

SLAVERY AND HUMAN TRAFFICKING POLICY

Pursuant to Section 54 of the UK Modern Slavery Act 2015, ST Engineering iDirect Inc. dba iDirect and its affiliates ("iDirect," "we," "us," "our" or the "company") publish this Slavery and Human Trafficking Policy on its corporate website for the financial years ending 31 December 2023 and 31 December 2024.

INTRODUCTION

iDirect opposes slavery and human trafficking in all its forms and is committed to ensuring there is transparency in our business. We have a zero-tolerance approach to modern slavery, and we are committed to the highest standards of professionalism, integrity and ethical behaviour in all our business dealings and relationships around the world.

Previously, we have addressed modern slavery in our supply chains, by including language in our vendor/supplier contracts, ensuring vendors and suppliers are complying with the UK Modern Slavery Act 2015. We intend to continue to review our procurement processes and Procurement Policy. We have included compliance with the UK Modern Slavery Act 2015 in contracts with our customers and partners. As part of our due diligence and contracting processes of third parties, we include specific provisions against the use of modern slavery and a requirement to comply with our Code of Conduct, which sets out the minimum standards required of our suppliers to combat modern slavery. Pursuant to our updated Supplier Code of Conduct, we expect all vendors and suppliers to comply with the UK Modern Slavery Act 2015 and other applicable labor laws and practices. We intend to continue to work in this area to comply with the Modern Slavery Act and to underscore the values and principles we seek to maintain.

ORGANIZATIONAL STRUCTURE

For further information about ST Engineering iDirect, Inc. dba iDirect please visit our website: <https://www.idirect.net/st-engineering/>

iDirect is a global leader in IP-based satellite communications, which predominantly employs highly skilled and professionally qualified people. We consider the risk and exposure to modern slavery within our business to be low. Nonetheless, we have taken steps to ensure that such practices do not take place in our business. iDirect employees have access to our Whistleblowing Hotline, telephone numbers and mailing address in order to report any malpractice, impropriety, statutory-noncompliance or any wrongdoing by board members, employees or suppliers in the course of their work. Our Human Resources Manual also guides employees on how to report any inconsistencies with iDirect's ethical standards. We are determined to foster and maintain an environment where all parties can report any wrongdoing, in good faith, without the fear of retaliation.

TRAINING

We implemented a mandatory training on modern slavery to all applicable employees. We will provide further training on modern slavery as appropriate and ensure employees are aware of modern slavery policies.

BOARD APPROVAL

This Policy has been approved by the iDirect Board of Directors on January 14, 2025.



Don Claussen, CEO

For and on behalf of the members of ST Engineering iDirect, Inc. dba iDirect and its affiliates.