

1. PURPOSE

SpaceBridge's Code of Conduct is based on the United Nations Global Compact's ten principles in the areas of human rights, labor, the environment and anti-corruption. These principles have enjoyed universal consensus and are derived from the Universal Declaration of Human Rights, the International Labor Organization's Declaration of Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention Against Corruption.

<http://www.unglobalcompact.org/>

SpaceBridge embraces, supports and enacts, within its sphere of influence, a set of core values in the areas of human rights, labor standards, the environment and anti-corruption. We make this commitment clear to employees, suppliers, sub-contractors, customers and partners at all levels of our business and compromise in our local and global communities.

1. HUMAN RIGHTS

We support and respect the protection of internationally proclaimed human rights. Our business community assumes the responsibility to respect human rights, that is, not to infringe human rights, in the context of our own daily activities and our business relationships. We support and promote the enjoyment of human rights while also advancing our business.

Our company has a systematic management approach to human rights, including due diligence processes that cover all our business relationships. Such processes identify and prevent or mitigate the human rights risks with which our company may be involved through links to our products, operations and services, in so avoiding involvement in the human rights violation that may be committed by a third-party.

2. LABOR

2.1. FORCED LABOR

SpaceBridge does not use any forced, bonded or compulsory labor for any work or service under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. All and any labor is freely given and employees are free to leave in accordance with established rules, laws and contracts.

2.2. CHILD LABOR

SpaceBridge abides by all the basic rules and laws that under international standards that distinguish what constitutes acceptable or unacceptable work for children at different ages and stages of their development. We verify that national laws and regulations stated by ILO conventions (Minimum Age Convention No. 138 and the Worst Forms of Child Labor Convention No. 182) provide the framework for national law to prescribe a minimum age for admission to employment or work that must not be less than the age for completing compulsory schooling, and in any case not less than 15 years. ILO Convention No. 182 requires governments to give priority to eliminating the worst forms of child labor undertaken by all children under the age of 18 years.

2.3. DISCRIMINATION IN THE WORKPLACE

SpaceBridge will not tolerate any person being treated differently or less favorably because of characteristics that are not related to their merit or the inherent requirements of the job. In national law, these characteristics commonly include: race, color, sex, religion, political opinion, national extraction, social origin, age, disability, HIV/AIDS status, trade union membership, and sexual orientation.

We apply non-discrimination policies, local rules and national law practices and this simply means that employees are selected on the basis of their ability to do the job and that there is no distinction, exclusion or preference made on other grounds.

We have instituted company policies and procedures which make qualifications, skill and experience the basis for our processes of recruitment, placement, training and advancement of staff at all levels.

3. ENVIRONMENT

SpaceBridge has introduced as a standard business practice the precautionary approach to Principle 15 of the 1992 Rio Declaration that states “where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation”.

We have a responsible commitment to the use of finite resources when it relates to standards of environment, health and safety.

3.1. ENVIRONMENTAL RESPONSIBILITY

SpaceBridge continuously undertakes initiatives to promote greater environmental responsibility.

Such measures apply as self-regulation and are guided by appropriate codes, charters and initiatives integrated into all elements of business planning, decision-making and fostering openness and dialogue with employees and the public.

4. ANTI-CORRUPTION

SpaceBridge works against corruption in all its forms, including extortion and bribery. We assume full responsibility for the challenges of eliminating corruption.

We will not tolerate any corruption in any form or variation in degree, whether it be from the minor use of influence to institutionalized bribery.

5. SUPPLIERS COMPLIANCE

SpaceBridge encourages and requires its suppliers and sub-contractors to comply with this Code of Conduct. Upon request, the suppliers and sub-contractors must provide appropriate information so SpaceBridge is able to verify this statement.