

The logo for Spaceopal features the word "spaceopal" in a lowercase, sans-serif font. A thick, black, curved line arches over the text, starting above the 's' and ending below the 'l', framing the word.

spaceopal

We make Galileo Fly



# Code of Ethics

Approved by the Shareholders of  
spaceopal GmbH by Written Resolution dated 08.10.2014  
Updated to issue 2.0 and put into effect by the Managing  
Directors in March 2025



1	INTRODUCTION.....	5
1.1	THE COMPANY AND THE GROUP .....	5
1.2	Relations with the shareholders and the stakeholders.....	5
2	SPACEOPAL CODE OF ETHICS.....	6
3	THE CODE OF ETHICS AND ITS APPLICATION .....	7
4	ANNEXI: DETAILS TO THE CODE OF ETHICS .....	8
4.1	General rules of conduct.....	8
4.1.1	Compliance with Laws and Regulations.....	8
4.1.2	Models and Rules of Conduct.....	8
4.1.3	Compliance with the Code of Ethics.....	8
4.1.4	Corporate Governance .....	8
4.2	Personnel and employment policy .....	9
4.2.1	Determining Conditions.....	9
4.2.2	Selection Policies.....	9
4.2.3	Professional Development.....	9
4.2.4	The Code of Ethics and the Persons working for spaceopal.....	10
4.2.5	Work environment.....	10
4.2.6	Privacy protection.....	10
4.3	Data protection and data security .....	11
4.4	Conflicts of interests .....	11
4.4.1	Company and individual interests.....	11
4.4.2	Prevention of conflicts of interest.....	11
4.5	Operating procedures and accounting data.....	12
4.5.1	Specific Company rules.....	12
4.5.2	Compliance with company rules.....	12
4.5.3	Accounting transparency.....	12
4.5.4	Money laundering .....	13
4.6	Protection of the company assets and property .....	13
4.6.1	Custody and Management of Resources and property .....	13
4.6.2	Intellectual property and know-how .....	13
4.7	Team spirit and inter-company relations.....	13
4.8	OBSERVANCE OF THE CODE OF ETHICS .....	14



4.9	External relations .....	14
4.9.1	Relations with the public authorities and institutions and other bodies representing collective interests .....	14
4.9.2	Relations with Customers, Consultants, Suppliers, other Parties in Transactions, Business and/or financial Partners etc. ....	15
4.10	Company information .....	15
4.10.1	Availability and access to information.....	15
4.11	Relations with the media and information management .....	16
4.11.1	Rules of conduct .....	16
4.11.2	Price-sensitive and other commercially sensitive information.....	16
4.11.3	Confidentiality obligation .....	16
4.12	Relations with the community and the environment.....	17
4.12.1	Responsibility towards the community .....	17
4.12.2	Respect for the environment .....	17
4.13	Breach of the code of ethics — sanctioning system.....	17
4.13.1	Reporting infringements.....	17
4.13.2	Guidelines of the system of sanctions .....	17

# 1 INTRODUCTION

## 1.1 THE COMPANY AND THE GROUP

This Code (hereinafter referred as the „Code of Ethics“) describes the commitments and the ethical responsibilities regarding both the business management and the Company activities undertaken by the employees, external co-workers of any kind, directors or statutory auditors of spaceopal GmbH — a Joint Venture of Telespazio S.p.A. and DLR Gesellschaft für Raumfahrtanwendungen (GfR) mbH (hereinafter referred as “spaceopal”). spaceopal works in the fields of Software and Hardware Design, Development and Engineering, Operations and Implementation of Systems, Services and Networks for Space Programmes, Programme Management, Mission and Satellite Constellation in Orbit Operation, integrated logistic Support, Data Processing and Service Provision.

The aims of spaceopal are pursued with loyalty, seriousness, appreciation, honesty, competence, fairness, team spirit and transparency by all those who work in the Company, and with absolute respect for the basic legal principles of human rights as well as the applicable laws and regulations. spaceopal shall promote these principles as well as fair competition, which it deems to be in its own interest as well as in the interest of all the stakeholders. Telespazio and DLR GfR both for themselves recognise the values as described in this Code of Ethics in their own exclusive interest. While recognising the independence of spaceopal, they require, however, spaceopal as a company of their respective group to conform to the values expressed in this Code of Ethics.

## 1.2 Relations with the shareholders and the stakeholders

Because of the presence of spaceopal on both national and international markets, its contributions in various contexts and the multiplicity of its counterparts, a primary importance has to be attributed to the management of relations with the shareholders and stakeholders, understood as all public or private, German or foreign, persons — individuals, groups, companies or institutions — involved with the Company for any reason and having an interest in the Company’s activities.

spaceopal strictly complies with the laws (as applicable in Germany and the laws of the countries in which the Company operates), including market regulations and the principles that are at the basis of fair competition. Important circumstances or situations regarding the Company’s business and expected future performance, must be punctually communicated to the shareholders.

## 2 SPACEOPAL CODE OF ETHICS

In order to effectively and fairly compete on the market, to improve customer satisfaction, to increase the Company's value for the Shareholders and to develop the skills and foster the professional growth of its employees and co-workers, spaceopal's decisions and rules of behavior, as expressed in this Code, are inspired by the principles concisely illustrated below:

### a) Compliance with the law

spaceopal undertakes to comply with all applicable national and international laws, ordinances and regulations, and with all generally recognized practices and rules. We appreciate the importance of ethical behavior, observe compliance with existing internal and external regulations and the fundamental principles of human rights (as outlined in the ten principles of the United Nations Global Compact). Spaceopal is committed to fighting corruption.

### b) Transparency

spaceopal recognises its responsibility to clearly and transparently keep its shareholders and all stakeholders informed, without favoring the interests of any particular group or individual.

### c) Management fairness and interaction in the Company

A fair conduct represents the fundamental guiding principle for all spaceopal activities, initiatives, reports and communications and is an essential element for the management of the Company.

The interaction and communication within the Company is based on mutual respect, mutual appreciation, fairness, honesty, accuracy, loyalty, tolerance, team spirit, and openness. spaceopal adheres to the highest standards of professionalism in its business practices.

The Company ensures equality of opportunity and aims to further qualify and develop its employees.

### d) Trust and cooperation

Relations with the Shareholders and the Stakeholders, at all levels, must be based on fairness, honesty, appreciation of confidentiality, cooperation and mutual respect. Only in this way can the continuity of the relationship of trust and cooperation be guaranteed, for mutual benefit and for the sustainable growth of the value created.

### e) Protection of the environment, health and safety

spaceopal protects the environment, observes the employment standards, as well as the standards for health and safety, including safety in the workplace and furthers a good work life balance.



f) Protection of the Company's assets and property

Spaceopal is committed to safeguarding the Company's assets and property, protecting its mobile and fixed assets, the technological resources and Information Technology equipment, the Company's knowledge and/ or know-how.

In particular, the belief of working in some way for the advantage of the Company cannot justify the adoption of behaviour in conflict with the aforesaid principles. All the people working in spaceopal, without distinction or exception, are therefore committed to conforming to these principles and ensuring that they are respected within the sphere of their own positions and responsibilities. This commitment justifies and demands that the parties with which spaceopal has relations of any kind also act towards the Company according to rules and procedures inspired by the same values.

### 3 THE CODE OF ETHICS AND ITS APPLICATION

The Code of Ethics of spaceopal expressly sets out the values to its directors, statutory auditors, employees and external co-workers of any kind must comply with, accepting responsibilities, positions, roles and rules, which they shall undertake not to violate, even if their actions do not give rise to any direct legal responsibility of the Company towards any third parties, accepting full personal responsibility both inside and outside the Company. Therefore, knowledge of the Code of Ethics and compliance therewith on the part of all those who work for spaceopal are essential to ensure the Company's transparency and its reputation. Furthermore, all the people with whom spaceopal conducts business must also be acquainted with the Code and abide by the principles contained therein.

# 4 ANNEX I: DETAILS TO THE CODE OF ETHICS

## 4.1 General rules of conduct

### 4.1.1 Compliance with Laws and Regulations

spaceopal operates in absolute compliance with the applicable laws and regulations of the countries where it conducts business, and with the principles laid down in the Code of Ethics and the procedures established by its internal protocols.

Moral integrity is a constant duty of all those who work for spaceopal and must inspire the behavior of its entire organization.

spaceopal's executives and employees, and all those who work for or with spaceopal in any capacity, are therefore required, within their respective spheres of competence, to know and respect the applicable laws and regulations of the countries where spaceopal operates, and to also ensure attention and respect for the legal requirements governing competition on both German and international markets.

### 4.1.2 Models and Rules of Conduct

Anyone working for spaceopal must perform his or her work in compliance with the Code of Ethics, with professional commitment, morality, integrity and management fairness, also with a view to protecting the Company's image.

Within this context the Company directors and executives must be the first, through their behavior, to set an example for all employees of the performance of their work, fostering awareness of and compliance with the Code on the part of the employees, and at the same time encouraging them to request clarifications or to present updating proposals when necessary.

### 4.1.3 Compliance with the Code of Ethics

spaceopal promotes and encourages cooperation among its employees in the respect and implementation of the Code of Ethics and, according to their respective tasks and roles, the internal protocols. Directors, statutory auditors, employees, collaborators, business and financial counterparts, advisors, customers and suppliers are required to contribute to its enforcement, reporting any shortcoming or breach (or even only an attempted breach) of which they may gain knowledge.

### 4.1.4 Corporate Governance

spaceopal maintains a system of corporate governance aimed at maximizing the Company's value for the Shareholders, at controlling Company risks, and at ensuring transparency for the market.





## 4.2 Personnel and employment policy

### 4.2.1 Determining Conditions

The persons working for spaceopal are indispensable for the existence of the Company and its activities and are a critical factor for successful competition on the market. Honesty, loyalty, ability, professional skill, reliability, technical knowledge and the commitment of its staff are therefore included among the decisive conditions apart from those listed in the Code of Ethics that must be pursued in order to achieve the Company's aims. They therefore represent the main characteristics that spaceopal requires of its directors, statutory auditors, employees and collaborators. spaceopal works to overcome any kind of discrimination, corruption, exploitation of children or forced labour and, more generally, to promote the dignity, health, freedom and equality of workers, in line with the United Nation's Universal Declaration of Human Rights, the fundamental Conventions of the International Labour Organization (ILO) and the OECD's Guidelines.

### 4.2.2 Selection Policies

In order to contribute to the development of Company aims, and to ensure that such aims are pursued by all with respect for spaceopal's ethical principles and values, the policy of the Company focuses on the selection of each employee, consultant and collaborator in accordance with the aforesaid values and characteristics. With regard to the selection of staff — which is conducted in application of equal opportunities policies and without any discrimination regarding the candidates' private lives and opinions — spaceopal chooses persons with profiles which are actually required within the Company, avoiding any partial or preferential treatment of any kind. The staff of spaceopal has been employed under a regular employment contract, in application of the law, of applicable regulations and national collective labour agreements.

In particular, spaceopal shall not tolerate or allow any employment relationships involving a breach of applicable labour regulations concerning child, women, and immigrant work, even if conducted by external co-workers, suppliers or trade partners. This includes, without limitation, any non-compliance with the list of international social and environmental conventions referred to in Annex X of Directive 2014/24/EU".

### 4.2.3 Professional Development

In the evolution of the work relationship, spaceopal undertakes to create and maintain the necessary environment to allow each person to further develop his/her skills and knowledge, always with respect for the aforesaid values, following a policy based on recognition of merit and equal opportunities, and providing specific programs of professional refresher courses aimed at the acquisition of greater skills. Employees are therefore requested to cultivate and foster the acquisition of new skills, capacities and knowledge, while executives and department managers must pay maximum attention to allow their collaborators to use and increase their professional skills, creating the conditions for the development of their capacities and exploitation of their potential. The management and selection of personnel must be guided by principles of fairness and impartiality, avoiding favoritism or discrimination, and respecting the professional expertise and competence of the worker.



#### 4.2.4 The Code of Ethics and the Persons working for spaceopal

In addition to promoting the knowledge of the Code of Ethics by spaceopal management, the staff of the Company may, at any time, ask their immediate superiors for advice and clarifications about the content of the Code of Ethics and the protocols and about the tasks they have to perform and for the provision of special trainings and courses. When a new employee is hired, or a new work relationship is established with a collaborator and/ or consultant, spaceopal immediately provides all the information necessary for the correct knowledge of the Code of Ethics and the protocols, especially the protocols connected to specific responsibilities and will ask for confirmation that the documentation received has been examined.

#### 4.2.5 Work environment

spaceopal undertakes to create a work environment that ensures, for all the recipients and, in particular, the employees and collaborators in any capacity and at any level, healthy and safe conditions, respect for personal dignity and which do not allow for the characteristics of a single individual to give rise to discrimination (i.e.: racial, religious discrimination and so on.) or a circumvention of the rules of non-discrimination.

In observance with the prescriptions of the applicable laws and safety standards, spaceopal ensures that the work environment and the workplace will also be adequate in order to safeguard its employees' health and safety and establish the respective protocols in its quality management system.

spaceopal is committed to safeguarding the moral integrity of all its employees and/or self-employed co-workers, guaranteeing their right to dignified working conditions and the full exercise of political and union rights. spaceopal protects its workers against acts of psychological violence or mobbing and opposes any discriminating attitude or behaviour which might cause prejudice to the individual, his beliefs and inclinations. Harassment or molestation of any kind in any work relationship is absolutely forbidden and it is forbidden, in general, to behave in any way that might compromise the peaceful performance of the functions assigned, and otherwise cause prejudice to the dignity of the worker.

spaceopal also disseminates and consolidates awareness of the principles of safety and protection of the workers' health at the workplace, developing awareness of the risks and promoting responsible behaviour by all its employees and/or co-workers.

Furthermore, spaceopal also encourages its employees to take care of their own health by creating a balance between work and their private life.

#### 4.2.6 Privacy protection

Complying with the applicable laws, spaceopal undertakes to safeguard privacy as regards the information on the private life and the opinions of each of its employees and, more in general, of everyone who interacts with the Company, by following legal provisions and adopting appropriate regulations aimed at providing, in particular, that no undue communication and/or disclosure of personal data shall occur without the prior consent of the person concerned.

In particular, respect for the worker's dignity must be ensured also through respect for the privacy of correspondence and interpersonal relationships between employees, as well as by banning interference in meetings or conversations and intrusion or forms of control that can place the worker's personality under pressure.



Personal data may only be gathered, processed and/or used to the extent that this is necessary for specified, explicit, legitimate purposes. The surrounding circumstances of this process must ensure a sufficient level of security, also when transmitting the information. Compliance with the German Federal Data Protection Act is of utmost importance.

### 4.3 Data protection and data security

spaceopal also adopts appropriate measures and initiatives to ensure the safety, integrity, correct use and working of electronic or computer systems, programmes, communication or data of the Company or of any third parties, and safeguards intellectual property rights regarding the use of electronic and computer programmes and data and intellectual property in general, and the integrity of information made available to the public through the internet. spaceopal promotes besides an effective IT security management the observance of these guidelines on management and individual level and in its relation with any third parties, including consultants, customers and business partners.

### 4.4 Conflicts of interests

#### 4.4.1 Company and individual interests

The relationship between spaceopal and its directors and employees is based on trust. The Managing Director's and employees' primary duty is to use the Company's assets and his/her own professional skills in the interests of the Company.

spaceopal directors, employees and collaborators must therefore avoid any situation and must abstain from any activity in which their personal interests – either direct or indirect - are in conflict with those of the Company or where their personal or family interests could interfere with or hinder their capacity to impartially and objectively take decisions in the Company's interest.

Any individual that is in a potential conflict of interest regarding a certain matter shall refrain from being involved or participating in any act involving or representing the Company or any third parties in such matter. This shall also apply to consultants and commercial partners, who must also undertake specific commitments to avoid such situations of conflict of interest.

#### 4.4.2 Prevention of conflicts of interest

In order to avoid situations, even potential situations, of conflict of interest, when spaceopal assigns a task to an individual, whether director, employee or collaborator, it asks at the beginning of such relationship to sign a special statement where they declare that no conflict of interest exists between the individual and the Company. The above-mentioned persons must also promise to promptly inform their immediate senior managers and/or the persons they are reporting to at spaceopal if an actual or potential conflict of interest should arise later in time.



## 4.5 Operating procedures and accounting data

### 4.5.1 Specific Company rules

Specific protocols, inspired by this Code of Ethics, are drawn up after analysis of the Company's situation, in order to detect any risks to which the Company and its internal control system may be subject. They shall be made binding for all employees and persons working for spaceopal.

Specific protocols must also be adopted to identify responsibilities in the operating processes of spaceopal. Following the control principle of the separation of tasks – the various steps of the individual operations must be performed by different people, whose responsibilities are clearly defined and known within the organization in a way that no single person has unlimited and/or excessive power. Processes and decisions must be documented in a traceable way.

### 4.5.2 Compliance with company rules

All directors, employees and all those who work with spaceopal in any capacity, each within his/her respective sphere and position, are required to strictly observe the company rules issued in line with Section 4.5.1, e.g. in the Company's Quality System.

Any failure to comply with the procedures established by the protocols and the Code of Ethics will compromise the relationship of trust that exists between spaceopal and all those who interact therewith for any purpose.

### 4.5.3 Accounting transparency

Truthfulness, accuracy, completeness, lawfulness and clarity of basic information are indispensable for the transparency of accounting records and are a fundamental value for spaceopal, also for the purpose of guaranteeing a clear picture of the Company's economic, equity and financial situation for the Shareholders and third parties.

To achieve these conditions, the documentation of the basic facts, which must be entered into the accounting books in support of the records, must first and foremost be complete, clear, truthful, accurate and valid, and the records must be updated to allow for any checks. The relevant accounting record must completely, clearly, truthfully, accurately and validly reflect what is described in the supporting documents. In the event of economic items and assets, valued based on estimates, the relevant data must be recorded in compliance with the criteria of reasonableness and prudence, with clear illustration, in the relevant documentation, of the criteria according to which the value of the asset has been estimated. Forecasts and estimates must be based on sufficient verification and control, so that information to the Shareholders or to any other parties, including the general public can always be representative of the facts in order to prevent those who receive the information from being misled in any way. Anyone being informed or who may gain knowledge of any omissions, falsifications, or irregularities in the bookkeeping and the underlying documents, or of any infringement of the principles set down in this Code of Ethics is required to immediately inform the directors of the Company. Such infringements compromise the relationship of trust with the Company, and will be suitably sanctioned.



Within the limits laid down by the applicable laws, spaceopal provides full and prompt information, clarifications, data and documents which the Shareholders, customers, suppliers, the supervisory authorities, institutions or other authorities may request in the performance of their respective duties. Any relevant information must be immediately communicated to the Company bodies in charge of monitoring Company management and to the supervisory authorities.

#### 4.5.4 Money laundering

It is forbidden to receive or accept, in any way and under any circumstances, the promise of payment in cash, or to risk being implicated in events linked to the recycling of money deriving from illicit or criminal activities. Before establishing relations or stipulating contracts with regular customers and other long-term business counterparts, the moral integrity, reputation and good name of such person must be checked. spaceopal undertakes to respect all national and international rules and provisions on money laundering.

### 4.6 Protection of the company assets and property

#### 4.6.1 Custody and Management of Resources and property

spaceopal is committed to using the available resources –always in line with the values of the Code of Ethics and all its provisions – in order to guarantee, increase and reinforce the Company's assets, in order to protect the Company itself, its Stakeholders, its creditors and the market. All spaceopal directors and employees shall treat the Company's assets and property with due care. All spaceopal movable property shall be designated and may only be moved from the Company's site in accordance with the respective operating procedures, which in general should require authorisation in writing.

#### 4.6.2 Intellectual property and know-how

Spaceopal is committed to equally protect the intellectual property and know-how it owns as well as the intellectual property and know-how of its shareholders.

### 4.7 Team spirit and inter-company relations

Those who are appointed by Telespazio or DLR GfR to responsibilities and offices at spaceopal must loyally and correctly perform the tasks assigned to them, foster communications between the shareholder companies, and foster and exploit synergies, cooperating in the interest of common objectives of both shareholders. The circulation of information within the Shareholders, particularly for the drafting of the balance sheet and other communications, must take place according to the principles of truthfulness, honesty, correctness, completeness, clarity, transparency and prudence, respecting each company's independence and its specific areas of activity.

## 4.8 OBSERVANCE OF THE CODE OF ETHICS

The task of supervising the observance of the Code of Ethics is entrusted to the directors who hold independent powers of initiative and control.

### 4.9 External relations

#### 4.9.1 Relations with the public authorities and institutions and other bodies representing collective interests

##### *4.9.1.1 Relations with the public authorities and administration*

Relations concerning the Company's business with public officials or with those holding positions in the public service – who operate on behalf of a central or local public administration, legislative bodies, the EU institutions, international public organizations or any foreign state, the magistrates, public supervisory authorities and other independent authorities, as well as with private licensees of a public service, must be established and conducted in strict and absolute compliance with the applicable laws and regulations, and with this Code of Ethics. Attention and care must be paid especially in the following transactions: tender procedures, contracts, authorisations, licences, concessions, applications for and/or management and use of loans granted by above mentioned persons, the management of orders, relations with supervisory authorities or other independent authorities, welfare institutions, bodies responsible for tax collection, bodies responsible for bankruptcy procedures, actions before the civil, criminal or administrative courts, access to and use of computer and electronic data or systems and electronic documents, etc.

In order to avoid infringement of legal provisions or of acting, in any case, in a manner that is prejudicial to the Company's image and integrity, the above operations and any administration of financial resources related to such operation must be specifically approved by the relevant Company department and must be carried out with due respect for the law and for the principles of this Code of Ethics.

Any act intended to induce representatives of the bodies mentioned above, whether German, Italian or foreign, to do or omit to do anything, which might be in breach of any applicable laws or with the purpose of an unjustified benefit or damage to a party is strictly forbidden.

##### *4.9.1.2 Gifts, donations, benefits, and promises of favors*

Spaceopal strictly forbids all individuals acting in its interest, name, or on its behalf from soliciting, demanding, accepting, obtaining, being promised, offering, or promising—either directly or indirectly:

- Money,
- Non-monetary gifts exceeding a modest value (e.g., approximately €25),
- Goods, services, or favors that are not legitimately due (including occupational opportunities).

This prohibition applies in dealings with public officials, public administration employees, or private individuals, including corporate entities, within the scope of professional relationships. These principles equally apply to business relations with commercial and private parties. Invitations, such as meals or entertainment, may only be accepted if strictly related to a professional context and conducted with appropriate value and circumstances that avoid any appearance of impropriety or misconduct. Acceptance of such invitations must be reported to Spaceopal's directors.



Furthermore, any undue requests for or offers of gifts, donations, or benefits must be promptly reported to Spaceopal's directors or the surveillance body for appropriate action. Spaceopal is committed to full cooperation with judicial authorities and will avoid any conduct that might hinder or prejudice the enforcement of applicable laws.

In alignment with Article 8.1.8 of the Joint Venture Agreement, which stipulates that the Shareholders' Committee must resolve on matters including the granting of donations, endowments, or other allowances by the Company, no such actions may be undertaken without prior approval from the Shareholders' Committee.

#### 4.9.2 Relations with Customers, Consultants, Suppliers, other Parties in Transactions, Business and/or financial Partners etc.

##### 4.9.2.1 *Conduct in the course of business*

spaceopal conducts its business in compliance with the Code of Ethics and requires a similar behaviour from anybody with whom it holds business and/or financial relationship of any nature whatsoever, with a particular stress on the choice of other parties in transactions, suppliers, business partners, consultants etc. spaceopal shall not establish any business relationship whatsoever with organisations not respecting these principles, including indirect or through intermediaries. This includes individuals or entities which are known or can be reasonably seen or alleged to be part of or act in support of any corruptive, criminal organizations or human rights infringement of any nature, including e.g. mafia like organizations or labour conditions.

Spaceopal shall maintain respectively lawful, transparent and traceable procurement processes for the selection of parties in transactions, business and financial partners, consultants, suppliers of goods and providers of services on the basis of objective, transparent and documented evaluation criteria, such as quality, cost efficiency, price, professional expertise, competence and efficiency, and after obtainment of suitable guarantees as to the correctness of the consultant or supplier of goods or services.

Agents, consultants and/or intermediaries must regularly liaise with the Company concerning the obedience to assigned tasks and responsibilities. The Company reserves and shall reserve the right to conduct audits with a view to ascertaining that all contractual obligations are being complied with.

##### 4.9.2.2 *Gifts, donations and benefits*

In respect of gifts, donations and benefits the rules and principles set forth in Section 4.9.1.2 also apply in business relations to commercial and private entities.

Invitations (e.g. dinner, lunch etc.) from business relations may be not be accepted, unless these are strictly related to a working context and are chosen in an appropriate value and context that does not give rise to an appearance of any impropriety and incorrectness.

## 4.10 Company information

### 4.10.1 Availability and access to information

Within the limits laid down by the applicable laws as well as justified confidentiality agreements, spaceopal shall produce promptly and fully any information, clarifications, data and documents requested by the Shareholders or customers, its auditors, suppliers, public supervisory authorities, institutions, agencies and other bodies in the performance of their respective duties.



All Company information of any relevance must be immediately communicated to the Shareholders and the supervisory authorities.

## 4.11 Relations with the media and information management

### 4.11.1 Rules of conduct

Relations with the press and other media and, more in general, with external counterparts, must be conducted only by those expressly authorised for this duty, in line with the procedures or regulations adopted by the Company. External communications must be inspired by the principles set forth in this Code of Ethics.

### 4.11.2 Price-sensitive and other commercially sensitive information

Every form of direct or indirect investment based on confidential Company information whose knowledge has been acquired in the course of the activity carried out within the Company or its Shareholders is strictly forbidden. Special importance and attention must therefore be given when disclosing outside the Company any documents and information regarding events falling within the sphere of activities directed by the Shareholders and spaceopal itself which are not in the public domain and which could, if made public, considerably influence commercial opportunities, the prices of goods and services in the market, and possibly even prices of financial instruments and/or performance of financial instruments on the stock market. Such information, after approval on the part of the Company directors, must always be communicated through the concerned Company and channels and the persons appointed for this purpose at Telespazio, DLR GfR and/or spaceopal.

### 4.11.3 Confidentiality obligation

Due to the particular nature and importance of the Company's sector of business, all the recipients of confidential information are – within the limits of the laws - required to maintain the greatest reserve – and to therefore refrain from disclosing or requesting information – regarding documents, know-how, research projects, Company operations and, in general, all information they may gain in the course of their work.

Confidentiality applies to all internal private, scientific or protected information. Suppliers', Shareholders', Stakeholders', business partners' and employees' non-public information or non-public information concerning them shall be protected in accordance with applicable law and contractual requirements.

In particular, all information subject to specific provisions of law or regulations, regarding, for example, national security, military sectors, inventions, scientific discoveries, protected technologies or new industrial applications, as well as contractually reserved information, is considered as confidential or secret. All information learnt during the course of work which could represent a risk or prejudice for the Company or allow an employee to gain undue earnings is also considered as confidential.

The obligation to comply with this confidentiality regime shall extend beyond the termination of the work relationship with spaceopal.





## 4.12 Relations with the community and the environment

### 4.12.1 Responsibility towards the community

spaceopal is aware of the effects of its activities on its surrounding community, on economic and social development and on the general wellbeing of the community, and pays attention to the importance of social acceptance on the part of the communities in which it operates.

### 4.12.2 Respect for the environment

spaceopal regards the environment as a primary asset to be protected and therefore plans its activities in a manner that is compatible with the environment and the assets entrusted to the Company, taking into account the development of scientific research in this field.

## 4.13 Breach of the code of ethics — sanctioning system

### 4.13.1 Reporting infringements

With reference to the reporting of actual, attempted or requested infringements of the standards laid down in the Code of Ethics, and/or to illicit actions, the Company ensures that a whistleblower will not be negatively impacted when acting in good faith. If a whistleblower was personally involved in the infringement but has averted further damage to the Company due to the notification, spaceopal will take this into consideration. See also the specific rule on accounting described in Section 4.5.3.

### 4.13.2 Guidelines of the system of sanctions

Breaches of the principles of this Code of Ethics as well as any breaches of the law will be incisively pursued by the Company, with promptness and immediacy, through adequate and proportionate disciplinary measures in addition to any criminal proceedings which might also arise when such behavior represents an offence.

The disciplinary measures for infringement of the Code of Ethics must be seriously borne in mind by all those who have work relations with spaceopal: spaceopal therefore circulates the Code of Ethics and information on the sanctions applicable, and on the methods and procedures of application.



Code of Ethics Approval by Managing Directors

	Name	Signature / Date
Edited by	M. Stefanec SPO Contracts	
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Approved by	Marco Folino Managing Director (CEO)	