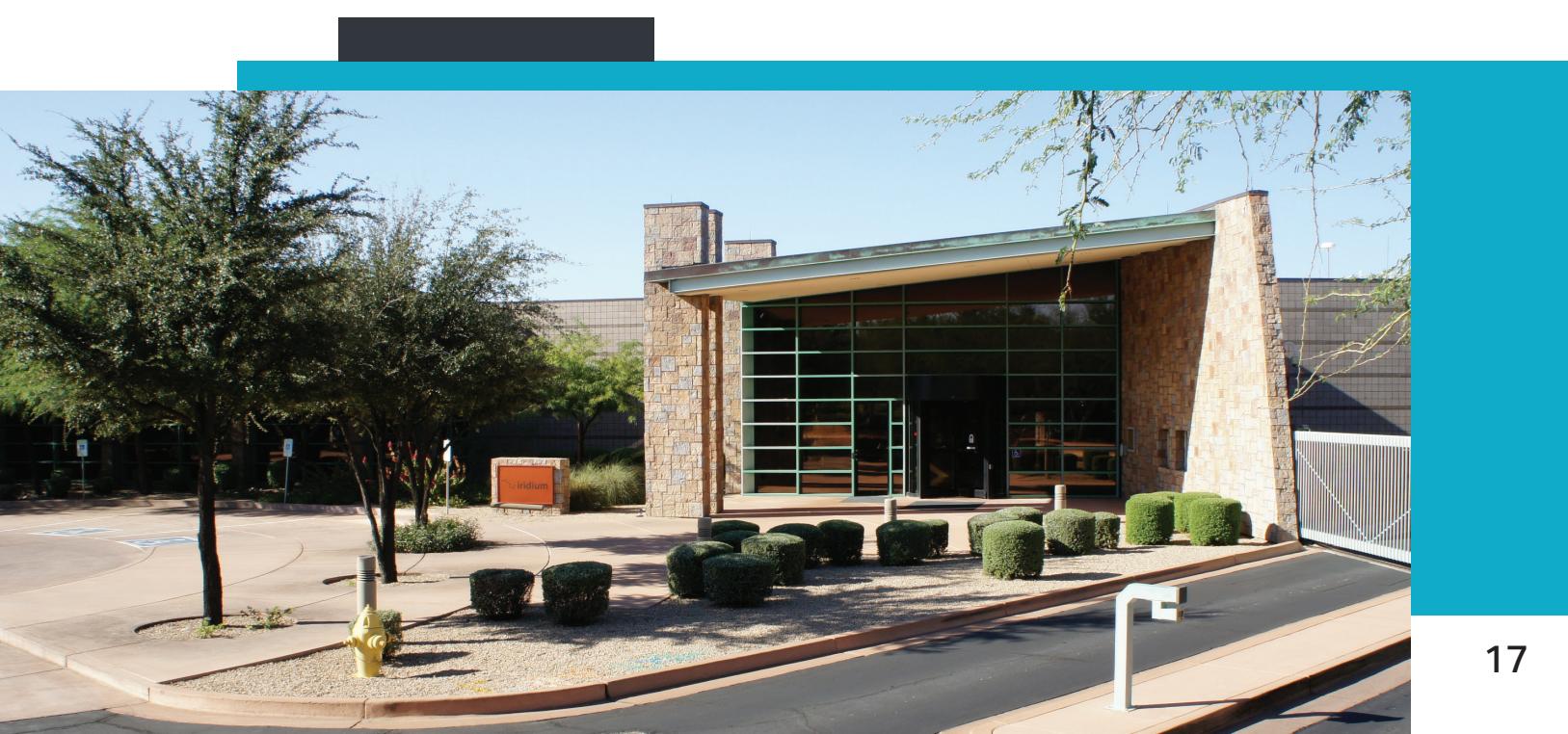
Iridium takes pride in conducting itself in an honest and ethical manner in all contexts. However, the rules and expectations for doing business with public sector clients are more complex and stricter than those that govern work with our commercial clients. These requirements create additional responsibilities for Iridium that apply when we are soliciting business, acting as a prime or subcontractor, or doing work funded by the U.S. federal government (including grants). Failing to meet these obligations creates enormous risk – including, but not limited to, loss of business, preclusion from future opportunities, and personal and corporate civil and/or criminal liability.

Working with the government means that we:

- Maintain the highest levels of procurement integrity
- Ensure that all submissions, reports and invoices are true, complete, and accurate
- Understand and avoid organizational conflicts of interest
- Do not hire former government employees without approval of the Compliance Officer
- Avoid kickbacks, bribes and illegal or unethical commissions

Iridium is fully committed to complying with all applicable laws and regulations, including the obligation to timely disclose to the contracting agency any violation of civil or criminal law concerning fraud, conflict of interest, bribery or inappropriate gratuity. To facilitate compliance, it is imperative that all personnel who solicit, procure and conduct business with the government (be it federal, state or local), carefully review Iridium's Government Contracts Compliance Policy, which contains detailed information on Iridium's obligations, as well as examples of common situations where issues may arise.

If you have questions about how Iridium conducts business with the government, you should contact your supervisor or the Compliance Officer. If you are aware or suspect a violation of Iridium's Government Contracts Compliance Policy, you are required to promptly report it – failing to do so is a violation of this Code and could jeopardize Iridium's ability to meet its own contractual reporting obligations.



04

Iridium's Commitment to Protecting its Reputation and Assets

Iridium's market value and reputation are the result of decades of hard work and commitment to excellence. We must be good custodians and not engage in activities that could jeopardize Iridium's assets or reputation.



COMPLIANCE WITH THE LAW

Iridium is a publicly traded company that operates in a highly regulated sector and is subject to numerous U.S. and global legal regimes. Our success depends upon each employee operating within legal guidelines and cooperating with local, national and international authorities. Disregard of pertinent legal regimes could subject Iridium and Iridium personnel to severe sanctions and will not be tolerated.

This section discusses our basic compliance obligations for a subset of laws and regulations that are particularly relevant. While it does not address every possibly applicable law or regulation, we expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. If you have a question about whether conduct is legal, you must immediately contact your supervisor or the Compliance Officer.

INSIDER TRADING

Insider trading occurs when a person uses material non-public information in connection with buying or selling securities (such as shares of stock) or shares such information with others who might make an investment decision based on that information. Insider trading is not only unethical, it is illegal and can result in severe penalties, including imprisonment.

As a result of your work with Iridium, you may become aware of material non-public information about Iridium or a company with which Iridium does business. You may not use any such information to trade in Iridium or another company's securities. Similarly, you may not share material non-public information with another person (tipping) or use non-public information you acquire from another person to trade in securities.

If you have any questions about whether restrictions apply to you, please refer to Iridium's Insider Trading Policy or seek guidance from the Compliance Officer before acting.

ANTI-BRIBERY LAWS AND THE FOREIGN CORRUPT PRACTICES ACT

Iridium wins business based on the merits of its products, services and people – not through bribes or corruption. You must comply with all anti-bribery and anti-corruption laws applicable in any jurisdiction in which we operate – including the U.S. Foreign Corrupt Practices Act (FCPA), which prohibits directly or indirectly giving anything of value to a foreign Government official to obtain or retain business, favorable treatment or other advantage and requires the maintenance of accurate books and records, with all company transactions being properly recorded. Failure to comply can result in civil or criminal liability for you, as well as Iridium. If you are contemplating providing a gift or gratuity to a foreign government official, an official's family member, or anyone associated with a foreign state-owned enterprise, you must consult with your supervisor or the Compliance Officer.

U.S. EMBARGOES AND SANCTIONS LAWS AND REGULATIONS

U.S. laws and regulations prohibit U.S. companies, their subsidiaries, and their employees from doing business with certain countries (or traveling to those countries), governments, entities, organizations and individuals who are subject to sanctions. The U.S. Treasury Department maintains a list of sanctioned entities and individuals. We expect that all Iridium personnel will comply with these laws and regulations. If you have questions about whether an activity is restricted or prohibited, please review the detailed information provided in Iridium's Export Control Policy, and/or seek assistance from your supervisor, the Director of Compliance and Security, or the Compliance Officer before taking any action.

ANTIBOYCOTT REGULATIONS

Because countries sometimes disagree on sanctions and boycotts, at times a country may prohibit Iridium from complying with another country's sanctions or boycott laws. In particular, the U.S. has regulations that prevent U.S. companies from taking actions that have the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a U.S. person or a country that is friendly with the U.S. You must report to your supervisor or the Compliance Officer if you receive any request to take any action which has the effect of furthering or supporting a restrictive trade practice or boycott fostered or imposed by a foreign country against a foreign country friendly to the United States (e.g., Israel) or against any United States person.

EXPORT/IMPORT CONTROLS

Iridium is committed to complying with the United States' export control regime, which prohibits or restricts:

- Exports from the United States to, and re-exports from, certain other countries of goods, software and technology
- Disclosures of technology and software to certain foreign nationals
- Transfers of U.S.-origin items to specific companies and entities identified on lists published by the U.S. Government
- The use of U.S.-origin items for certain military or proliferation purposes

Activities that could implicate U.S. export control laws range from shipping equipment to or providing service in a foreign country, to permitting the download of controlled software by someone in another country, to allowing a non-U.S. person to access U.S. technical information (regardless of location). To ensure compliance, you must get approval from your supervisor, the Director of Compliance and Security or the Compliance Officer before engaging in activities that could implicate export control laws or regulations.

ANTITRUST LAWS

Antitrust laws are designed to protect the competitive process. Iridium is committed to complying with applicable antitrust laws, which means that you are prohibited from:

- Entering into formal or informal agreements with competitors that harm competition or customers (e.g., agreements that fix prices or allocate customers, territories or contracts between competitors)
- Attempting to acquire or maintain a monopoly through anticompetitive conduct
- Exchanging certain kinds of information with competitors (e.g., pricing, production and inventory information)

All the above may violate antitrust laws and could incur severe criminal or civil penalties. Understanding the requirements of antitrust and unfair competition laws of the jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the Compliance Officer if you have a question relating to these laws.

FINANCIAL RECORDKEEPING OBLIGATIONS

Our records serve as a basis for managing our business, making public disclosures and meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. The integrity of such records, therefore, is critical and we will not tolerate their falsification or alteration.



INTEGRITY OF OUR FINANCIAL RECORDS

Accurate, transparent, and complete recording of our financial transactions is essential to our reputation and compliance with applicable laws and regulations. No employee may take or authorize any action that would intentionally cause our financial records or disclosures not to comply with generally accepted accounting principles or applicable laws, rules and regulations (including U.S. Securities and Exchange Commission (SEC) regulations).

You must create and maintain records that are accurate, complete and supported. This means:

- All records must be created honestly and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities
- All costs, expenses and time must be represented, supported and allocated to the correct contract, project or transaction
- All expenses charged to a project or contract must be both reasonable in amount and permissible by the terms of the project or contract
- All transactions and liabilities must be classified correctly, never disguised or hidden
- In short, all records must be created and maintained in accordance with Iridium's internal controls and procedures

If you have any question or reason to believe that a record is inaccurate, misleading, or not in line with the above principles, you must contact your supervisor, the Compliance Officer, the Audit Committee, or another compliance or management resource.

INTEGRITY OF OUR REPORTS AND DISCLOSURES

Iridium is committed to ensuring that its reports and disclosures are a full, fair, accurate, timely and understandable presentation of our financial condition. No employee may knowingly make, or cause someone else to make, any false or misleading statement in any report Iridium files with the SEC, Government customer or agency. This also means that employees are prohibited from omitting any information from a report that is necessary to make the report accurate in all material respects.

You are required to cooperate with our accounting and legal departments, our independent public accountants, and government representatives investigating those filings and reports. Cooperation includes your providing candid responses to their questions and providing them with accurate information. You also have a responsibility to report any concerns you have about the accuracy of our disclosures or reports, as well as the underlying information, to your supervisor, the Compliance Officer, or another compliance or management resource.

CONFLICTS OF INTEREST

We expect our employees to be free from influences that conflict with Iridium's best interests or might deprive Iridium of their loyalty in business dealings. While we respect your right to manage your personal affairs and investments, you must avoid conflicts of interest that occur when your personal interests may interfere with the performance of your duties or the best interests of Iridium.

When considering whether an activity may present a conflict of interest, it may be helpful to ask yourself:

- *Does it interfere with your (or a co-worker's) job performance, responsibilities or morale?*
- *Could it in any way implicate any confidential, non-public information to which you have access at Iridium?*
- *Could it have any potential adverse impact on Iridium's business, our relationships with customers, suppliers or competitors?*
- *Could it result in your receiving a substantial financial or other benefit?*
- *Would it appear improper to an outside observer?*

Please keep in mind that even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of Iridium, you should discuss the matter with your supervisor or the Compliance Officer.

PROTECTION AND PROPER USE OF COMPANY ASSETS

Iridium personnel are expected to protect Iridium assets and ensure their efficient use. Failure to do so may have a direct impact on profitability. Any misuse or suspected misuse of Iridium assets must be immediately reported to your supervisor or the Compliance Officer.



IRIDIUM TRADEMARKS

Iridium has worked hard to create a valuable brand identity. Any unauthorized use of the Iridium brand may diminish that value – either intentionally or otherwise. Accordingly, you may not use for your personal purpose:

- Iridium's corporate name or brand names
- Trademarks or service marks owned or associate with Iridium
- Iridium's letterhead or stationery

IRIDIUM INFORMATION SYSTEMS

You may not, while acting on behalf of the company or while using our computing or communications equipment or systems, engage in activities that are illegal, violate company policy, or could result in reputational harm, liability, or loss of equipment availability for Iridium. Examples of such inappropriate or unlawful activities include:

- Hacking (accessing internal or external computer systems or resources without express written authorization)
- Engaging in harassment, libel or fraud
- Sending unsolicited bulk email in violation of applicable law
- Trafficking in contraband of any kind
- Espionage

If you have any questions about whether a contemplated action could fall into one of these categories, you are obligated to seek prior approval from your supervisor or the Compliance Officer. Additionally, to protect you and Iridium, you must make a permanent record of any authorization you receive to access another entity or person's computer system or similar resource.

CONFIDENTIAL INFORMATION

Iridium's business depends on its ability to protect one of its most precious assets – confidential information. Confidential information is all information held by Iridium that has not been released to the general public, whether that information is considered proprietary to Iridium or is information others entrust to us as part of our business.

As the inappropriate release of such information – whether or not intentional – may damage Iridium, Iridium's customers, the public, or be otherwise illegal or subject Iridium to liability, you are expected to safeguard all confidential information unless it is released to the public through approved channels or you receive authorization from the Compliance Officer. This means that you should not post it online, publicize it, or discuss it in places where you may be overheard (elevators, taxis, restaurants, etc.).

Further, you may not share confidential information with other Iridium personnel, unless such persons have a legitimate need to know the information to perform their job. Similarly, you should not forward or disseminate company communications – including emails outside of Iridium – except for legitimate legal or business purposes.

Nothing in this Code or any other company policy or agreement prohibits you from making disclosures to the government (with or without prior notice to the Company) pursuant to applicable whistleblower laws.

MEDIA AND PUBLIC DISCLOSURES

Iridium recognizes that there are certain times when it is in the company's best interest to communicate with the public. However, to protect against inappropriate sharing of confidential or incorrect information – whether intentional or not – as well as inappropriate publicity, and to ensure all those with an interest in Iridium have equal access to the information, all such communications on behalf of Iridium must happen through specific channels. Only people authorized by Iridium – known as "spokespersons" – should respond to media, investor, or other public inquiries, when speaking on behalf of Iridium.

If you get a third-party request for company information, it should be referred to a spokesperson – you may not respond, absent spokesperson approval, whether or not the inquiry is posed as being on the record, off the record, for background, or with an understanding that the conversation will remain confidential or secret.

WAIVERS

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of The Nasdaq Stock Market, a committee of the Board, and will be disclosed to stockholders as required by applicable laws, rules and regulations.

KEY CONTACT INFORMATION

COMPLIANCE OFFICER

William Conner
(703) 287-7441
(571) 396-1292 (mobile)
william.conner@iridium.com

FACILITIES, SECURITY & SAFETY

David Warmouth
(480) 479-1551
(480) 910-3582 (mobile)
david.warmouth@iridium.com

HUMAN RESOURCES

Melissa Ferguson
(703) 724-8231
(571) 246-6079 (mobile)
melissa.ferguson@iridium.com

HOTLINE

(833) 778-1524
<https://iridium.ethicspoint.com>



iridium®