

SES SUPPLIER CODE OF CONDUCT

—
Our commitment to social and environmental
responsibility and ethical business conduct
in all aspects of our activities





THE HIGHEST STANDARDS OF BUSINESS ETHICS

At SES, we conduct our business in compliance with all applicable laws and regulations and observe the highest standards of business ethics.

As our supplier¹, your contributions are critical to our ability to deliver service. We require all of our suppliers to commit to responsible business, social and environmental practices.

All business shall be conducted in compliance with this Supplier Code of Conduct (the "Code") wherever suppliers are located or services are provided. Our collective commitment to these principles are critical to maintaining a successful, compliant and ethical industry.

Compliance with Laws

Our suppliers are obliged to comply with all laws and regulations applicable in each country where they are established or operating, including all locations where they conduct business activities. This includes, among others, compliance with all relevant health and safety, security, environmental, social, supply chain regulations and labour law provisions as well as anti-corruption and anti-trust laws applicable to them.

1. SES' suppliers, suppliers' subcontractors, service providers, business partners, agents, consultants, law firms, lobbyists, and other representatives ("SES Supplier").

HUMAN RIGHTS

We expect our Suppliers to conduct their business in a way that upholds and supports the protection of internationally recognised human rights and ensures that they are not complicit in the abuse of any such rights.

At SES we expect our suppliers to respect internationally recognised human right and fundamental freedom conventions.

This includes respect of human rights derived from the Universal Declaration of Human Rights², the principles established in the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work³ and any other internationally recognised human right and fundamental freedom conventions, but also extends further to providing fair and dignified working conditions as described below.

No child labour

We expect our Suppliers to ensure that no child labour is used in the performance of work within their organisation or down their supply chain. 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 1973⁴, whichever is higher.

No forced labour

We expect Suppliers to adhere to the laws prohibiting all forms of modern slavery, including forced or compulsory labour, human trafficking, bonded or indentured labour, and to prevent any involvement in such practices.

We expect Suppliers to provide all workers with a written contract in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions.

Suppliers must not charge workers fees, recruitment costs or deposits, directly or indirectly, as a precondition of work.

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

Suppliers should not restrict the freedom of movement of its workers, e.g. by retaining any identification documents (such as passports, work permits, and travel documentation).

Responsible sourcing of minerals

Suppliers must apply necessary and appropriate measures in their supply chain to ensure that conflict minerals including tin, tungsten, tantalum, and gold, if used in their products, have been sourced responsibly without directly or indirectly financing or benefiting armed groups that are perpetrators of serious human rights abuses.

We expect our 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.

2. <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

3. <https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>.

4. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0:NO:12100:P12100_INSTRUMENT_ID:312283:NO.

To ensure healthy working conditions, Suppliers should follow ILO standards regulating working hours, resting hours, maximum consecutive days of work and annual leave.

EMPLOYMENT PRACTICES

Dignity and respect

We expect our Suppliers to ensure that they provide a working environment based on mutual respect that is free from physical, psychological, sexual, and verbal harassment, pressure, or duress.

Fair treatment and equal opportunity

We expect our Suppliers to 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.

We expect our Suppliers to ensure that employment, including hiring, payment, benefits, advancement and termination, is based on ability and not any personal characteristics.

In alignment with our own high-level objectives, we encourage our Suppliers to strive towards inclusiveness and gender balance at all levels of employment within their workforce.

Health and safety

We expect our Suppliers to ensure safe and healthy working conditions for its workers by having in place sufficient processes including relevant risk prevention and mitigation measures. Where necessary, the Supplier shall

provide personal protective equipment for all persons working at or visiting its premises, to limit, as far as reasonably practicable, their exposure to safety hazards.

We expect our Suppliers to maintain high standards of physical, mental, and social well-being for its workers through relevant prevention measures and training.

Wage, benefits and working hours

We expect our 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.

SES expects its Suppliers to follow ILO standards regulating working hours, resting hours, maximum consecutive days of work and annual leave.

Freedom of association and collective bargaining

We expect our Suppliers to respect their workers' right 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.

We expect our Suppliers to respect their workers' freely exercised right to join or not join any association of their choosing within the relevant national framework and to bargain collectively.



ENVIRONMENT

We developed the SES Environmental, Health and Safety charter to create awareness of SES expected standards.

Environmental management

We expect our Suppliers to conduct their business in a manner that actively and sufficiently manages environmental risks and reduces and mitigates environmental impacts across their operations, products, and supply chain. Suppliers shall strive to establish an appropriate Environmental Management System (e.g. ISO 14001, EMAS or comparable) which would ensure, among others, safe handling of chemical and hazardous materials, proper treatment and disposal of waste and wastewater, as well as minimisation of energy use, waste or any other form of pollution.

We further expect our Suppliers to reduce their impact on climate change by means such as, but not limited to, reducing their direct and indirect greenhouse gas emissions, improving energy efficiency, increasing the use of renewable energy, reducing the use of hazardous materials and single-use plastics, minimising consumption, increasing reuse and recycling of

products. Suppliers should review the [SES Environmental, Health and Safety charter](#) for awareness of SES standards expected.

Sustainable product and process development

We encourage our Suppliers to consider the environmental, social and economic impact of their products 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.

We expect our Suppliers to furthermore contribute to the continuity of supply by seeking alternatives in a timely manner to chemicals and substances which are likely to become unavailable due to regulatory constraints aligned with SES' ESG targets. We encourage our Suppliers to have a net zero strategy and work with us to provide information that would aid us in the reduction of our footprint.



ETHICAL CONDUCT

We expect our Suppliers to comply with the applicable laws and regulations regardless of any local customs.

Beyond compliance with applicable law, we expect our Suppliers to commit to respect the highest ethical standards of honesty, integrity, transparency, and fairness in all relationships within and outside their organisation. Suppliers are invited to review the SES Code of Conduct and Ethics for further awareness of SES standards.

Fraud prevention

We expect our 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. We expect our Suppliers to exert due diligence to prevent and detect fraud, corruption, or any other misbehaviour mentioned herein, in all business arrangements, including contracts, partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

We expect our Suppliers to exert due diligence to prevent and detect fraud, corruption, or any other misbehaviour, in all business arrangements

Bribery

SES takes a zero-tolerance approach to bribery and corruption in all forms and will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. Bribery occurs when a person offers or gives anything of value in order to improperly influence a transaction or decision.

Suppliers must never offer, attempt to offer, authorise, or promise any payment or any kind of other service in favour of suppliers, consultants, and partners of any kind, for the purpose of obtaining or retaining business or gaining an improper 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, we expect our 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 favourable decision.

Managing conflicts of interest

We expect our 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 SES, 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.

Gifts and hospitality

In any business relationship, Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by applicable laws and regulations, that these exchanges do not violate the rules and standards of the recipient's organisation and are consistent with reasonable market customs and practices. Suppliers are invited to review the SES Gifts & Entertainment Policy for awareness of SES standards expected in this matter.

International sanctions

The United Nations, European Union, the United States and other countries impose financial and trade sanctions against specific countries, industries, entities and persons. Violations of these laws or regulations may subject us and individuals to serious civil and criminal penalties. Moreover, certain countries (such as the US) apply their sanctions laws extraterritorially to reach transactions that have no apparent connection with the US. To protect our interests and ensure compliance with applicable sanctions rules, it is imperative that our Suppliers do not undertake any commercial activities raising potential sanctions questions unless and until we has reviewed and cleared the business activity for sanctions compliance purposes.



RELATIONSHIPS WITH COMPETITORS AND BUSINESS PARTNERS

Fair competition

We are dedicated to compliance with the competition and antitrust laws in the countries in which we do business. A Supplier should not enter into or discuss agreements with competitors, suppliers or customers that restrict competition in any market or otherwise restrict the price or other terms that we may offer without approval from us.

A Supplier in possession of competitively-sensitive information as a result of being previously employed at a competitor must comply with all confidentiality and non-disclosure agreements in effect with that previous employer.

A Supplier should consult SES in connection with business arrangements that could raise competition law issues, including:

- Exclusive arrangements for the purchase or sale of products or services;
- Bundling of goods and services;
- Agreements that restrict a customer's choice in using or reselling a product or service;
- Technology licensing agreements that restrict the freedom of the licensee or licensor;
- Selective discounting; or
- Distribution arrangements with competitors.



Maintaining accurate records

We expect our 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. We expect

our Suppliers to retain records in accordance with applicable retention requirements.

Timely payment to suppliers

We expect our 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.

INFORMATION PROTECTION

Confidential/Proprietary/ Personal information

Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should only be used for the business purpose for which it was provided, unless prior authorisation is received from the owner of the information. Confidential information includes all information covered by non-disclosure agreements executed by SES, and all non-public information that may be of use to competitors or harmful to SES or its customers, if disclosed.

Suppliers shall comply with all applicable laws governing intellectual property rights, including intellectual property designated as a trade secret or that is subject to patents, copyrights, or trademarks restrictions. Suppliers shall also comply with all applicable laws and regulations governing data protection and data privacy.

Information Security

We expect our Suppliers to employ necessary physical and technical security measures to ensure that the confidentiality, availability, integrity, authenticity and non-repudiation of information processed by them is maintained at all times. Suppliers shall ensure that their cybersecurity measures always remain state of the art and that any data breach or security incident falling in the frame of their relationship with us, is reported to us without undue delay. If access is granted to our IT systems, Suppliers shall comply with our Information Security Policy.

Export compliance

All our Suppliers engaged on behalf of SES in the transfer of hardware, software or information that is subject to the export control laws of any jurisdiction must ensure transfer of such items complies with those laws.





GOVERNANCE

We value the implementation and maintainance of effective programs educating and encouraging workforces to make ethical, value-driven choices in business activities.

Internal ethics and compliance

We expect our Suppliers to implement and maintain an internal management system commensurate with 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 this Code are followed.

With respect to their own suppliers, affiliates and subsidiaries, Suppliers shall either apply this Code or a code of conduct of their own, provided that the latter ensures at least an equivalent standard of protection of the values and principles established herein.

We expect our Suppliers to implement and maintain effective programs educating and encouraging their workforce to make ethical, value-driven choices in their business activities.

Adequate reporting channels

While engaging with us, Suppliers agree to notify us in a timely manner of any suspected violation of this Code by Suppliers' or our employees and partners as well as by their

subcontractors or by their own suppliers by sending an email to vendor.management@ses.com.

If Suppliers want to raise a concern confidentially, they can access the [SES Global Compliance Hotline](#), which is a dedicated confidential resource accessible to our stakeholders worldwide. The hotline is operated by a third-party vendor, NAVEX Global, and is available 24 hours a day in several languages. NAVEX Global maintains strict confidentiality for all reports.

We expect our 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 behaviours in breach of applicable laws or of the principles established in this Code without fear of retaliation, in line with the laws and regulations in force about whistle-blowers protection.

SES expects its Suppliers to take action to prevent, detect, and correct any retaliatory actions against whistle-blowers.

CONSEQUENCES FOR VIOLATING THE CODE

If an SES Supplier has questions or needs guidance in a particular area, the Supplier must contact us for guidance about how to deal with a particular issue.

Suppliers are also expected to cooperate in SES investigations into matters related to compliance with the Code.

(damage awards or fines) in accordance with applicable law.

Non-compliance with laws and regulations referred to in the Code may subject a Supplier to criminal penalties (fines or jail sentences) or civil sanctions

Non-compliance by a Supplier may result in the termination of the legal relationship between SES and the Supplier and the pursuit of any applicable legal remedies by SES.



For questions or concerns,
contact the [SES Vendor
Management and
Procurement Team](#)

SES HEADQUARTERS

Château de Betzdorf
L-6815 Betzdorf
Luxembourg

Published in December 2023.
This brochure is for informational
purposes only and it does not constitute
an offer by SES.

SES reserves the right to change the
information at any time, and assumes no
responsibility for any errors, omissions or
changes. All brands and product names
used may be registered trademarks and
are hereby acknowledged.

For more information about SES,
visit www.ses.com

