



# **SES Code of Conduct and Ethics**

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## Summary of the SES Code of Conduct and Ethics

SES, (together with its subsidiaries<sup>1</sup> shall be referred to as either "SES" or the "Company") is committed to conducting its business in compliance with all applicable laws and regulations as well as to observing the highest standards of business ethics. This commitment is reflected in the Company's Core Values, which are:

- **Integrity.** Integrity at SES is consistently adhering to the principles of honesty, accountability, fairness and respect in our relations with our people, our customers and all third parties:
  - Holding oneself personally accountable;
  - Treating everyone and their ideas with dignity and respect;
  - Embracing diversity and communicating candidly, openly and honestly;
  - Complying with all applicable laws and regulations.
- **Excellence.** Excellence at SES is having the passion and commitment to be the best in our industry:
  - Behaving passionately about customer satisfaction and the services that we provide;
  - Relentlessly pursuing continuous improvement;
  - Expecting the best from people, processes and technology.
- **Partnership.** Partnership at SES is developing and maintaining cooperative relationships that build upon strengths and skills within the Company to achieve common goals and to benefit the customer:
  - Sharing ideas and information and encouraging interaction;
  - Demonstrating a spirit of trust and cooperation as a worldwide team;
  - Valuing and leveraging the strengths, perspectives and ideas of colleagues, customers and vendors.
- **Leadership.** Leadership at SES is articulating strategic vision, demonstrating values and creating an environment where goals and objectives can be accomplished to meet the needs of the marketplace:
  - Creating and communicating our vision;
  - Inspiring enthusiasm, commitment and loyalty;

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<sup>1</sup> A subsidiary is an entity in which SES owns, directly or indirectly, more than fifty percent (50%) of the voting rights, or in which the power to control the entity is possessed by or on behalf of SES

- Challenging and coaching colleagues
  - Acting proactively and delegating responsibility.
- **Innovation.** Innovation at SES is establishing a business culture that stimulates creativity across the organization, develops people and improves processes, products, services and results:
    - Sharing ideas and encouraging interaction;
    - Thinking outside of the box and challenging the status quo;
    - Anticipating market demands and customer needs;
    - Keeping open to new ideas, concepts and processes.

The SES Code of Conduct and Ethics (the “Code”) is designed to enable all employees, Officers and Directors of the Company (together “SES Employees” or the “Company’s Employees”) to take a consistent approach to integrity issues.

This Code provides an explanation of applicable laws, regulations and Company policies relating to SES Employees’ conduct and ethics. The Code also describes the procedures to follow related to concerns or violations, as well as the potential sanctions for violations. All SES Employees shall comply with the spirit and letter of the policies set forth in this Code.

Key elements of the Code are:

- Obey all applicable laws and regulations governing our business worldwide;
- Be honest, fair and trustworthy in all Company activities and relationships;
- Avoid all conflicts of interest between Company activities and your personal affairs;
- Foster an atmosphere in which fair employment practices extend to every member of the diverse Company community;
- Strive to create a safe workplace and to protect the environment; and
- Through leadership at all levels, sustain a culture where ethical conduct is recognized, valued and exemplified by all SES Employees.

## **Compliance with the Code**

### **SES Employees**

SES policies apply to all SES Employees .

The policies outlined in this Code of Conduct and Ethics (“the Code”) are designed to ensure that the Company’s Employees act at all times, not only in accordance with the letter, but also in accordance with the spirit of the laws and regulations applying to the Company’s business. Even the appearance of improper behaviour should be avoided.

SES Employees are expected to read and understand the policies outlined in this Code. Any questions about this Code or the appropriate course of action should be addressed to your local Compliance Officer or your SES Ombudsman.

### **Non-controlled Affiliates**

SES Employees serving as Directors of non-controlled affiliates should, to the extent possible, encourage such affiliates to adopt and follow corresponding policies.

### **Third Parties**

SES Employees shall require that others representing SES, such as consultants, agents, resellers and independent contractors agree to follow applicable SES policies.

SES Employees shall:

- Perform integrity due diligence on third parties with whom the Company does business.
- Provide third parties with appropriate education on the requirements of Company policies.
- Take necessary action, up to and including terminating a contract with anyone representing SES, after learning that a third party failed to abide by Company policies.

## **Applicable Law**

SES conducts business in many countries around the world, and accordingly, is subject to the laws of many different countries. It is the Company's policy to comply with all applicable laws and regulations of the countries where business is conducted.

In some instances, there may be a conflict between the applicable laws of two or more countries. In the event of such a conflict, the SES Employee must contact in-house legal counsel who will provide guidance as to how to resolve the conflict.

## **Employee Compliance**

Each element of the Code identifies specific responsibilities. However, SES Employees must also follow these basic obligations common to all policies:

- Understand the details of common policies relating to their work. Each SES Employee should have an understanding of issues addressed by each provision and should have a detailed understanding of the provisions that apply to his or her job.
- Seek assistance from his or her manager, company legal counsel or other SES resources, such as the internal auditors, the local Compliance Officer or the SES Ombudsperson should questions arise about the application of the Code. Communication may be written or oral and may be anonymous.
- Promptly raise reasonable concerns that they may have about possible violations of the Code. Chapter 13 of the Code describes an alternative reporting procedure.
- If a concern related to a violation of the Code is raised, and the issue is not resolved to the SES Employee's satisfaction, the issue may be addressed with another one of the contacts listed here below .
- Cooperate in SES investigations into matters related to compliance with the Code.

***The Company prohibits any SES Employee from retaliating or taking adverse action against anyone for raising or helping to resolve, in good faith, a concern related to the Code. Such retaliation or even the threat of retaliation shall be deemed a violation of the Code.***

***It is not permitted for an SES Employee to knowingly file a false report of a Code violation or alleged violation.***

The Code cannot, and is not intended to, address all of the situations that may be encountered while working for the Company. There will be occasions, which are not described in the Code, for which decisions must be made regarding the appropriate course of actions. When in doubt, SES Employees should use common sense and ask themselves one or more of the following questions:

- Are my actions legal?
- Am I being fair and honest?
- Will my actions stand the test of time?
- How would I feel if my actions were publicly disclosed? Would my actions embarrass or harm SES?

If they are still not sure what to do, they should ask their manager, or contact in-house counsel, the local Compliance Officer or the Ombudsperson to get guidance.

### **Non-compliance with the Code**

SES Employees who violate the Code will be subject to disciplinary measures, up to and including termination of their employment.

***The following are a few examples of conduct which may result in disciplinary action :***

- Actions that violate Company policy;
- Requesting others to violate a Company policy;
- Failure to promptly raise a known or suspected violation of a Company policy
- Failure to cooperate in investigations of possible violations of Company policy; and
- Retaliation against another SES Employee or third party for reporting a Code violation or integrity concern.

This list is not all-inclusive and should only be considered as an example.

Non-compliance with a provision of the Code may subject the SES Employee and/or the Company to criminal penalties (fines or jail sentences) or civil sanctions (damage awards or fines) in accordance with applicable law.

Non-compliance with the Code or any other Company policy, guideline or procedure may result in disciplinary action, up to and including termination and legal proceedings of employment and the pursuit of any applicable legal remedies.

## **1. Fair Employment Practices**

The Company is committed to fair employment practices, including the prohibition against all forms of illegal discrimination. By providing equal access and fair treatment to all SES Employees on the basis of merit, we foster the Company's success while enhancing the progress of individuals and the communities where our businesses are located.

The Company is committed to following the applicable labour and employment laws wherever it operates. This includes observing those laws that pertain to freedom of association, privacy, recognition of the right to engage in collective bargaining, the prohibition of forced, compulsory and child labour and those laws that pertain to the elimination of any improper employment discrimination.

### **Key Requirements**

- Comply with all applicable laws and regulations.
- Use merit, qualifications (e.g. education, experience, competencies, etc.) and other job-related criteria, complying with applicable laws, as the sole bases for all employment-related decisions affecting employees and applicants.
- Recruit, hire, train, compensate, promote and provide other conditions of employment (e.g. office space, career development opportunities, mobility) without regard to a person's race, colour, religion, national origin, gender (e.g. no discrimination for reasons linked to pregnancy), sexual orientation, age, disability, veteran status or other characteristics protected by law.
- Provide a work environment free of improper harassment, including but not limited to harassment directed at a person because of his or her race, religion, gender, sexual orientation, disability, *etc.*
- Respect the privacy rights of employees by using, maintaining and transferring their personal data in accordance with applicable national laws and Company guidelines and procedures. While seeking to maintain employee privacy, however, the Company must reserve the right to monitor use of Company property (e.g. computers, e-mail, phones, proprietary information, *etc.*) to the extent permitted by and in accordance with applicable law.
- Take affirmative actions (where permitted by law) to increase opportunities in employment for women, minorities, the disabled and certain veterans.

- If a conflict arises between the requirements of this policy and the laws, customs or practices of a particular country, consult with management and in-house legal counsel to determine the most appropriate course of action.

## **2. Environment, Health & Safety**

The Company is committed to achieving environmental, health and safety (EHS) excellence. The Company strives to provide a safe and healthy working environment and to avoid adverse impact and injury to the environment and to the communities in which it does business.

### **Key Requirements**

- Comply with all relevant environmental, health and safety laws and regulations.
- Create and maintain a safe working environment and endeavour to prevent workplace injuries.
- Reduce waste, emissions and the use of toxic materials.
- Eliminate unreasonable risks from our activities, products and services.
- Address site contamination issues in a cost-effective and appropriate manner.
- Respect the environmental rights and interests of neighbors.

## **3. Internal Controls**

### **Protection of Assets and Information**

SES Employees have a responsibility to protect Company property against loss, theft, abuse, unauthorized use, access or disposal. Theft, carelessness or waste has a direct impact on the Company's profitability. Suspected incidents of fraud, theft, loss or damage shall be reported immediately in accordance with the procedure indicated in Chapter 13 of the present Code.

SES Employees may use Company assets only for legitimate company business purposes or for other purposes approved by the Company's management.

Mobile phones, personal mobile communications devices or personal computers, including access to the Internet, are provided to help SES Employees perform work related responsibilities. Incidental and occasional personal use is permitted

so long as the use does not violate Company policy (IT Security Policy currently under review in the group).

### **Internal Control Systems, Reports and Records**

The Company maintains internal control systems to ensure compliance with laws, regulations and Company policies to protect and prevent misuse of Company assets and ensures appropriate authorization for Company transactions and other corporate activities.

The Company prepares reports that fulfill relevant business and legal requirements, including financial statements that fairly present the Company's financial position. SES Employees have a responsibility to ensure that Company records do not contain false or intentionally misleading information. Any intentional and unauthorized alteration or destruction of records will lead to disciplinary action and/or termination.

### **Key Requirements**

- Follow Company accounting procedures, as well as all generally accepted accounting principles, standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts and business expense reporting.
- Maintain complete, accurate and timely records and accounts to reflect all business transactions.
- Safeguard all physical, financial, informational and other Company assets.
- Use economic, risk-based criteria to make business decisions.
- Provide timely, candid forecasts and assessments to management.
- Maintain sound processes and controls.
- Comply with Company procedures and applicable laws and regulations relating to the management of documents and records.
- Retain documents and records that relate to existing or reasonably foreseeable litigation, audits or investigations as instructed by in-house legal counsel.

#### **4. Insider Trading or Dealing and Stock Tipping**

The Company discloses important information about its business in accordance with Luxembourg, French, European and other applicable securities laws and stock exchange guidelines. The Company has established strict requirements that prohibits SES Employees who have access to material or price-sensitive non-public information through their roles with the Company from sharing or using that “inside information” to buy or sell stock or other securities of any company while in possession of that information.

A specific Code for Dealing in SES Securities (“Dealing Code”) is applicable to all SES Employees, a copy of which can be found on the intranet under the following link

[http://intra.ses/lib/policies\\_procedures/corporate/03\\_Dealing\\_Code\\_-\\_Jan-07.pdf](http://intra.ses/lib/policies_procedures/corporate/03_Dealing_Code_-_Jan-07.pdf)

For any questions regarding Insider trading or dealing, refer to the Dealing Code or get in touch with the SES General Counsel’s Office, your local Compliance Officer or your SES Ombudsperson.

#### **Key Requirements**

- Never buy or sell the stock or other securities of any company while in possession of inside information about the company.
- Never recommend or suggest that anyone buy, sell, or retain the stock or other securities of any company while you have inside information about that company.
- Do not disclose inside information to anyone outside the Company except when disclosure is required to enable the Company to properly conduct business. In such cases, with the advice and assistance of in-house legal counsel, appropriate measures should be put in place to prevent the misuse or inappropriate disclosure of the inside information.

#### **5. Confidentiality and Privacy**

Confidential information (or any non-public information) related to the Company or its products or services is to be treated as confidential during, as well as after, an SES Employee’s term of employment.

Confidential information includes all information covered by non-disclosure agreements executed by the Company, all non-public information that may be of use to competitors, or harmful to the Company or its customers, if disclosed.

The Company is committed to protecting personal information collected from or maintained regarding third party individuals and SES Employees. Each SES Employee must take care to protect individually identifiable third party or SES Employee information and other sensitive personal information from inappropriate or unauthorized use or disclosure, and each Company business must implement fair and responsible privacy and information protection procedures and take reasonable steps to ensure compliance.

Any occurrence of unauthorized access or attempted theft of confidential information may be reported as indicated in Chapter 13.

### **Key Requirements**

- Comply with all applicable privacy and data protection laws and regulations.
- Provide individual third parties and SES Employees, as required by law and/or by the privacy and information protection procedures of the relevant SES Company with:
  - Notice of relevant privacy policies;
  - Descriptions of the types of information being collected and the uses to be made of the information;
  - Choices regarding certain uses of the information by your business;
  - Access to the information for verification and correction; and
  - Security measures for the information.
- Learn and follow procedures for privacy and data protection. Particular attention should be given to the protection of sensitive personal information (e.g. financial, medical, family-related information).
- Do not acquire, use or disclose individual SES Employee or individual third-party information in ways that are inconsistent with privacy policies or with applicable laws or regulations.
- Keep secure records of confidential information, including computer-based information.
- Consult with in-house legal counsel before establishing or updating any system, process or procedure to collect, use, disclose, or transmit confidential information, medical or financial records, or other sensitive personal information.

## **6. Relationships with Competitors and Business Partners**

The Company is dedicated to compliance with the competition and antitrust laws in the countries in which it does business. Competition laws directly affect the Company's business. Given the inherent complexity of competition issues, SES Employees should seek guidance on all such issues with in-house legal counsel.

### **Key Requirements**

- Comply with all applicable competition laws, decrees, orders and undertakings affecting the Company and SES Employees.
- Do not propose or enter into any agreements or understandings-expressed or implied, formal or informal, written or oral- with any competitor regarding any aspect of the competition between the Company and the competitor for sales to third parties.
- Do not propose or enter into any agreements or understandings with customers which restrict the price or other terms at which the customer may resell or lease any product or service to a third party, unless you have obtained prior written approval from in-house legal counsel.
- Do not propose or enter into any agreements or understandings with suppliers which restrict the price or other terms at which the Company may resell or lease any product or service to a third party, unless you have obtained prior written approval from in-house legal counsel.
- Consult with Company in-house legal counsel early in the process of evaluating any proposed merger, acquisition or joint venture.
- Consult with Company in-house legal counsel in connection with business arrangements that could raise competition law issues, including:
  - Exclusive arrangements for the purchase or sale of products or services;
  - Bundling of goods and services;
  - Agreements that restrict a customer's choice in using or reselling a product or service;
  - Technology licensing agreements that restrict the freedom of the licensee or licensor;
  - Selective discounting; and
  - Distribution arrangements with competitors.

## **7. Working with Governments and Customers- Trade Laws**

The Company is committed to complying fully with anti-bribery, export and export control, customs and anti-boycott laws and sanctions. These laws and regulations affect all aspects of the Companies' business and its Employees.

### **Key Requirements**

- Follow relevant trade control laws and regulations, including but not limited to licensing, shipping documentation, import documentation, reporting and record retention requirements of all countries in which SES conducts business. Such regulations may apply to international trade in goods, technology, software and services as well as to financial transactions. Learn and follow the Company's procedures regarding international transactions.
- Learn and understand the extent to which trade controls apply to transactions conducted by the Company.
- Make sure all international transactions are screened against all applicable laws and regulations that restrict transactions with certain countries and persons.
- Do not cooperate with any restrictive trade practice or boycott prohibited or penalized under any applicable local laws. Tell your manager about all boycott-related requests, including requests for information.
- Consult with the Company's in-house legal counsel or your manager in any transaction in which a conflict arises between the law under which business is conducted and the law of another country or region.
- Understand which party to international transactions bears legal responsibility for the accuracy of import and/or export documentation. Where the Company bears legal responsibility, check the procedures to monitor and verify the accuracy and completeness of information presented to government authorities by the Company or by its agents. Where an agent or customer is the responsible party, ensure that the Company provides the full and accurate information required by the other party to meet its responsibility.

### **Improper Payments**

SES Employees should not offer anything of value to any person, business or government to obtain improper advantage in selling goods or services, conducting transactions or representing the Company's interests to governmental authorities.

Non-compliance with this policy can result in severe civil and criminal penalties. Most countries prohibit the bribery of their own public officials, and many also prohibit the bribery of officials of other countries. SES's approach to improper payments goes beyond these laws and prohibits improper payments in all activities, both with governments and in the private sector.

### **Key Requirements**

- Never give, offer, or authorize the offer, directly or indirectly, of anything of value (such as money, goods or a service) to a customer, third party or government official to obtain any improper advantage. A business courtesy, such as a gift, contribution or entertainment, should never be offered under circumstances that might create the appearance of an impropriety.

This policy does not prohibit lawful reimbursement for reasonable and bona fide expenditures – e.g. travel and living expenses incurred by customers and directly related to the promotion of products or services or to the execution of a contract.

- Never give a gratuity or other payment to government officials or employees to expedite a routine administrative action without consulting with the senior manager for your group or in-house legal counsel. If such a “facilitating payment” is made, it must be clearly and accurately reflected in financial reports.
- Never contribute company funds or other company assets for political purposes without the prior approval of the SES Executive Committee.
- Require any person or firm (e.g. consultant, agent, sales representative, contractor, commercial representative, distributor) that represents the Company to comply with this policy and related laws and regulations.
- Exercise due diligence when selecting persons or firms to represent the Company, such as distributors and sales representatives or agents.

## **8. Money Laundering**

Money laundering, which is the process of making the proceeds of criminal activities appear to be legitimate, is prohibited in most countries. The Company is committed to complying with anti-money laundering laws in every country in which it conducts business.

The Company will only do business with parties involved in legitimate business activities and whose funds are derived from legitimate sources. The Company shall use integrity due diligence processes to ensure that funds derived from money laundering are not accepted. Involvement in relationships and transactions where money laundering occurs could seriously damage the Company's reputation.

### **Key Requirements**

- Follow "know your customer" procedures to ensure that parties with whom the Company does business are involved in legitimate business activities and that funds are derived from legitimate sources.
- Comply with all applicable laws that prohibit money laundering and that require reporting of cash or other suspicious transactions.
- Do not accept payment in cash, via money orders or payment from any party without clearance from your in-house legal counsel.
- Watch for warning signs that indicate money laundering and other illegal activities or that violations of Company policies are occurring. For example, watch out for unusually complex payment structures which have no real business purpose or for unusually favourable business terms.
- If questions or concerns arise regarding money laundering, immediately raise the matter with Company in-house legal counsel before proceeding with a transaction or matter. Resolution of any such matter must be well documented.

## **9. Conflicts of Interest Issues**

### **Relationships with Suppliers, Dealers, Customers and Other Business Partners**

The Company recognizes that SES Employees may take part in legitimate financial, business and other activities outside of their employment with the Company. However, these activities must be lawful and free of conflicts with their responsibilities as SES Employees.

SES Employees must avoid activities that conflict with SES's interests or that influence their judgment or actions in performing their duties as employees. In particular, SES Employees must comply with the guidelines contained in the Code regarding gifts, meals, entertainment and other benefits from parties with whom the Company does business.

## **Key Requirements**

- SES Employees should never request or solicit offers for entertainment, meals, gifts or other gratuities or personal services or favours from parties with whom the Company does business.
- Business meals as the guest of a third party may be accepted if they are offered voluntarily, have a legitimate business purpose and are an integral part of the work agenda (e.g., lunch during a seminar or meeting, cocktail reception following meetings or dinner incorporated into a continuing work period). SES Employees have a responsibility to inform their supervisors on an ongoing basis about the frequency and nature of meals and entertainment paid for by third parties.
- Travel and overnight accommodation paid for by a third party are not allowed without the prior written approval of the Senior Vice President responsible for the SES Employee accepting the travel and/or accommodation. Exceptions are permitted for business travel in a third party's plane with the prior approvals of an immediate supervisor and a Senior Vice President. If a third party pays for travel or accommodation or provides "in-house" accommodation, the SES Employee should determine the fair-market value, make appropriate payment to the third party and arrange for reimbursement via his or her expense report.
- Attendance at sports events and activities, shows or other appropriate entertainment or social activities as the guest of the same third party is not allowed more than twice a year. A representative of the hosting company must be present.
- If SES Employees use suppliers, dealers or customers to provide goods or perform services of a personal nature, fair-market value must be paid for the goods or services, and the payment must be documented (e.g. an invoice).
- Solicitation or acceptance of personal financial assistance of any kind from a supplier or a customer, other than a financial institution in the ordinary course of its business, is prohibited.
- SES Employees may take advantage of discounts and other promotions offered by suppliers or customers, provided such discounts are available to all SES Employees. Discounts that have been solicited or bargained for in connection with obtaining or providing goods or services on behalf of the Company or that are only offered to a limited group of SES Employees are prohibited.

If you have questions (e.g., in an internal setting where rejection of the gift would be considered culturally discourteous), you should review the matter with your supervisor or any of the other contacts referred to in this Code.

### **Outside Personal Activities**

SES Employees may participate in legitimate and lawful business and other activities outside of their jobs with the Company, provided that such activities do not conflict with the SES Employee's responsibilities with the Company or conflict with the policies and standards set forth in this Code.

SES Employees may not act as Officers serve on the board of another for-profit commercial entity without the necessary prior written approval from the General Counsel of the SES entity for which the employee works.

SES Employees may not engage in private business activities that interfere with their SES duties and may not, without prior approval, work or otherwise perform services for hire for third parties with whom the Company does business or who are competitors to the Company.

SES Employees may, in their personal capacities and on their own time, participate in not-for-profit community, governmental, educational, religious and civic organizations and may serve or act as Officers or on boards of directors, provided that such participation or service does not interfere with their duties as an SES Employee.

### **Share Ownership**

SES Employees and their immediate family members may not hold, directly or indirectly, any undisclosed share ownership interest in business partners, competitors or other concerns having current or proposed business relationships with the Company.

Immediate family members are the Employee's spouse or legally recognized partner, their dependent children as well as other relatives who have shared the same household as the Employee for at least one year on the date of the purchase of the share ownership interest defined above.

Exceptions are ownership interests that do not influence the performance of duties of the SES Employee. For example, if the shares held by the Employee or an immediate family member represent less than 1% of the relevant company's share capital or are worth less than 10,000 EUR and the shares are tradable on a public stock exchange.

## **10. Quality**

The Company's commitment to excellence is essential to its growth and success. SES Employees should strive to meet and exceed the expectations of both internal and external customers and to continuously strive to improve the quality of the Company's products and services.

## **11. Intellectual Property**

Among the Company's most valuable assets is its intellectual property - patents, trademarks, copyrights, trade secrets and business processes. It is Company policy to establish, protect, maintain and defend its intellectual property rights and to use those rights in a commercially responsible manner. All SES Employees must take steps to safeguard these assets.

In addition to protecting the Company's intellectual property rights, the Company respects the valued intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose the Company and SES Employees to civil law suits and damages as well as significant fines and criminal penalties.

New Company products, services, processes, hardware and software, and any proposed use of the intellectual property of others should be timely and reasonably reviewed for infringement by the relevant in-house legal department.

### **Key Requirements**

- Identify and protect commercially significant Company intellectual property.
- Respect valid patents, copyrighted materials and other protected intellectual property of others.
- Consult with company legal counsel concerning necessary licenses or approvals to use intellectual property of others.
- Consult with company legal counsel before:
  - Soliciting, accepting or using proprietary information obtained from third parties;
  - Disclosing Company proprietary information to third parties;
  - Permitting third parties to use Company intellectual property.
- Assert intellectual property rights only in ways consistent with the law.

- Understand your responsibilities to the Company regarding new inventions and ideas that you might develop during your employment with the Company. Consult with in-house legal counsel if there is any question about these responsibilities.
- Comply with the guidelines for use of the Company trademarks, trade names and corporate logos. Guidance regarding such use may be obtained from corporate communications or in-house legal counsel.
- Intellectual property related to inventions and ideas relevant to the Company's business, and created in whole or in part using Company facilities or equipment while an SES Employee, are property of the Company.

## **12. Political Activities and Contributions**

The Company respects and supports the right of its Employees to participate in political activities. However, these activities should not be conducted on Company time or involve the use of Company resources and should not interfere with the Employee's performance. SES Employees who become involved with a political group must make it clear that such activities are being conducted purely in a personal capacity and not on behalf or in connection with the Company.

SES Employees will not be reimbursed for personal political contributions.

No corporate funds or services shall be paid or furnished to any political party or any candidate for, or incumbent in, any public office, except as permitted by law and as approved by the SES Executive Committee.

## **13. Reporting Procedure**

Any reasonable concern about a violation of this Code may be reported through the means described hereafter which are offered as an alternative solution to contacting Personnel Representatives whose rights and duties remain unchanged.

Such reasonable concern should be raised

either with the SES Employee's manager,  
the local Compliance Officer,  
or with the relevant SES Ombudsperson from the list given hereafter, or

in exceptional circumstances (e.g. amount involved, level of person concerned - Management or Executive Committee members - significant impact on the SES group business or reputation) with the Chairperson of the Audit Committee.

In order to ensure an efficient treatment of cases and answers to queries, the Employees of each company are invited to address their requests to the Ombudsperson of their company, when one has been appointed, or to the Ombudsperson of the parent company of the company for which the Employee works.

Directors should raise any concern with the Chairman of the Board or the Chairman of the Audit Committee.

The Chairman of the Board should raise any concern he has with the Chairman of the Audit Committee.

The Company shall promptly and thoroughly investigate any good faith allegation of a violation of this Code. Every SES Employee is required to cooperate in internal investigations related to possible Code violations.

The Company prohibits any SES Employee from retaliating or taking adverse action against anyone for raising or helping to resolve, in good faith, a concern related to the Code. Retaliation or even the threat of retaliation shall be regarded as a violation of the Code.

In order to allow the Company to properly investigate a concern, allegations of non-compliance or violations to the Code should include sufficient information concerning the incident or the violation. SES Employees shall not knowingly submit false reports or allegations.

SES Employees may submit a complaint or allegation of a violation without revealing his or her identity. However, in certain circumstances, the Company may be obliged by law to disclose the information or the identity of the person submitting the complaint or allegation. If an SES Employee wishes to co-operate in the investigation process, he or she should submit his or her name and contact information with the complaint or allegation. In such a case, the Ombudsperson or the Chairman of the Audit Committee may contact the SES Employee to request further information regarding the complaint.

Complaints may be sent to the relevant Ombudsperson at the e-mail or mailing addresses listed below. Only the Ombudsperson for each SES business will have access to the e-mail. A complaint may also be submitted by calling the pertinent Ombudsperson at the numbers listed below.

A complaint received by the Ombudsperson will first be reviewed by the Ombudsperson on a confidential basis. He or she may carry out investigations

regarding the complaint before submitting the complaint to the Audit Committee. He or she will report any complaints or allegations received to the Chairman of the Audit Committee on at least a monthly basis.

The Chairperson of the Audit Committee has the right, at his or her discretion to conduct investigations on any case thus reported.

Each complaint and any information relating to a complaint will be retained in written and/or electronic form by the Ombudsperson.

**SES Ombudsperson and General Counsel:**

John Purvis :  
Senior Vice President and General Counsel

**SES ASTRA Ombudsperson and General Counsel:**

Miriam Murphy  
Senior Vice President & General Counsel

**SES AMERICOM Ombudsperson and General Counsel:**

Thai Rubin  
Senior Vice President & General Counsel

**SES NEW SKIES Ombudsperson and General Counsel:**

Thai Rubin  
Senior Vice President & General Counsel

**Chairman of the Audit Committee:**

Mr Marc Speeckaert

**Chairman of the Compliance Committee:**

Pierre Margue  
Vice President Corporate and Legal Affairs

## **Questions about the Code**

Questions about the SES Code or other business ethics situations may arise from time to time. If you are unsure about the proper course of action, discuss the situation with your supervisor, your local Compliance Officer or the in-house legal counsel. If these alternatives are insufficient, you may contact the relevant ombudsperson as defined above in section 13 on a confidential basis.