

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 ORBCOMM Canada, Inc. (collectively, “ORBCOMM” or “we”) in adherence to Section 11 of Bill S-211. It outlines the measures that ORBCOMM has taken in the last financial year 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, electronics and SaaS solutions. 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 with a goal of ensuring that these standards are complied with by our vendors, suppliers, and business partners.

Section B: Policies and Due Diligence Processes

ORBCOMM maintains and enforces a Code of Conduct for vendors and suppliers (“the Code”), which sets out the minimum standards required from our business partners. The Code deliberately sets forth a prohibition of child labour and forced labour. We also continued 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. As part of our supplier contracting process, we require our suppliers to acknowledge and agree to abide by the Code. In addition, all of our contracts include a provision whereby our vendors and suppliers commit to comply with applicable laws and regulations in the performance of their contracted services, a failure to do so would result in a material breach of the contract and which could lead to termination of the business relationship.

ORBCOMM is 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 worker recruitment and maintain internal controls to ensure that all ORBCOMM employees are recruited and employed 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 continuously conduct assessments to identify risks associated with the use of child labour or forced labour in our activities and supply chains. These assessments rely on publicly available data and consider the degree of regulatory compliance in specific regions.

While our risk assessment does not presuppose the use of forced labor 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.

Flowing from the foregoing, we hold vendors and suppliers to high ethical standards and prohibit forced or child labor, prioritizing partners who respect human rights and environmental concerns. We conduct due diligence with suppliers per OECD guidelines, especially in high-risk areas, and partner with manufacturers that contractually agree

to comply with applicable laws and standards and the ORBCOMM Vendor Code of Conduct.

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. This includes providing ongoing training to our sourcing and supply chain teams on the issues of child and forced labour. In addition, our vendor agreements with suppliers in higher-risk countries include strict representations and warranties confirming compliance with all applicable child and forced labour laws and standards.

Section D: Remediation Measures

Within the last financial year, we have not identified any forced labour or child labour being used in our activities and supply chain. 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 would be a violation of the Code and would result in corrective action up to and including termination of contracts.

Section E: Remediation of Loss of Income

Within 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 Code of Ethics and Conduct, which addresses our company's obligation to comply with global laws, rules and regulations, including intolerance for child labour and forced labour. This training is incorporated into our employee onboarding process, as well as our annual compliance training programs. These training modules also provide employees with instructions on how to report violations of our Code of Ethics and Conduct through our anonymous whistleblower program. Employees are required to acknowledge their commitment to our Code of Ethics and Conduct to complete the training.

Starting in the current fiscal year, we plan to introduce additional training for our procurement team members regarding responsible sourcing as part of our procurement process, which is specifically focused on the prevention of child labour and forced labour 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.

ORBCOMM tracks key performance indicators (“KPIs”) in a more formal manner to support reflection on the effectiveness of our policies and processes in preventing the use of modern slavery in our activities and supply chains. These include KPIs such as:

- Number of whistleblower reports related to concerns around modern slavery being used in our activities and supply chains, and
- Completion rates of our training programs related to preventing modern slavery being used in our activities and supply chains.

ORBCOMM anticipates the addition of the following KPI to assist in further managing our vendor and supplier Code compliance requirements:

- Percentage of suppliers signing off on our Code of Conduct for vendors and suppliers

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

Conclusion

At ORBCOMM, we place great importance in conducting business ethically and working with supplier partners who uphold a commitment to similar values. 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 labor.

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 entity or entities listed above. 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-14-2025

Date

Signed by:



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Signature

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