

GLOBAL EAGLE ENTERTAINMENT INC.

STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

April 17, 2018

I. Purpose

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 on behalf of Global Eagle Entertainment Inc. and all other corporate entities within its global group that are carrying on business in the UK. This includes, but is not necessarily limited to, the following UK subsidiaries, to the extent that they are carrying on business in the United Kingdom

- IFES Acquisition Corp Limited
- IFE Holdings Limited
- Inflight Management Development Centre Limited
- Inflight Productions Limited
- GEE Financing Limited
- Global Eagle Entertainment Limited
- IFE Services Limited

Throughout this statement, therefore, references to the "**Company**" or "**we**" include references to Global Eagle Entertainment Inc. and all of the above entities, unless otherwise specified, or the context otherwise requires.

This statement is consistent with the Company's Global Business Conduct and Compliance Policies Manual, as well as our core values to protect and advance human dignity and human rights in our global business practices. The Company has a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls to put in place to safeguards against any form of modern slavery taking place within the business or our supply chain.

II. Our organisation

We are a leading provider of maritime, terrestrial, and aviation satellite connectivity and inflight and shipboard entertainment

III. Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- An Anti-Trafficking in Persons Policy adopted by Global Eagle Entertainment Inc. in order to comply with US Government Policy on Human Trafficking, which includes details of how staff can report matters of concern and a prohibition on retaliation against those who report human trafficking
- Whistleblower Policies and Procedures which ensures all employees know they can raise concerns about any potential unlawful acts, including how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals
- A hiring policy which includes 'right to work' checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Global Business Conduct and Compliance Policies, including the Company's Anti-Trafficking in Persons Policy, Anti-Corruption Policy, Export Controls and Sanctions Policy, Anti-Money Laundering Policy, and Record-Keeping Policy included therein
- A monthly "Compliance Corridor" internal newsletter which highlights topical compliance issues and educates employees on points relevant to compliance matters
- A Know Your Customer/Supplier (KYC) vetting process/procedure

IV. Our suppliers

The Company operates a supplier policy and maintains a supplier list.

We conduct due diligence on all suppliers before allowing them to become a supplier.

This due diligence includes requiring suppliers to provide details of their company ownership and control, whether they are publicly listed and confirmation whether they have ever been sanctioned or debarred by any national, state, provincial or local government.

V. Training

We have personnel on staff who have a general awareness of the procedures required to identify and prevent human trafficking, and we are considering any further specific training requirements that we feel are necessary.

VI. Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if reports are received from employees through the Company's whistleblowing procedures, the public, or law enforcement agencies to indicate that modern slavery practices have been identified

Approval for this statement

This statement was approved by the Global Eagle Entertainment Inc. Director of Compliance.

Name: Thomas J. Hess

Signature:  2E9E6217AE1D46A...

Signed: April 17, 2018