

# List of Signatures

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# Respecting human rights

## Introduction

KSAT undertakes to respect and uphold all internationally recognized human rights, no matter where we are in the world. KSAT must meet the requirements of the Norwegian Transparency Act and carry out a due diligence assessment in line with the OECD's guidelines for multinational companies. This statement has been published in accordance with the requirements of the Norwegian Transparency Act and has been reviewed and approved by the KSAT President and CEO and the Board of Directors.

The document covers the full operations of Kongsberg Satellite Services AS (KSAT), including subsidiaries. It sets out the steps taken by KSAT to continue the work to assess, prevent, and mitigate the risks of modern slavery and human trafficking in its business operations and supply chains, during the fiscal year from 1st January 2023, ending 31st December 2023.

## THIS IS KSAT

KSAT is a company group, owned equally by Kongsberg Defence & Aerospace AS and Space Norway AS. KSAT was established in 2002, but our journey began already in 1967 when Tromsø Telemetry Station was inaugurated. After decades of business in a high-pressure, extremely challenging environment, with ground-breaking achievements, we can now celebrate more than 50 years of delivering excellence.

KSAT headquarters are in Tromsø, where approximately 300 of our 430 employees are based. The remaining are located at the Svalbard Ground Station, our Ground Station in Punta Arenas, Chile and at our sales offices in Oslo, Stockholm and Colorado.

### Vision

To be at the forefront for connecting Space and Earth for exploration, communication and increased understanding of our planet while enabling decision support.

### Mission

To provide the most reliable end-to-end services for actionable space derived information.

### KSAT's four core values

Quality, Pride, Responsibility, Thriving.

## Business Area and Services

KSAT provides services from a global satellite antenna network, and our value chain includes presence in countries that are associated with high human rights risks.



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### Ground Network Services

The KSAT network currently consists of more than 350 antennas. They are in over 27 selected locations worldwide and are continuously being developed to meet new customer demand. KSAT is always adding more capacity, more antennas, and new sites. KSAT provides high-value services to customers, utilizing our outstanding heritage, resilient capabilities, and unique locations. The KSAT Global Ground Station Network sites have been specifically selected to provide optimised connectivity for satellites in polar and inclined orbits.

### Earth Observation Services

KSAT specializes in using satellite data in operational monitoring services to provide information and decision support. KSAT has invested heavily in people and infrastructure over many years. Our customers benefit from the world's fastest available acquisition and processing chain, Near Real-Time services, such as oil spill and vessel detection, and rapid data delivery. KSAT offers access to satellite information through one point of contact. KSAT's expertise can be relied on to provide availability anytime, via the unique 24/7 manned operations centre for analysis and emergency support.

## **Governance**

The customers and public expect KSAT to work in an ethical, business-like and generally accepted manner. We expect the same from our suppliers. KSAT has offices and subsidiaries in 5 countries and business partners across all regions. The global nature of our business means that human rights are a material topic for KSAT. We are committed to respecting internationally recognised human rights including forced labour, child labour and labour rights, as set out in the United Nations (UN) International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

KSAT has implemented a Code of Ethics and Business Conduct, which governs how we treat people and underpins our commitment to operate responsibly whilst seeking not to cause or contribute to adverse human rights impacts. KSAT works with a range of suppliers in numerous countries who help make an important contribution to our value creation. We flow-down fundamental principles of our human rights policy to suppliers through Supplier Conduct Principles ('SCP'). These principles have been established to ensure safe working conditions throughout the supply chain, ensuring that workers are treated with respect and dignity, that business operations are environmentally sound, and that business is conducted in accordance with internationally recognised principles for business ethics.

In July 2022, the Norwegian Parliament adopted the Transparency Act to promote respect for fundamental human rights and working conditions. To meet the requirements of Transparency



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Act and other international laws and regulations, KSAT are currently implementing an integrity due diligence process to identify our human rights risk exposure and manage compliance in the supply chain.

We have established channels for raising concerns within KSAT and for reporting of concerns from business partners. Our policy and procedure is to work together with the supplier to find opportunities for improvement, not to terminate the business relationship.

## **Human rights due diligence**

### Our approach

KSAT follows the United Nations Guiding Principles (UNGP) and OECD guidelines for multinational enterprises approach to due diligence and recognises the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. This is an ongoing activity, as risks may change over time in line with operational changes or external influences.

We have suppliers across all regions, and we consider country risk as key driver of potential human rights risk. All suppliers are individually assessed using a risk-based approach which takes into consideration several factors. The risk assessment of our suppliers and business partners includes product- and industry risk as well as country risk for human rights and decent working conditions. We assess country risk using cumulative risk ratings based on the Transparency International's Corruption Perception Index and the Global Rights Index (ITUC index). This assessment demonstrates that around 80 per cent of our suppliers are situated in low-risk countries.

In addition to our own internal processes, we also consider potential risks from external sources, including but not limited to international organisations, policy makers, shareholders, civil society organisations, market forces, media, customers, and individuals in the supply chain or supply chain communities.

Given the complexity and interconnectivity of human rights, our due diligence process combines a wide range of compliance topics, including but not limited to bribery and corruption, sanctions and trade regulations and enforcements.

### Risk Exposure

To determine human rights risk exposure, we have considered both internal and external factors which may give rise to human rights impacts in terms of our operations and business partners. Actual and potential adverse impacts associated with KSAT is based on the likelihood and



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significance of the risk. KSAT's involvement with the identified risks are assessed in line with the OECD due diligence guidance in order to determine the appropriate responses. The involvement is defined within "caused by", "contributes to" and "related to".

The human rights risks identified so far relate to product and industry risk in our supply chain and business partners in jurisdictions considered high risk for human rights violations. High risk products identified in our supply chain include IT products and components used in the production of hardware acquired by KSAT, such as antenna systems. Antenna systems are KSAT operating assets utilized to provide our ground network- and earth observation services. Hence, this is a risk that KSAT is related to through the supply chain.

Risk is also associated with the construction industry as well as presence in countries with a higher associated risk related to human rights and decent working conditions. We acknowledge that when it comes to local hosting providers, site construction and satellite antenna suppliers, KSAT can, to a greater extent contribute to the risk exposure.

We will perform further assessments going forward and will develop a structured approach to manage the significant risks.

No actual adverse impacts have been identified in the supply chain or with business partners.

#### Conflict minerals

KSAT's commitment to respecting human rights extends across our value chain and we require the same from our suppliers. To comply with regulatory and customer requirements relating to the prohibition and limitation of conflict minerals, KSAT's suppliers are required to have in place a supply chain policy and due diligence procedures related to conflict minerals. We are also working continuously to develop our due-diligence systems and processes to cover the supply of such materials.

#### Forward focus

In 2022 and 2023, we focused on identifying and assessing the human rights risk exposure in our operations and supply chain. In 2023 and 2024 we have also conducted a double materiality analysis in line with EU's Corporate Sustainability Reporting Directive. The double materiality analysis addresses sustainability as a whole, including human rights from our own workforce, through the workers in the value chain, affected communities and to the end users. The output from the assessment substantiates the results of our conducted human risk exposure assessment and will also form KSAT's work towards sustainability and human rights going forward.



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We will continue the implementation of policies and risk assessment methodology across the group and further develop and improve KSAT's processes for due diligence, identification of human rights risks and follow-up of the supply chain.

We will continue to monitor developments and prepare KSAT for upcoming regulations such as the EU Corporate Sustainability Due Diligence directive.



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