

ICEYE

Supplier Code of Conduct

ICEYE's radar satellite imaging service and hardware helps clients resolve challenges in sectors such as maritime, disaster management, insurance, finance, security, and intelligence. Our constellation of SAR (synthetic aperture radar) satellites enable a high level of change detection both day and night, and in any weather.

Environment, society and sustainability are a matter of principle for us and we build on deeply caring about the environment and society by good governance practices and respect to human rights and fair labor standards, even as our business expands to cover a vast range of different use cases.

This supplier code of conduct is applied to all ICEYE operations, including ICEYE Oy and all its subsidiaries (collectively referred to as "ICEYE"), and all suppliers and vendors (collectively referred to as "suppliers") who deliver goods, services, or other business-related activities to ICEYE.

1. Business principles and law

At ICEYE we are committed to conducting our business ethically and in accordance with all applicable national and international regulations and laws in the areas where we operate, and we expect our suppliers to adhere to these same principles as well. In addition to complying with all applicable legal and regulatory requirements, suppliers are expected to act in accordance with the highest standards for business ethics. Ignorance of legal obligations is never an excuse or defense of misconduct, and violations of the laws or regulations may result in harm to both ICEYE and the supplier alike.

In addition, suppliers shall avoid any situations where a conflict of interest between the supplier and ICEYE exists, and shall disclose any potential or existing conflict of interest to ICEYE at their earliest convenience.

If a supplier notices any deviations to this Supplier Code of Conduct, bad business ethics or similar misconduct, they are encouraged to immediately notify their ICEYE contact person or supply.chain@iceye.com

1.1 Accuracy of information, ICEYE assets and fair competition

Suppliers agree to safeguard the security of ICEYE's assets, confidential information and intellectual property, and to handle all ICEYE related data appropriately, in accordance with applicable laws and regulations as well as ICEYE guidelines.

The information that suppliers issue to ICEYE about their business operations, shall always be true, accurate and up to date.

Suppliers shall conduct responsible marketing, and compete fairly and ethically in all other respects.

1.2 Anti-corruption and bribery

We at ICEYE conduct all of our business in an honest and ethical manner, and we expect our suppliers, including sub-suppliers, and other entities acting on behalf of the supplier to do the same. Suppliers shall not engage in any form of bribery, corruption, extortion, or any improper business arrangements. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. Suppliers shall establish and maintain policies and procedures designed to prevent bribery and corruption.

Any gifts and hospitality provided or accepted between suppliers and ICEYE representatives should be modest, appropriate and comply with applicable laws and regulations as well as ICEYE values and policies, and should not influence, or appear to influence, any decisions between the representative and supplier.

1.3 Anti-money laundering and export controls

Suppliers shall implement protective measures and refrain from any activities which may be considered part of the money laundering process. Suppliers shall comply with all applicable laws and regulations regarding the European Union and United States export control and export restrictions, as well as economic sanctions imposed by the European Union, United States, United Kingdom or United Nations.

2 Human rights and labor standards

Suppliers shall respect internationally recognized human rights as defined in the United Nations Universal Declaration of Human Rights, and ensure they are not involved in any human rights violations. Suppliers shall identify their human rights impacts, implement mitigation actions when required and provide remedial action in the event of human rights violations. Suppliers must comply with all labor regulations, fair employment practices and safe and healthy workplaces.

ICEYE has published a Modern Slavery Act Transparency Statement in accordance with Section 54 of the UK's Modern Slavery Act 2015, and expects its suppliers to take part in ensuring that modern slavery or human trafficking is not taking part in any part of their line of business. ICEYE will not collaborate with any supplier or any party whatsoever, which uses child or forced labor or conducts business with armed groups participating in human rights violations. No parts or materials ICEYE uses shall be produced by child or forced labor.

2.1 Forced labor

Suppliers shall not use forced labor, and employees shall be free to leave their employment after reasonable notice as required by national law or contract. Employees shall not be required to lodge deposits of money, identity documents or other valuables with their employer.

2.2 Child labor and young employees

Suppliers shall not, in any circumstances, employ children who are below the minimum legal employment age. The minimum age is the age of completion of compulsory schooling, or not less than 15 years (or 14 years in countries subject to the developing country exception of ILO Convention 138). Children and young people above the minimum age but under 18 years of age shall not be employed in any hazardous work, or work that jeopardizes their health, safety, or morals.

2.3 Non-discrimination and mistreatment

ICEYE expects its suppliers to treat their employees and other stakeholders with respect and interact in a good and polite manner. Suppliers shall not behave inappropriately or discriminate against their employees or other stakeholders based on race, religion, gender, political opinion, age, nationality, sexual orientation, civil status, or disability.

ICEYE has zero tolerance towards mistreatment, abuse, bullying, sexual harassment or any kind of personal offensive behavior and any supplier working at ICEYE premises shall adhere to this zero-tolerance policy.

2.4 Health and safety

Suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Suppliers shall ensure that appropriate health and safety information is provided to its employees and sub-suppliers, and that relevant training and protective equipment is provided and occupational health and safety performance is monitored regularly.

2.5 Drugs and alcohol

Illegal drugs are not permitted at the ICEYE offices, office premises, ICEYE company apartments or ICEYE organized events. Suppliers' employees and their sub-suppliers are not allowed to work under the influence of illegal drugs or alcohol at ICEYE premises or projects related to ICEYE or its business.

4 Environment and sustainability

ICEYE's suppliers shall comply with all applicable laws and regulations regarding sustainability and protecting the environment. Suppliers should identify the climate and environmental impact of their operations and implement mitigation actions when required. Suppliers should always strive to minimize the waste and emissions and reduce the use of energy and water where reasonable and pay attention to efficient use of materials and lifecycle impacts of their products and services.

5 Raise your concerns

We encourage our suppliers to voice their concerns in case they have noticed any kind of misconduct at any level. For action to be taken in a timely manner, it is important to report any incidents at your earliest convenience. The best way to communicate your concerns is through your ICEYE contact person.

Signature on the next page

We hereby agree to adhere to all the principles outlined in this Supplier Code of Conduct

(Company Name)

By:

Printed (Name, Title and Address)

Date: _____