

Code of Conduct

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Introduction

The Code of Conduct (the Code) have been established to ensure safe working conditions throughout the whole Andøya Space supply chain, ensuring that workers are treated with respect and dignity, impartially and fairly, that business operations are environmentally sound and that business is conducted in accordance with internationally recognized principles and relevant international conventions (including UN Global Compact, ILO conventions, OECD Guidelines for Multinational Enterprises, United Nations Guiding Principles on Business and Human Rights and UN Conventions on Children's rights).

Andøya Space expects all its employees, suppliers, partners and customers to act in accordance with the Code. We expect all suppliers, partners and customers to require the same level of consciousness throughout their supply-chain.

To reduce Andøya Space operational risks, we regularly perform commercial evaluations and screening of our suppliers.

Andøya Space expects our employees and suppliers to familiarize themselves with Andøya Space values, which are available at www.andoyaspace.no. Andøya Space takes a partnership approach to suppliers in an effort to pursue the Code by:

Proactively seek continuous improvement on the part of suppliers within the areas covered by the Principles. If suppliers fail to comply with the standards in the Principles, Andøya Space general policy is to encourage improvement and not terminate the contract.

Encourage rather than penalize suppliers that identify activities that do not measure up to these standards (by themselves or with subcontractors) and who agree to pursue improvements.

Consider a similar ethical trading standard as a reasonable alternative if suppliers are already working to achieve similar standards.

This document is electronically signed by

Odd-Roger Enoksen

CEO & President

Andøya Space AS

1 National Legislation

In all of their activities, Andøya Space suppliers must at any time operate in full compliance with the legislation, rules and regulations of the countries in which they operate. Where the provisions of applicable local laws and the principles address the same subject, and they are not in conflict, the highest standard shall be applied.

Where any of the requirements in the Code conflict with applicable local legislation in the sense that it would represent a breach of applicable local legislation if the Code were applied, the highest standards that are consistent with applicable local legislation shall be applied.

2 Human Rights

Andøya Space will always, and expect all Suppliers to:

- Support, respect and conduct its business consistently with the United Nations Guiding Principles on Business and Human Rights.
- Ensure that they are not complicit in human rights abuses

3 Labor Rights

Andøya Space and Suppliers are expected to be committed to upholding the labor rights of workers, and to treat them with dignity and respect as understood by the international community. The labor rights of workers are defined in the International Labor Organization Conventions. The requirements are:

3.1 Freely Chosen Employment¹

Forced, bonded or indentured labor or involuntary prison labor shall not be used. All work shall be voluntary, and workers shall be free to leave upon reasonable notice. Workers shall not be required to lodge government-issued identification, passports or work permits to the supplier or labor agent as a condition of employment.

3.2 Child Labor Avoidance²

Child labor shall not be used. The term “child” refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is highest.

Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers. Where young workers are subject to compulsory education laws, they may work only outside of school hours.

In cases where child labor occurs, companies shall develop programs that provide for the transition of any child found to be performing child labor, to enable her or him to attend and remain in quality education until no longer a child.

¹ ILO Convention 29 (Forced labor) and 105 (Abolition of forced labor)

² ILO Convention 138 (Minimum age), Convention on the Rights of the Child, Art. 31 (Leisure, play and culture) and Art. 32 (Child labor)

3.3 Working Hours³

Working hours shall be regulated and be in accordance to national legislation, national or local collective bargaining agreement or any other freely negotiated agreement in the country where the work is carried out.

Work weeks are not to exceed the maximum set by local law or local collective bargaining agreement. Weekly working hours should not on a regular basis be more than 48 hours.

Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e., that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.

All overtime work should be voluntary, other than as permitted in the following:

Where the company is party to a collective bargaining agreement freely negotiated with labor organization representing a significant portion of its workforce, then it may require overtime work in accordance with such agreement to meet short-term business demand.

Workers shall be allowed at least one day off per seven-day week. The requirement for one day off per seven-day week can only be waived if this follows from law, regulations or collective agreement in the country where the work is performed. i.e. for military personnel.

3.4 Wages and Benefits⁴

Wages paid for a normal work week shall always meet at least legal or industry minimum standards and shall be sufficient to meet the basic needs of personnel and to provide some discretionary income.

In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Deductions from wages shall not be permitted as a disciplinary measure. The basis on which workers are paid is to be specified in a timely manner via a pay stub or similar documentation.

All workers shall be provided with a written contract outlining their wage conditions and method of payments before entering employment, in a language they understand.

3.5 Humane Treatment

Disciplinary policies and procedures shall be clearly defined and communicated to workers. There shall be no harsh or inhumane treatment, including no sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor is there to be a threat of any such treatment.

Suppliers shall comply with the regulatory requirements set out in the US Federal Acquisition Regulation and the UK Modern Slavery Act in relation to human trafficking.

³ ILO Convention 1 (Working Hours)

⁴ ILO Convention 131 (Minimum wage fixing)

3.6 Non-Discrimination⁶

Andøya Space and Suppliers shall not engage in discrimination based on gender, race, religion, sexual identity, color, age, ethnicity, disability, pregnancy, political affiliation, union membership or family status when hiring or in conjunction with employment practices such as promotions, rewards, and access to training.

In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

3.7 Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues.

Suppliers shall respect the rights of workers to associate freely, to join or not to join labor unions, to seek representation, join workers' councils in accordance with local legislation, etc.

Workers shall be able to communicate openly with management regarding working conditions without bargaining is restricted under law, the supplier shall allow workers to freely elect their own representatives.

3.8 Regular Employment

Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labor, casual labor, or day labor) or other labor relationships. The duration and content of apprenticeship programs shall be clearly defined.

4 Health and Safety

4.1 Occupational Safety⁶

Worker exposure to potential safety hazards shall be minimized through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures, as well as by ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective gear. Workers shall receive regular health and safety training. Workers shall not be disciplined for raising safety concerns.

4.2 Emergency Preparedness

Emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities, and recovery plans.

4.3 Occupational Injury and Illness

Procedures and systems shall be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker to report, classify and record injury and illness

⁶ ILO Convention 100 (Equal Remuneration) and 111 (Discrimination – Employment and Occupation).

⁶ ILO Convention 155 and Recommendation 164

cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and to help workers return to work.

4.4 Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, water fit for human consumption and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier or a labor agent are to be kept clean and safe, and provided with appropriate emergency exits, hot water for bathing or showering, and adequate heat and ventilation, as well as reasonable personal space along with reasonable entry and exit privileges.

5 Quality and Continuous Improvement

Andøya Space is committed to deliver World-Class quality in everything we do, and to seek continuous improvements. We expect our suppliers to work collaboratively and openly with us to seek best quality and continually improve our operations and products. We expect our suppliers to, where applicable, to comply with ISO-9001.

6 The Environment

The supplier is expected to have a precautionary approach towards environmental and climate challenges. In manufacturing operations, adverse effects on the community, the environment and natural resources are to be minimized while safeguarding the health and safety of the public.

6.1 Pollution Prevention and Resource Reduction

Waste of all types, including wastewater and energy, are to be reduced or eliminated at source or by practices such as the modification of production, maintenance and facility processes, materials substitution, conservation and the recycling and reuse of materials.

6.2 Hazardous Substances

Chemical and other materials that pose a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

6.3 Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are to be characterized, monitored, controlled, and treated as required by relevant legislation and permits prior to discharge or disposal.

6.4 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required by relevant legislation and permits prior to discharge.

6.5 Greenhouse Gases (GHG)

Suppliers are expected to identify, measure and report greenhouse gases generated from operations. Targets and plans should be established for how to reduce the GHG emissions.

6.6 Water

In areas vulnerable to a scarcity of freshwater, our suppliers are expected to seek ways to measure and disclose the use of freshwater. Plans should also be established for how to reduce the use of freshwater in operations.

6.7 Sustainable Technologies

Suppliers are expected to encourage the development and use of sustainable technologies, e.g., to choose sustainable effective technologies and components in their own production processes and strive to increase the use of technologies that reduce the environmental footprint.

6.8 Environmental Permits and Reporting

All required environmental permits, approvals, and registrations are to be obtained, maintained, and kept current, and their operational and reporting requirements are to be followed.

7 Business Integrity

7.1 Anti-Corruption

The supplier shall comply with laws and regulations related to bribery, corruption, fraud, and all other illegal business activities. The supplier shall not offer, request, accept, or receive any kind of undue benefit, service, or incentives to/from government officials, international organizations, or other third parties for the purpose of obtaining or retaining business or business advantage, or personal benefits. This applies whether this benefit is being offered directly or indirectly through an intermediary.

The supplier shall not by intent or negligently search to get access to information that can give an undue advantage. The supplier shall not, directly or indirectly, offer, give or accept gifts, hospitality or expense coverage that can give, or be perceived as, an improper advantage in connection with a person's position, tasks or missions, unless the gift, etc. is of modest value. Representation, gifts, or expense coverage shall never be given or taken in connection with a bidding processes or negotiations related to contracts. The exception is a normal representation, when there is a legitimate business purpose and the cost is kept within reasonable limits. Cash or cash equivalents shall not be offered or given.

Suppliers shall not sponsor political parties or politicians in connection with the contract entered into with Andøya Space. Suppliers must undertake any lobbying activities in compliance with all applicable laws.

7.2 Disclosure of Information

Information regarding business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices.

7.3 Intellectual Property

Intellectual property rights shall be respected; the protection of technology and know-how shall be done by maintaining a system for secure processing, transmitting, storing, and destroying of information.

7.4 Competition

Suppliers shall always meet competitors in an honest and professional manner. The supplier shall not cause or be part of any breach of applicable competition laws and regulations, such as illegal cooperation on pricing, or illegal market sharing.

7.5 Data Privacy

The supplier shall respect the employees and third parties' privacy policies and shall record and/or monitor personal data in accordance with applicable data protection legislation.

If the supplier handles personal data on behalf of Andøya Space, it is expected that the supplier signs a Data Processing Agreement. Such agreement regulates the supplier's obligations to process personal data in accordance with applicable data protection legislation.

For information related to Andøya Space handling of personal data please see andoyaspace.no for privacy statement and public version of Andøya Space Privacy policy. The privacy policy is established to comply with applicable data protection legislation, including the EU General Data Protection Regulation (GDPR).

7.6 Money Laundering and Tax obligations

Our suppliers shall be firmly opposed to all forms of money laundering and shall take steps to prevent its financial transactions from being used by others to launder money. The supplier shall report and pay its public taxes and fees according to the current law requirements.

7.7 Defence Industry Disclosure

For suppliers of components for military products, management and each individual employee should maintain full transparency, bearing in mind that they are part of the value chain in the defence industry. If the supplier is given access to classified information, the necessary security agreements, clearances, and authorizations must be in place.

7.8 Conflict Minerals

Andøya Space is determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals.

To support the responsible sourcing of minerals within our supply chain, Andøya Space suppliers are, with regards to certain minerals; tin, tantalum, tungsten and gold (including their derivatives) originating in the Democratic Republic of the Congo or its surrounding countries, expected to have in place a supply chain policy and processes to undertake:

- a reasonable inquiry into the country of origin of conflict minerals incorporated into products it provides Andøya Space; and
- due diligence (with reference to OECD/RMI guidance or similar) of its supply chain, as necessary, to determine if conflict minerals sourced from the covered countries directly or indirectly support unlawful conflict there; and
- risk assessment and mitigation actions necessary to implement the country of origin inquiry and due diligence procedures.

7.9 Sanctions Denied Parties Lists or Embargoed Countries

Suppliers shall take reasonable steps to ensure that neither they nor their suppliers are involved in business with parties that are subject to relevant sanctions, denied parties lists, or embargoed countries. Andøya Space shall immediately be notified of any nonconformity.

7.10 Conflict of interest

We expect our suppliers to avoid any potential conflict of interest, to declare if any should arise, and to collaboratively seek to manage them.

8 Implementation and Administration

8.1 Management System

Suppliers are expected to adopt or establish a management system related to the content of these Principles. The management system shall be designed to ensure compliance with applicable legislation and regulations, conformance with the Principles and identification and mitigation of operational risks related to the Principles. It should also facilitate continuous improvement.

8.2 Responsibilities

The supplier should designate an individual in a senior management position to ensure compliance with the Principles.

8.3 Access for verification

In the event of announced and unannounced audits of the supplier for the purpose of verifying compliance with the requirements in this document, Andøya Space personnel, Andøya Space customer or Andøya Space consultants shall have unlimited access to any part of the premises where work under a contract is being performed. This also includes work performed at any subcontractors' premises.

8.4 Records

The supplier is expected to maintain appropriate records to demonstrate conformance with the requirements of these Principles.

8.5 Communication of the Principles

Suppliers are expected to communicate the requirements of the Principles to all workers, suppliers or subcontractors engaged in their supply chain. Suppliers should take steps to ensure that their suppliers and subcontractors comply with requirements of the Principles. Suppliers should also provide means for employees to report on or discuss noncompliance confidentially.

8.6 Asking questions and raising concerns

Suppliers should have a system for reporting and handling concerns, including breach of the Principles, and shall without delay inform Andøya Space in writing of any concerns related to business with Andøya Space. Andøya Space expects full cooperation in relation to the investigation of the matter.

Suppliers shall not practice retaliations against anyone raising or helping to address a genuine business integrity concerns. Our suppliers shall implement programs to ensure confidentiality and protection of whistle-blowers.

Questions or reporting of concerns can be made to ethics@andoyaspace.no.