

Supplier Code of Conduct

Axiom Space is an organization with strong values of Integrity, Innovation, Leadership and Togetherness. Our Supplier Code of Conduct contains general guidelines for conducting business with the highest standards of ethics. It is what Axiom Space expects of all its suppliers.

This Supplier Code of Conduct articulates Axiom Space, Inc.'s ("Axiom") expectations of the conduct of suppliers and business partners doing business with Axiom ("suppliers"). Suppliers are expected to understand and act consistent with Axiom's approach to integrity, responsible sourcing, and supply chain management. Axiom expects that its suppliers will cascade similar expectations through flow-down contractual provisions in their own supply chains.

As a result, all suppliers of goods and services to Axiom ("suppliers") and the Axiom employees who work with them are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to our company's stature to maintain high ethical standards by adhering to all applicable laws and avoiding even the perception of impropriety or conflict of interest. We expect suppliers of goods and services to Axiom to maintain the same high standards of business ethics by adhering to all laws and avoiding the appearance of impropriety or conflict of interest.

It is Axiom's policy to cooperate fully with governmental and regulatory authorities in investigating possible violations of applicable laws and regulations. If appropriate, Axiom will assist authorities in the prosecution of persons who engage in illegal conduct. Without limitation, suppliers of goods and services to Axiom, as well as any subsidiary, affiliated and/or member entities supplying goods and services to Axiom, are expected to observe and comply with the following:

HUMAN RIGHTS

Forced Labor

Suppliers will not use slave, prisoner or any other form of forced or involuntary labor. Suppliers must take reasonable measures to ensure that all their employees understand the terms of their employment.

Child Labor

Suppliers will not use child labor. Axiom has a zero-tolerance policy regarding the employment of children where the age of employment is not in accordance with applicable laws.

Trafficking in Persons

Suppliers will not engage, directly or indirectly, in human trafficking. Axiom prohibits human trafficking abuses.

Conditions of Employment

Suppliers will comply with applicable laws regulating work hours, wages and benefits. Employees must be paid in a timely fashion that meets or exceeds legal minimum standards.

Labor Brokers

If necessary for a supplier to use a labor broker, the supplier will ensure the broker employs ethical recruitment practices, complies with applicable laws, and does not withhold identity documents.

Harassment & Discrimination

Suppliers will not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. Harassment or discrimination of any kind will not be tolerated.

Freedom of Association and Collective Bargaining

Suppliers will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining.

WORKPLACE HEALTH & SAFETY

Suppliers will provide clean, healthy and safe environments for their employees that meet or exceed legal standards. Suppliers will have safety procedures for their employees and tracking tools that drive to a goal of zero workplace safety incidents. Supplier employees will have the right to refuse work and report any conditions that do not meet these criteria.

ENVIRONMENT

Continuous Improvement

Suppliers will increase efficiency throughout their companies and take measures to reduce their carbon footprint, energy use, water use, wastes, and other emissions. Over time, Axiom expects suppliers will establish targets and be transparent in their progress toward their targets.

Responsible Stewardship

Suppliers will look to conserve resources and protect the communities and environment that surround them. Axiom encourages its suppliers to develop and diffuse environmentally friendly technologies and to increase the use of renewable energies.

BUSINESS INTEGRITY

Anti-Corruption/Anti-Bribery

Suppliers will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties.

Ethical Behavior

Suppliers will avoid conflicts of interest (including in supporting Government contracts the avoidance of unequal access to information, biased procurement ground rule setting and impaired objectivity). Suppliers will also operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to: anti-competitive business practices, respect for and protection of intellectual property, company and personal data (though proper non-disclosure agreement execution), export controls (e.g., providing relevant export control classifications) and economic sanctions (i.e., conducting appropriate screening of the supplier's own business partners).

Reporting and Non-Retaliation

Suppliers will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation. Suppliers will also appropriately investigate reports and take corrective action, if needed. Suppliers will prohibit retaliation.

Acceptable Use

Supplier warrants that its I.T. systems (hardware, software & peripherals) meet Axiom's Acceptable Use Policy at www.axiomspace.com/suppliers. In the case of a cybersecurity incident, Supplier shall without undue delay and, where feasible, not later than thirty-six hours after having become aware of it, notify Axiom Space, Inc. at AXM-SOC@axiomspace.com. At the completion of the contract, Supplier shall promptly return all Axiom IT resources provided to them.

Stakeholder Engagement

Suppliers will communicate these or substantially similar codes to their suppliers and subcontractors. Suppliers will continuously improve their sustainability and stakeholder engagement progress. Axiom also encourages suppliers to work closely with local communities to implement projects and strategies that improve the community and those who live there.

Suppliers will develop and implement appropriate internal business processes and policies to ensure compliance with applicable law and this Supplier Code of Conduct. Suppliers will be able to demonstrate compliance with this Code upon our request and will take any action to correct any non-compliance.

Reporting Integrity Concerns to Axiom

Subject to any restriction posed by law, suppliers will promptly inform Axiom of any concern related to issues governed by this Supplier Code of Conduct. Axiom policy prohibits retaliation against any person reporting such a concern. To report a concern, suppliers can always speak directly to their Axiom representative. In addition, the Axiom Aware Line allows employees, contractors, suppliers and others to report concerns of misconduct affecting Axiom to an anonymous reporting system. Individuals can file a report 24 hours a day, 7 days a week by phone, web, or email. Dial toll-free, within the United States, Guam and Puerto Rico and Canada:

Individuals filing reports on the Axiom Aware Line can remain anonymous, as permitted by law. The regional link to access information for the Axiom Aware Line.

URL: <https://www.lighthouse-services.com/axiomspace>

Axiom Space Hotline numbers: English 1-833-214-1174, or Spanish 1-800-216-1288.

Declaration

As indicated by the authorized signature below of an officer of the Supplier Company, Supplier fully understands and agrees to adhere to these principles set forth in the Axiom Space Supplier Code of Conduct. Axiom may at its discretion request that the Supplier re-sign the Supplier Code of Conduct following material changes in the Supplier's organization or three (3) years after previous Supplier Executive signature.

Supplier Name: _____

Signature: _____

Company Address: _____

Title: _____

Date: _____
