

# Inmarsat Modern Slavery Statement

2019/20

## 1. Introduction

On 4 December 2019, Inmarsat Group Holdings Limited (formally Inmarsat plc) was acquired by Connect Bidco Limited, a newly incorporated entity registered under the laws of Guernsey and owned by a consortium of (i) funds advised by Apax; (ii) funds advised by Warburg Pincus or its affiliates; (iii) Canada Pension Plan Investment Board; and (iv) Ontario Teachers' Pension Plan Board. The Board of Connect Bidco Limited has ultimate responsibility for the Inmarsat Group governance framework and is committed to maintaining high standards of business conduct.

This statement seeks to outline actions and progress undertaken during the financial year ended 31 December 2019 and is the fourth statement the Inmarsat Group has published in accordance with the Modern Slavery Act 2015.

We have policies and governance procedures in place to ensure that modern slavery does not occur in our own business or supply chain and we are committed to running our business responsibly, including a zero tolerance approach to modern slavery.

## 2. Structure of Organisation

Inmarsat is the leading provider of global mobile satellite communications services headquartered in London with over 1,800 employees. 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.

This statement is to meet the requirement for Inmarsat to comply with Section 54, Part 6 of the Modern Slavery Act 2015. Any reference to supplier data or information within this statement concerns all suppliers (direct and indirect) under the remit of the Global Procurement team.

## 3. Policies and Practices

Corporate Social Responsibility (CSR) is built into Inmarsat's DNA as we were founded to provide life-saving communications services more than 40 years ago. This public service responsibility continues today through our global maritime and aviation safety services.

This is also underpinned by a number of policies:

### **3.1. The Inmarsat Code of Business Conduct and Ethics**

The Inmarsat Code of Business Conduct and Ethics sets out the principles to which all Inmarsat's staff and contractors are expected to adhere and advocate in meeting these standards. This applies to Connect Bidco Limited, Inmarsat Group Holdings Limited and all its subsidiaries including its directors, officers, employees and contractors and aligns our policies, culture and legal obligations into one document.

### **3.2. Human Rights Policy**

The Inmarsat Human Rights Policy reinforces our ongoing commitment to responsible business and our zero tolerance approach to modern slavery. Introduced in 2019 the Policy sets out a culture of respecting and protecting communities in which we work to provide a positive impact on human rights.

### **3.3. 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. It was introduced during 2019 to all new suppliers and progressively to existing suppliers with spend in excess of \$1m. During the year, all suppliers with spend over \$1m responded to the questionnaire to confirm their compliance with modern slavery legislation. During 2020 and 2021 Inmarsat will focus on auditing existing suppliers with spend over \$500k. Development and implementation of the Supplier Code of Conduct is led by the VP Global Procurement.

### **3.4. Speak Up Campaign**

During 2019 Inmarsat published a new speak up policy, which, in conjunction with the whistleblowing hotline, is designed encourage Inmarsat staff to highlight concerns in confidence – including any modern slavery concerns.

## **4. Due Diligence**

### **4.1. Supplier Due Diligence**

Inmarsat takes seriously its responsibilities in ensuring the supply chain is robust, auditable and compliant with legislation. Inmarsat requires every new supplier to confirm compliance with UK legislation, including modern slavery 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.

During 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 and modern slavery concerns and is now operational for over 95% of our supplier spend. We hope to increase this to 98% over 2020. Our compliance team who support the procurement function with these reviews, also undertake specific and enhanced screening checks where necessary.

### **4.2. 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.

## **5. Risk Analysis and Next Steps**

Following the publication of the Modern Slavery Act, we continue to review all of our key suppliers to identify those operating in countries of higher risk of forced labour. 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. Our aim is to use this information in our procurement processes to minimise the risk of forced labour in our supply chain.

## **6. Training**

### **6.1. Whistleblowing**

Inmarsat operates a Whistleblowing scheme, allowing employees to make an anonymous and confidential concern about the actions of business partners, managers and other employees. The scheme can be used for anything of concern including corruption, human rights and other areas of concern. These are then independently investigated.

During 2019 there were 0 (zero) reports via this hotline.

### **6.2. Code of business Conduct and Ethics training**

Inmarsat operates a mandatory Code of Business Conduct and Ethics training programme which is an updated programme to the previous Legal Compliance training. Employees are required to complete this on an annual basis and it includes training on Ethics, Anti-Bribery, Modern Slavery and Human Rights.

## **7. Summary**

The ongoing approach that Inmarsat will take in addressing this important issue is threefold: Education and Training, Identification of Risk and Accountability.

### **7.1. Education and Training**

Whilst it is explicit in the remit of Inmarsat's global procurement team to know and understand its supply chain and the risks associated with it, Inmarsat believes that modern slavery and its implications need to be understood throughout the business. Inmarsat requires its employees, contractors and management to commit to taking a proactive role in identifying it and if it is seen, to report it.

Training is provided across the business to ensure modern slavery is in the consciousness of all employees and contractors.

### **7.2 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. In areas of high risk this will involve rigorous audits of

suppliers' supply chains and encourage effective worker/management dialogue to provide sustainable and scalable solutions to risks.

### **7.3 Accountability**

Inmarsat will be accountable for its business relationships and will progressively work to eliminate vulnerabilities in its supply chains. Where modern slavery or other 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 2019 financial year and was approved by the Board of Directors on 2 June 2020.



**Rupert Pearce**

Chief Executive Officer, Connect Bidco Limited

This Statement has been approved by the boards of directors for the following companies. They all delegated authority to Rupert Pearce to sign this statement on their behalf.

- Inmarsat Group Holdings Limited
- Inmarsat Holdings Limited
- Inmarsat Group Limited
- Inmarsat Investments Limited
- Inmarsat New Ventures Limited
- Inmarsat Finance III Limited
- Inmarsat Solutions Limited
- Inmarsat Global Limited