

We. Create. Space.



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## About OHB System AG

OHB System AG is one of the leading space companies in Europe. It belongs to the listed high-tech group OHB SE, where around 3,000 specialists and system engineers work on key European space programs. With two strong sites in Bremen and Oberpfaffenhofen near Munich and more than 40 years of experience, OHB System AG specializes in high-tech solutions for space. These include satellites for Earth observation, navigation, telecommunications, science and space exploration as well as systems for human space flight.

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OHB SYSTEM AG

SUPPLIER  
CODE OF CONDUCT

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Portrait

For those working for an OHB company (in the following “OHB”), corporate responsibility is not just another catchphrase but also a core principle that has guided us and will guide us in the future. We have grown from a business founded on family values into one of the leading space companies in Europe and an important independent force in European aerospace industry.

Being highly valued and maintaining the appreciation of our customers, investors, employees, as well as overall space community, requires on the ethical behaviour of every single person who is connected to OHB and its affiliates. Giving ourselves a strict set of ethical values to guide business dealings in the highest standards is just the start, we believe that part of our long term corporate success is the relationship to our suppliers. This relationship should be founded on mutual trust and respect. Therefore, we expect all suppliers who do business with OHB to uphold the same ethical values and compliance responsibilities by acting with the same fairness in all aspects of their own business practices and by monitoring these principles throughout their own supply chain.

For this reason, OHB enforces this Supplier Code of Conduct, which reflects basic principles also laid down in the guidelines of OHB’s Code of Conduct<sup>(1)</sup> and contains the minimum standards that OHB expects from its suppliers.

<sup>(1)</sup> OHB’s Code of Conduct:  
<https://www.ohb.de/investor-relations/corporate-governance/code-of-conduct>

1. Compliance with Laws, Rules and Legal Regulations

Every supplier is obliged to comply with all applicable laws, rules and legal regulation in each country where operations are managed or where services are provided. Our suppliers are also expected to implement and maintain a system to ensure compliance with such laws, rules and legal regulations, covering both their own operation and that of their supply chain.

Furthermore, we encourage suppliers to go beyond basic legal compliance and to enforce compulsory regulations on human rights, labour standards and anti-corruption measures<sup>[2]</sup>.

2. Human Rights

Our suppliers must observe the basic human rights set forth in the Universal Declaration of Human Rights of the United Nations<sup>[3]</sup> and are expected to address any violation of human rights associated with any operation of OH B.

2.1. Fairness, Tolerance and Equal Opportunities

Suppliers shall provide equal employment opportunity and fair working conditions to all their employees and applicants and should act without any kind of discrimination on the grounds of nationality, culture, religion, ethnic origin, sex, sexual orientation or age.

<sup>[2]</sup> For example the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at work and the United Nations Convention Against Corruption.

<sup>[3]</sup> Declaration of Human Rights of the UN:  
<http://www.un.org/en/universal-declaration-human-rights/>

2.2. Child Labor

We expect all of our suppliers to expressly prohibit any kind of child labor within their organization or within any of their supply chain.

The term “child” herein refers to any person under the minimum legal age for employment applicable within the country of the supplier. This legal age must also conform to the minimum working ages specified by the International Labour Organization (ILO) Convention 138 or for hazardous work by the ILO Convention 182. This means that suppliers are expected to verify the dates of birth when appointing new employees and to document this in the personnel file; and to not employ any workers under the age of 14 or for hazardous work under the age of 18.

2.3. Forced Labor

Suppliers must prohibit human trafficking or any other kind of forced labor and ensure that minimum standards of employment law are enforced. The prohibition of unfair labor practices applies especially to unreasonable wages, disproportionate working hours and to freedom of association.

3. Health and Safety Standards

We expect all of our suppliers to enforce fair and safe working conditions and ensure compliance with all applicable local law and furthermore, to promote good health and safety standards as a fundamental principle. We demand that our suppliers create an employment environment that is free from any physical, psychological, verbal or any other form of abusive conduct and to implement a high standard of occupational health and safety. All suppliers are expected to provide a safe working environment for all employees that strives to prevent accidents

and minimizes health risks as much as possible (for example in accordance with OHSAS 18001, which is based on ISO 9001 and ISO 14001, or any national equivalent). This also includes a protected mechanism for employees to report possible violations of the principles of this Supplier Code of Conduct.

### 4. Anti-Corruption and Bribery Policies

To maintain a fair competitive working environment, suppliers must comply with all applicable laws and regulations addressing corrupt practices – for example anti-trust laws, trade practice laws and all other laws, rules and regulations dealing with unfair competition practices. More specifically, the United Nations and Organization for Economic Co-Operation and Development (OECD) convention against corruption is the most important law in relation to foreign corrupt practices and must be actively enforced. Furthermore, all suppliers are expected to apply due diligence to prevent and detect any corruption in business arrangements. OHB will not knowingly conduct business with any supplier who has been suspected of corruption or any related crime. This also includes money laundering, terrorism financing or participating in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

OHB does not tolerate any form of engages directly or indirectly in any form of corruption or bribery.

#### 4.1. Anti-Trust, Fraud and Deception

We expect our suppliers to act fairly and with integrity in their competition for market share. Suppliers shall neither engage nor tolerate any form of corruption, bribery, theft, fraud, deception or extortion including any payment or other benefit for the purpose of influencing the decision-making process whether or not in violation of any applicable laws. Suppliers must also refrain from participating in a cartel.

#### 4.2. Illegal Payments

Our suppliers are expressly expected never to offer, grant, demand or accept any bribes, payoffs, kickbacks, incentives, gifts, favours or any other benefit from any person or organisation for business opportunities with or in any other way related to the business operations of OHB. Similarly, OHB will not accept bribes, kickbacks, incentives, gifts, favours or other benefits from a supplier or business partner for the purpose of obtaining an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

#### 4.3. Insider Trading

Suppliers are expressly prohibited from trading information or using any material or non-publicly disclosed information gained by virtue of business activities with OHB as the basis for shares acquisition or to enable others to trade with stocks or securities of OHB. The term 'insider trading' refers to such practices of using specific information not publicly known and related to a company of the OHB Group as a way of influencing the stock exchange or market price, if they were published.

### 5. Information Protection

All sensitive information must be properly handled.

#### 5.1. Intellectual Property Rights

Therefore, all suppliers must comply with all applicable laws and regulations governing intellectual property rights, protection against disclosure, patents, copyrights, trademarks and any other proprietary know-how. Moreover, suppliers must protect and secure any business information of OHB in strict confidence and should not improperly use or disclose such information to third parties, unless an explicit authorization from the disclosing party is given. A high standard of data integrity and of technical safeguards against any unauthorized access must be guaranteed.

### 5.2. Data Privacy

Our suppliers are expected to process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes according to applicable rules and laws.

## 6. Global Trade Compliance

Our suppliers must ensure that their business practices are in full accordance with all applicable laws and regulations governing the export and import of parts, components, services, and technical data.

## 7. Counterfeit Parts

Suppliers must put in place and maintain effective methods to minimize the risk of introducing counterfeit parts or materials into deliverable products. Notification of any suspected counterfeit product(s) should be made as soon as possible. Suppliers are expected to conduct their business and provide their services in a truthful and transparent way.

## 8. Conflict Mineral

Suppliers must comply with applicable laws and regulations regarding conflict minerals which include tin, tungsten, tantalum and gold.

Our suppliers should take steps to determine if the tin, tungsten, tantalum and gold which may be contained in their products do not directly or indirectly finance or benefit armed groups, especially in Conflict-Affected and High-Risk-Areas (CAHRAs).

Our suppliers should exercise due diligence on the source of these minerals and require the same from their next tier suppliers.

## 9. Sustainability

We expect our suppliers to comply with all applicable laws and regulations on environmental protection and should preserve resources and protect the environment as much as possible. Suppliers are expected to establish and maintain – as far as possible – a suitable environmental management system (such as DIN EN ISO 14001 or equivalent) in order to minimize their environmental pollution and make continuous improvements in environmental protection.

## 10. Ethical Expectations

We expect our suppliers to always compete in a fair and ethical manner and to take decisions based only on objective business criteria (no personal, family or financially questionable criteria). In support of that, every supplier must keep all internally or externally produced records accurate and truthful. Suppliers should also strive to foster a professional climate in which their employees feel encouraged to raise and address any legal or ethical issues without fear of punitive action or retaliation.

We expect our suppliers to provide their employees avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions.

### 11. Compliance with this Supplier Code of Conduct

#### 11.1 Our expectations of our suppliers

Our suppliers are strongly encouraged to implement their own written code of conduct and to establish a management system to support compliance with all applicable laws and regulations. To clarify any issues related to this Supplier Code of Conduct, the supplier should contact OHB.

#### 11.2 Whistleblower System “We.Create.Integrity”

Violations of this Supplier Code of Conduct may result in detrimental consequences for the relationship between any of the OHB’s companies and the supplier. The supplier is therefore strongly encouraged to immediately report and – as far as possible – correct any observed violations or questionable issues.

A whistleblower system is also available at the We.Create.Integrity. portal for reporting any significant violations of the Code of Conduct – particularly illegal business practices. This system operates in several languages and permits a confidential and specially encrypted dialogue with the OHB Compliance Department (anonymous on request).

You can access the We.Create.Integrity portal via the following link:

<https://www.bkms-system.com/wecreateintegrity>

#### General Disclaimer

This Supplier Code of Conduct is in no way intended to conflict with or modify the conditions of any existing contract. In the unlikely event of a conflict, the Supplier Code of Conduct is secondary to any contract terms.

#### Main References

- OHB’s Code of Conduct  
<http://www.ohb.de/investor-relations/corporate-governance/code-of-conduct.html>
- United Nations Global Compact  
[www.unglobalcompact.org](http://www.unglobalcompact.org)
- Universal Declaration of Human Rights  
[www.un.org/en/rights](http://www.un.org/en/rights)
- International Labour Standards (ILO)  
[www.ilo.org/global/standards/lang--len/index.htm](http://www.ilo.org/global/standards/lang--len/index.htm)
- United Nations Convention against Corruption  
<http://www.unodc.org/unodc/en/treaties/CAC/index.html>
- OECD convention against corruption  
<http://www.anticorruption.ie/en/ACJS/Pages/WP08000004>
- OHSAS 18001 Healthy & Safety Standard  
[www.ohsas-18001-occupational-health-and-safety.com](http://www.ohsas-18001-occupational-health-and-safety.com)
- International Organization for Standardization (ISO)  
[www.iso.org](http://www.iso.org)

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