



# Code of Conduct

---

# Code of conduct 2023



SSC is a global provider of advanced space services with more than fifty years of experience. We are a Swedish state-owned company with more than 600 coworkers<sup>1</sup> in 21 locations and 9 countries around the world. Since our start pioneering scientific rocket launches in northern Sweden in the 60's, we have grown into a full-service supplier of state-of-the-art space engineering, satellite management, launch and test services to customers in the institutional, commercial and defense sectors worldwide.

SSC has many important stakeholders: coworkers, owners, business partners<sup>2</sup> as well as the public at local, national and international level. In order to gain and retain trust and to be a reliable business partner, SSC has to 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 CoC are also integrated in our Supplier Code of Conduct. Potential risks for violations are identified and managed with in the Sustainable Business Analysis Models for Sales and Procurement.

1. "Coworker" or "staff" is defined as a person employed by SSC regardless terms of employment, e.g. full-time, part-time, fixed time.

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

# CEO statement

**“Our purpose for being in this industry** is to enable a sustainable development of life on Earth and exploration of the beyond – through state-of-the-art space services

*Stefan Gardefjord, Chief Executive Officer*



At SSC we take pride in everything we do. We create value for our customers and owners by providing advanced space services based on sustainable business conduct. We expect every coworker to take responsibility for their actions and together we make sure that every part of our business operations is in line with our Code of Conduct.

To be a reliable and long-term trustworthy business partner in today's global society involves all of us acting responsibly. This requires us to be transparent in how we assess and conduct our business operations and necessitates that our actions are based on clear values and business ethics. This is why we have implemented this Code of Conduct.

This Code is the foundation for the business we do and defines our values and business ethics. The Code is supported by SSC's policies, procedures and instructions, and clarifies what our stakeholders can expect from us as a company and what values and behavior we expect from our coworkers.

Our purpose for being in this industry is to enable a sustainable development of life on Earth and exploration of the beyond – through state-of-the-art space services. We can provide services that create great value for our customers and contribute to a more sustainable world. Being a service provider in the global space industry requires a deep understanding of the multitude of conditions, cultures and values that different regions and countries represent.

Naturally, SSC adheres to all laws and regulations that affect our operations. However, there are no global laws and regulations that fully regulate our industry. SSC therefore needs to understand the opportunities, risks and challenges that face SSC and the global space industry at large. SSC supports internationally recognized guidelines and soft laws<sup>3</sup>, and they guide our ethics and values.

We have committed to the UN Global Compact<sup>4</sup> and continuously strive to improve compliance to its defined principles. We have also joined the global Exponential Roadmap Initiative with the aim of making the company sustainable throughout the entire value chain. Furthermore, in 2022 we signed ESA's Statement for a Responsible Space Sector together with actors from the European space sector, aiming to provide a basis for a sustainable development of the space industry, and increase our industry's contribution to society by working more socially and environmentally responsible.

These soft laws are integrated into SSC's business to ensure that all operations are in line with internationally recognized values and requirements.

This Code of Conduct has been adopted by SSC's Board of Directors and shall be the core of SSC's management, leadership and business conduct. It is a Code that applies to all our coworkers no matter where in the world we do business, nor who our business partner is, and nor what service we provide. It's a commitment to ensure SSC's mission – to help Earth benefit from Space – and how we contribute to a more sustainable world.

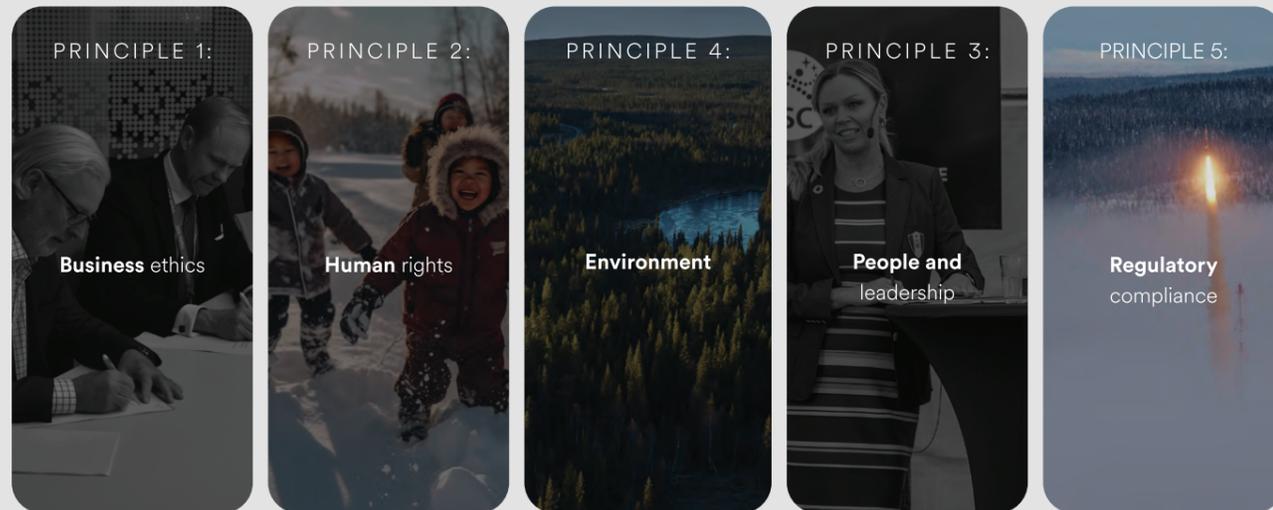
Solna, April 2023  
Stefan Gardefjord  
Chief Executive Officer

3. UN Global Compact, UN Guiding principles on business and human rights, OECD Guidelines for Multinational Enterprises, SDG and Agenda 2030, ILO's fundamental conventions, UN Outer Space Treaty

4. <https://www.unglobalcompact.org/>

# Responsibility and compliance

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



These principles are described in more detail in the following pages. The CEO is ultimately responsible for SSC's Code of Conduct. The responsibility includes ensuring that all employees have understood and comply with the Code as well as ensuring that SSC's Code of Conduct is addressed with SSC's 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 to ensure 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 staff shall complete a training program that includes SSC's Code of Conduct. All new coworkers shall conduct the training within the first months of employment. It is the responsibility of each manager to ensure that each coworker completes the training and that the Code is being implemented.

SSC 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, and to SSC's Head of Sustainability.

## Reporting incidents or concerns

A reporting system for grievances is available on SSC's external website for stakeholders raising concerns about SSC, SSC staff or SSC's business conduct. The grievances are primarily addressed internally by SSC's Executive Committee. Information about the grievance reporting mechanism can be found on SSC's external webpage<sup>5</sup>.

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 SSC's Code of Conduct. Therefore, SSC has a confidential reporting system referred to as "whistle blowing". All matters reported through this reporting mechanism can be made anonymously. The matters will be assessed together with an external party. The reporting system is available through SSC's internal and external websites. Coworkers who report an incident shall be assured that they do not risk any negative repercussions.

## PRINCIPLE 1

# Business ethics



As a key player in the global space industry we are valued, assessed and defined by our actions in everything we do. SSC takes pride in conducting business fairly and responsibly. We treat everyone – colleagues, business partners and other stakeholders – with respect. The UN Global Compact principle regarding anti-corruption is followed<sup>6</sup>.

**SSC ensures ethical business conduct** – SSC competes fairly and does not take part in activities that restrict, hinder or eliminate fair competition. SSC abides by applicable cartel and antitrust laws, as well as regulations valid for the nations where we conduct our business. Vendors are evaluated and selected based on their ability to supply their services and products in a sound business manner, and their ability to meet the requirements in SSC's Code of Conduct.

**SSC does not accept or offer bribes** – SSC has zero tolerance of accepting or offering bribes or any other offer or benefit that might be perceived as an improper benefit or improper remuneration. An improper benefit doesn't have to have a financial value. An improper benefit is, or is perceived, as an encouragement for the receiver to perform his/her duties in an unlawful way or in a way that is disloyal to their employer or principal. This applies globally within SSC in all parts of our value chain, regardless of the business culture in a specific country, market or industry.

**SSC is cautious about gifts and invitations** – SSC is very cautious about giving and receiving gifts and invitations. SSC follows laws and regulations regarding anti-corruption and bribery in the countries where we operate. When in doubt, coworkers are advised to raise the matter with their supervisor or manager.

As a global employer, SSC is fully aware that the line between what is acceptable and unacceptable can easily be overstepped. If in doubt, the appropriate response is to politely turn down gifts or invitations.

Donations to causes such as sports, science, cultural, humanitarian, or social causes shall always be approved by the responsible manager and made by the legal entity. All donations shall be recorded.

**SSC avoids conflict of interest** – If an SSC coworker has a personal relationship with a partner, family member or friend that has a business relationship with SSC, caution must be taken to avoid that personal interest affects the business relationship. If a possible conflict of interest is identified, the responsible manager or supervisor must be informed immediately.

SSC does not provide any direct or indirect contributions to candidates seeking public office, political parties, or other political organizations. Coworkers may not receive paid leave (unless regulated by national law) for political activity and may not engage in political or religious propaganda in their work.

**All SSC coworkers shall undergo training in business ethics** – Training in business ethics including anti-corruption is compulsory for all SSC coworkers. It is the responsibility of each coworker to understand the business culture when entering a new market or country in order to avoid any participation in corrupt business conduct.

**SSC 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.

5. <http://sscspace.com>

6. <https://www.unglobalcompact.org>

## Human rights



As a leading player in a global market, SSC recognizes and respects cultural and national differences. SSC supports and respects the universal declarations of human rights as defined by the United Nations<sup>7</sup> and the human rights principles set out in the UN Global Compact<sup>8</sup>.

**SSC takes responsibility** – 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, SSC acknowledges human rights violations as a business risk that need to be appropriately mitigated. This could in severe cases lead to the cancellation of a contract.

**SSC takes measures to prevent Human Rights violations** – SSC has implemented the UN Guiding Principles on Business and Human Rights<sup>9</sup>. This means that SSC shall address adverse human rights impacts which requires taking adequate measures for their prevention, mitigation and, where appropriate, remediation. How a business meets its responsibility to respect human rights will be proportional to e.g. its size.

To ensure the above SSC has;

- a) A policy commitment through this Code of Conduct to meet SSC's responsibility to respect human rights.
- b) A human rights assessment process to identify, prevent, mitigate, and account for SSC's possible impacts on human rights. This assessment is included in SSC's business process through SSC's "Sustainable Business Analysis". In high-risk circumstances, a human rights due diligence is performed.

c) A process that enables the remediation of adverse human rights impact that SSC have caused or contributed to. More information about how to submit grievances can be found on SSC's external webpage<sup>10</sup>.

d) SSC is conveying these requirements to the supply chain in SSC Supplier Code of Conduct. This is an integral part of the procurement process.

**SSC recognizes challenges** – SSC 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 SSC from addressing any issues arising internally nor externally. SSC's security committee addresses business ethics and is informed if complex business ethical matters are identified. SSC's security committee includes the CEO, the Chairman of the Board and three additional members of the Board.

SSC acknowledges human rights violations as a risk – SSC recognizes that the risk of violating Human Rights might change over time due to changes both in SSC's business operations as well as in the world around us. SSC continuously works on assessing the company's impact and transparently reports on our progress in the annual sustainability report.

7. <http://www.un.org/en/universal-declaration-human-rights/>

8. <https://www.unglobalcompact.org>

9. [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

10. <http://sscspac.com/responsibility>

## People and leadership



At SSC we act with respect towards each other and towards external partners. Equal rights regarding gender, ethnicity, nationality, sexual orientation and competence is always respected as we consider diversity an asset. Employment with SSC is always based on a legal agreement. SSC recognizes and supports the ILO's Conventions<sup>11</sup>. The core of these conventions shall be followed when the convention is more far reaching than national legislation. We recognize freedom of association and the right to collective bargaining<sup>12</sup>. The UN Global Compact principles regarding labor are supported and respected<sup>13</sup>.

**SSC employees act with respect** – As a coworker at SSC, when performing our duties, we represent our company. As an SSC coworker, we should always take this into account in our behavior. This means that we as SSC coworkers are courteous in word, behavior and appearance towards our colleagues and business partners. All coworkers are entitled to be treated with respect and with consideration of each and everyone's legitimate right of integrity. All forms of discrimination and harassment are forbidden at SSC. Harassment entails all types of unwelcome behavior or derogatory comments such as sexual intimidation, racism, aggression, bullying, discrimination, violence and verbal attack. Harassments or discrimination shall be reported. Coworkers who report an occurrence of harassment or discrimination shall feel assured that they do not risk any negative repercussions.

**At SSC we create a healthy and safe working environment together** – SSC has the responsibility to ensure a healthy and safe work environment which includes not only physical but also mental and social well-being. SSC assesses, follows

up and takes action to minimize the risk of occupational injuries or illness. SSC's coworkers may not distribute, possess, use or work under the influence of drugs or alcohol on any SSC property or in connection with any SSC operation without specific permission<sup>14</sup>. Each coworker has a responsibility to contribute to a safe and healthy work environment by following and respecting internal policies, procedures, and instructions as well as external laws and regulations. Deviations shall immediately be reported, addressed and corrected. All managers in SSC are responsible for this within their area of responsibility.

**SSC leads by example and takes responsibility** – SSC's managers are leaders and are expected to be role models. A leader's behavior sets the standard for how we work at SSC. As a leader you translate strategic objectives and directions into goals and priorities, making sure that the staff understands how corporate decisions affect them and what is expected of them. Leaders within SSC are expected to communicate and facilitate dialogue with the coworkers to ensure understanding and trust in the direction of SSC and their role achieving the overall goals. At SSC, leaders are accessible. Leaders are good listeners and communicators, building trust by supporting coworkers to perform their best in a safe and healthy manner. Leaders within SSC take responsibility and ownership of situations no matter how challenging they might be. Leaders within SSC see to the best interest of the company, support each other and their staff and strive to create "One Global Company" where every coworker is respected and feels appreciated for their competence and personality.

11. International Labor Organization (ILO) [http://www.ilo.org/wcmsp5/groups/public/@ed\\_norm/@declaration/documents/publication/wcms\\_095895.pdf](http://www.ilo.org/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_095895.pdf)

12. [http://www.ilo.org/global/docs/WCMS\\_244362/lang-en/index.htm](http://www.ilo.org/global/docs/WCMS_244362/lang-en/index.htm)

13. <https://www.unglobalcompact.org/what-is-gc/mission/principles>

14. Valid permit are e.g. company staff or customer events, prescriptions issued by medical doctors for medicinal pharmaceutical use.

## Environment



At SSC we regard environmental sustainability as a foundation for our operations and a key for our future growth and profitability. SSC recognizes the necessity of actively contributing to combat global environmental challenges. We respect and support the UN Global Compact principles regarding environment<sup>15</sup>. SSC recognizes the necessity of combating global environmental challenges and acknowledges the targets set in the Paris agreement.

### SSC focuses on protecting the environment we operate in –

At SSC we understand that our businesses have an impact on the environment, and we take responsibility:

- SSC protects the environment and acts to continuously minimize our environmental impact as much as possible, and we always consider environmental consequences when using company resources.
- SSC uses information and communication technology to minimize CO2 emissions.
- SSC commits to the Paris agreement and has a Net Zero Climate emission goal to 2040 covering the full value chain.
- We design our physical sites and systems to ensure minimal energy consumption.
- SSC always complies with environmental laws and regulations.

f) SSC adheres to the precautionary principle in planning and operations, choosing the most environmentally friendly alternative with the least long-term adverse environmental impact when procuring and/or developing new services or products, as well as when carrying out business operations.

g) SSC handles hazardous waste and substance in a professional way to ensure safe and healthy business operations. We use the substitutional principle to use less hazardous chemicals whenever feasible.

h) Material shall be recycled and re-used in all cases possible.

**SSC promotes green missions** – At SSC we take pride in supporting and promoting missions that benefit the environment, such as earth observation and supporting scientific research on climate change. We also take pride in participating in missions actively contributing to a sustainable future environment.

SSC will continuously strive to make partnerships with stakeholders, partners on the customers' end and supplier end to reach our high ambitions of Net Zero emissions.

## Regulatory compliance



SSC's position in the global space industry 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 SSC's operations globally.

**SSC complies with laws and regulations** – At SSC we comply with laws and regulations of the nations in which we operate and nations we are associated with to ensure safe and healthy business conduct for both people and the environment.

SSC recognizes and supports international conventions and soft laws<sup>16</sup> – The core of these common conventions and soft laws shall be followed when more far reaching than national legislation.

**SSC maintains accurate accounting** – SSC's accounting shall be correct and in keeping with all applicable standards. This applies to each individual business activity. All coworkers have a responsibility to maintain accurate accounting and documentation in order such as travel expenses, time sheets and purchase orders to ensure compliance and efficient management.

**SSC pays taxes in the countries where we operate** – SSC always pays taxes according to national laws and regulation in the countries where we operate and within the framework of our business and operating principles. SSC shall never take part, or be associated with, business opportunities that actively involve tax avoidance.

**SSC respects business integrity** – At SSC we respect the integrity of our own company as well as the integrity of our business partners. This means that we treat sensitive equipment, intellectual property and information according to national and international laws and regulations as well as respect business agreements and contracts.

**SSC protects business assets** – Security is part of our brand. At SSC we protect ours as well as our business partners' physical and intangible assets including information. SSC always adheres to internal security policies and instructions, as well as our customers' security requirements.

15. <https://www.unglobalcompact.org/what-is-gc/mission/principles>

16. UN Global Compact <https://www.unglobalcompact.org/>

UN Guiding principles on business and human rights [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

OECD Guidelines for Multinational Enterprises <http://www.oecd.org/corporate/mne/>

SDG and Agenda 2030 <http://www.un.org/sustainabledevelopment/development-agenda/>

ILO's fundamental conventions <http://www.ilo.org/global/lang-en/index.htm>

UN Outer Space Treaty <http://www.unoosa.org/oosa/en/ourwork/spacelaw/treaties/introouterspacetreaty.html>

# SSC core values

---

SSC's vision is to be a leading global provider of advanced space services. SSC's core values – Customer oriented, One Company, Responsible, Excellence – are the identity of our company and our SSC brand. These core values are a part of our Code of Conduct and shall be recognized in everything we do.

## CUSTOMER ORIENTED

"We always put our customer needs at the forefront of everything we do"

## ONE COMPANY

"Collaboration is key – one for all and all for one"

## RESPONSIBLE

"We are known to be reliable and result-oriented all the way"

## EXCELLENCE

"We always strive to deliver better than expected"



**We help Earth benefit from Space**

[www.sscspace.com](http://www.sscspace.com)