The Viasat Group **Modern Slavery** and Human Trafficking Statement 2024

# Viasat:

## Introduction

Viasat, Inc. and its related entities (the "Viasat Group") are committed to conducting business ethically and with integrity. We respect international principles of human rights and strive to recognise and combat the risk of modern slavery in our supply chain.

We work with our suppliers to build a business with respect for human rights at its core.

This statement sets out the steps taken by the Viasat Group to prevent modern slavery in our business and supply chain for Viasat, Inc.'s financial year ending March 31, 2024.

This statement is issued by Viasat, Inc. on its own behalf and for each of its subsidiaries doing business, or part of their business, in Australia, California, the Netherlands and the United Kingdom (referred to together in this statement as "Viasat").

The Viasat Group companies that are specifically required to publish an annual modern slavery statement in those jurisdictions are identified in the annex to this statement.

This statement is made to comply with the requirements of the Modern Slavery Act 2018 (Cth) (Australia), the California Transparency in Supply Chains Act 2010, the Dutch Child Labour Due Diligence Act (Wet zorgplicht kinderarbeid), the Norwegian Transparency Act 2022 and the Modern Slavery Act 2015 (UK).

## Our structure and operations

Viasat, Inc. is a global communications company that is listed on Nasdaq and has its headquarters in Carlsbad, California. The Viasat Group employs approximately 7,200 global employees and operates in more than 79 locations across the globe.

Viasat is an innovator in communications technologies and services, focused on making connectivity accessible, available, and secure. Viasat's business powers millions of connections on land, in the air and at sea through three business segments:

 Satellite Services - Viasat uses its proprietary, high-capacity satellite platform to provide high-speed broadband services with multiple applications to consumers, enterprises, and mobile broadband customers, including commercial airlines and maritime vessels.

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- Commercial Networks Viasat develops advanced satellite and wireless products, systems, and solutions that enable high-speed fixed and mobile broadband services.
- Government Systems Viasat provides global fixed and mobile broadband products and services, satellite communications systems, and tactical data link solutions to military and government users around the world. We also develop secure networking, cybersecurity, and information assurance products and services.

Viasat is developing a next-generation communications network to further enhance its high-quality, secure, affordable, and fast connections to enhance the lives of people everywhere.

## Our ethical stance

Viasat is a business that has been committed to the promotion of ethical business practices from its establishment in 1986. It conducts a due diligence review on an annual basis of its business and supply chain and it publishes the outcome of that review in its annual Environmental, Social and Governance (ESG) Impact Report. As evidenced by its <u>FY23 ESG Impact Report</u>, Viasat is committed to ensuring that its policies and practices are aligned with best ethical practice, benchmarked against set targets for continual development and improvement, and shared publicly to ensure transparency in how it conducts its business.

The importance of ESG-related issues to Viasat can also be seen in how they are considered across its operations. Several departments within Viasat are responsible for managing ESG-related issues which have an impact or potential impact on different aspects of Viasat's business.

Viasat's board of directors and executive leadership team regularly review and engage with its ESG strategy, and its dedicated social impact team are responsible for driving the business' ESG-focused initiatives under the direction of Viasat's chief people officer.

Viasat's executive leadership team is also committed to ensuring that its ESG priorities are appropriately aligned with stakeholder expectations, taking into account current market trends, business risks and opportunities.

In addition to the due diligence review referred to above, Viasat conducts a priority issues analysis, risk analysis and gap analysis which considers feedback from key stakeholder groups, including employees, customers, investors, policymakers, and industry peers, and which Viasat uses to shape its ESG strategy over the years to come.

## The Viasat supply chain

#### The nature of Viasat's supply chain

The global nature of Viasat's business operations means that its supply chain is extensive and includes the provision of goods and services by a number of key third-party suppliers. These goods and services include the supply of tools and equipment and the provision to Viasat of various cleaning, maintenance and professional services.

Throughout its operations, Viasat does not condone forced or compulsory labour, or human trafficking. Such conduct violates Viasat's ethics and policies.

Going beyond its core operations, Viasat also recognises that it is important to understand and manage the risks of modern slavery and human trafficking becoming unintentionally embedded in its supply chain.

#### Viasat's management of modern slavery risks

Viasat's suppliers come from all across the world. Viasat recognises that this increases the risk that modern slavery practices could unknowingly become embedded in its supply chain.

To control and mitigate this risk, Viasat is committed to:

- a. Engaging capable suppliers that, as a condition of their engagement, undertake to comply with strict standards, including a requirement that they:
  - i. conduct their business lawfully, including by complying with all laws regarding slavery and human trafficking in the countries in which they do business;
  - ii. engage in practices that are not just commercially efficient, but which also see workers treated ethically and fairly;
  - iii. certify that materials incorporated into supplied products comply with the laws regarding slavery and human trafficking of the country or countries in which the suppliers are doing business;
  - iv. do not make use of forced, prison or indentured labour;
  - v. provide workers with a safe and healthy working environment;
  - vi. take responsibility for the ethical behaviours of their supply chains; and
  - vii. contractually confirm that they ensure that their workers are trained to recognise potential signs of forced labour and other modern slavery non-compliance, and are made aware of how to report and investigate suspicions of improper conduct.
- b. Asking our suppliers to certify their compliance with the Electronic Industry Coalition Code; and
- c. Requesting that all regular major suppliers of goods and services assess and report on their meeting of set benchmarks, including their maintenance of an Environmental Management System, their meeting of set quality standards, and their compliance with various social, environmental and quality requirements.

Viasat accountability standards mean that where Viasat's assessment of its supplier practices reveals unacceptable performance against key benchmarks, Viasat will, depending on the nature of the identified non-compliance, either engage with the relevant third-party supplier to ensure that it is urgently corrected or, if appropriate, otherwise terminate the third-party supplier's engagement.

Viasat plans to inject even further rigor into its due diligence practices by, over time, assigning a risk rating to each of its suppliers of goods and services. Viasat anticipates that this will impact the way in which it undertakes due diligence of supplier practices and procedures in the years to come and will allow it to build on its existing risk-based due diligence and supplier performance assessment processes.

#### Performance monitoring

Viasat reserves the right to monitor and audit its suppliers' performance against key modern slavery-related benchmarks and policy requirements to evaluate compliance with appropriate standards for trafficking and slavery in supply chains.

Viasat employs procurement personnel within its social impact team who are able to monitor and internally report upon such matters and who perform these duties under the direction of Viasat's chief people officer.

## Our policy on and human trafficking, conflict minerals and child labour

Viasat has a number of policies in place that underpin its commitment to ensure that its business is run in a fair and ethical way. Copies of Viasat's supplier policies and related information and resources are frequently published online and can be found <u>here</u>.

Many of these key policy positions with respect to human trafficking are, for ease of reference, also summarised in Viasat's <u>Guide to Business Conduct</u>.

To promote the advancement of fundamental human rights, Viasat is committed to eliminating conflict minerals from the products. This commitment, detailed in Viasat's <u>Statement on Conflict Minerals</u>, also extends to its suppliers. Viasat requires its suppliers to complete an industry Conflict Minerals Report Template form upon request, and to perform reasonable due diligence of their supply chains to determine if conflict minerals are sourced from the Democratic Republic of the Congo or adjoining countries that directly or indirectly support human rights violations.

Viasat will not tolerate the use of child labour in any circumstance. Viasat will always investigate if it considers there are reasonable grounds to suspect that the goods or services have been produced or created with the help of child labour. Viasat will adopt and implement a strategic action plan if there is a reasonable suspicion of child labour.

## Training about slavery and human trafficking

In addition to the Procurement Monitoring Staff training referred to above, all employees, permanent or temporary, and consultants working six consecutive months or longer complete the Viasat Workplace Ethics course on an annual basis.

Accordingly, all Viasat employees and management, who have direct responsibility for supply chain management, receive training on human trafficking and slavery, particularly with respect to mitigating risks within Viasat's supply chain.

## Reporting

Viasat encourages anyone with information regarding modern slavery or human trafficking taking place at Viasat, or anywhere in its supply chain, to make a report to Viasat's Ethics and Compliance Hotline by calling (+44) 0808-234-7051 or (+1) 888-475-8376. Reports to the hotline are taken very seriously and are thoroughly investigated by Viasat.

Viasat also operates a non-retaliation policy to encourage employees and contractors to voice any concerns they may have, including about modern slavery and any other human rights violations.

## Future developments

Viasat is continuing to enhance its policies, contractual requirements, procedures and training with a view to eradicating modern slavery in its supply chain. Viasat will continue to improve its due diligence procedures and to raise awareness of modern slavery among its colleagues and partners.

Global developments in regulation and associated guidance relevant to Viasat is continuously monitored and taken into account when amplifying and enhancing Viasat's policies, methodologies and procedures to ensure Viasat continues to live to its high ethical values.

## **Board approval**

This above statement, on behalf of Viasat, Inc. and the companies listed in the schedule to this statement, has been reviewed and approved by the Viasat Board, following consultation between all relevant Viasat entities.

The Board will continue to annually review and sign off on Viasat's Modern Slavery Statement.

This statement was approved by the Viasat Board of Directors on May 14, 2024

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Mark Dankberg Chairman of the Board, Chief Executive Officer and Co-founder

Date: 5/30/2024

#### Annexure A

**Bejing Viasat Science & Technolgy CO LTD** Carmel Comunicaciones, S.A. de C.V. **Engreen India Private LTD Europasat Limited** Flysurfer Colombia S.A.S Flysurfer Ecuador S.A Inmarsat Australia Pty Ltd Inmarsat BH d.o.o Inmarsat Brasil Limitada Inmarsat Communications Company LLC Inmarsat DOOEL Skopje Inmarsat Employment Company Limited Inmarsat Finance III Limited Inmarsat Finance Plc Inmarsat Global Japan KK Inmarsat Global Limited Inmarsat Global Limited (Fucino Branch) Inmarsat Global Limited (Qatar Branch) Inmarsat Group Holdings Inc. Inmarsat Group Holdings Ltd Inmarsat Group Limited Inmarsat Hellas Satellite Services SA Inmarsat Holdings Limited Inmarsat Hong Kong Limited Inmarsat Inc Inmarsat India Private Limited Inmarsat Investments B.V. Inmarsat Investments Limited Inmarsat KK Inmarsat Leasing (Two) Limited Inmarsat Maritime Venture Inmarsat Navigation Ventures Limited Inmarsat New Ventures Ltd Inmarsat New Zealand Limited Inmarsat SA Inmarsat Satellite Services (Romania) Inmarsat Services Limited Inmarsat Services Ltd (France) Inmarsat Sols (US) Inc Inmarsat Sols B.V.(AUS branch) Inmarsat Solutions (Canada) Inc Inmarsat Solutions (Shanghai) Co Inmarsat Solutions AS Inmarsat Solutions B.V. Inmarsat Solutions doo Beograd-Novi Boegrad Inmarsat Solutions ehf Inmarsat Solutions Global Limited Inmarsat Solutions Limited Inmarsat Solutions Pte Limited Inmarsat Solutions SA (PTY) Limited Inmarsat Spain S.A.

Inmarsat Trustee Co. Ltd Inmarsat Turkey Telekomünikasyon Limited Şirketi **Inmarsat Ventures SE** ISAT Global Xpress OOO PT ISAT RigNet, Inc. Rossese sp. z o.o. Segovia Inc Stratos Gesellschaft fur Satelliten-Kommunikation mbH Stratos Holdings (Cyprus) Limited TrellisWare Technologies, Inc. V3GS Communications Sweden AB VAS S.A. Viasat Australia Pty LTD Viasat Austria V3GS GmbH Viasat Belgium B.V. Viasat Brasil Participacoes LTD Viasat Brasil Servicos de Com LTD Viasat Broadband B.V. Viasat Canada Corp. Viasat China Viasat Communications Germany GmbH Viasat Communications Italy S.r.l. Viasat Communications Middle East Viasat Communications UK Ltd Viasat Croatia MBC d.o.o. Viasat Czech Republic MBC s.r.o. Viasat Europe Sàrl Viasat France MBC S.A.S. Viasat Germany GmbH Viasat Hungary V3GS MBC ltd. Viasat Iberica, S.L. Viasat Inc. South Africa branch Viasat India Pvt. Ltd. Viasat Ireland LTD Viasat Israel Viasat Netherlands B.V. Viasat Netherlands MBC B.V. Viasat Nigeria Limited Viasat Peru S.R.L. Viasat Poland MBC LLC sp Viasat Sat Ventures Holdings Sarl Viasat Slovenia V3GS sl d.o.o. Viasat Switzerland MBC Sarl Viasat Technologies Limited Viasat Tecnologia S.A. de C.V. Viasat UK Limited Viasat Vglobal Viasat, Inc. Vsat Italy S.r.l.