



Code of Conduct 2024

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Starion Group develops and delivers tailored system engineering services and solutions for space, defence and other critical infrastructures across Europe. Regardless of location, it is essential for our directors, employees and consultants to have a deep understanding of our goals and how we pursue them.

Introduction letter from Emmanuel Adant

The Starion Code of Conduct presents a set of core values and principles that guides our collective working approach. It is our commitment to operate to the highest standards of integrity: this defines our actions, which are key to our success within a legal framework. Additionally, it serves as a reference point for all policies and guidelines that explore specific issues within our business practices.

Starion's Code of Conduct establishes the foundation for numerous aspects of our operations, including the development of business strategies and employee recruitment. By embedding this Code into our working practices, Starion ensures that everything we say and do aligns with our company vision, mission and values, thus upholding our integrity, relationships and reputation.

This Code came into effect in April 2024 and is applicable to all staff, encompassing full-time, part-time, contracted and temporary employees, regardless of their level, in all countries where Starion operates. The Board of Directors kindly request that you allocate time to read and thoroughly comprehend this Code, and we encourage your commitment to implementing it in every aspect of your business-as-usual practices, within and across our entire business activities.

We appreciate your cooperation.



Emmanuel Adant

Managing Director

1 Our mission, values and guiding principles

At Starion, our mission, vision and values guide our delivery of engineering services and tailored technologies, bolstering societal resilience and fostering strong customer relationships.

Starion is a privately owned company, headquartered in Belgium. One of two sister companies formed in 2024 through a partial demerger of RHEA Group, Starion has three decades of heritage as a system engineering and services company focussed on the space industry. We pride ourselves in delivering the highest quality services to meet or exceed the needs of clients in the space sector, defence and other critical infrastructures.

2 Building partnerships: engagements and collaborations

The principles by which Starion values and respects its employees and contractors, serving as the guiding beliefs, are encapsulated within the following categories:

Recruitment: We aim to recruit individuals who share our vision and values, aligning with our mission for success. We comply with all relevant employment laws and regulations in all countries of operation.

Equality and diversity commitment: We are dedicated to fostering and sustaining a culture of equality and diversity. As a minimum, we strive to meet and uphold the legal standards in each country where we operate.

Respect: We highly value the knowledge, skills and experiences that each individual contributes to our organisation. We actively involve our employees in developing our culture and practices to leverage their utmost potential in their roles.

Work environment: We strive to create a stimulating and enjoyable workplace where individuals can realise their full potential.

Dignity and respect: Our employees and contractors are treated with dignity and respect, and we are dedicated to maintaining a discrimination-free, harassment-free and victimisation-free environment.

Privacy and work-life balance: We respect our employees' privacy and their right to a fulfilling life outside of work.

Modern slavery and human trafficking: We are committed to actively opposing and preventing modern slavery and human trafficking in all its forms. We expect the same commitment from our employees, contractors, suppliers and business partners.

Compensation: Employees and contractors can expect fair remuneration for their work. The EU regulations regarding pay transparency – which aims to establish equal pay for equal work between men and women – aligns with our shared values of eliminating pay discrimination and narrowing the gender pay gap.

3 Collaborative business partners and suppliers in our network

When selecting suppliers, business partners and any organisation or individual with whom we engage in business, we prioritise competence and reliability. We highly regard our relationships with suppliers

and other business partners, striving to foster trust and transparency, as well as open and dependable working relationships.

4 Operational framework and practices

4.1 Ethical practices

We diligently adhere to the laws and regulations of each country in which we operate. Below are various ethical practices that we are expected to uphold in our work.

- A conflict of interest may arise for directors, employees and consultants if their loyalties are divided between Starion's interests and their own. This also applies if they receive personal benefits from actions or decisions made in their official Starion capacity. We expect all individuals to disclose any potential conflicts.
- As individuals, we refrain from engaging in any activity or business that directly or indirectly competes with Starion, or from utilising knowledge gained within employment to assist others in competing with us or undermining Starion's work.
- Engaging in anti-competitive practices, such as price fixing or collusion with competitors, is strictly prohibited.
- Giving or receiving bribes, or offering gifts with the intention to influence, is strictly prohibited, irrespective of local business customs. This policy extends to interactions with current or prospective suppliers, authors, business partners, customers, government officials and any other parties.
- We abstain from making personal investments that might affect our business judgement. For instance, we should not have personal interests in companies that compete with, or do business with Starion, unless we have disclosed this interest to the Legal Department, and they have approved it.
- We refrain from doing business on behalf of Starion with an individual or entity with which we, or a close family member, has a personal interest, unless we have disclosed the potential conflict of interest to our line manager, and they have approved it.
- We treat Starion property with respect, and we make sure that it is not used for personal purposes unless in the event of an exceptional, authorised circumstance.

We have several policies in place, including the 'Conflict-of-Interest Policy' and the 'Bribery and Fraud Policy', which offer more comprehensive insights into our approach. Additionally, there are local policies, such as the 'Gifts and Hospitality Policy', that all staff must read and understand. All our policies can be located on Starion's Information Management System (IMS).

4.2 Our customers

We highly value the trust and confidence our customers place in us, committing to transparent, honest and reliable communications.

Our response to customer inquiries is consistently professional and courteous, adhering to appropriate response times.

Customer feedback is welcomed, and we strive to utilise this information for continuous service improvement.

Our product information, advertising and all communication materials consistently aim to adhere to the highest standards of clarity, accuracy and truthfulness. We are committed to compliance with laws and regulations related to advertising, which can vary by country. These laws encompass a range of areas, including truth in advertising, intellectual property, privacy, antitrust, environmental advertising laws and media-specific regulations.

4.3 Intellectual property

Starion's intellectual property, including trademarks, design rights, copyrights, proprietary information and trade secrets, must be safeguarded at all times. Our usage of Starion's logo and other brand marks is guided by Starion's Corporate Branding Guidelines. We extend our respect for intellectual property worldwide, including that of our suppliers and organisations we collaborate with in our business operations.

4.4 Our records and data

We are committed to full compliance with data protection laws, including the General Data Protection Regulation (GDPR). Protecting the security and privacy of information is integral to our operations. Our comprehensive approach includes stringent data protection policies and procedures, obtaining explicit consent when required, ensuring individuals' rights over their data and implementing mechanisms for timely data breach reporting. We also work diligently to adhere to GDPR's strict requirements for processing personal data.

We are dedicated to the rigorous adherence to laws and regulations governing financial records and reporting. In our commitment to upholding the integrity of our financial records, we follow several key principles, such as Generally Accepted Accounting Principles (GAAP) and International Financial Reporting Standards (IFRS), Tax Compliance: Data Protection and Privacy Laws.

We comply with Anti-Money Laundering (AML) obligations and regulations, maintain records and report any suspicious financial transactions in order to help prevent financial crimes.

We are deeply committed to financial records and reporting compliance, encompassing data protection, adherence to operational and financial policies, and the prevention of false or misleading entries. In this commitment, we rigorously follow data protection laws like GDPR to safeguard individual privacy. We place a high value on financial integrity and unwaveringly maintain accurate, transparent and lawful financial records.

4.5 Confidentiality

We uphold the confidentiality of Starion's strategic plans and information, sharing them with external parties only when necessary and authorised. Under no circumstances do we disclose this information for personal or third-party gain.

In the event of a media or external inquiry about Starion that is unrelated to our products or appears unusual, we promptly direct it to the Starion Marketing and Communications Department. We do not respond independently unless expressly directed by a member of our Board or the Starion Marketing and Communications Department.

For further guidance on intellectual property, data protection and confidentiality, please contact the Starion Legal Department.

4.6 Our Environmental Social and Governance (ESG) responsibilities

At the core of our business, we embrace the principles of Environmental, Social and Governance (ESG) with unwavering dedication. In our pursuit of environmental responsibility, we conscientiously work to minimise our operational impact on the environment by consistently exploring opportunities to reduce our carbon footprint and promoting sustainability in all our operations.

On the social front, Starion champions universal human rights, including equal employment opportunities, safe workplaces, freedom of speech, the right to association and access to education for all. We stand firmly against illegal or inhumane labour practices and extend these high standards to our suppliers and partners. Within our own organisation, we foster a workplace culture that values diversity, inclusion and the wellbeing of our employees.

Our commitment to ESG principles is a testament to our unwavering dedication to responsible and ethical business practices.

4.7 Our Whistleblowing Policy

At Starion, all our employees, freelancers, shareholders, suppliers, customers and, more generally, all stakeholders, can raise a concern about a known or suspected violation of our Code of Conduct, or any of our governance protocols, or any violation of applicable laws, rules or regulations.

4.8 Facilitating understanding: the Code of Conduct

Our aim is to ensure widespread understanding and integration of the Code of Conduct throughout our organisation. To achieve this, we have established a comprehensive approach:

- Every member of the Starion team will receive an electronic copy of the Code of Conduct as part of their onboarding process. It is also available on Starion's intranet.
- All employees will receive an annual reminder about Starion's Code of Conduct, regardless of any content changes to the document. We will ask everyone to read the document upon receipt of it and keep an easily accessible copy for day-to-day reference.

Should you have any questions or require guidance on the Code of Conduct, assistance is readily available from:

- Your immediate manager
- The Human Resources (HR) Department
- Starion's Legal Department
- Starion's Marketing and Communications Department

You have a duty to report if you believe someone is acting in a way that is inconsistent with Starion's Code of Conduct. It is important that you take appropriate action. You can report it to your manager, or if you are uncomfortable doing so, contact your local HR team. Information on how to report can be found in our 'Whistleblowing Policy' which provides guidance on proceeding confidentially.

5 Locating our policies and contact information

The Code of Conduct references several of Starion's policies, which encompass both company-wide and locally relevant guidelines. All these policies are accessible through Starion's intranet or via the IMS.

If you encounter any challenges in finding specific policies, do not hesitate to seek assistance from your immediate manager, an HR manager, Starion's Legal Department or Starion's Marketing and Communications Department.

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