

Anti-Bribery and Anti-Corruption Policy

1. Satellogic Inc. [dba Satellogic] and its subsidiaries and affiliates, are committed to transacting business with integrity, acting ethically and legally in accordance with all applicable global anti-bribery and anti-corruption laws, such as the UK Bribery Act of 2010, the Dutch Criminal Code Article 177, the Spanish Criminal Code, the Argentine Criminal Code, and the US Foreign Corrupt Practices Act (the “*FCPA*”). As part of this commitment, Company policy prohibits any participation or involvement in bribery or corruption in any country in which the Company directly or indirectly conducts business.
2. This Anti-Bribery and Anti-Corruption Business Policy (the “*Policy*”) applies to anyone who acts on behalf, or in the interest, of the Company – including but not limited to joint venture and other suppliers, agents, resellers and consultants (hereinafter collectively referred to as “*Satellogic Third Party Partners*”) and their directors, officers, and employees wherever located (collectively referred to herein as “*Business Associates*”) with respect to their activities in regard to the Company – to comply with all applicable anti-bribery and anti-corruption laws and the Policy.
3. Business Associates may not take any actions for the purpose of circumventing these requirements. For example, a Business Associate may not ask or otherwise use a third party to do that which is forbidden by this Policy.

General Requirements to Prevent Bribery and Corruption

4. Business Associates may not directly or indirectly make, promise, approve, authorize or offer to give to anyone – or accept or solicit from anyone – anything of value (including but not limited to cash payments) to improperly induce the recipient to take (or to refrain from taking) action that would bestow a commercial benefit or advantage on the Company or any other party.
5. Giving things of value to family members, close associates or favored organizations of business Resellers, potential Satellogic Third Party Partners or public officials should follow the same limitations set forth for gifts, entertainment and hospitality generally, as such actions may be interpreted as attempts to circumvent these rules.

Dealing with Public Officials

6. While it is the policy of the Company to prohibit bribery of any kind (in both the private and public sectors), interactions with Public Officials (defined below) must be monitored especially closely due to the increased risk for violations of applicable anti-bribery and anti-corruption laws. Bribery of Public Officials is against the law in every country and often carries criminal penalties for both the individual and the company. Accordingly, any financial or business dealings, and any gifts or entertainment/hospitality, involving such persons will be scrutinized with particular care, both by the Company and by people outside the Company.
7. In addition, many countries have laws against the bribery of Public Officials in countries other than their own. Therefore, it is important to remember that any such bribe would create problems for the Satellogic Third Party Partner and the Company in more than one legal jurisdiction. Thus, all interactions with Public Officials should adhere scrupulously to this Policy in order to avoid any appearance of impropriety on behalf of the Business Reseller or the Company.
8. For the purposes of this Policy, a “Public Official” includes: (i) any officer or employee of a government or any department, agency or instrumentality thereof (including a government-owned or government-controlled state enterprise or a state-run facility or system) or of a public international organization, such as the United Nations or



the World Bank; (ii) any person acting in an official capacity for or on behalf of a government or government entity or of a public international organization, any political party or party official or any candidate for political office (including, for example, consultants who hold government positions, employees of companies owned or controlled by governments, civil servants, administrative and judicial officers, political candidates and members of the military). Though they are not themselves Public Officials, interactions with family members of, and others closely associated with, Public Officials are subject to the same restrictions as interactions with Public Officials.

9. Satellogic Third Party Partners and their Business Associates are **not** permitted to directly or indirectly make or offer facilitation payments. A “facilitation payment” is a nominal payment to a Public Official to secure or expedite the performance of a routine, non-discretionary governmental action. Examples of facilitation payments include payments to expedite the processing of licenses, permits or visas for which all paperwork is in order. If a Business Associate receives or becomes aware of a request or demand for a facilitation payment or bribe in connection with work for the Company, the Business Associate must report such request or demand promptly to his or her primary supervisor or the Company’s Compliance Officer before taking any further action.

Gifts, Hospitality, and Entertainment

10. In many countries, gifts, hospitality, and entertainment play an important role in legitimate and appropriate business protocols and customs. However, when provided inappropriately, gifts, hospitality, and entertainment may violate one or more laws. Therefore, the laws and this Policy must be followed.

11. All gifts, hospitality, and entertainment must be:

- Never given or accepted if any improper action is expected in return;
- Infrequent;
- Of nominal value;
- Not cash or a cash equivalent;
- Transparent and documented; and
- Legal under all applicable anti-bribery and anti-corruption laws, including applicable local laws.

12. Satellogic Third Party Partners and their Business Associates are not permitted to receive gifts, services, perks, entertainment, or other items of more than token or nominal monetary value. Moreover, gifts of nominal value are permitted only if they are received on an infrequent basis and only at appropriate gift-giving occasions.

Charitable Donations and Political Contributions

13. Contributions to political candidates or political parties, as well as donations to charitable organizations in which Public Officials possess a role (such as director or trustee), raise potential issues under applicable anti-bribery and anti-corruption laws. Accordingly, no political contributions or charitable donation may be offered or made on behalf of the Company unless pre-approved in writing by the Company’s Compliance Officer.

14. To the extent permitted by applicable law, Satellogic Third Party Partners and their Business Associates may participate in political and charitable activities with their own money and on their own time. Such activities must be undertaken in a way that makes clear to an outside observer that they are unrelated to any business of the Company.

Books and Records

15. The corporate books and records of the Business Reseller must accurately and completely reflect, in reasonable detail, the Satellogic Third Party Partner's transactions and activities, including the nature and purpose of the transaction or activity. No false, inaccurate or incomplete entry may be made in the Business Reseller's books or records for any reason.

Responsibilities in Support of This Policy

16. Compliance with this Policy is mandatory.

17. Satellogic Third Party Partners who violate this Policy are subject to termination of all commercial relationships with the Company.

18. Satellogic Third Party Partners are expected to raise concerns related to potential violations of this Policy or applicable anti-bribery and anti-corruption laws. Such reporting is encouraged. Failure to communicate in such circumstances may result in termination of the contract with the Company.



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

COMPLIANCE CERTIFICATION

The undersigned Satellogic Third Party Partner acknowledges that it has received and reviewed Satellogic’s Anti Bribery and Anti-Corruption Policy (the “*Policy*”) and fully understands that the undersigned has an obligation to fully adhere to the Policy and applicable anti-bribery and anti-corruption laws in connection with my contract with Company. In particular, the undersigned acknowledges and affirms that:

1. Neither the undersigned nor any Business Associate of the undersigned has or will:
 - a. directly or indirectly give, offer or promise to give – or accept or solicit – anything of value (including but not limited to cash payments, gifts, or donations) if the purpose is to improperly induce the recipient to take (or to refrain from taking) action that would bestow a commercial benefit or advantage on the undersigned or the Company or any other party; or
 - b. take any action that furthers or causes an unlawful or improper payment, gift, or donation; or
 - c. take any other action that would cause the undersigned or the Company to violate any applicable anti bribery and anti-corruption laws.
2. If the undersigned becomes aware of information that reasonably suggests that a violation of the Policy or any applicable anti-bribery and anti-corruption laws has occurred, the undersigned will promptly report that information to the Company.
3. The undersigned understands that any failure to comply with the Policy or any applicable anti-bribery and anti-corruption laws may result in termination of the undersigned’s contract with the Company.

Third Party Partner Name: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____