



Marlink Group Code of Conduct



MARLINK GROUP CODE OF CONDUCT

Message from the CEO

Dear Colleagues, Business Partners and other stakeholders,

As Marlink employees, even though we work for different companies in our group, and in different locations around the world, we share the same core values. Marlink has incorporated and respects the Ten Principles of the UN Global Compact into our strategies to establish a culture of integrity, value, trust and innovation.

Our commitment today is to uphold these values and this will secure our success for tomorrow. Marlink also expects its business partners to uphold these values and to act accordingly.

Doing the 'right thing' is not always easy however this Code will provide valuable guidance on the most common ethics and compliance issues. It is important we all become familiar with these terms.

Thank you for taking the time to do so and I trust that by acting upon and upholding these integrity principles, we will make Marlink a great place to work at and a Group of companies to be proud of.

Sincerely yours,

Erik Ceuppens
CEO Marlink Group

WE SUPPORT





Marlink's Integrity Principles

Our Commitment to Integrity



Marlink Group Integrity Principles



Commitment to Our People

Our Company believes that a workplace should be based on respect, honesty, and fairness. We encourage innovation and employee engagement and are committed to maintaining high standards of quality, health and safety. We are all equally entitled to and respect Human Rights without discrimination as set out in international conventions and local laws. Labour Rights are a vital part of Human Rights and grant all employees the right to fair pay, benefits and freedom of association etc.

Commitment to Our Customers

Our company wishes to maintain and develop its leadership position as a satellite communications provider in the maritime and land sectors. Marlink desires to differentiate itself with a unique service portfolio as well as a consultative approach with customers and service providers in the market, by leveraging a variety of technology-agnostic multi-band connectivity services, combined with innovative solutions and applications via a service delivery platform, operated as a managed-services model. This ambition is supported by long term, and multiple active alliances and commercial collaborations.

Commitment to Our Company

Our employees are committed to avoiding any conflicts that might put their personal interests ahead of what is best for the Company. Additionally, our employees are encouraged to speak up and seek guidance if they have any ethical or compliance concerns. Marlink wants to deliver products and services which meet expectations and growing together an extended enterprise. This is achieved by ensuring sustainable profitability and focusing on value creation.

Commitment to The Environment

Marlink is committed to reducing its environmental impact throughout the entire value chain by utilising technology and implementing sustainable practices. Our focus includes increasing energy efficiency and using renewable and green energy sources. We also prioritise waste recycling and adherence to international regulations for electronic waste management, as well as supporting a balanced local environment.



Commitment to Building Trust

Marlink is aiming to be a trustworthy business partner. Our employees protect the property and confidential information of the Company, of our stakeholders and our business partners. Protecting confidential data, keeping accurate records and adhering to all laws governing our business are key to our long-term success.

Commitment to Conducting Ethical Business

Business meals, hospitality, and modest non-monetary gifts may be given or accepted if they reflect customary business practices. However, all business decisions must be based solely on the merits. Only clean business is sustainable business. Corruption is detrimental to the work environment, stifles innovation, and is illegal. Our Company has a zero-tolerance policy towards corruption of any kind.

Commitment to Corporate Citizenship

Our Company is committed to be a good corporate citizen. We acknowledge our responsibilities towards the environment, our local communities, and our stakeholders.

Commitment to be Responsive

Our Company is committed to respond to Employee's concerns and suggestions. Our HR Business Partners and the Legal department representatives are always available to offer guidance and support. Marlink has established a Whistleblowing procedure to report a concern, confidentially and without fear of retaliation.



Our Commitment
to Integrity



Marlink conducts its business with integrity, respecting applicable laws and regulations.

These Standards of Business Conduct provide guidance in key areas to help us operate in accordance with our Integrity Principles. They contain cross-references to some additional policies and other documents to provide easier access to more detailed guidance where necessary.

The Standards apply to all employees, officers and directors of the Marlink Group including entities over which Marlink has full or joint control. Because we prefer suppliers and other business partners who share our values, these partners are expected to adhere to our integrity standards.

1. Focusing on People

In keeping focus on excellence, we aim to attract and retain leading-edge talent. We foster the continued engagement of employees at all levels, throughout the organisation. We promote an environment of trust amongst teams and an open and constructive dialogue with employees and their representatives.

Fostering Our Talent

We recognise that by fully respecting employee rights, it creates a trusting workplace that also increases innovation, a key to our competitiveness. Individuals are selected for career advancement based on their potential, their performance, their behaviour, and their willingness to work in different functions and entities. While fostering individuality contributes to rich cultural diversity, our high-performance culture requires common values and behaviours that govern our interaction with each other and with stakeholders.

Encouraging Open Dialogue

We promote an open and trusting dialogue with employees at all levels of the Company. Employees are strongly encouraged to openly communicate, to speak up, to discuss and clarify their questions or concerns, and management is encouraged to listen and be responsive. Any direct or indirect retaliation, or attempted retaliation, against an employee who speaks up in good faith is strictly prohibited and will not be tolerated.



In support of

WOMEN'S EMPOWERMENT PRINCIPLES

Established by UN Women and the
UN Global Compact Office

Human and Labour Rights

We are committed to pursuing the highest health, safety and security standards in the workplace. We must familiarise ourselves with, and follow all external health and safety laws and internal health and safety policies and procedures. We also recognise our responsibility to uphold health and safety standards across the extended enterprise with suppliers, business partners and contractors. Marlink complies with current national legislation and is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labour and unlawful child labour.

Diversity and Inclusive Culture

Marlink is a global organisation that values cultural diversity as a key strength and is committed to promoting diversity and inclusion in all aspects, including race, gender, religion, national origin, political opinion, sexual orientation, social background, age and physical or mental character. Discrimination based on any protected characteristic will not be tolerated. Additionally, any form of harassment, whether physical, visual or verbal, is strictly prohibited in our workplace. As part of our commitment to the UN Women's Empowerment Principles (WEPs), we strive to create an inclusive culture where all employees are respected and valued. We are committed to promoting equality and the empowerment of women through our policies, practices and programmes.

Protecting Personal Data

Marlink collects, processes and uses personal data of its employees and partners to fulfil its operational activities. We comply with obligations resulting from the European regulations (e.g. the GDPR as per May 2018) and, as applicable, with any local laws and regulations concerning how individual personal data is collected, processed and used. We must always respect and protect the privacy of our employees, customers, suppliers and partners.

Alcohol, Drugs and Gambling

We do not abuse alcohol or illegal drugs in the workplace, or abuse prescription medication, and we do not purchase sexual services on business trips or other assignments including long-term expatriation. Money gambling is not allowed during working hours. After working hours, use of intoxicating substances or computer games / money gaming is not permitted if the volume of the usage leads to absence from work, reduced working capacity or performance of the work for Marlink.



2. Respecting and Protecting Assets & Information

We each have a duty to protect Marlink assets, both tangible and intangible. We must work to ensure that none of these assets are stolen, damaged, misused or improperly destroyed. In addition, we should be aware of our responsibilities when accessing, using, modifying, storing or disclosing any Marlink asset.

Protecting Assets

To protect assets, premises, staff, visitors, data, information systems and telecommunications networks from hostile acts and from competitors, a security policy has been implemented which is applicable to all parts of the Group and associated third parties. We must treat all property entrusted to us in a professional manner and in support of Marlink business goals. Any personal benefit we receive through our work for Marlink must be in compliance with our Gifts and Hospitality guidelines hereto incorporated.

We must use company computers, data and telecommunication resources in a safe, ethical, lawful and productive manner. Use of these is solely to facilitate the performance of our job-related responsibilities. Under no circumstances should we use company computers and information systems and tools to pursue illegal or improper purposes. Access to confidential and proprietary information is strictly on a need-to-know basis. This information can only be revealed to formally authorised co-workers or outside parties who need this information for legitimate business purposes, or if required by law.

We are encouraged to develop innovative solutions for products, services and business models. We must always ensure that we secure and protect Marlink intellectual property and avoid knowingly infringing upon the intellectual property rights of others. Intellectual property refers to creative ideas and expressions of the human mind that possess commercial value and for which exclusive rights are recognised such as patents, trademarks and copyrights.



Maintaining Accurate Records

Our shareholders and our business partners, as well as government regulators, rely on the accuracy and correctness of the information contained within our business records. We therefore have a responsibility to ensure that the information we provide is accurate, timely, complete, fair and understandable.

In maintaining our financial records, we must follow the internal control procedures set forth by Marlink or our Division or Business Unit. We may not create or participate in the creation of records that mislead anyone or conceal any improper activity. This means, in part, that we must never make false or misleading entries or allow or facilitate improper or insufficient disclosures. We are expected to maintain and destroy company documents in a secure way. Consult a manager or your Legal department with questions as to how long you should retain a document or how to destroy it properly.

Protecting Marlink Information

The discussions conducted by Marlink with any business partner shall be limited to the information needed to engage in the purpose of the subject discussions. The disclosure of certain kinds of Marlink information may be highly sensitive and potentially business-critical, and unprotected or unrequired disclosure may have a negative effect on Marlinks reputation or competitiveness in the marketplace. For sharing of sensitive information, there shall always be a NDA signed upfront.

Protecting Third-Party Information

Our customers, suppliers and other partners often entrust the company with their own confidential and proprietary information. To be a trustworthy partner, we must handle third-party proprietary information in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

We shall not accept or ask for third-party proprietary information unless the owner of such information has agreed to its transfer. If we receive third-party proprietary information without authorisation, it shall be promptly reported at Legal@marlink.com.

Access to government-classified information requires specific clearances, relative to the level of sensitivity. Any exchange or transmission of classified information or material must comply strictly with the relevant security process. Any actual or suspected incident or misuse must be immediately reported to the Information Security Officer at Information.Security@marlink.com.



Protecting the Environment

At Marlink, protecting the environment is a key aspect of our overall commitment to Environmental, Social and Governance (ESG) principles. We familiarise ourselves with, and follow local laws and international environmental standards, and continuously monitor our environmental impact through data collection and reporting.

Our goal is to minimise carbon emissions from our operations and promote sustainable waste management practices at our locations. We also actively use renewable energy sources when available and focus on increasing energy efficiency through the implementation of technology and sustainable methods. Our efforts are aimed at minimising negative impact on the environment and align with our overall commitment to ESG principles and contribute to the achievement of the UN Sustainable Development Goals (SDG).

Managing Internal and External Communications

Marlink's reputation and image are very important assets. It is crucial that we promote and protect our image. In addition, we must provide accurate information to the public regarding our business. The disclosure of certain kinds of information is highly regulated. Therefore, only designated persons may respond to formal outside requests for information. All public statements about the Group must be approved by appropriate persons within Marlink Group.

All media enquiries should be sent to the Communications Department. No information should be provided to the media without prior approval and guidance from the relevant department. Marlink employees must not provide information, or engage in social media activities, on behalf of Marlink. The Company's social media engagement is managed by the Communications Department.

In addition, all content in published material, including brochures, advertising and all editorial support should be truthful and not disparage any competitors' products, services or employees. Marlink sponsorships serve to build and secure relationships between Marlink and its constituencies by contributing to a range of selected events, activities, conferences, foundations, institutions etc. They may relate to social, cultural, sport or educational issues or they may be general in nature. They must always be transparent and accurately recorded in the books and records.

For guidance on social media, a Marlink SOCIAL MEDIA GUIDE has been developed to help Marlink employees use Social Media effectively and responsibly. The Marketing Communications department will assist to answer your questions.



3. Engaging in Proper Business Practices

Integrity, honesty and transparency should guide each of us in our business activities. We are expected to deal with customers, suppliers and other business partners in the Group's interests and in compliance with laws and regulations. All new Marlink suppliers are asked to sign and return the "Supplier – Code of Conduct" and are subject to a compliance check ensuring they do not deal with fraud, terror, corruption, etc.

Zero Tolerance of Corruption

No Marlink employees may engage in any kind of corruption, whether public or private. We may never offer, attempt to offer, authorise or promise any sort of bribe, facilitation payment or kickback to a public official or private body, for obtaining or retaining business or an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private body. In addition, we must never hire someone else to do anything that we cannot ethically or legally do ourselves. We must apply our anti-corruption policies in the negotiation and execution of commercial contracts as well as to mergers and acquisitions and other projects.

Marlink employees shall pay special attention to cash payments that may be unusual in view of the nature of the transaction; to transactions made through bearer cheques or to those made in foreign currencies other than those previously agreed upon, and report any transactions they consider irregular through the procedures and channels set forth in this Code of Conduct. Marlink shall not accept cash payments beyond the legally defined limits.

Gifts and Hospitality

Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers and other partners are commonly used to build goodwill and acknowledge appreciation in business relationships. However, these courtesies must reflect a normal courtesy of business and may not influence, or give the appearance of influencing, any business decision. Good judgment should always guide us in these situations. Business courtesies are prohibited by law under certain circumstances and in certain countries. We must each follow the policies that apply to us. Gifts of cash or cash equivalents, such as gift certificates and vouchers, are never permitted.

In the interest of full transparency and to facilitate possible audits or reviews, any giving or receiving of gifts or hospitality above the equivalent of 50 USD must be fully and accurately recorded by notification to the Legal department.



Identifying and Managing Conflicts of Interest

As part of our efforts to protect the Marlink reputation and ensure we are acting based on what is best for the Company, we must avoid both actual and apparent conflicts of interest at all times, and if we cannot avoid a conflict of interest, we must make it known to our supervisor. In particular when hiring current and former public officials or government employees, we should comply with all applicable laws, regulations and directives, including those dealing with conflicts of interest. These rules extend to negotiations or contracts with government employees relating to potential employment by Marlink either on the payroll or as consultants or subcontractors.

Competing Fairly

We believe in fair competition and must strictly comply with applicable competition laws in the countries where we do business. These laws forbid agreements or behaviour that may restrain or alter competition or trade. The exchange or disclosure of commercially sensitive information relating to competitors, customers or suppliers may also violate applicable competition laws.

Complying with Export Laws

As a global company, we purchase goods and services from a diverse group of suppliers. We also provide goods and services to customers all over the world. It is therefore critical that we carefully comply with all applicable regulations that govern our import and export activities. This is a complex legal and regulatory environment. The Legal Department can assist to answer any questions regarding the import or export of goods, services or information.

Cooperating with Authorities

We are expected to cooperate with legitimate authorities. Any request from a public official that relates to an investigation or inquiry must be coordinated with the Legal Department.

Treating Suppliers Fairly

Suppliers deliver a high proportion of the value of Marlink's products and thus play an important role in customer satisfaction. We are committed to sustaining fair relationships with suppliers. The Procurement function is responsible for ensuring that all supplier relationships are handled in an equitable and compliant manner. We each have a duty to make certain that issues with suppliers are professionally dealt with at all times, and that our selection of suppliers is based solely on what is best for the Company.



4. Sanctions

When an individual is found in violation of Marlink’s Code of Conduct, sanctions may be imposed. Any sanction imposed should be proportionate to the violation, taking into consideration the context, previous violations, and seriousness of the violation. Sanctions might consist of a warning, loss of privileges, suspensions, counselling or other actions as may be deemed appropriate.

5. What to do when you have a concern

Our Integrity Principles and Standards of Business Conduct are applicable to all employees regardless of employment positions or geographical locations. Because the right answer is not always obvious, all employees are strongly encouraged to openly communicate and to clarify their questions or concerns. It is equally important that all managers build a positive working environment and that they encourage their employees to openly communicate and avoid any form or shape of discrimination. All Employees are strongly encouraged to report their concerns through the normal business channels, such as your manager, your Human Resources Business Partner (HRBP), or your Legal Team. Confidential reporting can be done through people@marlink.com.

Marlink Employees have a right to report censurable matters in Marlink. Censurable matters means, for example, information about criminal offences and breaches of other statutory obligations, prohibitions or applicable laws. Moreover, censurable matters may include inconsistencies and suspected breaches of the Code of Conduct and general ethical standards that enjoy broad support in society as a whole. The whistleblowing procedure describes the internal notification regarding censurable matters and reporting can be done confidentially through people@marlink.com

QUESTIONS? PLEASE CONTACT:

Legal Team
Legal@marlink.com

Information Security Officer
Information.security@marlink.com

Whistle blowing contact team
People@marlink.com