

# Code of Conduct

# Code of Conduct

Space is today an integral part of everyday life, underpinning everything from navigation and communication to Earth observation, business intelligence, security, and more. Its importance continues to grow – for both society and geopolitics.

As a leading global provider of advanced space services with more than 50 years of experience, we help space organizations, research institutes, and commercial and institutional partners around the world get access to space.

With a local presence on all continents and approximately 750 dedicated employees, we provide specialist expertise across the space value chain. Our capabilities include satellite communications and satellite control services, spacecraft operations, rocket and balloon systems, launch services and flight test services, as well as engineering, operations and consultancy services for space missions.

Among our strongest assets are Esrange Space Center in northern Sweden, set out to be a leading provider of satellite launch services from mainland Europe, as well as one of the world's largest commercial ground station networks for satellite communications.

SSC Space has many important stakeholders: coworkers<sup>1</sup>, owners, business partners<sup>2</sup> as well as the public at local, national and international level. To gain and retain trust and to be a reliable business partner, SSC Space must take responsibility for every part of our business operations and ensure that we contribute to a more secure and sustainable world.

Areas highlighted in our Code of Conduct are also integrated into our Supplier Code of Conduct. Potential risks for violations are identified and managed within the Sustainable Business Analysis for Sales and Procurement.

<sup>1</sup> "Coworker" or "staff" is defined as a person employed by SSC Space regardless of terms of employment, e.g. full-time, part-time, fixed term contract.

<sup>2</sup> "Business partner" is defined as an external partner that SSC Space exchanges goods and/or services with, or a party that represents or collaborates with SSC Space.



# CEO statement

Our mission is to help Earth benefit from Space. This mission carries a responsibility to act ethically, safeguard trust, and contribute to long-term sustainable development. Sustainable business Conduct is embedded in our strategy and operations, and we actively support internationally recognized principles and initiatives that promote responsible business practices.

Being a leading service provider in the global space industry requires a strong understanding of the many conditions, cultures and values represented across regions and countries. SSC Space complies with all applicable laws and regulations governing our operations and supports internationally recognized guidelines and soft laws. However, there are currently no comprehensive global laws that fully regulate the space industry. This makes it essential for us to understand the opportunities, risks and challenges facing both SSC Space and the industry.

This means our responsibility extends beyond compliance. We must consistently do what is right, even when no rule explicitly requires it. In a complex and evolving environment, thoughtful and ethical decision-making is essential. When in doubt, we ask questions. When something feels wrong, we speak up.

As CEO, I am committed to fostering a culture where integrity, accountability and respect guide every decision we make. Our Code of Conduct translates our principles into practical guidance and serves as the foundation for responsible and competitive service delivery.

Each of us, regardless of role, carries responsibility for upholding these standards. Every coworker represents SSC Space and is expected to act with professionalism, integrity and respect across all locations and business contexts. To be effective, the Code of Conduct must be supported by our actions, policies, procedures and instructions, and clarify what our stakeholders can expect from us as a company and what values and behavior we expect from ourselves and others.

Our long-term success depends on trust: trust from customers, partners, authorities, and from one another. By living our Code and staying true to our values, we protect that trust and strengthen the role of SSC Space as a responsible and sustainable space company.



Charlotta Sund  
President and CEO



# Our five principles

Our Code of Conduct is based on the following five principles.

These principles are described in more detail in the following pages.



Business ethics



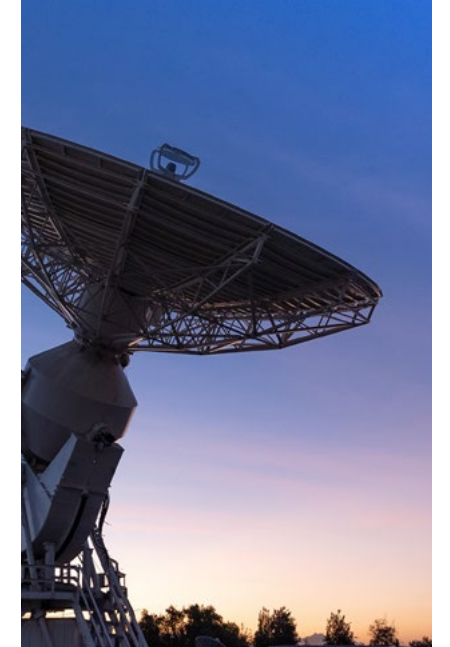
Human rights



People and leadership



Environment  
– SSC Space  
Environmental policy



Regulatory compliance

# About our Code of Conduct

## Responsibility and implementation of this Code of Conduct

Our Code of Conduct is adopted by the Board of Directors of SSC Space, and is at the core of the company management, leadership and business conduct. The CEO is responsible for the Code of Conduct and its implementation. The responsibility includes ensuring that all employees understand and comply with the Code as well as ensuring that the Code is addressed with the company business partners. The CEO, together with the members of the Executive Committee and their management teams, shall act as role models when implementing and complying with the Code. The CEO is also responsible for ensuring that all managers and

coworkers are given the tools to meet the requirements of the Code. To ensure a sustainable business it is vital that all coworkers are familiar with and have understood the Code of Conduct and what it means in terms of business practices and personal behavior. All SSC Space staff shall complete an annual Code of Conduct training program. Managers are responsible for ensuring that all coworkers complete the required training.

Employees are responsible for putting the Code into practice in their daily work and seeking clarification whenever questions arise.

## Understanding and reporting deviations of the Code of Conduct

SSC Space has an open corporate culture that encourages coworkers to speak up and address concerns and questions that may arise. Specific questions regarding the Code can be addressed to a coworker's direct manager, or to the Head of Sustainability at SSC Space. We welcome an active dialog with employees and external stakeholders.

Internally managers, HR and the Executive Committee are always available to address concerns or deviations from the Code, raised by employees. Issues or concerns may also arise for which a person may prefer to report anonymously. This may concern such

things as unethical behavior, violation of legal requirements or other violations of the SSC Space Code of Conduct. Therefore, the company has a confidential reporting system referred to as "whistleblowing". All matters reported through this reporting mechanism can be made anonymously and reports are managed by a third party. Coworkers who report an incident shall be assured that they do not risk any negative repercussions. The reporting system is available through the SSC Space Intranet and website. Different communication channels are also available on SSC Space's homepage for external stakeholders to address concerns regarding the code, including whistleblowing.

# Business ethics

SSC Space is a global actor in the space industry and is committed to the highest standards of integrity and ethical business conduct. We maintain zero tolerance for bribery, corruption, or any other form of unethical behavior. We always act in the best interests of SSC Space and do not seek to obtain improper advantages or place ourselves in situations that may give rise to actual, potential, or perceived conflicts of interest.

As representatives of SSC Space, we act with transparency, professionalism and integrity, and avoid any situations that could improperly influence – or be perceived to influence – our judgment or decision-making. Our employment, procurement and other business processes are fair, transparent and responsible. We engage only with customers, suppliers and partners who share our commitment to ethical conduct and compliance with applicable laws, regulations, and relevant international standards governing the space sector. We do not enter business arrangements involving unusual payment methods or terms that deviate from accepted industry practice. SSC Space complies with all applicable laws and fulfills its tax obligations in the countries where we operate.

We neither offer nor accept gifts, hospitality, sponsorships, donations or other benefits that could be perceived as an attempt to improperly influence business decisions. No one acting on behalf of SSC Space may seek or accept any benefit – directly or indirectly, for themselves or others – in exchange for preferential treatment in any business transaction. SSC Space is politically neutral. The company does not provide any direct or indirect contributions to candidates seeking public office, political parties, or other political organizations. Coworkers may not engage in political or religious advocacy in their professional role, nor receive paid leave for political activities unless required by national law. Recruitment, promotion and collaboration decisions are based solely on merit. Personal relationships – including family or friends – must never result in preferential treatment or unfair advantages.

SSC Space takes deviations seriously. Any violation or deviation of the herein principle of business ethics will result in disciplinary action followed by dismissal and/or legal action, if necessary.

## Key expectations

- Say no to gifts or favors that don't feel right – if something could look like a bribe or special treatment, don't accept it.
- Be open if there's a possible conflict – if a personal relationship or side interest could affect your work, tell your manager.
- Keep business clean and straightforward – avoid deals, payments, or arrangements that seem unusual or unclear.
- Speak up if something feels wrong – don't stay silent just because it is uncomfortable or inconvenient.





## Human rights

Space based applications such as communications and earth observation provide opportunities to promote human rights and positive societal development, but these services also pose risks if the services are used for the wrong purposes. Therefore, the company acknowledges human rights violations as a business risk that needs to be appropriately mitigated. This could in severe cases lead to the cancellation of a contract.

SSC Space recognizes and respects cultural and national differences including the rights of indigenous people and supports and respects the universal declarations of human rights. The company has implemented the UN Guiding Principles on Business and Human Rights. We are also conveying these requirements to the supply chain in the SSC Space Supplier Code of Conduct. This is an integral part of the procurement process.

SSC Space recognizes that complying with the UN Guiding Principles on Business and Human Rights can be challenging in certain cases. However, the challenge shall never prevent us from addressing any issues arising internally or externally. The Security Committee of SSC Space addresses business ethics and is informed if complex business ethical matters are identified. The Security Committee includes the Chair of the Board.

SSC Space recognizes that the risk of violating human rights might change over time due to changes both in business operations as well as in the world around us. We continuously work on assessing the company's impact and transparently report on our progress in the annual sustainability report.

### Key expectations

- Think about how SSC Space services could be used. If a project, supplier or customer could cause harm to people or communities, raise the concern early.
- Do your checks when working with customers, suppliers and partners. Follow the company processes to make sure we work with business partners who respect human rights.
- Understand that risks can change. Stay alert – what was OK before may not be OK tomorrow. If circumstances change, say something.

# People and leadership

## People, Leadership and Working Environment

SSC Space operates in line with internationally recognized labor and human rights frameworks. We support and apply the ILO Conventions, including freedom of association and the right to collective bargaining and the UN Global Compact principles on labor, wherever these set higher standards than national legislation. Employment at SSC Space is always based on a legal agreement.

Diversity is a strength at SSC Space, and equal rights and opportunities are fundamental. All employees have the right to family-related leave. Discrimination, harassment, bullying, or any form of abusive behavior is strictly prohibited and must be reported. You are always protected from negative repercussions when submitting a report.

The use or influence of drugs or alcohol in connection with SSC Space operations is not permitted unless explicitly authorized.

As a leader at SSC Space, you are expected to

- Set the tone by how you act. Be fair, respectful and professional – others will follow your example.
- Make sure people feel safe and included. Don't tolerate discrimination, harassment, or bullying, and act quickly if issues come up.
- Be clear about direction and priorities. Help your team understand what matters and what is expected.
- Encourage open and honest dialogue. Listen, invite different perspectives and make it safe to speak up.

As an employee at SSC Space, you are expected to

- Treat people with respect. Be fair, inclusive and considerate in how you act and communicate.
- Act professionally at work. How you behave reflects SSC Space – with colleagues, partners and others.
- Help keep the workplace safe and healthy. Speak up about risks, concerns, or unacceptable behavior.
- Work together and share knowledge. Collaborate openly and take responsibility for your part.
- Follow the company processes and policies and raise concerns without fear of retaliation.





## Environment – SSC Space Environmental policy

At SSC Space, environmental sustainability is a fundamental part of our governance, operations, and long-term value creation. We recognize that our activities impact the environment and we take responsibility for managing these impacts in a systematic, structured and continuous manner. We work collaboratively with customers, partners and suppliers to advance shared environmental and climate ambitions and to drive continuous improvement across the value chain. SSC Space reports on progress and goal achievements in the annual sustainability report.

SSC Space adheres to the precautionary principle and works proactively to prevent emissions, reduce environmental risks and continuously improve environmental performance across our operations and value chain. Environmental considerations are integrated into decision-making, planning, procurement, and daily operations. We comply with all applicable environmental laws and regulations and apply high internal standards where legislation is limited or absent.

SSC Space recognizes climate change as a material risk and responsibility. We address climate mitigation by systematically reducing greenhouse gas emissions through improved energy efficiency, reduced resource intensity

and engagement across the value chain. SSC Space commits to the Paris agreement and has a long-term ambition to achieve net-zero climate emissions by 2040, covering the full value chain. In parallel, the company works with climate adaptation by strengthening the resilience of our sites, infrastructure and operations to current and future climate-related risks. Climate considerations are integrated into site design, maintenance, investments and operational planning.

We strive to minimize energy consumption and continuously improve energy efficiency in facilities, systems and operations, including through digital solutions and information and communication technologies. Natural resources are used efficiently and responsibly, including water, with consideration to local conditions and availability.

SSC Space promotes circular economy principles by reducing material use, increasing reuse and recycling, and minimizing waste generation wherever feasible. Materials are selected with consideration to life-cycle impacts. Hazardous substances and waste are managed responsibly to ensure safe and healthy operations. The substitution principle is applied to replace hazardous chemicals with less harmful alternatives whenever feasible.

### Key expectations

- Consider the environmental impact in your daily work – not just cost or speed.
- Use the company resources wisely. Save energy, water and materials whenever you can – small actions make a real difference.
- Speak up about environmental risks or incidents - if something in our operations could harm the environment, report it.
- Look for smarter, more sustainable ways of working at SSC Space. Cut emissions, reduce waste, reuse materials and choose better options when possible.

# Regulatory compliance

The position in the global space industry of SSC Space puts high requirements on understanding not only local but also national and international regulations and legal requirements. It is therefore important to have a broad understanding of laws and regulations that might affect the company operations globally. We comply with all applicable laws and regulations in the countries where we operate or are associated. Where international convention or recognized soft laws set higher standards than national legislation, these shall be followed.

Financial records, accounting and documentation must be accurate, complete and transparent and maintained in accordance with applicable standards and legal requirements. This includes expenses, time reporting and purchasing activities. SSC Space pays taxes in accordance with national laws in the countries where we operate and do not engage in, or support, tax avoidance practices.

We protect our business assets and those of our business partners, including physical assets, intellectual property, information and data. Confidential and personal information shall be handled lawfully and protected against unauthorized access, use, or disclosure, in line with legal, contractual and internal requirements.

SSC Space conducts business in accordance with fair competition principles and applicable competition and antitrust laws. We do not engage in anti-competitive behavior, misuse insider information, or improperly share sensitive or confidential information. Transparency does not require disclosure of information that is confidential, restricted, or legally protected.

SSC Space complies with applicable sanctions and export control regulations, including EU and U.S. and other relevant national export control laws. Controlled goods, technology, software, information and services shall not be transferred, shared, or accessed without proper authorization and in full compliance with these requirements.

## Key expectations

- Always comply with valid legal requirements – if uncertain ask your manager for advice.
- Protect sensitive data and information – be aware what information can be shared or not.
- Protect assets of SSC Space and customers – never leave equipment, documents, or systems unsecured – whether digital or physical.
- Be smart and careful when using digital tools – think before you click, share, or store information, and stay alert to cyber risks.
- Do your part by staying trained – complete all mandatory compliance training and apply it in your daily work.



## We help Earth benefit from Space

# SSC Space mission and values

### Customer Passion

- Exceed expectations
- Always walk the extra mile
- Be flexible and solutions oriented
- Spend wisely

### Collaboration

- Trust others and share knowledge
- Value everyone's individual strengths
- Be responsive
- Believe we are stronger together

### Care

- Act proactively before an issue arises
- Talk to and not about colleagues
- Act sustainably
- Treat others with respect

### Curiosity

- Embrace innovation
- Listen with an open mind
- Explore new ways of thinking
- Learn from failures and successes

### Courage

- Manage risks to create success
- Challenge the status quo
- Take responsibility for your actions
- Speak up and dare to be yourself

#### References

Links to soft laws and recognized guidelines that SSC Space commits to:

- Universal declaration of human rights
- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD guidelines for multinational enterprises
- SDG and Agenda 2030
- ILO fundamental conventions
- UN Outer Space Treaty

