



Doing the Right Thing

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1 Doing the Right Thing – Why it's Important

We want to succeed but we always want to do it with integrity. We want to set ourselves apart by working to a high ethical code when we do business. That's one of the reasons we started.

We expect everyone to follow the same standards whether you are permanent, with us for a short time or acting on behalf of Iridium. We can be clear around expectations but the choice is yours; we don't mind mistakes but if you don't follow the guidance it may result in a serious outcome ranging from a disciplinary to a criminal matter for you and may cause serious damage to our reputation.

This guidance outlines our expectations around how you treat people, and how you conduct yourself, including our expectations around drugs and alcohol, bribery, money laundering (that's not change in your jeans in the wash), and tax evasion. Whilst we may never be faced with any instances when we have to consider these – it is important to be aware.

2 Valuing Diversity

People are core to our business, whether colleagues or clients and we always get the best results when we recognise and respect differences, as well as the similarities between people. We are proud to have a culture which encourages acceptance and respect of all persons regardless of race, ethnicity, age, gender identification, sexual orientation, physical or mental ability, or religious beliefs. We will take significant actions against anyone who does not follow our core values in this respect.

3 Modern Slavery

Whilst we are not bound by the legal requirements to conform with the requirements of the Modern Slavery Act, in line with our ethical stance on human trafficking, we have appropriate controls to prevent Modern Slavery, pursuant to section 54 of the Modern Slavery Act 2015'.

4 Use of Alcohol or Drugs

Although we all like to let our hair down from time to time, no colleague is permitted to report for work, or be at work, under the influence of alcohol or drugs. Consumption of alcohol or drugs is not permitted at any time during normal working hours, including paid and unpaid breaks. In the case of celebrations or functions (e.g. retirements, Christmas etc), permission may, however, be sought in advance from your manager to allow the consumption of alcohol.

Colleagues reporting for work have a responsibility to be fit, capable and presentable to undertake their duties. If an employee is known or is believed to have consumed alcohol or drugs at any time during the working day or is believed to be under the influence of alcohol or drugs at any time during the working day, the employee will normally be suspended from duty for the remainder of that working day.

Employees who, at any time at work or during the working day:

- take drugs or are suspected or known to be under the influence of drugs;
- are believed to be buying or selling drugs;
- are in possession of unlawful drugs;

May be subject to disciplinary action which may be considered as gross misconduct. In addition to possible disciplinary action, employees may also be subject to criminal proceedings if it has been considered appropriate to involve the Police.

5 Environment Impact

In line with the UK government commitments to cut carbon emissions by 2030 as part of the Paris Climate Agreement we are reviewing options around measuring our environmental impact. We are partnering with Ecologic to become more climate positive, by planting trees and funding the worlds best climate crisis solutions through various subscription packages or customisable one-off payments. Our ambition over time is to become a carbon neutral organisation.

6 Bribery

Our work stands for itself - we don't need to pay to win! Under the Bribery Act 2010 it is a criminal offence if:

- an employee or associated person acting for, or on behalf of, Iridium offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, Iridium offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- Iridium does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

We are not saying you can't get to know our clients or suppliers, building relationships is in our DNA. We just need to ensure we are doing it in the right way.

You can still offer normal and appropriate hospitality and entertainment with clients – we just have to do it in the right way. Work on the ethos that if it doesn't feel right, then it probably isn't.

Remember to log on our CRM any entertainment we have undertaken with our clients or suppliers.

7 Money Laundering

We work with a lot of Financial Services Clients and Money Laundering is a key area of concern for them; whilst it's unlikely we will be faced with this, it's good to be aware and also to note that if you are asked to support this activity personally or professionally it's a criminal offence. We like you too much to have you in jail!

Money laundering is normally used to hide the origins of proceeds of crime or to fund terrorist activities. Participating in it or tipping someone off that they are being investigated are both criminal offences. Watch out for any odd requests such as someone offering to pay your credit card if you give them cash – you could be inadvertently part of a money laundering process.

8 Tax Evasion

They say nothing is as sure as death and taxes and sadly we can't avoid either in the long run. We need to ensure that we are not supporting tax evasion through our ways of working. For instance, if someone offers to do something 'cash in hand' we can admire their entrepreneurial spirit, but we shouldn't support this – we would be supporting tax evasion.

If you have any concerns around anything held within this policy these can be raised in confidence with **Matt Pickin**. We will ensure that any concerns are treated with confidence and do not cause detriment to you.

