

2025 ClearSpace Modern Slavery and Human Trafficking Statement

Introduction

ClearSpace Holding SA and its subsidiaries (collectively known as “ClearSpace”) are committed to preventing modern slavery and human trafficking in all aspects of our business. We adopt a zero-tolerance approach to such practices and work proactively to ensure our operations and supply chains uphold the highest standards of ethical conduct and respect for human rights.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and sets out the steps taken by ClearSpace during the financial year ending 31 December 2024 to prevent modern slavery and human trafficking.

Our Organization

ClearSpace is a leader of in-space sustainability technologies, with a focus on debris removal and in-orbit servicing. ClearSpace Holding SA is headquartered in Luxembourg, and has subsidiaries in the UK, Germany, and Switzerland. With operations spanning multiple countries, we are committed to conducting our business with integrity, transparency, and respect for human rights.

Our Supply Chain

ClearSpace’s supply chain is primarily composed of highly specialized companies delivering complex technical solutions, often through close collaboration with our teams. These solutions include both products and services provided by highly skilled professionals.

Many of our suppliers are large international organizations operating in the space and defence sectors. Our supply chain spans high-technology products, professional services, manufacturing, and office-related goods and services. This includes data licensors, consultants, agents, legal counsel, as well as providers of IT hardware and software, telecommunications equipment, furniture, and general office supplies. We also source electronic components, raw materials, and rare earth elements, which are essential to our operations.

While we assess the risk of modern slavery within our direct operations as low, we acknowledge that complex, multi-tiered global supply chains can present elevated risks. We remain committed to identifying and mitigating these risks through ongoing due diligence and supplier engagement.

Due Diligence and Risk Assessment

We assess the risk of modern slavery within our direct operations as low due to the nature of our workforce and business activities. Our suppliers are reputable providers and wholesalers. However, we recognize that complex, multi-tiered global supply chains can carry heightened risks, and we remain vigilant in addressing these challenges.

We carry out due diligence to identify and mitigate risks of modern slavery within our supply chains, including:

- Screening suppliers for sanctions, adverse media, and human rights issues,
- Requiring suppliers to acknowledge and comply with General Terms and Conditions,
- Including contractual clauses on ethical conduct and anti-slavery in supplier agreements,
- Assessing high-risk suppliers based on sector and geography.

Our Policies and Governance

ClearSpace has a zero-tolerance policy for slavery and human trafficking. We have internal policies that prohibit all forms of modern slavery or human trafficking, including:

Our Global Employee Handbook outlines in our Code of Conduct that engaging in any form of human trafficking, procuring sex acts of any kind or using forced labor is prohibited.

Our Recruitment Policy ensures that all hiring is fair, transparent and compliant with local labor laws.

All policies are reviewed annually and updated as necessary.

Training and Awareness

To promote awareness and understanding of modern slavery risks:

- All ClearSpace employees will complete mandatory ethics and anti-slavery training,
- Refresher training will be conducted annually, and records of completion will be maintained.

Monitoring and Effectiveness

To measure our effectiveness in preventing modern slavery, we will:

- Monitor training completion rates and policy acknowledgement,
- Conduct audits or assessments of high-risk suppliers (direct or through third-party assessments),
- Review incident reports and whistleblowing activity,
- Annually review our risk register and supplier engagement practices.

Where risks are identified, we will work collaboratively with suppliers to implement corrective actions. In cases of serious non-compliance, we reserve the right to suspend or terminate contracts.

Future Developments

In 2025, ClearSpace will implement the following enhancements:

- Review and update our General Terms and Conditions outlining our expectations regarding human rights and ethical business practices.
- Ensure structures are in place to log and escalate any concerns related to slavery and human trafficking.
- Roll out of Ethics and Anti-Slavery training to all ClearSpace employees.
- Targeted training for high-risk functions (e.g., procurement, operations).
- Review and enhance our Procurement Policy to cover modern slavery and human trafficking prevention.

We are committed to continuous improvement and fostering a culture of ethical responsibility across our global operations.

Reporting and Remediation

We encourage employees, suppliers, and partners to report any concerns related to slavery or human trafficking. All reports are treated confidentially and investigated thoroughly. Where required, we take swift remedial action, including ending relationships with suppliers who fail to meet our ethical standards.

Approval

This statement has been approved by the ClearSpace Board of Directors and will be reviewed annually.