

## Satellogic Supplier Code of Conduct

Satellogic is committed to conducting business in an ethical and honest manner, and in a way that promotes corporate social and environmental responsibility. This includes responsible supplier selection by conducting business with suppliers who share Satellogic's commitment to integrity. We understand that the business practices and actions of our Suppliers may impact or reflect upon Satellogic. Therefore, Satellogic requires its suppliers (Suppliers), their employees, agents, and sub-suppliers to operate in accordance with the principles and ethical standards contained in the Supplier Code of Conduct ("Supplier Code" or "Code").

This Code sets forth detailed standards and expectations for each Supplier concerning labor and human rights, health and safety, environmental protection, business ethics, and management practices.

Satellogic Suppliers shall conduct their business activities in full compliance with the applicable laws and regulations of Uruguay, all countries in which Suppliers are operating, and any other applicable laws. Suppliers shall ensure that products, services, and shipments adhere to all applicable international trade compliance laws, rules, and regulations.

Supplier compliance with this Supplier Code will be assessed, and any violations of this Code may jeopardize the Supplier's business relationship with Satellogic. Potential consequences for violation include termination.

### DISCLAIMER

This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, Suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.

### WHO IS A SUPPLIER?

For the purposes of this Code, "Supplier" is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company's behalf, including suppliers,

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contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

### COMPLIANCE WITH LAWS & SANCTIONS

We expect our Suppliers to maintain full compliance with all applicable laws and regulations as well as United Nations sanctions.

#### Comply with Sanctions

As a condition of doing business with Satellogic, Satellogic will require each supplier to accept Satellogic's Sanctions Compliance Policy by acknowledging it via this Supplier Code of Conduct or directly via incorporation into the contract entered into between the Supplier and Satellogic.

#### Maintain Accurate Records

We expect suppliers to create and maintain accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received in furtherance of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements.

### HUMAN RIGHTS

We expect our suppliers to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and foster an inclusive and ethical culture.

#### Child Labor

We expect our suppliers to ensure that illegal child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

#### Human Trafficking

Suppliers must adhere to regulations prohibiting human trafficking, and comply with all applicable local laws in

the country or countries in which they operate. Suppliers must refrain from violating the rights of others and appropriately address any adverse human rights impacts of their operations. Suppliers must educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules, and notify the contracting manager of violations and action taken against employees. Specifically, Suppliers will be prohibited from the following in all contracts:

- Destroying, concealing, or confiscating identity or immigration documents;
- Using misleading or fraudulent tactics in recruiting;
- Charging employee recruitment fees or providing inadequate housing based on local standards, laws and directives;
- Failing to provide employment contracts and other documentation in the employee's native language; and
- Failing to interview and protect employees suspected of being trafficking victims.

## EMPLOYMENT PRACTICES

### Harassment

We expect our Suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

### Non-discrimination

Suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams.

### Fair Wages

Suppliers will pay legally-mandated wages and benefits, will comply with the law regarding wage deductions, and will provide workers with the basis on which workers are paid via pay stub or similar documentation. Suppliers are expected not to deduct from wages as a disciplinary measure.

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## Substance Abuse

We expect our Suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

## ANTI-CORRUPTION

Our Suppliers must comply with applicable anti-corruption laws (e.g., the UK Bribery Act, the U.S. Foreign Corrupt Practices Act), directives and/or regulations that govern operations in the countries in which they do business, regardless of local customs.

### Improper Payments / Business Courtesies

Our Suppliers must refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations, or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.

### Due Diligence

We expect our Suppliers to exert appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties.

### Anti-Trust

Our Suppliers must comply with anti-competition and antitrust laws and are prohibited from fixing prices, colluding or rigging bids with competitors, allocating customers or markets with competitors, or exchanging any pricing information with our competitors.

## CONFLICT OF INTEREST

We expect our Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential

conflict of interest in their dealings with our company. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of Satellogic and personal interests or those of close relatives, friends or associates.

## INFORMATION PROTECTION

### Confidential/Proprietary Information

We expect our Suppliers to properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

### Intellectual Property

We expect our Suppliers to respect and comply with all the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

### Information Security

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with all applicable data privacy laws. Suppliers shall assure extension of this requirement to all sub-tier sources they employ.

### Insider Trading

Our Suppliers must not use material, non-public information obtained in the course of business as the basis for trading or for enabling others to trade in the securities of those of any company with which they transact.

### Accessibility

Suppliers will embed relevant web accessibility standards, innovation, and best practices to deliver inclusive products and services for our users and stakeholders.

## ENVIRONMENTAL, HEALTH & SAFETY

We expect our Suppliers to operate in a manner that actively manages risk, minimizes waste, and protects the environment. In manufacturing operations, Suppliers will strive to create regenerative processes and will minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public. We expect our Suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

### Safe Work Environment

We expect our Suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

Suppliers are responsible for assuring that all workers are qualified to perform their work functions safely. Suppliers shall provide workers with appropriate workplace health and safety training in their primary language and health and safety related information shall be clearly posted in the facility.

### Environmental Permits and Reporting

Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.

### Resource Efficiency and Clean Energy

Throughout their operations, Suppliers will work to reduce consumption of resources, including raw materials, energy, and water. Suppliers will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.

## GLOBAL TRADE COMPLIANCE

## Security

When applicable, Suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

## Import

We expect our Suppliers to ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data.

## Export

We expect our Suppliers to ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, and technical data; these include the European Union Regulation 428 / 2009, the International Traffic in Arms Regulation and the Export Administration Regulations. Suppliers shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.

## Trade and Export Control

Suppliers shall comply with all trade control, export control, import and related laws and regulations, and shall incorporate international Supply Chain Security (SCS) measures into their business processes as described by the World Trade Organization's SAFE framework or similar SCS guidelines (e.g., Business Anti-Smuggling Coalition (BASC) Security Program; Customs-Trade Partnership Against Terrorism (C-TPAT); Authorized Economic Operator (AEO), and Partners in Protections. To the extent that Suppliers transport goods for Satellogic into the United States, Suppliers shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at [www.cbp.gov](http://www.cbp.gov).

## Counterfeit Parts

We expect our Suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

## ETHICS

Suppliers are expected to conduct business with integrity, mutual respect, and to uphold the highest standards of ethics and behavior in every aspect of their businesses, including relationships, practices, sourcing, and operations.

## Business Integrity

Suppliers shall not engage in, and have a zero tolerance policy regarding corruption, misrepresentation, extortion, embezzlement, kickbacks, bribery, and any other type of corrupt actions to obtain or retain business or to obtain an unfair or improper advantage. Suppliers shall abide by the UK Bribery Act, the Foreign Corrupt Practices Act (FCPA), and all applicable anti-corruption laws and regulations of the countries in which they operate. Suppliers shall implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws. Suppliers must immediately report to Satellogic any circumstance where an officer, director, employee, representative, or agent of Satellogic or any of its subsidiaries has made any improper request or demand of the Supplier that could violate any law. All business dealings, structure, financial situation, and performance should be transparently performed and accurately reflected on Suppliers' business books and records in accordance with applicable laws and regulations as well as prevailing industry business practices.

## QUALITY

Suppliers must take due care to ensure their work product meets Satellogic's quality standards. We expect our Suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.

## Gifts and Business Courtesies

Occasional small gifts or modest business entertainment provided by Suppliers or Satellogic must not be given with the intent to affect an employee's business judgment and must not give the appearance that judgment may be affected. When doing business with or conducting business on behalf of Satellogic, Suppliers



may, for legitimate business purposes: (i) offer modest gifts or entertainment to suppliers, customers or other business associates; or (ii) accept modest gifts or entertainment offered by suppliers, customers or other business associates; provided, however, that in each instance the gift or entertainment is unsolicited, is not and could not reasonably appear to be a bribe, kickback or other illegal or illicit payment, is not given in exchange for any consideration, and does not create the appearance, or an actual or implied obligation, that the gift giver is entitled to preferential treatment, an award of business, better prices or improved terms of sale.

### Identity Protection

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

### Consequences for Violating Code

In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any Supplier under the terms of the existing procurement/purchasing contract.

### Ethics and Compliance Policies

Commensurate with the size and nature of their business, we expect our Suppliers to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. This should include measures to address compliance within these standards and take appropriate action to correct identified deficiencies. We encourage our Suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

### Business Integrity

Suppliers will avoid even the appearance of conflicts of interest in their work with us, and will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with us. If Suppliers extend any

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business courtesies to our employees, they will do so infrequently and the courtesies must be of no more than moderate value. Suppliers will also accurately reflect their business dealings in their books and records. Suppliers will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Suppliers will not make illegal payments directly or indirectly. Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

### Fair Business, Advertising and Competition

Suppliers shall conduct their business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business. Further, Suppliers shall uphold standards of fair business, advertising, and competition.

## MANAGEMENT SYSTEM

Suppliers shall establish and maintain a management system that ensures compliance with this Supplier Code and applicable laws, identifies and mitigates related operational risks, and facilitates continuous improvement and prompt corrective action. The management system must be designed to ensure ongoing compliance with applicable laws, regulations, requirements related to Supplier operations and products; as well as conformance with this Supplier Code of Conduct evidenced by documentation and records. Suppliers must ensure that this Code is appropriately communicated to all of its officers, directors, employees, representatives, agents, and sub-suppliers.

## GUIDANCE AND REPORTING

Suppliers shall promptly report questionable behavior, concerns, or potential or actual violations of this Supplier Code upon learning of same, and implement a corrective action plan to cure the non-compliance within a specified time period. Satellogic will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or



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has reported questionable behavior or suspected violations of this Supplier Code.

Suppliers are to promptly respond to requests for information from Satellogic, or an authorized third party working on Satellogic's behalf, regarding matters covered by this Supplier Code. Violations of this Supplier Code will require the prompt establishment of corrective action plans or training. Failure to meet the corrective action plan may affect Supplier's standing with Satellogic, may lead to disqualification from future opportunities with Satellogic and may result in the termination of the Satellogic's business relationship with Supplier. Satellogic reserves the right to hold Suppliers responsible for reasonable costs of investigating non-compliance and appropriate remediation resulting from a Supplier's non-compliance.

This Supplier Code of Conduct is intended to facilitate improved communications by informing current and potential Suppliers of Satellogic's standards, and ethical expectations of our Suppliers. Suppliers with questions regarding this Code should contact Satellogic's Compliance Department at [compliance@Satellogic.com](mailto:compliance@Satellogic.com).