

# Global Violence & Harassment Policy

## Purpose

ORBCOMM is committed to providing a work environment free from all forms of violence, discrimination and harassment. In pursuit of this goal, ORBCOMM does not condone and will not tolerate acts of violence, harassment or discrimination against or by any employee.

## Scope

This Policy applies to all ORBCOMM employees, including full-time, part-time, temporary, contract, volunteers, co-op students, interns and apprentices.

This Policy applies to all aspects of ORBCOMM's internal and external practices and each ORBCOMM subsidiary and wholly owned affiliate. Sources of workplace harassment may include customers, clients, management, workers and members of the public where such harassment occurs in the workplace.

For the purpose of this Policy, harassment, violence and discrimination can occur at any place or in any work-related context including virtual/remote environments and company sponsored events outside the office such as social or travel occurring with colleagues, customers or any third party where you are identifiable as an ORBCOMM employee.

In this Policy, we have included definitions and examples of discrimination, harassment, and workplace violence. The examples are not an exhaustive list; use your common sense and good judgment, as well as the information provided in our training program, to ensure your day-to-day interactions are respectful and inclusive.

## Definitions

**Discrimination**: workplace discrimination means unequal treatment based on a protected ground, class or category and is prohibited by this Policy.

**Workplace violence or bullying**: workplace violence or bullying is the exercise or threat of physical force or conduct reasonably likely to have been intended to cause physical,

psychological or emotional harm against a worker. Examples of such behavior include, but are not limited to:

- Physical acts to persons or property
- Any verbal or non-verbal threat, behavior or action which can be reasonably interpreted to result in a physical act to persons or property; or
- Disruptive behavior that is not reasonably appropriate to the work environment in which it occurs

**Harassment/Sexual Harassment**: means conduct that are known or ought reasonably to be known to be unwelcome and is prohibited by this Policy. It can involve words or any unsolicited, unwelcome, disrespectful, or offensive behavior and can be typified as:

- Behavior that is hostile in nature, or intends to degrade an individual or group (whether or not the person or group is the subject of the behavior) based on personal attributes including; age, race, color, national origin, disability, family status, religion, gender, sexual orientation, gender identity or expression, military service or affiliation, bankruptcy, genetic information, record of offence or any other protected ground under applicable local legislation;
- Unwelcome or insulting gestures, remarks, jokes, innuendos, propositions or taunting based on a protected ground under applicable local legislation;
- Refusing to speak to or with someone or treating someone differently because of a protected ground under applicable local legislation;
- Sexual solicitation or advance made by a person to another person, where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome;
- Sexual solicitation or advance made by a person in a position to confer, grant, or deny a benefit or advancement, either directly or indirectly by nature of their position (such as by a manager to any junior employee), to the person are prohibited, and are deemed a violation of this Policy;
- Physical contact such as touching, patting, or pinching, with an underlying sexual connotation;
- Sexual assault;
- Any actions that reasonably creates a hostile, intimidating, or offensive workplace.

## **Reporting Violation of our Policy**

If you are either directly affected by or witness to any violation of this Policy, it is imperative for the safety of all employees that the incident be promptly reported.

Managers and supervisors who become aware of potential harassment or violence are obligated to report their concerns to Human Resources or the Legal & Compliance Department.

ORBCOMM may:

- Investigate all reported acts and incidents of violence, and as necessary consult with other parties (e.g., legal counsel, health & safety consultants, employee assistance provider, local police services);
- Take any/all reasonable measures to eliminate or mitigate risks identified by the incident;
- Document the incident, its investigation, and corrective action taken;
- Review annually, this Policy in conjunction with the review of the hazard assessment, the effectiveness of actions taken to minimize or eliminate workplace violence and make improvements to procedure, as required.

### **Process for Reporting Violations of our Policy**

Any employee who believes they have been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to report it by doing one or more of the following:

- Contact Human Resources to discuss and/or report the incident
- Discuss the situation with the harasser's Manager, your Manager or any member of the Management team.
- If you feel comfortable, address the harasser personally or in writing pointing out the unwelcome behavior and requesting that it stop.
- Employees retain the right to make a report directly to their applicable government authorities, as permitted under law.

Any employee who believes they have been discriminated against or harassed can and should in all confidence and without fear of reprisal or retaliation by Management, discuss and report to HR and/or Management.

### **Investigations**

ORBCOMM will respond to all complaints or incidents of workplace harassment in a fair and timely manner. Harassment should not be ignored, as silence can and often is interpreted as acceptance, as well as the goal of the harassment. Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they lodged a complaint when they believed they were the victim of a violation of this Policy.

ORBCOMM will take reasonable measures to ensure that all information obtained during the course of an investigation will not be disclosed, unless the disclosure is necessary for the purposes of investigating or taking corrective action, or as otherwise required by law. In addition, all investigations will be conducted in compliance with applicable data protection and

privacy laws and personal information will be shared on a need-to-know basis. Records of any investigations, including reports, copies of evidence and decisions will be retained for the legally required period in each jurisdiction.

While an investigation is on-going, all parties involved are reminded of the importance of maintaining confidentiality. Employees are expected to refrain from discussing the complaint, incident or the investigation with other employees or witnesses unless necessary to obtain advice about their rights.

An investigation may include;

- Informing the respondent of the complaint;
- Interviewing the complainant, any person involved in the incident and any identified witnesses;
- Statements from all parties involved will be taken and documented;
- If applicable and/or when necessary ORBCOMM may employ outside assistance or request the use of legal counsel; and
- Upon completion of the investigation, ORBCOMM, will inform both the complainant and respondent of the findings of the investigation.

ORBCOMM will inform both the complainant and respondent in writing, where applicable, of the findings of the investigation and any corrective action that has been or will be taken as a result of the investigation. ORBCOMM will keep records of all complaints or incidents of workplace harassment for at least 1 year from the conclusion of the investigation.

If the complainant decides not to make a formal complaint, it may be decided that a formal complaint is required (based on the investigation of the incident) and will file such documents with the respondent.

### **Fraudulent or Malicious Complaints**

This Policy must never be used to bring fraudulent or malicious complaints. It is very important to realize that unfounded or frivolous allegations of violations of this Policy may cause both the accused person and ORBCOMM significant damage. If it is determined by ORBCOMM that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action, including up to termination, will be taken.

### **Local Standards and External Reporting Agencies**

This Global Violence and Harassment Policy establishes a baseline standard for promoting a safe, respectful, and inclusive work environment across ORBCOMM operations worldwide. Where local laws, regulations, or collective agreements impose stricter or additional

requirements than those set out in this Policy, such local provisions shall take precedence to the extent of any inconsistency. In all cases, ORBCOMM will comply with applicable local laws and will adapt the implementation of this Policy accordingly, while maintaining its overall commitment to zero tolerance for violence, harassment, and other forms of inappropriate conduct.

Furthermore, local standards may offer information about applicable local processes and/or laws, including opportunities to make a report of discrimination or harassment externally and/or details of rights/remedies/protections available under applicable legislation. For more information, and/ or guidance, please reach out to your local HR representative. Annexes to this Policy relate to jurisdictionally specific laws and reporting structures. They are not exhaustive, nor are they intended to reflect all applicable legal requirements in each jurisdiction ORBCOMM operates in. Employees should consult their local Human Resources or the Legal Department about the most current requirements in their jurisdiction.

## Annex A – United States

### Applicable Laws

- Title VII of the Civil Rights Act of 1964
- Americans with Disabilities Act (ADA)
- Age Discrimination in Employment Act (ADEA)
- State human rights/anti-discrimination laws

### Reporting Channels

In addition to internal reporting, employees may file complaints externally with:

- **U.S. Equal Employment Opportunity Commission (EEOC)**
  - Website: [www.eeoc.gov](http://www.eeoc.gov)
  - Phone: 1-800-669-4000
- **State or local Fair Employment Practices Agencies (FEPAs)**

## Annex B – European Union (General)

### Applicable Laws

- EU Equal Treatment Directives (2000/43/EC, 2000/78/EC, 2006/54/EC)
- Directive (EU) 2019/1937 (Whistleblower Directive)
- General Data Protection Regulation (GDPR)

### Reporting Channels

In addition to internal reporting, employees may raise concerns with:

- **National Equality Bodies** (contact details available via European Equality Bodies Network)
- **Labour Inspectorates or Courts**
- **Works Councils/Employee Representatives** (where applicable)

### Data Privacy

All personal data processed in connection with investigations will comply with GDPR, including principles of proportionality, data minimization, and restricted access.

## **Annex C – United Kingdom**

### **Applicable Laws**

- Equality Act 2010
- Employment Rights Act 1996
- Public Interest Disclosure Act 1998

### **Reporting Channels**

In addition to internal reporting, employees may raise complaints externally to:

- Advisory, Conciliation and Arbitration Service (ACAS) ([www.acas.org.uk](http://www.acas.org.uk))
- Employment Tribunal (claims must generally be filed within 3 months of the act of discrimination/harassment)

### **Data Privacy**

All personal data processed in connection with investigations will comply with the UK General Data Protection Regulation (UK GDPR) + Data Protection Act 2018 including principles of proportionality, data minimization, and restricted access.

## Annex D – Canada

### Applicable Laws

- Canadian Human Rights Act
- Provincial Human Rights Codes
- Occupational Health and Safety Acts (federal and provincial)

### Reporting Channels

In addition to internal reporting, employees may file complaints externally with:

- Canadian Human Rights Commission (federal jurisdiction)
- Provincial/Territorial Human Rights Commissions (e.g., Ontario Human Rights Tribunal, BC Human Rights Tribunal)
- Provincial Ministries of Labour for workplace violence issues

### Record Retention

Records must be retained in accordance with applicable OHS and human rights law — typically longer than one year (e.g., Ontario: at least **three years**).

### Data Privacy

All personal data processed in connection with investigations will comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) as well as applicable provincial laws and regulations.

## Annex E – Japan

### Applicable Laws

- Act on Securing, Etc. of Equal Opportunity and Treatment Between Men and Women in Employment
- Labour Standards Act
- Workplace Harassment Prevention Guidelines (covering sexual harassment, maternity harassment, and power harassment)

### Reporting Channels

In addition to internal reporting, employees may seek advice or lodge complaints with:

- Labour Standards Inspection Offices
- Hello Work Employment Service Centers
- Labour Bureaus

### Data Privacy

All personal data processed in connection with investigations will comply with the Act on the Protection of Personal Information, as amended (2022) (APPI). Sensitive information will require the express written consent of the party providing the information unless an exemption applies such as legal obligation).

## **Annex F – Australia**

### **Applicable Laws**

- Fair Work Act 2009
- Sex Discrimination Act 1984
- State/Territory anti-discrimination and OH&S laws

### **Reporting Channels**

In addition to internal reporting, employees may file complaints with:

- Australian Human Rights Commission (AHRC)
- Fair Work Commission
- State/Territory Equal Opportunity Commissions

### **Data Privacy**

All personal data processed in connection with investigations will comply with the 1988 Privacy Act and the Australian Privacy Principles (APP). Notice must be provided to individuals that their information is being collected in connection with an investigation.

## **Annex G – Singapore**

### **Applicable Laws**

- Tripartite Guidelines on Fair Employment Practices (TAFEP)
- Employment Act 1968
- Protection from Harassment Act 2014

### **Reporting Channels**

In addition to internal reporting, employees may seek assistance from:

- TAFEP (Tripartite Alliance for Fair and Progressive Employment Practices)
- Ministry of Manpower (MOM)
- Protection from Harassment Court

### **Data Privacy**

All personal data processed in connection with investigations will comply with the Personal Data Protection Act, as amended in 2020 (PDPA). Notice/consent is not required regarding the collection of data if it can be implied as being “reasonably necessary” for managing an employment relationship, including an investigation under the Policy.

## Annex H – Hong Kong

### Applicable Laws

- Sex Discrimination Ordinance (SDO)
- Disability Discrimination Ordinance (DDO)
- Family Status Discrimination Ordinance (FSDO)
- Race Discrimination Ordinance (RDO)

### Reporting Channels

In addition to internal reporting, employees may file complaints with:

- **Equal Opportunities Commission (EOC)** ([www.eoc.org.hk](http://www.eoc.org.hk))
- **Labour Department**

### Data Privacy

All personal data processed in connection with investigations will comply with the Personal Data (Privacy) Ordinance (PDPO). Personal data collected as part of an investigation can only be used in connection with that investigation. Consent not required, but notice is.