At SES, we believe in the need for content connectivity solutions everywhere and that providing access to the world's information in fast and reliable way is essential to providing everyone on Earth with the opportunities to grow and, in turn, to make a difference as well.

**OUR APPROACH & IMPACT**

Sustainability and Corporate Responsibility is an important component of the SES purpose and ambitions. The aim of our corporate activities is to add value in the short, medium and long-term. This reflects corporate success, as well as competitiveness and future viability and does not only depend on the company itself but also on the industry environment, relationships with stakeholders and the usage of different resources.

We aspire to conduct all of our business activities in a sustainable and responsible way. As part of this, we identify factors in four key areas—**S**ocietal, **E**nvironmental, **S**ocial and **G**overnance (SESG)—and our activities in these areas support the group’s purpose and ambitions. In doing so, creating lasting value and impact for all stakeholders.

We support the principles of the United Nations Sustainable Development Goals (SDGs). Our areas of action and the sustainability-related activities support the following Sustainable Development Goals in particular:

### SDG 10: Reduce inequalities
We bring content and connectivity to people and societies which were previously not connected to the world’s information, so they can contribute to a more equal world with more equal opportunities.

### SDG 3: Good Health and Wellbeing
Giving access to connectivity means bridging the information gap between countries or societies which benefit e-health, e-inclusion and improve the wellbeing of people.

### SDG 4: Quality Education
Our connectivity solutions offer a wide variety of education and trainings that enable people and societies to learn and develop at anytime, anywhere in the world.

### SDG 8: Decent Work and Economic Growth
By improving access to education and remote health solutions and investments into regions, countries and businesses while respect-
ing and upholding human rights in our own businesses and our supply chain, we support the implementation of decent work as defined by SDG 8.

- **SDG 9: Industry Innovation and Infrastructure**
  Through our innovation in Cloud, automation and virtualisation and the expected benefits for connectivity in poor and remote areas, we demonstrate the long-term potential of digital innovation.

**POLICIES TO MINIMISE RISK**

To minimise risks across the business, achieve our objectives to create sustainable value for stakeholders, we have identified potential risk areas relating to the Societal, Environmental, Social and Governance business activities. This is part of our Risk and Internal Control system, [More Information](#).

Balancing risks and optimising value creation for our stakeholders must go hand in hand with the right policies and business principles in place. Therefore, SES is implementing governance and policy structures tackling the four areas of SES’ Corporate Responsibility approach (Societal, Environmental, Social and Governance).

The following chapters give a fair and transparent overview of SES activities in these four areas related to value creation for our stakeholders while minimising risks.

**NON-FINANCIAL STATEMENT**

The following information is provided in compliance with the Non-Financial Reporting Directive requirements. The table below sets out where the relevant information can be found in this Annual Report.

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The following information is provided in compliance with the Non-Financial Reporting Directive requirements. The table below sets out where the relevant information can be found in this Annual Report.
SOCIETAL MATTERS

We understand that we are part of something bigger and that we want to contribute and make a difference to the society and the people around us.

Since 1985, SES has been doing the extraordinary in space to deliver amazing experiences everywhere on Earth. We provide over 1 billion people with access to entertainment, news and information content; bring connectivity to remote populations; pioneer new technologies that can drive social, environment and economic change globally; and save lives by restoring critical connectivity following natural disasters.

SES has implemented several policies and guidelines with the aim to bring stakeholder value to customers, societies and to make a difference.

DRIVING GLOBAL DIGITAL EQUALITY

Reliable, high-speed connectivity is key to driving digitisation and boosting countries’ economies and opening opportunities for their people. With the ability to beam reliable and flexible bandwidth anywhere on earth, our satellites bring access to information and learning, improving digital inclusion. In this way, we help progress initiatives across geographical barriers, bringing infrastructure to fragile economies and isolated communities, or aiding humanitarian efforts in disaster-hit areas. Each country has unique challenges and opportunities around the move towards digital and we are at the forefront of this transformation.

ENGAGING IN HUMANITARIAN AND DISASTER RELIEF

Over recent years, SES has engaged in various missions to improve humanitarian situations:

Emergency.lu missions

emergency.lu is a mobile, satellite based, telecommunications platform, created to re-establish communication (internet, phone) after a disaster, to support the coordination efforts of humanitarian organisations in the field and to contribute to saving lives during humanitarian emergencies. It is a Public-Private-Partnership between the Luxembourg Government and three Luxembourg companies (SES, HITEC Luxembourg and Luxembourg Air Ambulance).

In 2019, emergency.lu has been deployed in 15 locations:

- UNICEF in RoSS: [Link]
- WFP in Nigeria: [Link]
- UNHCR in Niger: [Link]
- UNHCR in Chad: [Link]
- WFP in CAR: [Link]
- UNICEF in Venezuela: [Link]
- UNHCR in Venezuela: [Link]
- Mozambique (Cyclone Idai): [Link]
- Bahamas (Hurricane Dorian): [Link]

Besides the ‘new’ deployments that SES achieved in 2019, there were also 3 missions that were up and running in 2019:

- UNICEF in RoSS (active from May 2015 to June 2019)
- UNHCR in Niger (Starting July 2017, ongoing)
- WFP in Nigeria (Starting January 2017, ongoing)

Since the initiation of the project in 2012, emergency covered 27 missions with 69 deployments.
**Disaster Response and recovery response**
Developed two disaster response and recovery products to better meet the needs of mission critical communications during a disaster. The first is a ‘response’ package geared toward the first days after a disaster when early communications are critical for disaster assessments and meeting the immediate needs of the people on the ground. The second package is a ‘recovery’ package utilizing our O3b constellation for a longer deployment where restoration of a network or connecting an entire community is the focus.

**Luxembourg initiatives—High-Performance ICT Infrastructure**
Supported by the Government of Luxembourg, SES devised a future-proof country-wide ICT infrastructure to deliver high-speed communications to connect government entities of Burkina Faso. The innovative solution integrates wireless terrestrial communications and available fibre-optic networks into a satellite-enabled infrastructure, powered by Medium Earth Orbit (MEO) capabilities. It is designed to connect over 880 sites across the country – to improve day-to-day operations for government offices and enable deployment of e-government, e-education, e-health projects. The infrastructure is also reinforced by solar energy installations. A reliable high-performance network is also the basis for further adoption of advanced IT tools and applications. Supporting the information, technology and communications sectors helps improve people’s lives, enables productivity and economic growth.

**SUPPORTING THE DEPLOYMENT OF UNIVERSAL ACCESS**
We believe that everyone has the right to seek, receive and impart information. This right is an integral part of the right to freedom of expression.

In 2019, SES has translated this belief into concrete actions and deployed access to information in the following developing countries:

**Colombia**
Together with INRED SES provides internet access to 1,000 remote sites in Colombia, currently providing 300Mbps. Those 1,000 sites were installed by 30 November 2019.

**Indonesia**
TELEGLOBAL and SES provide broadband internet access and mobile backhaul services to 150,000 sites in remote parts of Indonesia.

**Jakarta**
SES installed two gateways in Jakarta supporting TELEGLOBAL, enabling the delivery of almost 1400 MHz in bandwidth capacity.

**Brazil**
We are currently also working on a project providing internet access to 700 schools in remote areas in Brazil and have started with the deployment of the first phase.

**DRIVING E-LEARNING PROGRAMMES IN AFRICA**
E-learning can change lives by delivering quality education to even the most remote locations, everywhere on the planet. Although our e-learning programmes are deployed across the world, in the last few years we have focused our efforts on the African continent, where satellite technology is best-placed to reach rural and isolated areas. We have therefore worked with governments and public institutions in Africa to encourage them to embrace satellite technology to accelerate an education development programme.

For example, in Nigeria we have leveraged our satellite technology and infrastructure to run e-learning programmes since 2015. In partnership with the Nigerian Government we are implementing ICT projects that are bridging the digital and information gap in rural areas and providing e-learning facilities to underserved communities.

**GIVING BACK**
SES’ entire team focuses on charitable work, including volunteering, charitable activities that benefit from our donation-matching programme, SES social clubs, and charity projects endorsed by our HR Learning and Development team. These activities engage and motivate our colleagues, who then inspire each other to give back to the community where we work.

SES matches employee donations to charitable organisations including the Red Cross, the Red Crescent, Oxfam, Unicef, Médecins Sans Frontières, and Telecoms Sans Frontières.

In 2018, a group of SES volunteers developed SHARITY, an employee-based charity designed to support small and tailored development projects around the world. In 2019, SHARITY collected over EUR 13,000 and was able to bring girls back in school, help communities achieve sustainability, and contribute in a small way to keep this world a bit greener.
Although our business activities have a low environmental impact, we understand our responsibility as corporate citizen to support the urgent action to prevent climate change and to limit the increase in global temperatures.

SES environmental policy is structured around two main impact zones: space and earth.

1. **Responsible satellite fleet management**
   SES applies a responsible fleet management approach together with its satellite manufacturer to mitigate the environmental impact and to minimise space debris.

2. **Minimising the environmental impact of SES sites and ground stations.**
   SES does not operate any manufacturing sites; it has 44 offices and ground stations. SES applies best practices in minimising the environmental impact of these facilities. Further, SES also ensures that the amount of radiation emitted from earth stations complies with local standards in each country of operation. This is checked through annual audits by third party accredited organisations that specialise in the field of industrial safety (like the WHO).

Having analysed the risks of potential environmental impacts, SES concluded that there is no need to make financial provisions or guarantees in respect of environmental risks. Furthermore, there is no ongoing litigation concerning environmental issues within the Group.
**OPPORTUNITIES FOR CLIMATE CHANGE MITIGATION**

**Reduction of environmental pollution**
Satellites receive their operating power from the sun, through solar panels, outside the Earth’s atmosphere. They therefore create no carbon emissions during their operating lifetimes.

**Climate Change adaptation technology**
Climate change risks are not considered as principal risk.

**SPACE DEBRIS MANAGEMENT**
The United Nations General Assembly has recognised “that space debris is an issue of concern to all nations”. Space debris is defined as “all manmade objects including fragments and elements thereof, in Earth orbit or re-entering the atmosphere, that are non-functional.”

**Lifecycle analysis of satellites**

**Launch:** non-reusable launch vehicles end up breaking up into thousands of small fragments as they re-enter the atmosphere, and debris can also occur as a result of explosions during launch. SES is involved at the institutional and industry level in developing protocols for reducing or removing space debris. We are a founder of the Space Data Association (SDA), a non-profit association of spacecraft operators that support the controlled, reliable and efficient sharing of data to enhance the safety and integrity of satellite operations.

Since 2017, SES and SpaceX have pioneered reusable rockets for satellite launches. This reduces space debris, allows the reuse of materials that would otherwise go to waste, and improves cost-effectiveness of launches.

**In Operation and end-of-life:** SES satellites operate in either geostationary orbit (35,786 km above the Earth) or medium-earth orbit, (8,000 km). At end-of-life, they are re-orbited using their remaining on-board propellant into a graveyard orbit, approximately 200 kilometres beyond the geostationary orbit. In general, SES satellites do not re-enter the Earth’s atmosphere.

In this regard, SES follows the most stringent international standards for re-orbiting and passivating space assets and we have one of the best records in the industry terms of achieving a safe disposal of our satellites.

**MINIMISING EMISSIONS**

Since 2008, we have officially reported the CO₂ emissions of our operations through participation in the Carbon Disclosure Project (CDP), which collects the data of all SES’ business activities and locations.

The data collection for CDP covers three scopes:

- **Scope 1:** Direct Combustibles (gas and fuel consumption, refrigerant leakage, car fleet)
- **Scope 2:** Indirect Energy consumption (purchased electricity or heat)
- **Scope 3:** Other Emissions (business travel, commuting, waste, water consumption)

In 2018, the company’s activities related to operating and commercialising SES’ satellite fleet, as well as general administration, finance and marketing generated approximately 50,523 tons of CO₂ emissions worldwide, an increase of 8% compared to 2017. This increase was due to the growth of the company in number of employees and sites.


Emissions from Scope 2, electricity consumption, represented the largest component of SES’ total emissions (approximately 61%). Scope 2 location-based emissions factors were chosen in line with the GHG Protocol recommendations. For low occupancy sites, assumptions were made based on average electricity, gas and travel data at the main office sites. A data collection questionnaire was circulated to all 43 main SES global sites and a large sample of low occupancy and unmanned SES sites.

In the context of the legal framework in Europe with the goal to save energy, SES started to analyse the energy efficiency of the main facilities in accordance with EN 16247. This exercise has been performed at SES’ sites in Munich, Germany, and Betzdorf, Luxembourg. Through these and other initiatives, we have implemented a substantial and ongoing carbon reduction plan in our sites across the world.

**WASTE MANAGEMENT**

In order to facilitate the recycling of different waste types in Betzdorf (Luxembourg), our Headquarters and biggest site, we separate as much waste generated on site as possible.
We systematically collect data on waste management in compliance with the Ministry of the Environment, Climate and Sustainable Development and ISO14024. We encourage each of our employees to do their part to limit and eventually reduce the waste produced on our sites.

**Waste management initiatives**
- Food Waste: We try to avoid food waste and all organic leftovers are used as combustible to fuel a Biogas plant.
- Plastic: eliminating single use plastics from our catering facilities for packaging and cups.
- As an ecological alternative to bottled water, SES installed water dispensers, dramatically reducing the number of consumed plastic bottles and related transport, storage and recycling efforts.

Betzdorf campus provides the Ministry of the Environment, Climate and Sustainable Development with a detailed report reflecting all different types of waste collection (quantities, volumes, recycling types). Additionally, SES is audited and certified by the Luxembourg SDK (SuperDrecksKescht) Label on an annual basis.

**Supply chain waste minimisation**
Contractors, sub-contractors and suppliers are required to support SES waste reduction by implementing policies and procedures regarding waste management.

**PaperCut Initiative**
SES has implemented the 'Paper Cut' software in 2019, a print management software with the ambition to save paper waste while having a secure and easy printing experience.

As a result, SES saved in total 86,535 pages and 43,946 color pages equalling 6.85 trees and 724.9 kg of CO₂ savings.

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**SOCIAL MATTERS**
We understand that our activities are impacting and being impacted by wider social stakeholder groups of customers, suppliers and employees.

The success of SES is heavily dependent on the skills and commitment of our employees. More than 2,100 people from 81 nationalities worldwide contribute their concepts and ideas to their tasks and help to make improvements and innovations to create amazing customer experiences everywhere on the world.

**HUMAN CAPITAL STRATEGY**
In order to recruit, develop and retain highly qualified staff, we are continuously striving to further improve our attractiveness as an employer. Because our Leadership team, executives and managers should motivate their employees to achieve top performance, it is crucial that we equip them with outstanding leadership skills. In addition, we want to take on social responsibility and let diversity flourish in our global company. A professional Human Capital organisation and efficient operating processes form the basis for the implementation of these overarching goals, from which we have derived key areas of action.

Our main control tool is our Social Report, which uses key performance indicators concerning demographics, development and diversity.
HUMAN CAPITAL AMBITIONS

We are passionate about employee experience and employee success. We aim to treat employees as we want them to treat our customers; empower them to take ownership of their careers; and create a community where it is fun to work.

We strive to be future proof, powered by a strong, healthy culture. This depends on learning and teaching, a diverse workplace where everyone feels included, and having a growth mindset.

We drive business success within SES by anticipating and meeting the needs of the business through world-class human capital practices.

ATTRACTIVENESS AS EMPLOYER

Attractive and fair compensation and benefits

Our pay for performance compensation philosophy aims to stay ahead of the market and contributes to the Company’s business strategy in a fair and equitable manner.

Key Principles:

- We benchmark our total compensation against local practices of other global organisations with the ICT industry as a reference point.
- Total compensation consists of the annual base pay, bonus linked to individual, departmental and group financial targets, benefits aligned with local practices as well as long-term incentives in order to position the Company as a global employer of choice.
- We are fair and consistent in all compensation & benefits related decisions.

Modern working conditions

Working conditions are being increasingly influenced by working hours, workplaces, the work environment, the level of employee empowerment and a state-of-the-art, growth driven management culture.

The length of our employees’ workweek is generally regulated by the company or by a collective bargaining agreement.

Today’s living and working conditions require working times to be flexibly organized in accordance with individual needs. We help employees reconcile their professional and personal responsibilities and boost their flexibility and self-determination by giving them the opportunity for mobile working.

Since 2017, all employees can enter into a formal telecommuting arrangement where they may work from another SES office, from home or from another location for up to a max 20% of the contractually agreed working time. Further options for flexible working today include job sharing, part-time work, phased return from leave and reduction in work time.

Employee welfare

We challenge our employees to play an active and informed role in their health and benefits, providing information, programmes, benefits and policies that encourage physical and mental wellbeing. To this end, SES offers healthcare coverage for all employees in all locations, has a non-smoking policy for all SES offices and, depending on location, offers a range of wellness activities, healthy foods and confidential employee assistance to ensure everyone can find the balance between work, family and personal pursuits. We complement this with a variety of local employee events including informal get-togethers, parties, sports activities, community service projects and holiday activities.

Supporting our employees in times of need

To support our employees through the unexpected, the Social Fund has been established for the benefit of all employees of the SES Group.

This fund is intended to provide financial support to staff members and direct members of their families in case of social emergency situations, for which staff members or members of their families cannot be held responsible. This fund is a reflection of our company values. The spirit of these values defines SES as a caring organisation, that has a fundamental interest in protecting the welfare of its staff members and their families.

A COMPETITIVE WORKFORCE

Diversity management

We are committed to bringing together an SES team of diverse individuals, with different life experiences, different backgrounds, and from different geographies and cultures.

This approach is paramount to serving our customers today and helping us decipher the world’s communication needs of tomorrow. By actively nurturing an inclusive company culture, and appreciating why it is so important to create a fair and supportive work environment for our people, we seek to continue attracting and retaining the very best talent.

As an industry leader, SES is fully committed to increasing the number of colleagues from underrepresented groups and to creating a more diverse SES for the future.

Currently 24% of SES’ workforce are women, a figure that has been stable over the last years but that we aim to grow as part of our diversity strategy. Women are most present in Corporate Functions (58%) but considerably less in Technology & IT (12%). Furthermore, about 30% of our employees below 30 years are female. We have observed a slight increase of women representation at executive level (13% in 2019). In addition, 33% of SES’ Leadership Development Program are women.
We are determined to continue to increase the number of women in areas where they are underrepresented and to increase the number of female executives by 2020. We are applying systematic and supportive practices in building a female talent pipeline that will sustain long-term gender inclusion.

As of end-December 2019, SES employed staff from 81 nationalities across 41 offices. The most represented nationalities are: United States, Germany, Israel, Great Britain, France, Luxembourg, The Netherlands, Belgium and Italy.

In addition, SES has an overall healthy age distribution with an average age of 43.8. 43% of our employees are aged 40 and below and 11% are aged 30 and below.

SECURING TALENT

In-house talent acquisition programme
In 2018 we created a new global in-house Talent Acquisition function with dedicated personnel and developed a new Strategic Plan aligned to business imperatives. In 2019 we filled 412 positions 70% were filled externally. 47% of the positions were filled in Europe, 40% in North America.

Collaborating and supporting Science, Technology, Engineering and Mathematics (STEM)
To secure best in class employees and to sustain innovative capabilities, we believe that we must inspire the new generation towards Science, Technology, Engineering and Mathematics (STEM). Therefore, we engage in global activities in this field also using it as opportunity to support and increase diversity.

In May 2018, we teamed up with The Air League to create the first ever SES Space Scholarship. The Air League is a charitable organisation, founded in 1909, based in the United Kingdom. It provides powered flying, ballooning, gliding and engineering scholarships to young people and disabled veterans. The SES Space Scholarship is a unique opportunity for 17-18-year-old students, to introduce and inspire them towards the wide range of career opportunities in the space industry.

In promoting gender diversity in STEM, our office in Princeton, USA, has actively supported teams in the YWCA Princeton Robotics since 2016. In 2019 the two YWCA Princeton all-girls competitive robotics teams visited the SES facility and presented to SES scientists and management. Female leaders at SES spoke candidly to the girls about how they have managed to combine their passions and expertise to have strong careers in male-dominated industries.

In October 2019, SES hosted the fifth edition of Engineering Trainee Days for students aged 15-18 years from across Luxembourg. This is an initiative of Luxembourg’s engineering association and the association for young entrepreneurs, in cooperation with the Ministry of Education and Lifelong Learning.

SES associate programme
To maintain our position as the world-leading satellite operator, we have established a special development programme for graduates to provide us with a pipeline of young talent.

The SES Associate Programme is a two-year programme that invites talented young people to work in our orbit for four assignments, each lasting six months. The programme typically exposes them to all of our functional areas—technology, finance, business development and sales—over the course of their two years. Participants have the opportunity to contribute to actual projects, learn from business leaders, and gain deep insight into the satellite industry.
Learning and development

We offer a comprehensive portfolio of learning and professional development programmes to all our employees.

In 2019, we logged 9,177 participations in training for a total of 14,738 hours of learning, with participation up by 12.5% from 8,160 in 2018. This was facilitated by the increase in e-learning offerings. In fact, 5,491 of participations (66%) were in e-learning format.

We also managed a global Mentoring Programme last year with 70+ participants mentored by SES executives and introduced a monthly global Executive Lunch and Learn education session.

Trainings in hours in 2019

<table>
<thead>
<tr>
<th>Hours by Category</th>
<th>G17</th>
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<tbody>
<tr>
<td>Technical Trainings</td>
<td>1,674</td>
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<tr>
<td>Compliance Training</td>
<td>6,886</td>
</tr>
<tr>
<td>Leadership Training</td>
<td>3,271</td>
</tr>
<tr>
<td>Professional Development</td>
<td>2,504</td>
</tr>
<tr>
<td>Customer Centric Trainings</td>
<td>404</td>
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</tbody>
</table>

HEALTH MANAGEMENT AND SAFETY AT WORK

We want to maintain our employees’ health and physical well-being for the long term. Therefore, SES has uniform preventive healthcare standards in place worldwide.

As part of our approach we develop and implement anticipatory solutions that range from the job-related ‘health check’, preventive measures such as the flu vaccination (80 employees for the SES Betzdorf population), and the ergonomic design of workstations to the IT system that makes it easier to permanently reintegrate employees suffering from limitations imposed by their health.

SES has implemented many health policies ranging from self-instructions and road safety to travel safety and also includes contractor health standards.

In 2019, 9 accidents were reported for the SES Betzdorf populations, 8 on the way to or from work, 1 on site.

CUSTOMER ‘HEARTBEAT’—CUSTOMER SATISFACTION, VOICE AND SCORE

Customers are an integral part of SES defining our activities and impacting our performance. SES conducts a ‘voice of the customer’ survey once a year. This survey is based on quantitative and qualitative methods and aims to measure the following:

- CSAT (Customer Satisfaction)
- CES (Customer Effort Score)
- NPS (Net Promotor Score = loyalty indicator)

By analysing the results from a quantitative, standardized survey of a large sample of customers with a deep-dive qualitative interview analysis of a smaller group, results in a holistic picture on the perception of SES, customer challenges, expectations and improvement potential for SES and also other important insights to steer the company in a customer focused way.

PROCUREMENT POLICY

We take a partnership approach in regard to our suppliers and business partners. For example, our open innovation approach across the R&D value chain and the development of the new constellation O3b mPOWER to be launched in 2021 was the result of an open innovation model together with Boeing.

We review the ethical behaviour of our partners as well as their compliance with human rights and global citizenship requirements.

As for the purchasing policy of products and services for use in offices, the Vendor Management Department ensures that key suppliers have implemented policies for social and environmental issues. Requests for tenders stipulate a commitment to respect the SES ethical charter; procurement contracts always require compliance with regulations, including prohibition of employment of non-registered personnel.
GOVERNANCE MATTERS

Our Corporate responsibility objectives and their management are part of our corporate governance system and are also represented in the targets and remuneration of our Directors and Executives.

Integrity, compliance and legal responsibility are the cornerstones of our sustainable corporate governance and serve as the basis for all our actions.

COMPLIANCE AND CODE OF CONDUCT

We define compliance as trust-based, reliable and sustainable corporate governance derived from ethical values. The Board of Directors is responsible for compliance with the law and the company’s policies and seeks the same level of compliance from all SES subsidiaries and employees.

To manage and address compliance risk we have implemented a Compliance Management System including a Compliance Committee and a Code of Conduct which defines guidelines for our everyday business conduct, offers our employees orientation and helps them make the right decisions even in difficult business situations.

The SES Compliance Committee, composed of designated Compliance Officers in each main corporate location, is tasked with raising the staff’s awareness of the Code and ensures a consistent roll-out and training programme for the Code. The Committee meets regularly to discuss important topics or issues. Reflecting the company’s expansion into developing markets, the composition of the Committee includes representatives from SES’ offices in Asia, the Middle East and Latin America.

Whistleblowing System
In 2019, SES introduced a whistleblowing hotline, managed by a third-party provider, which allows our staff to file any compliance complaints in full confidence.

Compliance Training
SES has implemented a comprehensive compliance training programme for staff. In 2019, overall nearly 6,000 trainings have been completed on compliance topics including cyber-security, anti-bribery & corruption and sanctions & export controls.

RESPECTING AND UPHOLDING HUMAN RIGHTS

Respect for human rights is a natural prerequisite for responsible business management at SES. We expect all employees to be proactive in protecting human rights so that violations can be ruled out entirely when it comes to our company’s business activities. This is a goal that is also highlighted in our Code of Conduct.

For instance, the potential risk of any child or forced labour at any of our locations is always considered within the scope of our audits. We do not see any elevated risk of child or forced labour at any of our SES locations or in our activities. SES was also not aware of any cases of human rights violations within the scope of its own business activities during the reporting period.

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

SES is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. SES will not support or deal with any business knowingly involved in slavery or human trafficking.

The nature of SES’ business means that the majority of SES’ suppliers are large international companies providing complex technical services relating to the space industry through highly skilled professional employees. SES’ 50 largest suppliers account for approximately 80% of procurement spending.

SES does not procure a material amount of goods or services in sectors that are considered to be high risk for human trafficking or slavery (such as agriculture or horticulture, construction, textiles, catering and restaurants, domestic work, and entertainment).

SES has created a Code of Conduct for Suppliers, which clearly outlines SES’ stance towards slavery and human trafficking. SES also includes in its contracts with suppliers a clause requiring the supplier to comply with all laws applicable to the provision of the goods or service. SES’ contracts with its suppliers also contain a provision stating its suppliers cannot novate or subcontract any right or obligations to any third party without the written consent of SES.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 of the UK and sets out the steps SES has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.
AVOIDING CORRUPTION AND BRIBERY

SES is committed to respecting the highest ethical and legal standards, set out in our Code of Conduct, on which all our employees are trained. We have identified bribery and corruption as one of the risks that SES is facing by doing business in most countries around the world, including with governments.

As part of compliance training, 147 of the most exposed staff members were given anti-bribery training. We are also conducting external due diligence on our third-party agents upon their appointment. The level of this due diligence depends on the risk assessment, which itself is based on several elements, including the country of operation and the type of business.

We also reduce the risk of bribery through a clear process for gifts and entertainment. The relevant policy, which like all compliance policies is available on a dedicated intranet page, contains a dedicated e-mail address that can be used to obtain guidance prior to providing or accepting a gift or entertainment.

HIGH STANDARDS FOR DATA PROTECTION AND CYBERSECURITY

The robust management of data protection and data security is essential, in our opinion, to secure the long-term confidence of our stakeholders.

To ensure compliance with data protection laws and regulations, SES appointed a Data Protection Officer. SES has implemented a variety of measures, has reviewed, updated and enacted relevant procedures and processes, and continuously strives to comply with the General Data Protection Regulation (GDPR).

SES has implemented technical and organizational security measures to protect networks and systems from cyber attacks. As part of continual organisational improvement and in line with its commitment to strengthening cyber security, management has introduced a security framework in accordance with the leading industry standard ISO 27001 in key areas. This framework is continually adapted to new threats considering global organizational changes, security controls and practices within the group to reduce the risks of cyber attacks.

ANTITRUST AND INSIDER TRADING POLICY

SES is committed to full compliance with competition laws. Compliance with competition laws is each employee’s responsibility. Employees that violate this Policy may be subject to disciplinary action including termination of employment.

Given the complex nature, application and broad reach of competition laws, every SES employee is responsible for involving in-house legal counsel whenever and as soon as any issues or questions arise and before taking any action that might have competition law implications.

As a public company being listed at the Luxembourg and Paris Euronext stock exchange, SES has implemented a trading policy to ensure that SES and its directors and employees and, under certain circumstances, their respective close family members comply with the rules of the securities market, transparency regulation, Market Abuse Regulation and other applicable rules.

SUSTAINABILITY MANAGEMENT IN THE SUPPLY CHAIN

The purchasing functions within SES help to ensure the supply of materials and services at the best possible quality / cost ratio and thus strengthen the competitiveness of the company. SES places great emphasis on the efficient design of its procurement processes for achieving cost-effective purchasing results, as well as on sustainable procurement taking into account the requirements of national laws, EU law and the Group’s code of conduct for suppliers.

Given the structure of the satellite industry and the highly technical nature of SES business, we can differentiate between the general vendor policy and the dealing with major business partners and satellite manufacturers or launchers.

Satellite manufacturer:

As well as complying with International and Luxembourg Space Law, our main suppliers, principally located in Europe and the U.S., are held to high social responsibility standards.

As SES is a capital-intensive company with continuing significant investments in assets, a Policy is also required to ensure that all investments are monitored on a regular basis and that the company’s assets are safeguarded.
CONTACT

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The SES Investor Relations team will be pleased to assist you with any questions you may have in relation to SES.
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CONCEPT AND DESIGN

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