

# Code of Ethics and Business Conduct

## Foreword

At Solenix, our work reaches far beyond individual projects or contracts. As a company operating in the space sector, we are entrusted with responsibilities that demand the highest standards of integrity, professionalism, and accountability. Our customers, partners, and society rely on us not only for technical excellence, but also for ethical conduct in everything we do.

Our company values - **Creating Value Together, Being a Trusted Partner, Driving Sustainable Business, and Embracing Our Greater Responsibility** - are not abstract principles. They shape how we work, how we make decisions, and how we interact with one another and with the world around us. This Code of Ethics and Business Conduct translates these values into clear expectations and practical standards for daily behaviour and decision-making.

Solenix has built a strong reputation as a reliable and trusted partner, known for integrity, quality, and accountability. This reputation is one of our most valuable assets. It has been earned through consistent behaviour over many years, and it must be protected every day and by every one of us. Maintaining this trust requires more than compliance with laws and regulations; it requires personal responsibility, sound judgement, and the willingness to act in line with our values, even when under pressure.

Ethical conduct and business performance are inseparable. Long-term success, operational excellence, and sustainable growth depend on how we lead, how we collaborate, and how we take responsibility for our actions. Leadership at all levels means setting the right example, fostering open dialogue, and addressing concerns proactively. High performance at Solenix includes *how* results are achieved, not only *what* is delivered.

This Code of Ethics and Business Conduct applies to **all Solenix companies** and to everyone working for or on behalf of them, without exception. As CEO, I am personally committed to these principles and hold myself to the same standards described in this document. I expect the same commitment from every manager, employee, supplier, and business partner across the Solenix Group.

I encourage you to read this code carefully, to use it as guidance whenever you face difficult decisions, and to speak up if you observe something that concerns you. Acting with integrity is a shared responsibility and a fundamental part of our culture, our performance, and our future.



Alex Baumgartner  
Chief Executive Officer

## Purpose and Scope

The space industry demands the highest levels of integrity, precision, and responsibility. Our work contributes to scientific discoveries, climate monitoring, and technological advancement that benefits society. With this privilege comes the responsibility to maintain exceptional ethical standards in everything we do.

Solenix's Code of Ethics and Business Conduct reflects who we are, guides how we work, and defines the standards we uphold as we pursue our mission:

**As experts in our fields, we offer innovative engineering and trusted services to accelerate our customers' journeys in space and on ground.**

Our values are the ethical foundation of our mission. They guide every aspect of our work and provide the foundation for all the standards detailed in this code. When facing difficult decisions, we return to these values to ensure our actions align with who we are and who we aspire to be.

### We Create Value Together

We recognise that our people are the single most important element of our company. We seek individuals with exceptional technical and interpersonal skills who contribute their best to help our organisation thrive.

### We Are a Trusted Partner

We listen to our customers' needs and understand the context and value of our work. We strive to deliver exceptional quality, take ownership of our responsibilities, and apply solution-oriented approaches to all our collaborations.

### We Drive Sustainable Business

We balance financial success with investing in our future, creating an engaging workplace, and building long-term value. We prioritise sustainable practices over short-term gains and continuously improve our operations.

### We Embrace Our Greater Responsibility

As a member of society and the space community, we are committed to making a positive, lasting impact. We are socially responsible, support education and development, manage resources thoughtfully, and seek purposeful work that benefits the greater good.

This code is structured in two parts:

- **Part A: Ethical Principles**

These fundamental principles apply to our company and guide our expectations for suppliers and business partners. They reflect our commitment to ethical business practices and responsible operations.

- **Part B: Internal Conduct Standards**

These conduct standards apply specifically to our employees. They provide practical guidance for daily operations and decision-making within our organisation.

Together, these parts ensure we maintain exceptional ethical standards while meeting the compliance requirements essential for space industry leadership and maintaining the trust placed in us by customers, business partners, and society.

## Part A: Ethical Principles

*Applicable to our employees, suppliers, and business partners.*

### Legal Compliance and Regulatory Adherence

**We operate with full compliance to all applicable laws and regulations in every jurisdiction where we conduct business.**

Core Behaviours:

- Respect for national and international laws, including employment, environmental, and business regulations.
- Adherence to export control laws and regulations, including national and EU requirements.
- Compliance with sanctions and embargoes legislation.
- Implementation of organisational models for preventing corporate crimes.

### Human Rights and Workplace Standards

**We respect fundamental human rights and maintain safe, fair working environments that protect the dignity and well-being of all people.**

Core Behaviours:

- Respect for human dignity and fundamental rights in all interactions.
- Equal opportunities and fair treatment regardless of race, gender, age, religion, nationality, sexual orientation, or other personal characteristics.
- Zero tolerance for modern slavery, forced labor, or child labor.
- Implementation of appropriate health and safety measures, training, and equipment in the workplace.
- Promotion of respectful, open, and honest communications in all relationships.

### Integrity, Honesty and Loyalty

**We conduct business with integrity and honesty in all our actions, maintaining zero tolerance for corruption in any form while demonstrating loyalty to our commitments.**

Core Behaviours:

- Act consistently with our stated values and ethical principles in all situations.
- Honor our commitments to Solenix and our customers while avoiding conflicts of interest.
- Compete fairly and honestly without anti-competitive practices such as price-fixing or market manipulation.
- Never offer, promise, give, or accept bribes, facilitation payments, or improper benefits.
- Ensure accurate and truthful documentation, reporting, and communications.

## Information Security and Data Protection

**We protect all forms of information - personal data, confidential business information, and classified materials - with security and privacy measures that meet or exceed recognised industry standards.**

Core Behaviours:

- Compliance with data protection regulations including GDPR (EU), FADP (Switzerland), and other applicable privacy laws.
- Implementation of robust cybersecurity measures to protect systems and information from threats.
- Proper classification, handling, and storage of confidential, proprietary, and personal information.
- Respect for intellectual property rights and confidentiality obligations.
- Immediate reporting of any security incidents, data breaches, or potential violations.

## Environmental and Social Responsibility

**We operate with consideration for our environmental impact and contribute positively to society.**

Core Behaviours:

- Minimisation of environmental impact through responsible resource management.
- Contribution to scientific advancement and societal benefit through our work.
- Support for sustainable practices and environmental stewardship.
- Commitment to ethical sourcing and responsible business relationships.
- Responsible development of AI and emerging technologies with consideration for environmental and societal impact.

## Accountability and Reporting

**We maintain open communication channels and expect concerns to be raised and addressed appropriately.**

Core Behaviours:

- Provision of multiple channels for reporting concerns or violations.
- Protection from retaliation for individuals who raise concerns in good faith.
- Prompt and fair investigation of all reported issues.
- Commitment to continuous improvement in business practices.

## Supplier and Partner Expectations

We expect our suppliers, business partners, and subcontractors to uphold the Core Ethical Principles outlined in Part A of this code, either by adopting these principles directly or by maintaining their own code of conduct that addresses the same fundamental areas.

We require transparency about ethical standards and reserve the right to assess compliance through due diligence and ongoing monitoring.

## Part B: Internal Conduct Standards

*Applicable to our employees.*

### Excellence Through People

We contribute to an environment where everyone can thrive professionally while working towards our shared mission.

#### Professional Development and Learning

- Engage in continuous learning through available training programs, conferences, and skill-building opportunities.
- Strive to balance project planning with professional development needs.
- Participate constructively in regular feedback and career development discussions.

#### Inclusive and Respectful Workplace

- Apply fair and non-discriminatory hiring practices.
- Support efforts to build diverse teams including encouraging applications from underrepresented groups where appropriate.
- Do not participate in or tolerate discrimination, harassment, or behaviour that undermines individual dignity.
- Respect and consider diverse perspectives that contribute to innovation and problem-solving.
- Communicate and collaborate respectfully across all levels and locations.

#### Work-Life Balance and Flexibility

- Manage work responsibly, recognising that sustainable work practices support both personal well-being and professional effectiveness.
- Where flexible work arrangements are available, use them responsibly and in line with team and business needs.
- Respect agreed working hours, time off and healthy boundaries.

### Business Integrity and Compliance

We maintain the highest level of integrity in all business activities and ensure compliance with internal policies and procedures.

#### Regulatory and Professional Standards

- Comply with employment, tax, and business laws applicable to your role and location.
- Stay informed of legal and regulatory requirements relevant to your responsibilities.
- Maintain professional certifications required for your role and follow applicable technical standards.
- Where relevant for your role, participate in industry initiatives that promote responsible technology development.
- Escalate legal uncertainties or conflicts to management or the appropriate internal function.

## Accurate Records and Documentation

- Maintain truthful and accurate records in all communications and documentation.
- Ensure project reports, financial records, timesheets, and expense reports properly reflect actual transactions.
- Avoid false or misleading statements in any business context.

## Responsible Use of Company and Customer Resources:

- Use physical assets, financial resources, and budgets responsibly and only for legitimate business purposes.
- Exercise cost-consciousness when using company or customer-provided resources, including travel budgets.

## Conflicts of Interest

- Avoid situations where personal interests could conflict with professional duties or company interests, such as financial interests, personal relationships, or outside activities that could compromise objectivity.
- Disclose potential conflicts promptly to management to ensure a transparent resolution.

## Gifts and Business Courtesies

- Compete on the merit of our products and services without improper influence.
- Exercise caution with gifts, entertainment, or benefits that could influence business decisions.
- Never offer or accept cash or cash equivalents.
- Ensure any business courtesy is reasonable, legal, and consistent with industry practices.

# Responsible Technology Development and Operations

We consider the broader implications of our work and operate with environmental and social responsibility.

## Technology Ethics

- Develop AI and other technology solutions that are reliable, secure, and beneficial to society.
- Ensure transparency, fairness, and bias prevention in AI systems.
- Consider environmental impact including energy consumption of computational processes.
- Implement privacy and security by design principles in our operations and technology development.

## Environmental and Social Responsibility

- Reduce energy consumption and waste in your day-to-day work and business travel decisions.
- Support sustainable procurement practices; reuse and recycle where possible.
- Seek opportunities to apply your expertise for positive societal impact.

## Supply Chain and Business Partner Relations

**We extend our ethical standards throughout our business network and maintain responsible partnerships.**

### Partner Selection and Collaboration

- Select suppliers and business partners based on technical, quality, ethical, environmental, and other relevant requirements.
- Conduct appropriate due diligence to ensure partners align with our values.
- Communicate our expectations clearly and provide guidance for meeting our standards.
- Monitor compliance through regular assessments and ongoing dialogue.

### Collaborative Improvement

- Work together with partners to address issues and support improvement efforts.
- Share best practices and encourage ethical advancement throughout the supply chain.
- Terminate relationships when partners fail to meet standards or show unwillingness to improve.

## Digital Conduct and Online Presence

**We maintain professional standards in all digital communications and online activities that could reflect on our organisation.**

### Professional Digital Communication

- Maintain professional tone and courtesy in all electronic communications.
- Protect confidential information in emails, messaging, and file sharing.
- Follow cybersecurity protocols for password management and secure communication.
- Report suspicious digital activities or potential security incidents promptly.

### Social Media and Public Communications

- Exercise caution when discussing work-related topics on social media or public platforms.
- Obtain appropriate approvals before sharing information about projects, customers, or business partners.
- Respect confidentiality agreements when posting about work activities or milestones.
- Ensure personal opinions are clearly distinguished from company positions.

## Accountability and Improvement

We foster a culture of continuous improvement and provide systems that support ethical decision-making and reporting.

### Training and Continuous Improvement

- Participate in required training on this code and related policies.
- Stay up to date with updates and reminders about ethical standards.
- Provide feedback on strengthening our ethical practices.

### Speaking Up and Reporting Concerns

- Speak up when observing behaviour that may violate this code or applicable laws.
- Use the available reporting channels responsibly:
  - direct communication with managers, HR, and the Management Team;
  - feedback forms, also anonymous;
  - independent [whistleblowing](#) reporting mechanism.
- Protect individuals who raise concerns in good faith from retaliation.
- Treat all reports seriously and confidentially to the extent possible.

### Investigation and Response

- Cooperate fully and honestly with investigations.
- Implement corrective actions when assigned.
- Respect confidentiality of investigation processes and outcomes.

### Acknowledgment

- Acknowledge your understanding and commitment to this code.

Violations of this code may result in disciplinary action up to and including termination of employment or business relationships. The specific consequences depend on factors such as the nature and severity of the violation, the individual's response and cooperation, and their track record.

## Governance

### Roles and Responsibilities

The CEO is responsible for the issuance of this code. Managers are responsible for promoting adherence to this code within their line of management and reporting concerns appropriately.

### Reporting and Investigation

Concerns can be raised through the channels listed under "[Speaking Up and Reporting Concerns](#)."

All reported concerns shall be investigated promptly, thoroughly, and fairly. Material violations and investigations are handled by the CEO in coordination with appropriate functional leads (HR, IT, Data Protection, division and office heads, etc., depending on the nature of the concern).

### Response and Corrective Actions

When violations are confirmed, appropriate corrective actions are taken, which may include training, process improvements, or disciplinary measures up to and including termination.

Outcomes shall be communicated appropriately while respecting privacy and confidentiality requirements. Disciplinary measures shall be applied consistently and fairly across the organization.

### Review and Legal Framework

This Code of Ethics and Business Conduct is effective as of 05.02.2026 and will be reviewed annually to ensure it remains relevant and effective.

Please be aware that in cases where a specific clause in this Code of Ethics and Business Conduct is not consistent with local laws, the local law takes precedence.