



# SSC Supplier Code of Conduct

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## SSC Supplier Code of Conduct

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## SSC Supplier Code of Conduct

*This policy is Approved by SSC EC*

### 1 INTRODUCTION

Swedish Space Corporation, hereinafter referred to as SSC, is committed to Social, Environmental and Ethical Sustainability. This is clearly reflected in the SSC Code of Conduct. The SSC Supplier Code of Conduct that falls under the SSC Code of Conduct outlines our expectations on our suppliers of goods and services and is applicable to all business relations such as agents, distributors, partners and subcontractors. We take shared responsibility to sustainably and responsibly create value. The fundament of the expectations lies in adherence to laws and regulations. Our specifications reflect our commitment to promote adherence to internationally agreed declarations, standards, and agreements, including the latest versions of the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the Paris agreement, international treaty on climate change.

SSC's suppliers are expected to comply with all laws and regulations applicable in each country where they are established or operate, including all locations where they conduct business activities. This includes, but is not limited to, compliance with all relevant health and safety, security, environmental, social, and labor law provisions as well as anti-corruption and anti-trust laws applicable to them.

### 2 HUMAN RIGHTS

SSC expects its suppliers to conduct their business in a way that upholds and supports the protection of internationally recognized human rights as well as to ensure that they are not complicit in the abuse of any such rights. This includes respect of human rights derived from the Universal Declaration of Human Rights, the principles established in the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, but also extends further to providing fair and dignified working conditions as described in further detail below.

#### 2.1 No Child Labor

SSC expects its suppliers to ensure that no child labor is used in the performance of work within their organization. The term 'child' is to be understood as a person under the minimum legal age for employment in the country where the work is performed, or in accordance with the definition of the legal minimum age established in the ILO Minimum Age Convention of 1973, whichever is higher.



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### **2.2 No Forced Labor**

SSC expects its suppliers to adhere to the laws prohibiting all forms of modern slavery, including forced or compulsory labor, human trafficking, bonded or indentured labor, and to prevent any involvement in such practices.

SSC expects suppliers to provide all workers with a written contract in a language they understand, clearly indicating their rights and responsibilities regarding wages, working hours, benefits and other working and employment conditions. It is prohibited to the lodging of deposits or the retention of identity documents, the withholding of any part of an employee or worker's salary, benefits, property or documents in order to force those employees or workers to continue to provide services to the supplier.

Suppliers are expected to follow the ILO's general principles and operational guidelines for fair recruitment and not charge workers recruitment fees, as defined therein, as a precondition of work.

Suppliers are expected to respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary.

### **2.3 Fair treatment and equal opportunity**

SSC expects its suppliers to ensure fair treatment of its workforce and provide equal employment opportunity to existing and prospective workers without discrimination on grounds of race, ethnic origin, nationality, political, philosophical or religious opinions, health, disability, gender or sexual orientation or such further grounds as may be determined by the national law of the country or countries where the performance of the contract takes place.

In alignment with its own high-level objectives, SSC encourages its suppliers to strive towards inclusiveness and gender balance within their workforce. This includes a working environment based on mutual respect: free from physical, psychological, sexual and verbal harassment, pressure or coercion.

## **3 EMPLOYMENT PRACTICES**

### **3.1 Health and safety**

SSC expects its suppliers to ensure safe and healthy working conditions for its workers by having in place sufficient processes including relevant risk prevention and mitigation measures. The supplier shall provide necessary training and personal protective equipment for all persons working at or visiting its premises, to limit, as far as reasonably practicable, their exposure to safety hazards.



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SSC expects its suppliers to maintain high standards of physical, mental and social well-being for its workers through relevant prevention measures and training.

### **3.2 Wage, benefits and working hours**

SSC expects its suppliers to pay their workers at regular intervals at least the minimum compensation required under local law as well as to provide all locally mandated benefits. In addition to regular working hours, workers are expected to be compensated for overtime work either by providing an equal amount of time off or remuneration based on at least their regular hourly rate. Deductions from wages are permitted only insofar as they are mandated by local law, regulations or collective agreements and communicated to the workers beforehand. Deductions from wages may never occur as a disciplinary measure.

SSC expects its suppliers to follow ILO standards regulating working hours, rest hours, maximum consecutive days of work and annual leave.

SSC expects its suppliers to respect its workers' right to freedom of association and collective bargaining and for the workers to communicate openly with the management in order to defend their interests and advocate for improvement of their working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

SSC expects its suppliers to respect its workers freely exercised right to join any association of their choosing within the relevant national framework and to bargain collectively.

## **4 ENVIRONMENT**

### **4.1 Environmental management**

SSC expects its suppliers to conduct their business in a manner that actively and sufficiently manages environmental licenses risks and reduces and mitigates environmental impacts across their operations, products and supply chain. The suppliers of SSC are encouraged to establish an appropriate Environmental Management System (e.g., ISO 14001, EMAS or comparable) which should ensure, among others, safe handling of chemical and hazardous materials, proper treatment and disposal of waste and wastewater, as well as minimization of energy use, waste or any other form of pollution.



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### **4.2 Climate Change**

SSC expects its suppliers to put in place and present to SSC a long-term net zero goal in line with the Paris agreement and the Carbon Law which entails a reduction of CO<sub>2</sub> emissions in the full value chain. This means reduction of emissions that are direct and part of the supply chain and / or when using the product and or service.

The supplier is encouraged to improve energy efficiency and to make continuous improvements in energy management.

### **4.3 Sustainable products, services and process development**

SSC encourages its suppliers to consider the environmental, social and economic impacts of their products and services over their entire life cycle, to conserve natural resources, as well as to consider and mitigate the impact of their activities on the environment in the communities within which they operate, as well as in space, when applicable.

SSC expects its suppliers to furthermore contribute to the continuity of supply by, in a timely manner, seek alternatives to chemicals and substances likely to become unavailable due to regulatory constraints. The suppliers are encouraged to explore circular means to reach their desired product or service but utilizing less resources in, for example reuse or recycling.

## **5 ETHICAL CONDUCT**

### **5.1 Fraud prevention**

SSC expects its suppliers to conduct their business in a way that upholds and supports fraud prevention, anti-corruption commitments and the prohibition of influence peddling, extortion and illegal payments. SSC expects its suppliers to comply with the relevant applicable laws and regulations regardless of any local customs. Beyond compliance with applicable law, SSC expects its suppliers to commit to the highest ethical standards of honesty, integrity, transparency, and fairness in all relationships within and outside their organization.

SSC expects its suppliers to exert due diligence to prevent and detect fraud, corruption, influence peddling, or any other misbehavior mentioned herein, in all business arrangements, including contracts, partnerships, joint ventures, offset agreements and the hiring of intermediaries such as agents or consultants.

Suppliers must never offer, attempt to offer, authorize or promise any payment or any kind of other service in favor of suppliers, consultants, and partners of any kind, for the purpose of obtaining or retaining business or gaining an improper





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advantage, which cannot find adequate justification in the context of the contractual relationship established with them. This prohibition includes offering or paying of facilitation payments to public officials to speed up or obtain routine public actions. Likewise, SSC expects its suppliers to never solicit or accept a bribe, kickback or any offer, promise, gift, present or benefit whatsoever, the intent of which is to make illegitimate use of their influence with a view to taking or obtaining any favorable decision.

### **5.2 Fair competition**

SSC expects its suppliers to compete fairly for business opportunities. Suppliers must abide by anti-trust laws applicable to them and shall not conclude any formal or informal anti-competitive arrangements that aim to fix prices, allocate territory, collude, rig bids, or otherwise distort fair competition for market share. Suppliers must not seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims or allowing anyone to do so. The latter includes defrauding or stealing from the company, a customer or any third party, as well as any kind of misappropriation of property or information.

### **5.3 Managing conflicts of interest**

SSC expects its suppliers to take active measures to avoid conflicts of interest or situations that may be perceived as such. In the event of an actual or perceived conflict of interest, the supplier shall immediately notify all affected parties, including SSC, of the fact. The former includes a conflict between the professional and personal interests of the supplier's employees, agents or those of their close relatives, friends and associates.

### **5.4 Gifts and hospitality**

In any business relationship, suppliers are expected to ensure that the offering or receipt of any gift or business courtesy is, in addition to being permitted by applicable laws and regulations, not violating the rules and standards of the recipient's organization and is consistent with reasonable market customs and practices. No benefits in the form of a financial instrument (e.g., payments, securities, loans etc.) shall be offered to SSC staff. In any case, suppliers shall not use the exchange of business courtesies to gain an unfair competitive advantage.

### **5.5 Responsible sourcing of minerals**

SSC suppliers are expected to apply necessary and appropriate measures in their supply chain to ensure that conflict minerals including tin, tungsten, tantalum and



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gold, as well as critical raw materials identified as such by the European Commission in the EU Critical Raw Materials List, if used in their products, have been sourced responsibly. Responsible sourcing of conflict minerals and critical raw materials shall be understood as sourcing activities with limited environmental impacts which do not directly or indirectly contribute to financing or benefiting armed groups that are perpetrators of serious human rights abuses and which do not otherwise violate human rights.

SSC expects its suppliers, where relevant, to conduct due diligence in accordance with the principles established in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. If the material “chain of custody” of supplied minerals is “indeterminable” or otherwise unknown, the supplier is expected to either attain the appropriate certifications or phase out that material.

### **5.6 Trade restrictions, sanctions and embargoes**

SSC expects its suppliers to conduct its business in compliance with all international trade restrictions, such as sanctions and embargoes, as governed by applicable laws and regulations, and to ensure that it does not engage with any sanctioned parties.

### **5.7 Maintaining accurate records**

SSC expects its suppliers to create and maintain accurate records of their business transactions and refrain from altering any record entry to conceal and/or misrepresent any underlying transaction. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. SSC expects its suppliers to retain records in accordance with applicable retention requirements.

### **5.8 Timely payment to suppliers**

SSC expects its suppliers to be fair and reasonable in their payment practices and pay undisputed and correctly presented invoices on time in accordance with agreed contract terms and applicable law.

## **6 INFORMATION PROTECTION**

SSC expects its suppliers to employ necessary physical and technical security measures to ensure that the confidentiality, availability, integrity, authenticity and





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non-repudiation of information processed by them is always maintained. Suppliers shall ensure that their security measures, including cybersecurity, always remain adequate, considering the state of the art, and that any data breach or security incident falling in the frame of their relationship with SSC, is reported to SSC without undue delay.

Where personal data is involved, suppliers are expected to follow the information protection requirements established in data protection regulations. This refers to the laws or regulations applicable at any time concerning the Processing of Personal Data, which includes but is not limited to the European Parliament and Council Regulation (EU) 2016/679 (“General Data Protection Regulation”).

## **7 GOVERNANCE**

### **7.1 Internal ethics and compliance**

SSC expects its suppliers and their subsidiaries to implement and maintain an internal management system in proportion to the size and nature of their business which shall ensure in a verifiable manner that the relevant applicable laws and regulations as well as the standards of care established in SSC Supplier Code of Conduct are followed by them. SSC expects its suppliers to implement and maintain effective programs educating and encouraging their workforce to make ethical, value-driven choices in their business activities.

### **7.2 Adequate reporting channels**

SSC expects its suppliers to develop and promote a speak-up culture and to provide workers and third parties with access to adequate reporting channels where they can raise situations or behaviors in breach of applicable laws and regulations or of the principles established in SSC Supplier Code of Conduct without fear of retaliation, in line with the laws and regulations in force about whistleblower protection. SSC expects its suppliers to take action to prevent, detect, and correct any retaliatory actions against whistleblowers.

## **8 APPLICATION OF THE SSC SUPPLIER CODE OF CONDUCT**

SSC expects the supplier to have full knowledge of all relevant laws in the countries where we operate as well as the international standards referred to in this policy.



## SSC Supplier Code of Conduct

To meet expectations and requirements in this SSC Supplier Code of Conduct, SSC expects suppliers to continuously improve and review their performance in the above-mentioned areas. The adherence to this Code must primarily be based on trust, but SSC will, from time to time, perform audits, supplier self-assessments and requests for information or data related to our Suppliers' compliance with the requirements set in this Code. The Supplier shall supply SSC, or a third party appointed by SSC, with this information upon request.

If a Supplier deviates from the requirements in this Code, appropriate corrective and preventative actions will be taken. Suppliers who do not implement such appropriate corrective and preventative actions, or who have critical deviations against the Code, run an increased risk of exclusion from current and future business with SSC. Transparency is expected, and SSC welcomes the Supplier to share information where expectations and requirements might have been infringed.

### 9 SUPPLIER ACKNOWLEDGEMENT

We, the undersigned, hereby confirm that we have received, read and adhere to the expectations and contents of the SSC Supplier Code of Conduct.

Company name

Place and date

Signature

Clarification of signature