

ORBCOMM Bill S-211

Introduction

At ORBCOMM, social responsibility is a key component of our core values. We are focused on creating a healthy and safe work environment for our employees around the world that allows them to do their best work and grow personally and professionally. Further, we strive to make a positive impact on the global community.

Strong governance is essential to our daily operations. By ensuring that our business practices are transparent, ethical and in compliance with relevant laws and regulations, we can continue to build strong, trusted relationships with our customers, partners and vendors, mitigate risk to the company, and conduct ourselves with the highest standards of accountability and responsibility.

This document is a joint report prepared by ORBCOMM Inc. and its subsidiary, ORBCOMM Canada, Inc., (collectively, “ORBCOMM” or “we”) in adherence to Section 11 of Bill S-211 (“the Act”) for the financial year ending December 31, 2023. It outlines the measures that ORBCOMM has taken in the last financial year designed to prevent and reduce the risks of forced labour and child labour being used in our activities and supply chains.

Section A: Legal and Organizational Structure

ORBCOMM Inc. is headquartered in the United States. It is a privately held corporation that delivers IoT solutions for a diverse global customer base spanning transportation, supply chain, warehousing and inventory, heavy equipment, maritime, natural resources, and government.

ORBCOMM Canada, Inc. is a wholly owned subsidiary of ORBCOMM Inc. Our Canadian office is located in Ottawa, Ontario, Canada. ORBCOMM Canada, Inc. purchases products from ORBCOMM Inc and distributes those products within Canada. This mainly consists of technology hardware and electronics. ORBCOMM Canada also manufactures products in Canada for distribution in Canada and abroad.

Our collective mandate is to help our customers around the globe optimize their industrial operations and build a more sustainable future through our innovative IoT technology. The integrity of our supply chain is critical to our operations, enabling us to deliver quality, reliable solutions to our customers. We conduct business in an ethical, moral, and fair approach and we require the same of our vendors, suppliers, and business partners.

Section B: Policies and Due Diligence Processes

ORBCOMM maintains and enforces its Code of Conduct for vendors and suppliers (“the Code”), which sets out the minimum standards required from our business partners. The Code deliberately describes our bans on child labour and forced labour. We also continue to publicize our whistleblower hotline for employees and those within our supply chain as one of the options available for reporting any potential violations of the Code. In addition, our contracts include a provision whereby our vendors and suppliers agree to comply with applicable laws and regulations in the performance of their contracted services.

We are committed to working with our vendors and suppliers to ensure that our goods and materials are sourced ethically. We strive to take a collaborative approach with our supplier partners to achieve conflict-free sourcing. We also support the actions taken by governments and organizations to increase supply chain transparency in support of the shared goal of ending human rights violations.

We gather information on employee recruitment and maintain internal controls to ensure that all ORBCOMM employees are recruited voluntarily. Additionally, we expect vendors and suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and their supply chains.

Section C: Forced Labour and Child Labour Risks

As part of our efforts to ensure ethical conduct across our business, we have conducted a risk assessment to identify risks associated with the use of child labour or forced labour in our activities and supply chains. We have evaluated our vendor and supplier spend against the Walk Free Global Slavery Index, which provides insight into the prevalence of modern slavery by country. We also compared our vendor and supplier spend by product type against the US Department of Labor’s List of Goods Produced by Child Labor and Forced Labor, which outlines goods within certain countries that the Bureau of International Labor Affairs (ILAB) believes to have a higher degree of likelihood of being produced using child labour or forced labour.

Through this risk assessment, we identified that we procure a small percentage (less than 6%) of our goods from higher risk countries such as China, India, and Romania. Additionally, electronics sourced from China is listed on the US Department of Labor’s list of Goods Produced by Child Labor and Forced Labor. While our risk assessment does not presuppose the use of forced labour or child labour within our supply chains, it was conducted to help us assess where potential risks may arise and where we should focus our due diligence efforts.

We strive to continue to maintain the integrity of our supply chain and address any risks related to the use of modern slavery through our due diligence policies and processes.

Section D: Remediation Measures

Within and prior to the last financial year, we have not identified any forced labour or child labour being used in our activities and supply chains. Therefore, we have not had to take any measures to remediate any forced labour or child labour. Failure to comply with our ban on child labour and forced labour is a violation of our Code of Conduct and will result in termination of contracts and other corrective action.

Section E: Remediation of Loss of Income

Within and prior to the last financial year, we have not identified any forced labour or child labour being used in our activities and supply chains. Therefore, we have not had to take any measures to remediate loss of income associated with these issues. Should ORBCOMM encounter such situations in the future, we commit to taking a thoughtful approach to remediation.

Section F: Training

We currently conduct mandatory training for all employees on our Standards of Business Conduct, which addresses our company's intolerance of child labour and forced labour. This training is incorporated into our employee onboarding process, as well as our annual compliance training program. These training modules also provide employees with instructions on how to report violations of our Standards of Business Conduct through our anonymous whistleblower program, as well as the many other available reporting options. Employees are required to acknowledge their commitment to our Standards of Business Conduct to complete the training.

Going forward, we also plan to introduce additional training for our procurement team members regarding responsible sourcing as part of our procurement process, including specific content regarding the prevention of child labour and forced labour being used in supply chains.

Section G: Assessing Effectiveness

Each year, including in our last financial year, we conduct high-level reviews of our policies to ensure they are effective in managing our risks across the business, in our efforts towards continuous improvement.

Going forward, we plan to improve upon our tracking of key performance indicators ("KPIs") to support reflection on the effectiveness of our policies and processes in

preventing the use of modern slavery in our activities and supply chains. This may include KPIs such as:

- Number of whistleblower reports, (if any), related to concerns around modern slavery being used in our activities and supply chains
- Completion goals and tracking for all compliance training courses
- Requirement for all suppliers to agree to ORBCOMM's Code of Conduct for vendors and suppliers or substantially similar requirements

Through reflection on these KPIs and corresponding observations, we will continue to evolve our due diligence processes over time to further enhance our effectiveness in preventing the use of child labour and forced labour within our activities and supply chains.

Conclusion

At ORBCOMM, conducting business ethically and working with supplier partners who uphold a commitment to similar values is paramount. While we already have a strong foundation when it comes to due diligence and risk management procedures, we strive for continuous improvement in support of global efforts to eradicate forced and child labour.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above, and that it has been approved by the governing body of the entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Jerry Stapp

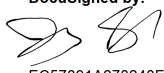
Full name

Director

Title

May-28-2024

Date

DocuSigned by:


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Signature

I have the authority to bind ORBCOMM Inc. and ORBCOMM Canada, Inc.