

Slavery and Human Trafficking
s.54(2) Modern Slavery Act
Eighth Statement
(Financial year ending 31 December 2023)
NSSLGlobal Limited

Introduction

This statement sets out the actions taken by NSSLGlobal Limited (NSSLGlobal) to understand and mitigate potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our own business or in the business of the suppliers we use.

We make this statement in compliance with section 54 of the Modern Slavery Act 2015. A copy of our statement can be found at our website: www.nsslglobal.com/msastatement

Our Business

We are an independent provider of commercial satellite communications services to a broad range of customers on a global basis. We have our headquarters in Redhill, UK and also have active subsidiary / branch offices in USA, Singapore, Netherlands, Poland, Norway, Sweden, Denmark and Germany. In providing our services we typically supply a mixture of airtime services and associated equipment, applications and hardware for installation at our customer's premises, or on their vessel or vehicle. We support our clients with their technical, project management, engineering and installation / activation requirements. We work through 24/7 network operating centres and our on-the-ground engineers (employed or contracted / third party).

We use components from a variety of sources in our workshops when customising or making equipment ready for use. In addition, through our NSSLGlobal Technologies business based in Norway, we engage in the development and manufacture of satellite technologies and applications, including hubs and modems. For this activity, we engage with third party manufacturers and external software development capabilities. This statement applies to NSSLGlobal Limited and its subsidiaries.

Our position

Our policy on Human Rights is summarised as follows:

- We seek to be a fair employer and pride ourselves on being a customer and supplier of integrity. We expect the same of our clients, partners and our supply chain.
- We seek to comply with all applicable law and internationally recognised human rights.
- We acknowledge the part our business has to play in upholding human rights, whether in the workplace or through our suppliers or with our customers, including our legal obligation as regards the Modern Slavery Act 2015.

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We adhere, as a business, to the six principles of the Modern Slavery Act 2015:

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** Make sure that they are not complicit in human rights abuses.
- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** The elimination of all forms of forced and compulsory labour;
- **Principle 5:** The effective abolition of child labour; and
- **Principle 6:** The elimination of discrimination in respect of employment and occupation.

We recognise our corporate commitment to all stakeholders to act ethically and with integrity in our business dealings and relationships. This includes ensuring that we and our suppliers value human life. We are committed to playing our part in preventing slavery and human trafficking in our business activities and ensuring that our supply chain is free from such activities.

Codes and Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in our business.

Our **Supplier Code of Conduct** includes a section on modern slavery and our expectations from suppliers and contract manufacturers. The Code contains commitments which pass down the supply chain, so that our immediate supplier or contract manufacturer is, in turn, responsible for ensuring compliance from his supplier and so on. The Code states the minimum ethical and labour and working practices we expect of our supply chain. We will continue to seek to implement this Code into our supply chain process. Refresher training of our teams continues as part of our commitment to instilling and encouraging business integrity best practice across our organisation; 2023 has seen us develop a dedicated on-line training module on MSA for those who engage with our supply chain.

Our **Anti-Slavery & Human Trafficking Policy** provides specific guidance for our staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour in our supply chain / manufacturing facilities and how to respond to and escalate any concerns. This is adopted into our organisation and has been augmented with refresher and induction training, as above, during 2023.

This policy is supported by our **Business Integrity Code of Conduct**.

Supply Chain including Contract Manufacturers

We procure a wide range of goods and services via a diverse and varied supply chain to meet our operational and customer needs. As mentioned above, we are also involved in the development and manufacture of certain satellite hub, modem technology and software applications for supply to our customers. For example, a number of our key suppliers in these innovations are significant companies, like Cobham PLC, Inmarsat, and RS Components. Others are contract manufacturers, small service companies and individual sole traders and independent contractors.

As part of the tender process and supplier selection, our suppliers and contract manufacturers are asked to sign up to our Supplier Code of Conduct along with completing the supplier questionnaire (see below).

Due Diligence and Risk Assessment

Our supplier questionnaire helps us with our assessment of the risk of modern slavery or human trafficking impacting our supply chain. The questionnaire will include a section on modern slavery with questions which target slavery and human trafficking risk and mitigation.

We continue to review our key supplier activities and countries where they operate in line with the Global Slavery Index and Child Labour Index to assess the risk of slavery or human trafficking. Our response will be tailored to our findings.

We continue to develop processes internally with our procurement team for the identification, assessment and monitoring of potential risk areas in our supply chains. This is part of a comprehensive risk management programme underway across the organisation.

Our Anti-Slavery & Human Trafficking Policy has provisions to protect whistle blowers – we actively encourage our staff to raise concerns on unethical business practices as included in the online Code of Conduct training launched in 2023.

Our Supplier Code of Conduct allows us to conduct regular reviews to ensure suppliers are assessed and their supplier questionnaires are up-to-date. Reviews may include on-site assessments or supplier audits dependent on the nature of the goods or services being provided and on the industry sector in which the supplier operates. The frequency of these audits and/or on-site assessments will be dependent on the risk profile of the contract and/or supplier.

As part of our contracting process, we flow-down compliance clauses as regards MSA and business integrity generally into our supplier arrangements as appropriate. This includes standard clauses containing prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children, as well as audit and review.

Potential new suppliers who are rated as being higher risk are required to provide further evidence of their ethical operations and ability to comply with our Supplier Code of Conduct. In 2023, we have reviewed what additional monitoring and reviews for 'higher' risk key suppliers is appropriate; this may be done by us or we may engage a third party to do so on our behalf.

Training

Through Company Presentations, we make available initial information on the Modern Slavery Act 2015 and also the implementation of our Supplier Code of Conduct and Anti-Slavery & Human Trafficking Policy. We also hold refresher sessions annually in the organisation for our staff who are involved in procurement.

Our new employee induction programme includes a section on Business Integrity, Ant-Bribery and Modern Slavery Risks.

In 2023, we launched our online Code of Conduct training module, which is assessed (required pass mark is 80%) and in 2024, we will launch refresher training modules to ensure that learning can be conducted on an annual basis.

UN Sustainability Development Goals and CSR

Our commitment to minimising exposure to modern slavery risks in our supply chain is in parallel to our wider CSR commitments and the UN SDG's we have adopted as a business. Our majority owner is a Norwegian company listed on the Oslo Stock Exchange. Annually we report our CSR activities for their review and inclusion in their annual reporting.

Responsibility

Ensuring compliance with our position on business integrity is part of our Management Team activity in the UK. Their activity is focused on ensuring MSA and other business integrity topics are considered at an operational leadership level. The management team agenda includes opportunity to share best practice, training needs or address concerns, and any actions are then delegated or referred to the right individuals withing NSSLGlobal to take forward, with top-down support.

The Steering Group activity includes assessing ongoing potential exposure to bribery, corruption and modern slavery risks. This assessment is linked to the periodical review of external sources, including the Corruption Perceptions Index, Global Slavery Index and the Child Labour Index and the responses from suppliers in their completed questionnaires.

Board Approval

The statement has been approved by the Group CEO of NSSLGlobal on behalf of the Board of Directors.

A handwritten signature in black ink, appearing to be 'Sallyanne Ray', enclosed within a large, loopy circular scribble.

Sallyanne Ray, Group CEO, 22 January 2024