



# Global Anti-Slavery Policy

Speedcast Holdings LLC

Version	1.2
Approved by Speedcast Board	20 December 2023
Date of next review	31 December 2024
Associated policies and protocols	<ul style="list-style-type: none"><li>• Diversity, Equity and Inclusion (DEI) framework</li><li>• SC-015 Supplier Code of Conduct</li><li>• Code of Conduct</li><li>• GHR-POL-004 Group Equality Policy</li><li>• Speedcast Diversity Policy</li><li>• HSSE 001 – Health, Safety, Security and Environmental (HSSE) Policy</li><li>• Speedcast - Whistleblower Policy</li></ul>

## About This Policy

This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of slavery practices and our commitment to fair working practices among our workforce and within our supply chains and

operations.

It is consistent with our Diversity, Equity and Inclusion (DEI) framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. As a result, this Anti-Slavery Policy is part of the Diversity, Equity and Inclusion (DEI) framework.

This Policy also supports the intent of international conventions, treaties, and protocols relevant to combat slavery, the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act (Cth) 2018.

## Context

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71 per cent of victims and nearly two-thirds of modern slavery victims are in the Asia-Pacific region.

Speedcast is dedicated to ensuring that slavery is not present in any aspect of our business, regardless of location or jurisdiction, and will take appropriate action to respond to the humanitarian impacts of slavery.

## Scope

This policy covers all employees, officers, directors, consultants, contractors, representatives, agents, volunteers, interns and any other person working on our behalf and;

Speedcast suppliers and partners and extends to their subcontractors, agents, related entities and consultants, such responsibilities are as set out in the Supplier Code of Conduct.

## What is Modern Slavery

Modern slavery is defined by the Modern Slavery Act (Cth) 2018 to include eight types of serious exploitation:

- **trafficking in persons**, the recruitment, harboring and movement of a person for the purposes of exploitation as set out below
- **slavery**, where the offender exercises powers of ownership over the victim(s)
- **servitude**, when the victim's personal freedom is significantly restricted and when a person is not free to stop working or leave their place of work
- **forced labor**, when the victim is either not free to stop working or not free to leave their place of work
- **forced marriage**, where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony

- **debt bondage**, when the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined
- **Forced prostitution or other forms of sexual exploitation**
- **child labor** involves situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs
- **deceptive recruiting for labor or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery

It can also extend to:

- entering into a commercial transaction involving a slave
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading
- conducting a business involving servitude or forced labor (including exercising control over the business or providing finance to the business)

## Speedcast approach to limiting the risk of modern slavery practices

Speedcast will work proactively to reduce slavery within our Supply Chain and Operations, and we expect all organizations we engage with to do the same.

### Supply Chain and Responsible Sourcing -

#### Speedcast Supplier Code of Conduct

We expect all existing and new suppliers to comply with the principles set out in our Supplier Code of Conduct. Fundamental to the Supplier Code of Conduct is an expectation that all suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use best endeavors to ensure that there is no slavery in their supply chains and operations. In the event suppliers identify any occurrence of, or material risk of slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Speedcast as soon as practicable of any occurrence of, or material risk of slavery they have identified and notify relevant authorities where appropriate.

#### Speedcast's contractual terms

Our contractual terms reflect supplier obligations including requirements to comply with all laws, regulations, orders, policies and guidelines of any international body having jurisdiction over the Supplier, which shall include global modern slavery laws that apply in the location(s) in which they operate.

## Operations

### Anti- Slavery Policy

Speedcast maintains an Anti-Slavery Policy (this policy) outlining our approach to reducing the risk of slavery practices within our supply chains and operations. The Policy provides guidance on the steps Speedcast takes to work with our suppliers to reduce risks and the range of support available for when a

Speedcast person becomes aware that someone is at risk of or affected by modern slavery practices.

#### **Incorporating anti-slavery commitments into other policies**

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing anti-slavery commitments that can be enhanced, or where anti-slavery protections can be incorporated.

#### **Ethical Investments**

Speedcast seeks to ensure that the investment of Speedcast funds is consistent with the fundamental principles of Speedcast. As such, no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as considerably compromising the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act (Cth) 2018.

#### **Human Resources**

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant within our workplace and occupational health and safety law.

### **Communications, Engagement and Training**

Speedcast employees will be provided communications and training opportunities to enhance understanding of the causes and humanitarian impact of modern slavery, the Global Anti-Slavery Policy and our approach to limiting the risk of slavery within our supply chains and operations.

Speedcast employees with high purchasing responsibilities will be provided additional training on the Supplier Code of Conduct and supporting suppliers to undertake due diligence.

### **Continuous improvement approach to reducing the risk of slavery**

We are committed to applying a continuous improvement approach to how we reduce the risk of slavery practices within our supply chains and operations.

We will seek feedback from Speedcast employees, suppliers, partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of slavery.

### **Reporting Concerns of Modern Slavery**

#### **Reporting unethical or unlawful conduct**

A key part of supporting ethical standards is enabling Speedcast employees, as well as our suppliers and partners, to feel free and safe to speak up when there are reasonable grounds to suspect that Speedcast or any Speedcast employee(s) are not acting ethically or in accordance with laws and

obligations.

### Responding to concerns of modern slavery practices

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices. In an emergency and if someone is in immediate danger, please call reach out to local authorities for immediate police assistance. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.