

AVANTI COMMUNICATIONS

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Avanti Communications and its affiliates and subsidiaries (**Avanti**) are committed to the prevention, deterrence and detection of slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken to achieve Avanti's stance of zero-tolerance of all forms of slavery (including debt bondage, deceptive recruitment practices and the use of threats or coercion), human trafficking, forced servitude and other exploitation in Avanti's supply chain or in any part of Avanti's business for the financial year ending 31 December 2022.

This statement has been approved by the board of Plate Newco 1 Limited on 26 July 2023 in relation to the financial year ending 31 December 2022 and also applies to any affiliate or subsidiary of Plate Newco 1 Limited.

OUR BUSINESS

We are a world-leading provider of agile, secure and pioneering satellite technology across Europe, the Middle East and Africa. Avanti is headquartered in the City of London with offices across Europe, Africa and America. Avanti has approximately 200 employees worldwide.

OUR SUPPLY CHAIN AND SUPPLIERS

Avanti's supply chain and its relationship has been established and improved. We have long-term technology partners, that are essential in the delivery of our global connectivity services and that we rely on each day to ensure customer satisfaction. We also utilise a range of professional services and logistics services.

Since 2018, we have a dedicated Procurement & Supply Chain team who, with the support of the Legal Department, seek to ensure we conduct our business ethically and in full compliance with all applicable laws. We proactively engage and manage our key suppliers centrally – ensuring that we understand their value chain, risk profile and country of origin. We use a supplier due diligence process for material and/or high-risk suppliers to ensure they are appropriately vetted.

Avanti's supply base consists of around 500 suppliers. These are segmented and managed accordingly within three categories:

- 'transactional suppliers' – providing low volume and/or low value goods and services, office supplies, facilities management, operational consumables, etc. 25% of this category are one-off purchases.
- 'enterprise-wide suppliers' – companies delivering professional services, IT software and equipment, insurance, logistics, legal, regulatory, accountancy and HR services.
- 'technology and service delivery partners' – technology, infrastructure, satellite terminals and networking suppliers that are an integral part of our service delivery.

Avanti does not design or manufacture products and therefore has no manufacturing facilities, component and/or raw materials suppliers to directly manage.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy (**Policy**) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The current version of the Policy is publicly available to all employees, customers, suppliers and members of the public and is published on the Group's website at www.avanti.space.

RISK ASSESSMENT AND DUE DILIGENCE

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Risk assessments undertaken by the Procurement Department, with the support of the Legal Department, cover the following key factors: territory, sector, business type, transactions, outsourcing, level of spend, individuals involved and agency/partnership relationships.

We understand that the following factors give rise to the highest modern slavery risks within Avanti's business:

- Operating in high-risk jurisdictions where there is limited regulation around employment practices and human rights.
- Contracting with suppliers who are evasive or reluctant to provide due diligence documentation when requested, or whose business structure contains shell companies when the purpose of their creation is not clear.
- Failure to complete sufficient referencing checks on our own employees.
- Failure to spot indicators of modern slavery or forced labour amongst our own employees or those of our suppliers, such as an absence of ID documentation, a lack of basic training for the work undertaken, physical signs of malnourishment or injury and limited English language skills.

To monitor these risks, Avanti conducts a due diligence process on material and/or risk-high suppliers which includes the completion by suppliers of a mandatory questionnaire on slavery and human-trafficking. Existing material and/or high-risk suppliers are also requested to complete the questionnaire (to the extent they have not already done so). The results of each questionnaire are recorded and assessed to ascertain whether the relevant supplier is vulnerable to the risk of slavery and human-trafficking. Where there is deemed to be a high level of risk, further investigations are carried out to ensure Avanti can remain compliant with the anti-slavery stance described in the Policy. Avanti will not contract with a high-risk supplier until it has received approval from the General Counsel and an additional member of the Executive Committee. All suppliers are sent an annual notification from Avanti reminding them of our zero-tolerance approach and directing them to refresh their awareness of the Policy, posted on the Avanti website.

SUPPLIER COMPLIANCE

Avanti requires that its suppliers are made aware of the Policy and may also be required to commit contractually to observe the Policy. Avanti's standard terms have been updated to require absolute compliance with the Modern Slavery Act as a condition of contract. These terms provide that, in the event of any breach of slavery and human-trafficking laws or breach of the Policy, Avanti may in its sole discretion terminate suppliers' contracts.

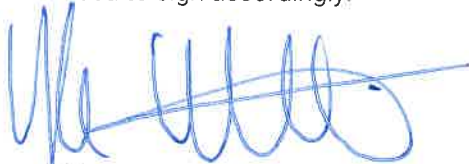
As part of our ISO9001 and ISO27001 certifications, we carry out annual information security audits at key supplier facilities. We take this opportunity to assess other concerns or risks, including the behaviour of the supplier's staff, and report any such concerns internally and/or raise with supplier's management.

TRAINING

Avanti provides relevant employees with training on the scope and application of the Modern Slavery Act on an annual basis. All Avanti employees and suppliers should know how to identify or prevent slavery and human-trafficking and employees are encouraged to report concerns, and receive protection for doing so, pursuant to Avanti's whistleblowing policy.

BOARD APPROVAL

This statement was approved by the board of Plate Newco 1 Limited on 26 July 2023 and Kyle Whitehill was authorised to sign accordingly.



Kyle Whitehill
Director and Group CEO
Plate Newco 1 Limited