



Supplier Code of Conduct Policy

PL-PRC-002
Revision A

OVERVIEW

CesiumAstro Inc., and its subsidiaries (collectively, “CesiumAstro” or “the Company”) is committed to doing business ethically and responsibly and expects the same of its suppliers, agents, contractors, consultants and other third parties (referred to collectively herein as “Suppliers”). Conducting our business with uncompromising integrity means acting ethically and complying with applicable laws and regulations. In support of this commitment, CesiumAstro has developed this Supplier Code of Conduct (“Supplier Code”) to convey its expectations of its Suppliers with regard to compliance with applicable laws, standards, and business practices. CesiumAstro requires its Suppliers to conduct business in a manner that complies both with the letter and spirit of this Supplier Code, both of which are an important part of our Supplier selection and evaluation process.

REQUIREMENTS

Act Ethically CesiumAstro is committed to the highest standards of ethical business practices and to carrying out business fairly, honestly, and openly at all times. The Company has a zero-tolerance approach for bribery or corruption of any kind. Suppliers acting on behalf of CesiumAstro must comply with all applicable anti-bribery and anti-corruption laws, regulations, and policies, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Suppliers must not make or accept any payments, promises, or exchanges that are unlawful, or that give the appearance of impropriety, to or from any person or entity for the purpose of retaining or obtaining business or to gain improper advantage. Suppliers must also not engage in fraud, kickbacks, money laundering, embezzlement, extortion, or any other form of corruption.

Avoid Conflicts of Interest Suppliers must identify and avoid actual, potential, or perceived conflicts of interest in their dealings with CesiumAstro. We understand that such actual or potential conflicts, including economic ties and personal relationships, may arise, and we expect our Suppliers to disclose them to CesiumAstro and all other affected parties in a timely fashion. Suppliers should take care that any personal relationship is not used in an attempt to influence a CesiumAstro Supplier’s business judgment.

Avoid Inappropriate Gifts, Meals, and Entertainment CesiumAstro Suppliers are prohibited from accepting anything more than modest gifts, meals, and entertainment from Suppliers. Ordinary business meals and small tokens of appreciation are generally permitted, but Suppliers should avoid offering CesiumAstro employees travel, frequent meals, expensive gifts, or anything else that could have an appearance of impropriety. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

Compete Fairly Standards of fair business, advertising, and competition are to be upheld. CesiumAstro and its Suppliers outperform the competition fairly, honestly, and with integrity. Competitive advantages are created with superior performance, not unethical or illegal business practices. Stealing proprietary information, or obtaining or possessing trade secret information without the owner’s consent, is prohibited. Additionally, Suppliers must not enter into any agreement, understanding, or plan (written or oral) with any of their competitors with regard to price, terms or conditions of sale, production, distribution, territories, or customers, or exchange or discuss with any of their competitors pricing, marketing plans, manufacturing costs or other competitive information. Suppliers must also comply with all antitrust laws applicable to their business activities.

Keep Accurate Books and Records Suppliers must maintain accurate business records and books of account that satisfy the highest standards and accurately reflect the true nature of the transactions they record. Suppliers must properly and accurately record all financial aspects of their work, represent themselves accurately to all relevant tax authorities and ensure appropriate processes are in place to prevent the facilitation of tax evasion by employees and other persons performing services on behalf of Suppliers.

Commit to Manufacturing Product Quality Suppliers must be committed to continuous improvement and to creating a zero-defect culture by manufacturing high-quality, reliable products on time and at an affordable price. Suppliers must implement and maintain methods and processes appropriate to their products to prevent counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and prevent such parts from re-entering the supply chain. We expect Suppliers to inform us immediately if counterfeit parts and/or materials are detected or suspected.

Provide Healthy and Safe Work Environments CesiumAstro is committed to protecting the safety and health of those working for or providing services to the Company. CesiumAstro therefore requires that Suppliers provide their employees with safe workplaces that meet, at a minimum, applicable country/regional laws and regulations and protect employees' health and well-being. The term *employees* apply to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker. In addition, Suppliers must provide a workplace that includes the following:

- Potable drinking water, adequate sanitation, lighting, temperature, ventilation, and suitable facilities for women's health needs.
- Facilities that are structurally sound and well maintained in accordance with all applicable laws and regulations.
- Adequate and appropriate training and protection for employees to avoid potential safety hazards, including personal protective equipment. Suppliers shall ensure that educational and training materials associated with safety and potential hazards are disseminated to all employees, as appropriate for their roles, and in their primary language.
- Clearly displayed health and safety protocols near where Suppliers' employees work. Suppliers should document, investigate, and report to the appropriate authorities any incidents that result in injury to an employee requiring care beyond basic first aid.
- No harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers, nor is there to be the threat of any such treatment.
- Emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

Maintain a Respectful Workplace Suppliers must seek to foster a diverse and inclusive workforce, provide a workplace free of discrimination and harassment, and treat employees fairly, including with respect to wages, working hours, benefits, working conditions, and freedom of association. CesiumAstro does not, and its Suppliers shall not, engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, marital status or any other characteristic which is protected under law, in hiring or other employment practices such as promotions, rewards, and access to training or other growth opportunities.

Respect Fundamental Human Rights Suppliers must respect their employees by ensuring that, within the context of the Suppliers' business operations, they have a right to life, personal liberty, and personal security. Suppliers must comply with all applicable laws and regulations, including treaties and international standards, paying special attention to ensure these rights are upheld for those who are at heightened risk for vulnerability or marginalization, including women, indigenous peoples, minorities, older workers, people with disabilities, and migrant or foreign workers. Suppliers shall comply with the following additional principles:

- CesiumAstro expects Suppliers to provide fair compensation that is, at a minimum, in compliance with all applicable wage and hour laws, rules, and regulations, including those associated with legally mandated benefits, overtime work, and other premium payment situations. Wages should be applied at a rate that is comparable with relevant standard industry living wage compensation.
- Suppliers shall not use, or facilitate the use of, forced labor in any of its manifestations including involuntary, compulsory, indentured, bonded, slave, or human-trafficked labor. Suppliers' employees shall not be coerced to work, or restricted in their freedom of movement, through the use of violence or intimidation or through any manipulative or predatory means.
- All work must be voluntary, and employees shall be free to terminate their employment at any time without penalty if reasonable notice is given as per worker's contract. Suppliers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Suppliers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Employees shall not be required to pay Supplier's agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by employees, such fees shall be repaid to the worker.
- Suppliers shall ensure that no employees are underage, meaning under the age of 15, under the minimum age for mandatory education, or under the minimum age for employment in the country, whichever is greatest.
- Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association, peaceful assembly, or protest against the business or its operations.
- Suppliers shall comply with all applicable laws and regulations, or collective agreements, regarding maximum working hours, overtime, vacation time, leave periods, maternity/paternity/parental leave, and public holidays.

Support Environmental Stewardship Suppliers must conduct operations in a way that minimizes the impact on natural resources and protects the environment, including by complying with all applicable environmental laws, regulations, and operating permits. Suppliers must also strive to optimize their use of energy, water, and agricultural inputs, reduce greenhouse gas emissions, and minimize water pollution and waste, including food waste and landfill usage.

Comply with Legal and Regulatory Standards CesiumAstro Suppliers are required to strictly observe all applicable laws and regulations. Violations of law by a Supplier can harm CesiumAstro's and its customers' reputations. Suppliers must require that their employees are familiar with the basic legal requirements that pertain to those employees' duties and responsibilities. In addition to those laws and regulations expressly described elsewhere in this Supplier Code, the following are some additional illustrative examples of applicable laws:

- CesiumAstro expects Suppliers to comply with applicable trade and sanctions laws and regulations of countries in which it conducts business. When working for or on behalf of CesiumAstro, Suppliers must not engage in any transaction with a sanctioned party or country or use another party to carry out any activity that cannot be lawfully performed directly due to trade sanctions prohibitions.
- Suppliers will maintain programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.
- Suppliers will cooperate with CesiumAstro's efforts to ensure it is sourcing its minerals and other raw materials responsibly, including responding to traceability and reporting requests. CesiumAstro and its Suppliers must ensure that all products within the supply chain comply with the regulations for "Conflict Minerals" and do not contain; Gold, Tin, Tantalum or Tungsten originating from the Democratic Republic of the Congo, Central African Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda, Uganda, or any other adjoining countries or countries currently subject to sanctions by the United States of America, European Union or any other applicable national or international authority.

Information Security Suppliers must implement and maintain appropriate security measures to protect the information (including confidential, proprietary, personal, export controlled, government security classified and controlled unclassified information) that they create, collect, handle, store or are responsible for, in accordance with applicable laws, regulations and contractual requirements, without regard to whether such information belongs to the Supplier, CesiumAstro, or other parties. Suppliers must maintain the appropriate risk management controls to prevent data breaches and ransomware attacks, and to ensure device security throughout their entire business and supply chain. Suppliers must address any security issues proactively and both notify and support CesiumAstro in responding to and remedying any security breaches. Nothing contained herein shall be interpreted to prohibit or otherwise restrict Suppliers from making any lawful reports to the government or from responding to any government entities' lawful request for information.

Supply Chain Security Suppliers must maintain policies and procedures that ensure containerization and shipment security practices conform to U.S. Customs Trade Partnership Against Terrorism ("CTPAT") and Authorized Economic Operator ("AEO") requirements.

Implement Monitoring and Compliance Measures Suppliers must maintain a management system that demonstrates adoption of the principles embodied in this Supplier Code of Conduct and that tracks and documents compliance with all applicable laws, government policies and regulations.

Supply Chain Management Suppliers must use their best efforts to extend the principles embodied in this Supplier Code of Conduct to their suppliers that are engaged in the production, supply and support of products or services for CesiumAstro.

MAKING A REPORT

Reporting Mechanisms To ensure that CesiumAstro is able to conduct its business in a manner consistent with the policies, laws, and regulations established and referred to in this Supplier Code, it has established a hotline that can be used by CesiumAstro, its Suppliers, and respective employees thereof. Suppliers who believe that an employee of CesiumAstro, or anyone acting on behalf of CesiumAstro, has engaged in illegal or otherwise improper conduct, should report the matter via one of the avenues below.

- Notification through CesiumAstro's third-party hotline (1-833-666-0380) [available 24/7] or online at cesiumastro.ethicspoint.com.
- Email, call, or letter to the CesiumAstro General Counsel or Legal Department at info@cesiumastro.com

All reports should be factual (based on actual or suspected violations), instead of speculative or conclusory, and should contain as much specific information as possible to allow the individuals investigating the report to adequately assess the nature, extent, and urgency of the investigation. Reporting and providing personal data is voluntary. That said, failure to provide certain personal data, including your identity as the complainant or reporter, may delay or make it impossible for CesiumAstro to act on any report submitted. If disclosed, the identity of a person making a good faith report will be processed in a confidential manner wherever possible. Only persons with a need to know will collect and process the reports and these persons are subject to a duty of confidentiality.

Cooperation with Requests for Information We expect our Suppliers to cooperate with our reasonable requests for information, certifications, and/or audit access. When there is a concern, our practice is to work with the Suppliers to problem solve. However, when an issue cannot be corrected or a Supplier is unwilling to engage, we reserve the right to end our relationship, consistent with the terms of any agreement in place.