

Code of Business Conduct



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Introduction from CEO

The Code of Business Conduct 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 of Business Conduct. 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 of Business Conduct 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.

14/02/25



Ketil Olsen (Feb 14, 2025 14:56 GMT+1)

Ketil Olsen

CEO & President

Andøya Space AS

1 Introduction

The Code of Business Conduct has 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.

Andøya Space expect our suppliers and partners in all parts of our value chain to adhere to the standards and principles presented in this document. This includes also our Andøya Space employees, contractors and consultants

1.1 Commitments to Our People

Andøya Space believes that a workplace should be based on respect, care, and dignity. A key factor in running the Group's business sustainably is having relationships that are based on fundamental human rights, we value cultural diversity and the fact that we are all different and unique. We encourage innovation and employee engagement and are committed to maintaining high standards of quality, health, and safety. We are all equally entitled to and respect Human Rights without discrimination as set out in international conventions and national laws. Labor Rights are a vital part of Human Rights and grant all employees the right to fair pay, benefits, and freedom of association.

1.2 Commitment to Our Customers

We collaborate closely with our customers and partners. We believe collaboration is the key to achieve mission success. Doing the impossible excites us, and we turn every stone to bring a project to completion. The answer to a challenge might not be the obvious one and we want to foster an environment where ideas and suggestions can flourish.

1.3 Commitment to Our Company

Company assets are everything that our company owns or uses to conduct business including equipment, facilities, systems, and information.

Protecting company assets is a core responsibility for all of us.

1.4 Commitment to Our Environment

Andøya Space is committed to the seventeen sustainable development goals through our membership to the UN Global Compact and our Sustainability Program. For us, this means contributing to the global 2030-agenda with enabling technology in space, as well as investigating and mitigating our impact on the environment.

1.5 Commitment to Building Trust

Andøya Space is aiming to be a trustworthy business partner. Our employees protect the property and confidential information of the Company, of our stakeholders and our business partners. We safeguard the duty of confidentiality, both internally and towards our customers. We protect confidential data in a safe and secure manner.

1.6 Commitment to Corporate Citizenship

Andøya Space is committed to be a good corporate citizen. We acknowledge our responsibilities towards the environment, our local communities, and our stakeholders.

2 People – Our most important value

In keeping focus on excellence, we aim to attract and retain leading-edge talent.

2.1 Human rights and Labor rights

We are committed to pursuing high health, safety, and security standards in the workplace. We must familiarize ourselves with and follow all external health and safety laws and internal health and safety policies and procedures. We also recognize our responsibility to uphold health and safety standards across the extended enterprise with suppliers, business partners and contractors. Andøya Space complies with current national legislation and is committed to a work environment that is free from human trafficking and slavery, including forced labor and unlawful child labor.

2.2 Diversity and Inclusive Rights

Andøya space is a Group that values cultural diversity as a key strength and is committed to promoting diversity and inclusion in all aspects, including race, gender, religion, national origin, political opinion, sexual orientation, social background, age and physical or mental character. Discrimination based on any protected characteristic will not be tolerated. Additionally, any form of harassment, whether physical, visual, or verbal, is strictly prohibited in our workplace.

2.3 Protecting Personal Data

We comply with obligations resulting from the European regulations (e.g., the GDPR as per May 2018) and, as applicable, with any local laws and regulations concerning how individual personal data is collected, processed, and used. We must always respect and protect the privacy of our employees, customers, suppliers, and partners.

2.4 Alcohol, Drugs and Gambling

We do not abuse alcohol or illegal drugs in the workplace, or abuse prescription medication. Money gambling is not allowed during working hours. After working hours, use of intoxicating substances or computer games / money gaming is not permitted if the volume of the usage leads to absence from work, reduced working capacity or performance of the work for Andøya Space.

During representation, travel, participation in courses and conferences, and other work-related occasions, we expect our employees to show moderation and behavior that does not harm the company's reputation. Employees are considered representatives of the company in such contexts.

2.5 Encouraging Open Dialogue

We promote an open and trusting dialogue with employees at all levels of the Company. Employees are strongly encouraged to openly communicate, to speak up, to discuss and clarify their questions or concerns, and management is encouraged to listen and be responsive. Any direct or indirect retaliation, or attempted retaliation, against an employee who speaks up in good faith is strictly prohibited and will not be tolerated.

2.6 Fostering our talent

We recognize that by fully respecting employee rights, it creates a trusting workplace that also drives innovation, a key to our competitiveness.

3 Respecting and Protecting Assets & Information

We all have a duty to protect Andøya Space assets, both tangible and intangible. We must work to ensure that none of these assets are stolen, damaged, misused or improperly destroyed. In addition, we

should be aware of our responsibilities when accessing, using, modifying, storing, or disclosing any Andøya Space asset.

3.1 Protecting internal knowledge

We only share confidential information when we are formally authorized to do so and there is a legitimate reason for doing so. The disclosure of certain kinds of internal information may be highly sensitive and potentially business-critical, and unprotected or unrequired disclosure may have a negative effect on Andøya Space reputation or competitiveness in the marketplace. For sharing of sensitive information, there shall always be a non-disclosure agreement (NDA) signed upfront.

3.2 Protecting Third – Party Information

Our customers, suppliers and partners often entrust the company with their own confidential and proprietary information. To be a trustworthy partner, we must manage third-party proprietary information in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

3.3 Protecting the Environment

Andøya Space is committed to the seventeen sustainable development goals through our membership to the UN Global Compact. For us, this means contributing to the global 2030-agenda with enabling technology in space, as well as investigating and mitigating our impact on the environment.

The environmental ambitions for Andøya Space start with the local environment at our facilities at Andøya, in the waters surrounding it and the community we are part of. They continue with the safe conduction of all our missions.

4 Business Integrity

4.1 Anti-Corruption

We have zero tolerance for corruption.

No employees may engage in any kind of corruption, whether public or private. We may never offer, attempt to offer, authorize, or promise any sort of bribe, facilitation payment or kickback to a public official or private body, for an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private body. In addition, we must never hire someone else to do anything that we cannot ethically or legally do ourselves.

We carefully select our business partners and monitor their commitment to ethical and lawful conduct.

We always speak up to our managers, or send mail to etikk@andoyaspace.no, when we have concerns regarding corrupt conduct of our colleagues or business partners.

4.2 Gifts and hospitality

Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers and other partners are commonly used to build goodwill and acknowledge appreciation in business relationships. Good judgment should always guide us in these situations. We shall exercise a great deal of caution in offering or receiving gifts or business attention. Gifts with an estimated value of more than NOK 1000, - must be reported and delivered to the Group.

4.3 Conflict of Interest

We shall pay special attention to our personal interests when these may conflict with Andøya space's interests. Personal interests include our financial interests, business opportunities, stakeholder outside employment or the interests of people close to us, such as close family members, personal friends, or business associates. All decisions that are made on behalf of Andøya Space must be based on an objective and fair assessment of the company's interest without being impacted by our personal interest.

4.4 Competing Fairly

Andøya Space's procurements shall be conducted professionally, efficiently, contribute to sustainable consumption and contribute to supporting our social mandate. We will conduct the procurements in line with relevant laws and regulations to ensure the requirements for competition, equal treatment, and transparency.

4.5 Equal Treatment of Suppliers

We are committed to sustaining fair relationships with suppliers. The Procurement function is responsible for ensuring that all supplier relationships are managed in an equitable and compliant manner. We each have a duty to make certain that issues with suppliers are professionally dealt with at all times, and that our selection of suppliers is based solely on what is best for the Company.

5 Information for Foreign Customers and Suppliers

Andøya Space adjusts its working hours and creates a work schedule based on the preferences of its customer

Andøya Space must also adhere to the Norwegian Working Environment Act, and we encourage you to follow the same guidelines while you have assignments in Norway. For more information, please refer to the [Norwegian Working Environment Act](#).

6 Asking questions and raising concerns

If any employee or third party believes that someone is violating this Code and/or the law, we ask that they report this immediately. If you have experienced or witnessed misconduct or unethical behaviour you must speak up and report it.

Andøya Space commits to review and where appropriate investigate concerns raised by employees and third parties regarding unethical behavior and potential misconduct. We have transparent, fair, and confidential procedures for employees and third parties to raise concerns. We will not retaliate against whistle-blowers or employees that raise concerns.

How to raise concerns:

- Talk to your manager.
- Send an email to the ethics committee; Etikk@andoyaspace.no

Lover og forskrifter:

[Arbeidsmiljøloven](#)
[Working Environment Act](#)
[Sikkerhetsloven](#)

Styrende dokumenter:

[UN Sustainable Development Goal 8: Decent Work and Economic Growth](#)