



MX1 Code of Conduct



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Summary of the MX1 Code of Conduct

As a wholly owned subsidiary of SES, MX1 and its subsidiaries¹ (referred to collectively as “MX1”) 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 MX1 Code of Conduct (the “Code”) is based on SES’s code of conduct and is designed to enable all employees, officers and Directors of MX1 (together “MX1 Employees”) to take a consistent approach to integrity issues.

This Code provides an explanation of applicable laws, regulations and MX1 policies relating to MX1 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 MX1 Employees shall comply with the spirit and letter of the policies set forth and referenced in this Code.

MX1 prohibits any MX1 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 will be deemed to be a violation of the Code.

It is not permitted for an MX1 Employee to knowingly file a false report of a Code violation or alleged violation.

¹ A subsidiary is an entity in which MX1 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 MX1.



Compliance with the Code

MX1 Employees

MX1 policies apply to all MX1 Employees.

The policies outlined in this Code are designed to ensure that MX1 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 MX1's business. Even the appearance of improper behaviour should be avoided.

MX1 Employees are expected to read and understand the policies outlined in this Code. They are expected to seek advice and direction when the requirements of the law or of good business practice appear unclear. MX1 encourages its employees to get help and advice as needed to comply with the MX1 Code of Conduct and encourages employees to use the available reporting options in case they have in good faith a compliance concern. Any questions about this Code or the appropriate course of action should be addressed to your local Compliance Officer or your MX1 Ombudsman.

An MX1 employee may remove himself or herself from participating in any activity or decision if such participation would violate a legal restriction or create a conflict of interest under the Code or applicable laws. The employee may excuse himself or herself by notifying his or her immediate supervisor and the local Compliance Officer in writing. Any disagreements regarding the basis for the employee's decision will be resolved by the Ombudsman after consultation with the employee and the employee's supervisor.

Non-Controlled Affiliates

MX1 Employees serving as Directors of non-controlled affiliates should, to the extent possible, encourage such affiliates to adopt and follow corresponding policies.

Third Parties

MX1 Employees shall require that others representing MX1, such as consultants, agents, resellers and independent contractors, agree to follow applicable MX1 policies. MX1 Employees shall:

- Perform integrity due diligence on third parties with whom MX1 does business.
- Provide third parties with appropriate education on the requirements of MX1 policies.
- Take necessary action, up to and including terminating a contract with anyone representing MX1, after becoming aware that a third party failed to abide by MX1 policies.



Applicable Law

MX1 conducts business in many countries around the world and, accordingly, is subject to the laws of many different countries. It is MX1'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 MX1 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, MX1 Employees must also follow these basic obligations common to all policies:

- Understand the details of common policies relating to their work. Each MX1 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, in-house legal counsel or other MX1 resources, such as the local Compliance Officer or the MX1 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. Section 15 of the Code describes alternative reporting procedures.
- If a concern related to a violation of the Code is raised, and the issue is not resolved to the MX1 Employee's satisfaction, then the issue may be addressed with another one of the contacts identified in Section 15.
- Cooperate in MX1 investigations into matters related to compliance with the Code.

The Code cannot, and is not intended to, address all of the situations that may be encountered while working for MX1. 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, MX1 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 MX1?

If an MX1 Employee is still not sure what to do, he or she should ask his or her manager, or contact in-house legal counsel, the local Compliance Officer or the Ombudsperson to get guidance.

Non-Compliance with the Code



MX1 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 MX1 policy
- Requesting others to violate an MX1 policy
- Failure to promptly raise a known or suspected violation of an MX1 policy
- Failure to cooperate in investigations of possible violations of MX1 policies
- Retaliation against another MX1 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 MX1 Employee and/or MX1 to criminal penalties (fines or jail sentences) or civil sanctions (damage awards or fines) in accordance with applicable law.

Non-compliance by an MX1 Employee with the Code or any other MX1 policy, guideline or procedure may result in disciplinary action, up to and including termination, and the pursuit of any applicable legal remedies. Non-compliance may also be reflected in the annual performance review and salary and bonus determinations for an MX1 Employee.



Topics Related to Individual Responsibility

1. Insider Trading or Dealing and Stock Tipping

As a wholly owned subsidiary of SES (SES and its subsidiaries shall be referred collectively as “SES”) whose shares are listed on a stock exchange, MX1 discloses important information about SES’s business in accordance with Luxembourg, French, European and other applicable securities laws and regulations. MX1 has established strict requirements that prohibit MX1 Employees who have access to material or price-sensitive non-public information through their roles with MX1 from sharing or using that inside information to buy or sell shares or other securities of SES while in possession of inside information. The same prohibition applies when MX1 Employees have inside information regarding other companies.

A specific code detailing the rules for dealing in SES Securities and defining what constitutes inside information (the “Dealing Code”) is applicable to all MX1 Employees. A copy is available on the Compliance@SES intranet page.

Key Requirements

- Never buy or sell shares or other securities of any company while in possession of inside information about that company. In case of doubt, abstain from dealing.
- 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 (stock tipping).
- Do not disclose inside information to anyone outside MX1 except when disclosure is required to enable MX1 to properly conduct business and when appropriate measures have been put in place to prevent the misuse or inappropriate disclosure of the inside information.

2. Conflicts of Interest

Relationships with Suppliers, Dealers, Customers and Other Business Partners

MX1 recognizes that MX1 Employees may take part in financial, business and other activities outside of their employment with MX1. However, these activities must at all times be lawful and free of conflicts with their responsibilities as MX1 Employees. These activities must not put at risk the employee’s integrity or reputation.

Each MX1 Employee must avoid activities that conflict with MX1’s interests or that influence his or her judgment or actions in performing their duties as employees. They must take decisions, based solely on objective criteria. Personal relationships or interests cannot influence their judgments.



In particular, MX1 Employees must comply with the Gifts and Entertainment Policy, a copy of which is available at the Compliance@SES intranet page. A specific e-mail address – gifts@ses.com – has been created for any questions or queries as to this policy.

Key Requirements

- MX1 Employees must comply with the requirements of the Gifts and Entertainment Policy, particularly as it relates to acceptance of business meals, travel and attendance at sports or entertainment events paid for by third parties.
- If MX1 Employees use suppliers, dealers or customers to provide goods or perform services of a personal nature, the fair market value must be paid for the goods or services, and the payment must be documented (e.g., with 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.
- MX1 Employees may take advantage of discounts and other promotions offered by suppliers or customers, provided that such discounts are available to all MX1 Employees. Discounts that have been solicited or bargained for in connection with obtaining or providing goods or services on behalf of MX1 or that are only offered to a limited group of MX1 Employees are prohibited.

If you have questions, you should review the matter with your supervisor or any of the other contacts referred to in this Code. For example, you may have a question as to how to proceed when rejection of a gift would be considered culturally discourteous.

Outside Personal Activities

MX1 Employees may participate in lawful business and other activities outside of their jobs with MX1, provided that such activities do not conflict with the MX1 Employee's responsibilities with MX1 or conflict with the policies and standards set forth in this Code.

MX1 Employees may not act as officers or serve on the board of directors of another for-profit commercial entity without prior written approval from Human Resources.

MX1 Employees may not engage in private business activities that interfere with their MX1 duties and may not, without prior approval from Human Resources, work or otherwise perform services for hire for third parties with whom either SES or MX1 does business or who are competitors of either SES or MX1.

MX1 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 serve on boards of directors, provided that such participation or service does not interfere with their duties as an MX1 Employee.



Share Ownership

MX1 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 SES or MX1.

Exceptions are ownership interests that do not influence the performance of duties of the MX1 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.

3. Internal Controls

Internal Control Systems, Reports and Records

MX1's internal control system consists of a set of policies, procedures, activities and actions which:

- help MX1 control its activities, efficiently conduct its operations and make efficient use of its resources
- manage risk and increase the likelihood that established objectives and goals will be achieved within the risk tolerances established by the risk management process

More specifically, the internal control system aims to ensure the following:

- compliance of actions and decisions with applicable laws, regulations, standards, internal rules and contracts
- efficiency and effectiveness of operations and the optimal use of MX1's resources
- correct implementation of MX1's internal processes, notably those to ensure the safeguarding of assets
- integrity and reliability of financial and operational information, both for internal and external use

The internal control system also ensure that management's instructions and directions are properly applied and that material risks are properly identified, assessed, mitigated and reported. Ultimately, control activities include a broad range of activities including



approvals, authorizations, verifications, reconciliations, reviews of operating performance, and segregation of duties.

MX1 prepares reports that fulfill relevant business and legal requirements, including financial statements that fairly present MX1's financial position. MX1 Employees have a responsibility to ensure that MX1 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.

Protection of Assets and Data

MX1 Employees have a responsibility to protect MX1 assets and data against loss, theft, abuse, unauthorized use, access or disposal. Suspected incidents of fraud, theft, loss or damage must be reported immediately in accordance with the procedure indicated in Section 15 of the Code.

MX1 Employees may use MX1 assets only for legitimate MX1 business purposes or for other purposes approved by MX1's management.

MX1 IT systems, including mobile devices or personal computers, and access to the Internet, are provided to help MX1 Employees perform work related responsibilities. Rules and principles of use of IT systems and of data stored, recorded or processed by those systems are defined by IT Security policies and guidance published on the SES intranet.

Key Requirements

- Comply with MX1 policies and procedures and applicable laws and regulations relating to the management of data, documents and records.
- Follow MX1 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, data and other MX1 assets.
- Use economic, risk-based criteria to make business decisions.
- Provide timely, candid forecasts and assessments to management.
- Maintain sound processes and controls.



- Retain documents and records that relate to existing or reasonably foreseeable litigation, audits or investigations as instructed by in-house legal counsel.

4. Political Activities and Contributions

MX1 respects and supports the right of its Employees to participate in political activities. However, these activities should not be conducted on MX1 time or involve the use of MX1 resources and should not interfere with the employee's performance. MX1 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 MX1.

MX1 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.



Topics Related to Corporate Responsibility

5. Fair Employment Practices

MX1 is committed to fair employment practices, including the prohibition against all forms of illegal discrimination. By providing equal access and fair treatment to all MX1 Employees on the basis of merit, we foster MX1's success while enhancing the progress of individuals and the communities where our businesses are located.

MX1 is committed to following 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) 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 MX1 guidelines and procedures. While seeking to maintain employee privacy, MX1 reserves the right to monitor use of MX1 property (*e.g.*, computers, e-mail, phones, proprietary information) 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.

Employer's Expectations



- All employees should act as an ambassador for the MX1 brand. They are expected to be committed to MX1 and to behave ethically and equitably vis-à-vis their peers. All fellow employees should be treated with mutual respect and trust.
- MX1 employees are therefore expected to live MX1's commitment to diversity and sustainability. MX1 employees should also conduct their business with honesty and integrity and in a professional and lawful manner that fosters the company's reputation. MX1 employees are required to handle confidential information with due care and skill, acting lawfully and in the interest of MX1.

6. Environment, Health & Safety

MX1 is committed to achieving environmental, health and safety (EHS) excellence. MX1 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 and dangerous goods, and substitute environmentally-friendly products to the extent available and cost-effective.
- 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.

7. Bribery

**MX1 will not tolerate any form of bribery or corruption,
even if it costs us business**

MX1 takes a zero-tolerance approach to bribery and corruption in all forms and will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. MX1 is committed to implementing and enforcing effective systems to counter bribery and corruption.



What is Bribery?

Bribery is the offering, promising, giving, receiving or requesting of any form of advantage to encourage any action which is illegal, unethical or a breach of trust. Bribes can be in the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or anything else of value. It is not just illegal to pay bribes to government officials. It is also illegal to pay bribes in commercial situations as well.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, a \$100 payment to a government official). They are common in many jurisdictions in which MX1 operates, but are bribes under the anti-bribery laws governing MX1.

Key Requirements

- MX1 is subject to anti-bribery laws that make it illegal to pay any form of bribe anywhere in the world. It is also illegal to allow any third party (such as a sales agent, distributor or consultant) to pay a bribe on our behalf.
- MX1 Employees should never offer, promise or give, directly or indirectly, any bribe under any circumstances.
- MX1 Employees should never accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that you will provide a business advantage for them or anyone else in return.
- A business courtesy, such as a gift or entertainment, should never be offered under circumstances that might create the appearance of an impropriety. It is never acceptable to give or receive a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome. MX1 is subject to SES's Gifts & Entertainment Policy detailing the rules about giving and receiving gifts and entertainment. As stated earlier, a copy of this Policy is available on the Intranet.
- MX1 will not pay any form of facilitation payment under any circumstances. MX1 will not tolerate any form of facilitation payments being paid by third parties on its behalf.
- MX1 Employees must avoid any activity that might lead to a facilitation payment being made by MX1 or by a third party on MX1's behalf, or that might suggest that such a payment will be made or accepted.
- It is never permitted to contribute MX1 funds or other MX1 assets for political purposes without the prior approval of the SES Executive Committee.
- Any person or firm (e.g., consultant, agent, sales representative, contractor, commercial representative, distributor, joint venture partner) that represents MX1 should be obliged to comply with this Code and related laws and regulations.



- Appropriate due diligence in accordance with the Sales Agents and Representatives Policy must be carried out when appointing sales agents and other representatives. A copy of this Policy is available on the intranet.

MX1 will never penalise employees who refuse to pay bribes



Topics Related to Compliance with Laws

8. International Sanctions and Embargoes

As a global group, all MX1 entities and employees must comply with all applicable economic sanctions regimes. The United Nations (“UN”), European Union (“EU”) and its member states, the United States (“US”), and other countries impose financial and trade sanctions against specific countries (“Sanctioned Countries”), industries, entities and persons (collectively referred to as “Sanctioned Parties”). Violations of these laws or regulations may subject MX1 and individuals to serious civil and criminal penalties. Moreover, certain countries (such as the US) apply their sanctions laws extraterritorially to reach transactions that have no apparent connection with the US. To ensure full compliance with all applicable laws, any new or renewed transactions or commercial activities that raise potential sanctions compliance issues must be reviewed. The Legal Department maintains an internal chart of sanctioned countries and parties which is regularly updated. The chart is available on the Compliance@SES intranet page.

To protect MX1’s interests and ensure compliance with applicable sanctions rules, it is imperative that MX1 follows a “know your customer” policy wherein it knows the types of commercial activities in which our customers are engaged. No commercial activities or proposed commercial activities raising potential sanctions questions are to be undertaken unless and until the Legal Department has reviewed and cleared the business activity for sanctions compliance purposes.

Key Requirements

- Due to comprehensive sanctions applied by the US and/or the EU to Cuba, Iran, North Korea, Sudan and Syria, all business that may touch these countries, or entities located in these countries, must be re-viewed by Legal before engaging in any business discussions or other activities.
- Prior to engaging in a commercial activity in one of the other countries identified on the chart of sanctioned countries, the MX1 responsible employee must provide to the Legal Department the names and addresses of all parties known to be involved in the proposed activity.
- The full procedure is described in the Sanctions Compliance Policy available on the Compliance@SES intranet page.

9. Export Compliance

All employees engaged in the transfer of hardware, software or information that is subject to the export control laws of any jurisdiction must ensure transfer of such items complies with those laws. The US export control rules are often triggered by transfers of information from MX1’s US entities or suppliers and MX1 employees outside the US. SES has developed a Technology Control Plan that outlines SES’s policies and procedures when US-controlled hardware, software or technical information is shared.



When requesting a shipment of hardware, no matter where the shipment originates, employees should contact their local logistics contact to ensure a reputable freight forwarder is used, customs duties are paid and all export laws are followed.

Key Requirements

- When transferring US-controlled technical information, contact an Export Compliance Coordinator (ECC) to ensure that all rules are followed and the information is properly marked.
- When transferring any hardware, follow the global shipping process and contact your local logistics representative.

10. Relationships with Competitors and Business Partners

MX1 is dedicated to compliance with the competition and antitrust laws in the countries in which it does business. Competition laws directly affect MX1's business. Given the inherent complexity of competition issues, MX1 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 MX1 and MX1 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 MX1 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 MX1 may resell or lease any product or service to a third party, unless you have obtained prior written approval from in-house legal counsel.
- An MX1 Employee in possession of competitively-sensitive information as a result of being previously employed at a competitor must comply with all confidentiality and non-disclosure agreements in effect with that previous employer. MX1 Employees must not seek out commercially sensitive information from other MX1 Employees who recently worked at a competitor.



- Consult with in-house legal counsel early in the process of evaluating any proposed merger, acquisition or joint venture.
- Consult with 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
 - Distribution arrangements with competitors.

11. Money Laundering

Money laundering, which is the process of making the proceeds of criminal activities appear to be legitimate, is prohibited in most countries. MX1 is committed to complying with anti-money laundering laws in every country in which it conducts business.

MX1 will only do business with parties involved in legitimate business activities and whose funds are derived from legitimate sources. Involvement in relationships and transactions where money laundering occurs could seriously damage MX1's reputation.

Key Requirements

- Follow all applicable due diligence and screening procedures (for customers, suppliers, business partners, sales agents, etc.) to ensure that parties with whom MX1 does business are involved in legitimate business activities.
- 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 in-house legal counsel.
- Do not pay third parties with a corporate cheque written to "cash" or "bearer". All cheques should be in the name of the person entitled to payment and not to a third party designated by such person.
- Wire transfers should be made to bank accounts in the name of the person entitled to payment and not to a third party account designated by such person. Such bank accounts should be in the country (1) where the service or goods were provided, (2) where the recipient is incorporated or has its headquarters, or (3) (if the recipient is a person) where he or she resides.



- Watch for warning signs that indicate money laundering and other illegal activities or that violations of MX1 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 in-house legal counsel before proceeding with a transaction or matter. Resolution of any such matter must be well documented.



Other Topics

12. Data Security

MX1 has developed a data management framework that outlines how data, documents and other types of information are defined, classified and secured. Data users are responsible for applying the correct classification to data they use or create in compliance with the Data Classification Policy and for managing data in compliance with the Data Handling Policy.

13. Confidentiality and Privacy

Confidential information (or any non-public information) related to MX1 or its products or services is to be treated as confidential during and after an MX1 Employee's term of employment.

Confidential information includes all information covered by non-disclosure agreements executed by MX1, and all non-public information that may be of use to competitors or harmful to MX1 or its customers, if disclosed.

MX1 is committed to protecting personal data collected from or maintained regarding third party individuals and MX1 Employees. Each MX1 Employee must take care to protect individually identifiable third party or MX1 Employee information and other sensitive personal information from inappropriate or unauthorized use or disclosure.

Any occurrence of unauthorized access or attempted theft of confidential information may be reported as indicated in Section 15.

Key Requirements (Confidentiality)

- Protect MX1's confidential information and do not disclose it to third parties, unless the third party is bound by adequate confidentiality obligations (e.g., via a non-disclosure agreement).
- Store confidential information securely.
- Consult with in-house legal counsel before establishing or updating any system, process or procedure to collect, use, disclose, or transmit confidential information or personal data (third party or MX1 Employee).
- Electronic storage of confidential information through cloud-based solutions is subject to prior approval by the IT Security team.

Key Requirements for Personal Data Protection (Data Privacy)



- Comply with SES's Global Data Protection Policy and all applicable privacy and data protection laws and regulations.
- Provide individual third parties and MX1 Employees, as required by law and/or by the privacy and information protection procedures of MX1 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
 - Access to the information for verification and correction
 - 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 MX1 Employee or individual third-party information in ways that are inconsistent with privacy policies or with applicable laws or regulations.

14. Intellectual Property

Among MX1's most valuable assets is its intellectual property – patents, trademarks, copyrights, trade secrets and business processes. It is MX1 policy to establish, protect, maintain and defend its intellectual property rights and to use those rights in a commercially responsible manner. All MX1 Employees must take steps to safeguard these assets.

In addition to protecting MX1's intellectual property rights, MX1 respects the valued intellectual property rights of third parties, including those of MX1's customers, partners and competitors. Unauthorized use of the intellectual property rights of third parties may expose MX1 and MX1 Employees to civil law suits and damages as well as significant fines and criminal penalties.

New MX1 products, services, processes, hardware and software, and any proposed use of the intellectual property of third parties, should be timely and reasonably reviewed for potential infringement by in-house legal counsel (or directly to SES IPR counsel at SES-ipr@ses.com).

Key Requirements

- Identify and protect commercially significant MX1 intellectual property.
- Respect valid patents, copyrighted materials and other protected intellectual property of third parties.
- Consult with in-house legal counsel concerning necessary licenses or approvals to use intellectual property of third parties.



- Consult with in-house legal counsel before:
 - Soliciting, accepting or using proprietary information obtained from third parties
 - Disclosing MX1 proprietary information to third parties
 - Permitting third parties to use MX1 intellectual property
- Assert intellectual property rights only in ways consistent with relevant intellectual property and trade secret laws.
- Understand your responsibilities to MX1 regarding new ideas and inventions that you might develop during your employment with MX1. Consult with in-house legal counsel if there is any question about these responsibilities.
- Comply with the guidelines for use of MX1 trademarks, trade names and corporate logos. Guidance regarding such use may be obtained from corporate communications or in-house legal counsel.
- You may in some departments have access to MX1 names or product names or other valuable ideas that are under consideration but have yet to be protected (trademarked or patented), and you must keep these potential trademarks or patents confidential as well.
- Intellectual property related to ideas and inventions relevant to MX1's business, and created in whole or in part using MX1 facilities or equipment or developed while you are an MX1 Employee, are property of MX1.

15. Reporting Procedure

Any reasonable concern about a violation of this Code may be reported through the means described in this Section (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 MX1 Employee's manager, the local Compliance Officer, MX1 Ombudsperson, or with the SES Ombudsperson, or in exceptional circumstances (e.g., amount involved, level of person concerned, significant impact on the SES group business or reputation) with the Chairperson of the Audit and Risk Committee.

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

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

MX1 will promptly and thoroughly investigate any good faith allegation of a violation of this Code. Every MX1 Employee is required to cooperate in internal investigations related to possible Code violations.



MX1 prohibits any MX1 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 will be regarded as a violation of the Code.

In order to allow MX1 to properly investigate a concern, allegations of non-compliance or violations to the Code should include sufficient information concerning the incident or the violation. MX1 Employees shall not knowingly submit false reports or allegations.

An MX1 Employee may submit a complaint or allegation of a violation without revealing his or her identity (except that in certain circumstances MX1 may be obliged by law to disclose the information or the identity of the person submitting the complaint or allegation). If an MX1 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, the Compliance Officer or the Chairman of the Audit and Risk Committee may contact the MX1 Employee to request further information regarding the complaint.

Complaints may be sent to the Ombudsperson at the e-mail or mailing addresses listed below. Only the Ombudsperson will have access to the e-mail. A complaint may also be submitted by calling the Ombudsperson at the numbers listed below. Each complaint and any information relating to a complaint will be retained in written and/or electronic form by the Ombudsperson.

A complaint received by the Ombudsperson will first be reviewed by the Ombudsperson on a confidential basis. He may carry out investigations regarding the complaint before submitting the complaint to the Audit and Risk Committee. He will report any complaints or allegations received to the Chairman of the Audit and Risk Committee where appropriate.

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

MX1 Ombudsperson:

Orna Naveh:
General Counsel

Postal address and other contact information:

MX1
c/o MX1 Ombudsperson
Bareket Building 1, Hanegev Street
7019900, Airport City, Israel
Phone: +972 3 928 0820
Fax: +972 3 928 0765



E-mail: ombudsperson.mx1@mx1.com

SES Ombudsperson:

John Purvis:
Executive Vice President and General Counsel

Postal address and other contact information:

SES
c/o SES Ombudsperson
Château de Betzdorf
L-6815 Betzdorf
Phone: +352 710 725 525
Fax: +352 710 725 532
E-mail: ombudsperson.ses@ses.com

Chairman of the Audit and Risk Committee:

Postal address: Mr Marc Speeckaert
Chairman of the Audit and Risk Committee
c/o SES
Château de Betzdorf
L-6815 Betzdorf

Questions about the Code

Questions about the MX1 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 in-house legal counsel. If these alternatives are insufficient, you may contact the ombudsperson as described in Section 15 on a confidential basis.