

# OUR STATEMENT ON SLAVERY AND HUMAN TRAFFICKING





# OUR APPROACH

We adopt a zero-tolerance approach to modern slavery, forced labour and human trafficking. SES fully supports the principles and objectives of the UK Modern Slavery Act of 2015 (MSA) and is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. As a signatory of the United Nations Global Compact since 2021, we are committed to adhere to international initiatives and standards such as the Fundamental Conventions of the International Labour Organization, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights. All forms of modern slavery, forced labour, child labour, exploitation, and discrimination are explicitly prohibited by SES in our Code of Conduct and inserted into legal documents with our suppliers, partners, and customers.

We will not support or deal with any business that engages knowingly in any form of modern slavery or human trafficking. This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 which covers the fiscal year 2023. It sets out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in its supply chains or in any part of its business. For clarification, the reporting entities covered by this joint statement can be found in our [Annual Report](#), Note 36, p203

# OUR STRUCTURE, OPERATION AND SUPPLY CHAIN

As of December 2023, SES's workforce totaled

**2.314**

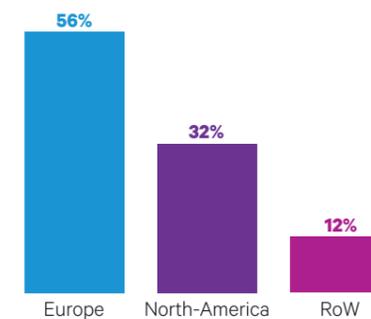
employees, with

**97%**

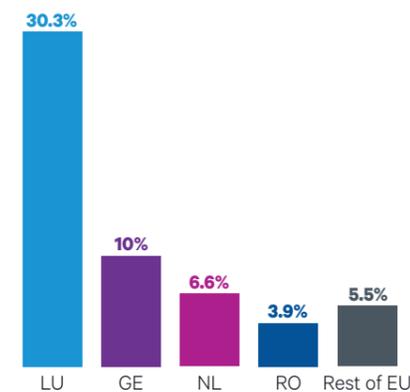
in full-time positions and

**3%**

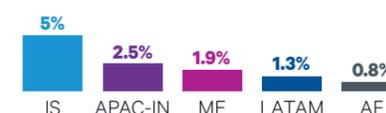
in part-time roles, globally based in the regions:



With Europe representing the most significant share of workers:



With the remaining 12% located in:



## Structure & Business Operation

Headquartered in Luxembourg, SES is active in Europe, North America, Latin America, Africa, the Middle East, and Asia. The company's global presence includes Betzdorf, Bristow, Reston, Washington D.C., Bogota, Mexico, Sao Paulo, Bucharest, Kyiv, Munich, Paris, Stockholm, the Hague, Accra, Addis Ababa, Emek Ha'Ela, Dubai, and Singapore.

## Structure & Business Operation

SES is the leader in global content connectivity solutions. With over 70 satellites in two different orbits, our reach is unlike any other. We combine a vast, intelligent network of satellites and ground infrastructure with industry leading expertise to manage and deliver high-performance video and data solutions virtually everywhere on the planet. For more than 30 years, our success has been built on sustainable innovation as we reliably connect more businesses, communities and government institutions in more places and deliver linear and on-demand video content seamlessly around the clock. We help broadcasters touch more viewers on screen; mobile network operators expand into uncharted markets; peacekeepers receive real-time intelligence; passengers work and play online; and communities thrive in a digital world—in some of the most remote places on the planet. [Click here](#) for more information about our organisation and operations.

## Workforce

As of December 2023, SES's workforce amounted to 2.314 employees, 97% of which consisted of full-time employees. Whereas the number of part-time employees amounted to 3%. The

company's workforce is 56% based in Europe, 32% in North America, with the remaining 12% located around the world.

Europe represents the most significant share of workers, located across four main sites: with 30.3% based in Luxembourg, 6.6% located in The Netherlands, 3.9% in Romania, 10% situated in Germany and lastly 5.5% in the rest of Europe.

The remaining 12% is located internationally with 5% of its employees in Israel, 2.5% situated in APAC-India, 1.9% in the Middle East, 1.3% in Latin America and 0.8% based in Africa.

## Supply chain

Many of our suppliers are large international companies providing complex technical solutions relating to the space industry through highly skilled professional employees. Our primary supply chain categories include space segment (satellite manufacturers and launchers), professional services, broadcasters, antenna manufacturers, IP platforms, radio frequency equipment manufacturers, and video solutions providers.

In 2023, SES procured products & services from approximately 3,300 suppliers based in about 100 countries. Over 40% of our suppliers are located in the EU, with an additional 44% based in the UK, US, Canada, South Korea, Switzerland and Australia. In 2023, we sourced almost 90% of our total purchase volume from countries in which we have significant operations such as the USA, Canada, South Korea, Australia, Germany, Luxembourg, the UK, Belgium, France, The Netherlands, Sweden, and Switzerland.

# OUR GOVERNANCE AND POLICIES

Respect for human rights is a natural prerequisite for responsible business management at SES and we are committed to acting in accordance with all applicable laws.

## GOVERNANCE

Our Chief Executive is responsible for the delivery of our ESG strategy. The Chief Legal Officer is the senior leader reporting to the CEO with ESG in their remit and supervises the Director of Social and Environmental Impact. The ESG team works across the organisation with key internal stakeholders in each area of the business - Technology, Finance, Strategy, Customer verticals, HR, Compliance, and Risk - who each have relevant ESG priorities and implementation responsibility.

The Board of Directors is responsible for compliance with the law and the company's policies. Through its committees, it supervises our ESG programme, including the targets set across our sustainability pillars. The Audit and Risk committee is briefed every quarter on the progress of ESG

topics and the targets of the ESG programme. The SES board additionally reviews and approves the Annual Report, which includes the sustainability section. Starting in 2024 the board will review and approve the double materiality assessment of the company.

We have also established a Compliance Committee, composed of designated compliance officers in each main corporate location and subject matter experts. The members are tasked with raising the staff's awareness of the Code of Conduct. The Committee meets regularly to discuss important topics or issues. Reflecting on the company's expansion into developing markets, the composition of the Committee includes representatives from SES' offices in Asia, Europe, the Middle East, and the Americas.



We have introduced a new mention of the SES Global Compliance Hotline—a whistleblowing mechanism accessible not only to internal SES employees but also to external stakeholders (such as customers and vendors).

## POLICIES

### Our Code of Conduct and Ethics

We have implemented a Code of Conduct, signed by the CEO of SES, which defines our everyday business conduct, offers employees advice, and helps them make the right decisions even in difficult business situations. The Code of Conduct highlights our responsibility to its staff including its obligation of equality of treatment, avoiding any discrimination or harassment and ensuring respect.

Prior to hiring contractors, we provide the party with an appropriate education on the mandatory requirements of our policies and take necessary action, up to and including terminating a contract with a contractor who failed to abide by SES policies. We plan to review our Code of Conduct to highlight specifically our commitment regarding human rights, an updated version will be released in 2024.

### Our Code of Conduct for Suppliers

The purchasing functions within SES are carefully managed by a dedicated Vendor Management and Procurement team for expenditures falling in scope.

We emphasise the design of our procurement processes, keeping in mind the obligations to applicable laws and our responsibility for sustainable practice. Our suppliers are required to adhere to a Supplier Code of Conduct and Supplier General Terms and Conditions (GTCs) which outlines SES' expectations with regards to insider trading, conflicts of interest, bribery, sanctions, money laundering, child labour, and human rights.

In 2023, we have made several updates to our Supplier Code of Conduct. Specifically, we have added a new section focused on human rights, which includes references to the ILO International Labour Standards. This section also covers specific topics such as Child Labour, Forced Labour, Mineral Sourcing, and Freedom of Association.

Additionally, we have expanded the Environment section. It now features a link to our recently developed Environmental, Health, and Safety Charter, along with a dedicated segment on Sustainable Product and Process Development.

Our Compliance Committee is responsible for raising the staff's awareness of the Code of Conduct.

# OUR MATERIALITY AND RISK ASSESSMENT

## 2021 Assessment – First Materiality Assessment

We did not identify any elevated risk of child or forced labour at any of our SES locations or in our own operations.

In 2021, we conducted a first materiality assessment to identify and prioritise SES material issues through external interviews with industry experts, customers, non-governmental organisation partners, civil society, and government representatives. Additional internal input was also collected through workshops, surveys, and ESG investor rating analysis. Based on this stakeholder outreach the below materiality matrix was developed.

The Tier 1 items represent the most critical, thus priority material issues for us. These issues include our engagement with the digital society, Diversity and Inclusion, operational carbon footprint, energy use, and

interaction with space and waste minimisation. The scope of this assessment being limited to SES' own operations, we did not identify salient human rights risks.

Indeed, as we do not procure a material amount of goods or services in sectors that are considered high risk for human trafficking or slavery (such as textiles, catering and restaurants, domestic work, as well as agriculture, forestry, and fishing) or we do not manufacture goods, operate factories or handle raw materials or commodities, we did not identify any elevated risk of child or forced labour at any of our SES locations or in our own operations.

Importance to Society ↑	Emergency response, Disaster management, Satellite & ground infrastructure end of life.	Cybersecurity and data privacy.	Digital access to basic services. Employee diversity, equity & inclusion. Space waste & congestion.
	Climate adaptation and resilience. Employee and worker rights, wellbeing and safety. Space policy advocacy. Use and recovery of toxics, precious materials and conflict minerals.	Emergency response, Disaster management, Satellite & ground infrastructure end of life.	Digital reach & inclusion. Ethical & transparent business practices. GHG emissions (scope 1, 2, 3). Renewables & energy use.
	Biodiversity and land use, water footprint.	Customer environmental benefits. Diversity in STEM education. Employee recruitment, development and engagement. Operational waste. Transparent supply chain management.	Local community impact.
	Business Impact →		
	■ Tier 1	■ Tier 2	■ Tier 3



## 2023 Assessment – First High-level Human Rights Assessment

The 2024 assessment will consider both the impact of SES business on society and the environment and how ESG issues affect the company.

In 2023, we have participated in the [United Nations Global Compact Business & Human Rights Accelerator programme](#), with the aim of improving our human rights due diligence process. As part of this project, we have conducted a high-level human rights risk saliency exercise in our direct supply chain. This second risk assessment was based on desk research, a benchmark of industry peers and companies in our supply chains, and internal stakeholder outreach.

Following this assessment, we identified three areas where potential negative impacts on human rights (including modern slavery) could occur in our industry's value chains (upstream and downstream):

- Labour Rights
- Human Rights and the Environment
- Human Rights and Responsible use of Technology

However, it is important to note that no actual human rights incidents were identified within the scope of our own

business activities and direct supply chain during the reporting period in 2023.

### Next steps

Further validation of these findings will be done in 2024 through additional external stakeholder engagement. This additional external outreach will not only be used to deepen the analyses and understanding of ESG risks in its value chains, but SES will also be part of a new double materiality assessment.

This new assessment's main purpose will be to prepare for the implementation of the Corporate Sustainability Reporting Directive (CSRD). This assessment will consider both the impact of SES business on society and the environment (impact materiality) and how ESG issues affect the company (financial materiality). The assessment will involve internal and external stakeholder engagement, such as customers, suppliers and business networks, NGOs, and Academia. It will cover all ESG topics including human rights.

# MITIGATION PROCESS



SES considers our engagement and relationship with suppliers to be a critical part of our commitment to eliminating modern slavery.

## Supplier Obligations

SES considers our engagement and relationship with suppliers to be a critical part of our commitment to eliminating modern slavery. SES Vendor Management and Procurement Vice President is responsible for ensuring compliance with internal business policies and applicable regulations for expenditures falling in scope. He reports directly to the Chief Finance Officer (CFO), who in turn reports to the SES Chief Executive Officer (CEO).

SES set a high bar for itself, its suppliers and business partners. In addition to the Supplier Code of Conduct, SES Vendor Management and Procurement (VMP) teams set up common policies and practices across SES for expenditures falling in scope, enabling standard approaches to be taken across key issues including related human rights and modern slavery risks. SES includes in its suppliers' contracts a clause requiring the supplier to comply with all laws applicable to the provision of the goods or service which include respect for human rights.

## Review of sustainable procurement policy

Once our new double materiality assessment will be completed in 2024, and the relevant sustainability issues in our supply chain identified, SES plan to develop a sustainable procurement policy and define targets and related Key

Performance Indicators (KPIs) to allow us to better track our performances.

## Supplier assessments

As part of the new Sustainable Procurement Programme that SES is developing, we have been exploring the possibility to use a third-party corporate responsibility supply chain assessment tool to gain visibility into the risks and vulnerabilities of our supply chain. With this pilot assessment, 86% of our vendors went through a scoring exercise. In addition, some of our critical vendors were selected to participate in a self-assessment questionnaire. While this engagement did not fully capture the impact and maturity level of our suppliers due to the limited sample size, the results and feedback from participants allowed us to identify areas for improvement and ways to better tailor the process to our suppliers.

## Brand accreditation program

A worthy initiative was taken by our Brand, Strategy and Development team that, in conducting an accreditation programme of their suppliers during 2023, proactively incorporated ESG criteria into the evaluation. Through the analysis of various documents and a series of interviews, we had the opportunity to engage with these stakeholders and gain a better understanding of what sustainability means to them, their constraints, and the possibilities of their industry.



## Key Actions for 2024

The following actions and activities have been identified to be implemented in 2024:

- Review and update of SES Code of Conduct
- Develop Sustainable procurement policy
- Review double materiality assessment
- Identify impacts, risks and opportunities of SES' critical vendors
- Define supplier assessment questionnaire taking learning from the pilot
- Further development of KPIs, Targets and Human Rights reporting
- Ongoing training on sustainable purchasing practices for procurement team

**Adel Al-Saleh**  
CEO, SES SA

## Whistle blowing

At SES, we encourage anybody connected with our business activities to 'speak up' through various channels, including the SES Global Compliance Hotline. This whistleblowing hotline, managed by the third-party provider Navex, enables anyone who has a concern about the action of SES or its employees or representatives to submit a report securely and confidentially on potential issues, such as bribery, health and safety, environment, and human rights or any conduct that would not comply with SES business policies or with applicable laws and regulation.

In 2023, as part of our ongoing commitment to compliance and ethics, we took significant steps to enhance our [online Global Compliance Hotline](#). One pivotal initiative was the expansion of our hotline to include not only our internal stakeholders but also anybody who has a concern, including but not limited to employees, contractors, suppliers, business partners, and third-party individuals, such as an employee of an SES customer or supplier. In 2023, no report relating to human trafficking were received via this hotline.

## Training and capacity building

All SES employees are required to confirm their knowledge of the Code of Conduct before signing their employment contract and undertake bi-annual mandatory training to

ensure their understanding of the Code of Conduct.

SES provides its employees access to several Human Rights trainings on third party e-learning platforms. In 2023, the most relevant training has been identified and especially recommended to our procurement managers, while they are also accessible to all SES employees.

As part of our ESG employee engagement to improve positive corporate culture and ESG values, a special info session on "Human Rights and Business responsibilities" has also been organised. During this session, aimed at the entire SES population, it has been highlighted the correlations between the business efforts in ensuring the respect of human rights and the stakeholders' expectations, it has also been detailed the legal framework and the international guidelines according to which companies operate. A second part of the session was focused on human rights, due diligence, and the implications of the value chain coverage, while several business cases were provided. Following the session, several additional materials were provided to the employees to enable them to deepen their knowledge of the subject. We are constantly working on improving our ESG and compliance training offer, ensuring an increasingly wide range of courses targeted at the different company departments.

For more information,  
please contact the  
ESG team

**SES HEADQUARTERS**

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