



To: the B4Ukraine Coalition

Re: Your Letter of 3 October, 2023

Iridium has maintained a policy of consistent support for Ukraine and repeatedly condemned the Russian invasion. We are complying with all applicable U.S. and international sanctions and export controls relating to Russia and no end-user devices have been shipped into the country since the invasion. The news you cite appears to be an unfortunate distortion of facts.

For example, the video cited at no point says Iridium is used in the military drone and to date no evidence, despite our requests, has been provided to show otherwise. As you might imagine, it's difficult to stop something from happening that no one is able to show is actually happening. In fact, all components identified have been from companies other than Iridium. And as I'm sure you're aware, the Russian military has its own satellites.

This aligns with the fact that, to our knowledge, Iridium does NOT have a current or past relationship with "AFM-Servers" – who we have been told is the maker of the drone depicted. Additionally, the capabilities identified in the "Ptero" system that was mentioned, like "80-megapixel cameras and thermal imagers to quickly create 3D plans of the area for special operations", are not possible using the Iridium system, indicating other connectivity options are being used. Very basic research could have confirmed all of this for the investigators.

Regarding the operations of our subsidiary in Russia, shortly after the invasion of Ukraine the U.S. government issued a general license which gives authority to telecom companies like us to continue to operate within its parameters. This policy seems to support keeping the free flow of information into and out of Russia and supports our longstanding and unique focus on providing service to 100% of the planet.

In concluding, I would like to state that Iridium has been and will continue to be a critical tool used by Ukrainians in defense against Russia. Thousands of Iridium devices are in use in Ukraine to support these efforts and in the surrounding countries to assist with refugee support. This will not change.

Respectfully,



Matt Desch

Matthew J. Desch
Chief Executive Officer
Iridium Communications Inc.
1750 Tysons Boulevard,
Suite 1400,
McLean, VA 22102,
USA

October 3, 2023

RE: Iridium Communications Inc.'s business operations in Russia

Dear Mr. Desch,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations working to curtail the financial resources enabling the Russian invasion of Ukraine. In the spirit of respect for the fundamental rights of all people, the rules-based international order, and a prosperous global economy, we expect companies to demonstrate public support for the people, democracy, and territorial integrity of Ukraine, opposition to Russia's war of aggression, and alignment with the UN Guiding Principles on Business and Human Rights (UNGPs).

We are deeply concerned by the [news](#) that Iridium is still, after 18 months of war, cooperating with the Russian military-industrial complex, contributing to Russia's aggression against Ukraine.

We are writing to formally notify Iridium on the serious and increasing risks the company faces by continuing its operations with Russia that may amount to complicity in human rights abuses committed by the Russian Federation and to request that Iridium:

- Immediately cease all operations and presence in Russia and completely exit the Russian market.
- Refrain from any future business, trade, or investment in Russia until Russia ends its war in Ukraine, territorial integrity of Ukraine is restored, and accountability imposed for war crimes and the destruction of Ukrainian infrastructure and property.
- Establish and implement comprehensive human rights due diligence measures for any responsible exit from or re-engagement with Russia.

It has been a year and a half since Russia invaded Ukraine and the devastating impacts continue to shock the global conscience and shake the global economy. Russia is violating international humanitarian law (IHL), including war crimes and crimes against humanity, through attacks on civilians and civilian infrastructure (e.g., mass executions, sexual violence, torture, forcible transfer of civilians). More than 27,000 Ukrainian civilians have been killed and injured and millions more have been forced to flee their homes, creating one of the largest humanitarian and refugee crises of modern times. In recognition of the severity of abuses, in March 2023 the International Criminal Court issued an arrest warrant for Vladimir Putin to answer war crimes charges.¹

¹ International Criminal Court, "Situation in Ukraine: ICC judges issue arrest warrants against Vladimir Vladimirovich Putin and Maria Alekseyevna Lvova-Belova," March 17, 2023,

In response to this unprovoked and unjustified war many other companies have already left Russia. According to the Kyiv School of Economics Institute's #LeaveRussia [company tracker](#), Iridium has decided to stay and continue its operations in Russia.

A report by Trap Aggressor and the accompanying video evidence shows that Russian UAVs, and in this specific instance the new drone modification with the Ptero system, “can perform its tasks solely thanks to the American navigation system produced by the US company Iridium.”² These findings may indicate that Iridium is failing to execute its Human Rights and due diligence commitments expeditiously and remains significantly exposed to the Russian market.

The report explains that Iridium continued cooperating with the Russian military complex long after the start of the full-scale invasion of Ukraine, indicating that the company is “directly helping Russia in its military aggression against Ukraine.” Furthermore, Iridium still maintains its Russian office.³

According to trade records, the Russian Iridium Communications directly purchased goods from the US counterpart continuously from 2015 to 2022, and in 2023, it purchased products indirectly, through an unidentified company. Additionally, in 2022, the Russian Iridium subsidiary, entered into an agreement with the central communication hub of the National Guard of Russia (Rosgvardiya). The contract stipulated that Iridium Communications would integrate Rosgvardiya into the international satellite radio communication system. Additionally, in March 2022, one of the founding entities of Iridium Communications, the state-owned enterprise Morsviazspudnik, rendered services to the Russian Ministry of Foreign Affairs.

In 2014, Iridium warned that it may experience disruptions due to the sanctions imposed on Russia, however, the company allegedly still holds “valid contracts for satellite communications services to the armed forces of Russia.”⁴

We understand that Iridium responded to these findings by highlighting its contribution to Ukraine’s defence and stating that the company does not have end-user account information but requires its partners to comply with applicable laws, including avoiding sales of Iridium services to sanctioned parties.

However, considering that Iridium has been aware of its usefulness to Russian weapons at least since 2014, and that its products have been consistently used in Russian military attacks on Ukraine, **we are writing to enquire whether Iridium can provide further details regarding the company’s continued cooperation with the FSB-linked company AFM-servers and Iridium’s ongoing business operations in Russia. Additionally, we would like to request Iridium to share details of its due diligence and KYC processes the company employed to prevent the use of its services to the Russian military. How does Iridium reconcile its role in Ukraine’s defence and the ongoing operations and offices in Russia? Has Iridium applied heightened human rights due diligence and a conflict-sensitive approach in deciding to continue its operations in Russia? Which stakeholders has the company engaged with in making this decision?**

<https://www.icc-cpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and> (accessed March 22, 2023).

² Inna Popovych, “Russian drones manufacturer keeps receiving satellite services from American company,” Trap Aggressor, September 28, 2023,

<https://trap.org.ua/en/publications/russian-drones-manufacturer-keeps-receiving-satellite-services-from-american-company/> (accessed September 29, 2023).

³ Iridium Russia, <https://iridium-russia.com/> (accessed September 29, 2023).

⁴ Popovych (n 2).

These activities seem to be in contradiction to Iridium's own principles and policies, as well as the wider international framework on humanitarian and human rights law.

As per the UNGP Guiding Principle 19: "Where a business enterprise causes or may cause an adverse human rights impact, it should take the necessary steps to cease or prevent the impact. Where a business enterprise contributes or may contribute to an adverse human rights impact, it should take the necessary steps to cease or prevent its contribution and use its leverage to mitigate any remaining impact to the greatest extent possible."⁵

Furthermore, Iridium's continued links to the Russian military complex indicate that the company is potentially not aligned with the internationally recognised standards on business and human rights. As per the UNDP: "If the use of force – the war – is deemed unlawful under international law, in addition to respecting human rights and international humanitarian law, *at a minimum*, business should assess, and avoid or mitigate its connection to the war efforts of the aggressor country to "ensure that they do not exacerbate the situation."⁶

With the above in mind, we seek to understand how Iridium has conducted and continues to conduct heightened human rights due diligence and how the findings of such a process have resulted in these continued business activities and relationships.

We request an urgent dialogue with Iridium's relevant senior management and staff to discuss the company's ongoing activities and relationships in Russia and associated risks to the people of Ukraine and the company. Please contact the B4Ukraine Coalition at contact@b4ukraine.org to schedule a call. We kindly ask for your response by 5:00pm CET, October 17th, 2023.

Sincerely,

The B4Ukraine Coalition

⁵ UN Guiding Principles, "Guiding Principle 19," <https://globalnaps.org/ungp/guiding-principle-19/> (accessed September 18, 2023).

⁶ UNDP, "Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts; A Guide," June 16, 2022, <https://www.undp.org/publications/heightened-human-rights-due-diligence-business-conflict-affected-contexts-guide> (accessed September 18, 2023).