



We. Create. Space.



OH B SE

SUPPLIER CODE OF CONDUCT

Supplier Code of Conduct

Content

Portrait	1
1. Compliance with Laws, Rules and Legal Regulations	2
2. Human Rights	
2.2.1. Fairness, Tolerance and Equal Opportunities	2
2.2. Child Labor	3
2.3. Force and Unfair Labor	3
3. Health and Safety Standards	3
4. Anti-Corruption	4
4.1. Anti-Trust, Fraud and Deception	4
4.2. Illegal Payments	4
4.3. Insider Trading	4
5. Information Protection	5
6. Export and Import	5
7. Counterfeit Parts	5
8. Conflict Mineral	6
9. Sustainability	6
10. Ethical Expectations	6
11. Compliance with the Supplier Code of Conduct	7
General Disclaimer	8
Main references	9

Portrait

For those working for OHB SE (in the following “OHB”), corporate responsibility is not just another catchphrase but also a core principle that has guided us. We have grown from a business founded on family values into one of the three leading space companies in Europe and an important independent force in European aviation and aerospace.

Being highly valued and maintaining the appreciation of our customers, investors and employees, as well as that of our competitors and the community relies on the specific behaviour of every single person who is connected to OHB and its affiliates. Giving ourselves a strict set of ethical values to guide business dealings in the highest standards is just the start. We believe that part of our long term corporate success is the relationship to our suppliers, one founded on mutual trust and respect. Therefore, we expect all suppliers who do business with OHB to uphold our own ethical values and compliance responsibilities by acting with the same fairness in all aspects of their own business practices and by monitoring these principles throughout their own supply chain.

For this reason, OHB enforces this Supplier Code of Conduct, which reflects basic principles also laid down in the guidelines of OHB’s Code of Conduct⁽¹⁾ and contains the minimum standards that OHB expects from its suppliers.

⁽¹⁾ OHB’s Code of Conduct: <http://www.ohb.de/investor-relations/corporate-governance/code-of-conduct.html>.

Supplier Code of Conduct

1. Compliance with Laws, Rules and Legal Regulations

Every supplier is obliged to comply with all applicable laws, rules and legal regulation in each country where operations are managed or where services are provided. Our suppliers are also expected to implement and maintain a system to ensure compliance with such laws, rules and legal regulations, covering both their own operation and that of their supply chain.

Furthermore, we encourage suppliers to go beyond basic legal compliance and to enforce compulsory regulations on human rights, labour standards and anti-corruption measures.^[2]

2. Human Rights

Our suppliers must observe the basic human rights set forth in the Universal Declaration of Human Rights of the United Nations^[3] and are expected to address any violation of human rights associated with any operation of OHB.

2.1. Fairness, Tolerance and Equal Opportunity

Suppliers shall provide equal employment opportunity and fair working conditions to all their employees and applicants and should act without any kind of discrimination on the grounds of nationality, culture, religion, ethnic origin, sex, sexual orientation or age.

^[2] For example the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at work and the United Nations Convention Against Corruption.

^[3] Declaration of Human Rights of the UN: <http://www.un.org/en/universal-declaration-human-rights/>.

2.2. Child Labour

We expect all of our suppliers to expressly prohibit any kind of child labour within their organization or within any of their supply chain.

The term “child” herein refers to any person under the minimum legal age for employment applicable within the country of the supplier. This legal age must also conform to the minimum working ages specified by the International Labour Organization (ILO)^[4].

2.3. Forced Labour

Suppliers must prohibit human trafficking or any other kind of forced labour and ensure that minimum standards of employment law are enforced. The prohibition of unfair labour practices applies especially to unreasonable wages, disproportionate working hours and to freedom of association.

3. Health and Safety Standards

We expect all of our suppliers to enforce fair and safe working conditions and ensure compliance with all applicable local law and furthermore, to promote good health and safety standards as a fundamental principle. We demand that our suppliers create an employment environment that is free from any physical, psychological, verbal or any other form of abusive conduct and to implement a high standard of occupational health and safety. All suppliers are expected to provide a safe working environment for all employees that strives to prevent accidents and minimizes health risks as much as possible (for example in accordance with OHSAS 18001, which is based on ISO 9001 and ISO 14001, or any national equivalent).

^[4] C138 - Minimum Age Convention, 1973 (No. 138). Art.2 No. 4 and 5 of this Convention declares a minimum age of at least 14 years if the country is insufficiently developed.

4. Anti-Corruption Policies

To maintain a fair competitive working environment, suppliers must comply with all applicable laws and regulations addressing corrupt practices - for example anti-trust laws, trade practice laws and all other laws, rules and regulations dealing with unfair competition practices. More specifically, the United Nations and Organization for Economic Co-Operation and Development (OECD) convention against corruption is the most important law in relation to foreign corrupt practices and must be actively enforced. Furthermore, all suppliers are expected to apply due diligence to prevent and detect any corruption in business arrangements. OHB will not knowingly conduct business with any supplier who has been suspected of corruption or any related crime.

4.1. Anti-Trust, Fraud and Deception

We expect our suppliers to act fairly and with integrity in their competition for market share. Suppliers shall neither engage nor tolerate any form of corruption, bribery, theft, fraud, deception or extortion including any payment or other benefit for the purpose of influencing the decision-making process whether or not in violation of any applicable laws. Suppliers must also refrain from participating in a cartel.

4.2. Illegal Payments

Our suppliers are expressly expected never to offer, grant, demand or accept any bribes, payoffs, kickbacks, incentives, gifts, favours or any other benefit from any person or organisation for business opportunities with or in any other way related to the business operations of OHB.

4.3. Insider Trading

Suppliers are expressly prohibited from trading information or using any material or non-publicly disclosed information gained by virtue of business activities with OHB as the basis for shares acquisition or to enable others to trade with stocks

or securities of OHB. The term ‘insider trading’ refers to such practices of using specific information not publicly known and related to a company of the OHB Group as a way of influencing the stock exchange or market price, if they were published.

5. Information Protection

All sensitive information must be properly handled. Therefore, all suppliers must comply with all applicable laws governing intellectual property rights, protection against disclosure, patents, copyrights, trademarks and any other proprietary know-how. Moreover, suppliers must protect and secure any business information of OHB in strict confidence and should not improperly use or disclose such information to third parties, unless an explicit authorization from the disclosing party is given. A high standard of data integrity and of technical safeguards against any unauthorized access must be guaranteed.

6. Export and Import Control

We expect that our suppliers ensure that their business practices are in full accordance with all applicable laws and regulations governing the export and import of know-how, services, components and related technical data.

7. Counterfeit Parts

Suppliers must put in place and maintain effective methods to minimize the risk of introducing counterfeit parts or materials into deliverable products. Notification of any suspected counterfeit product(s) should be made as soon as possible. Suppliers are expected to conduct their business and provide their services in a truthful and transparent way.

Supplier Code of Conduct

8. Conflict Mineral

We expect our suppliers to take steps to determine if their products contain any “Conflict Minerals” and if so, to implement supply chain due diligence processes to identify the sources of these minerals. Our suppliers support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in conflict-torn areas and war zones.

9. Sustainability

Our suppliers must comply with all applicable laws and regulations on environmental protection and should preserve resources and protect the environment as much as possible. Suppliers are expected to establish and maintain a suitable environmental management system (such as ISO 14001 or equivalent) in order to minimize their environmental impact.

10. Ethical Expectations

We expect our suppliers to always compete in a fair and ethical manner and to take decisions based only on objective business criteria (no personal, family or financially questionable criteria). In support of that, every supplier must keep all internally or externally produced records accurate and truthful. Suppliers should also strive to foster a professional climate in which their employees feel encouraged to raise and address any legal or ethical issues without fear of punitive action or retaliation.

11. Compliance with this Supplier Code of Conduct

Our suppliers are strongly encouraged to implement their own written code of conduct and to establish a management system to support compliance with all applicable laws and regulations. To clarify any issues related to this Supplier Code of Conduct, the supplier should contact OH B.

Violations of this Supplier Code of Conduct may result in detrimental consequences for the relationship between the OH B SE and the supplier. The supplier is therefore strongly encouraged to immediately report and – as far as possible - correct any observed violations or questionable issues.

Supplier Code of Conduct

General Disclaimer

This Supplier Code of Conduct is in no way intended to conflict with or modify the conditions of any existing contract. In the unlikely event of a conflict, the Supplier Code of Conduct is secondary to any contract terms.

Main References

- OHB's Code of Conduct
<http://www.ohb.de/investor-relations/corporate-governance/code-of-conduct.html>
- United Nations Global Compact
www.unglobalcompact.org
- Universal Declaration of Human Rights
www.un.org/en/rights
- International Labour Standards (ILO)
www.ilo.org/global/standards/lang--len/index.htm
- United Nations Convention against Corruption
<http://www.unodc.org/unodc/en/treaties/CAC/index.html>
- OECD convention against corruption
<http://www.anticorruption.ie/en/ACJS/Pages/WP08000004>
- OHSAS 18001 Healthy & Safety Standard
www.ohsas-18001-occupational-health-and-safety.com
- International Organization for Standardization (ISO)
www.iso.org

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About OHB SE

Domiciled in Bremen, OHB SE is Germany's first listed space and technology company. Two business units offer international customers sophisticated solutions and systems.

With over 37 years of experience in high technology together with its integrated skills in the areas of space technology and telematics, OHB Group is ideally positioned as one of the leading independent forces in the European space, aeronautics and telematics industry.

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