



SPACEBOURNE

Spacebourne Employee Handbook

Introduction

Welcome to Spacebourne (“the Company” or “Spacebourne”). We are excited to have you on board and look forward to your contributions in helping us advance aerospace technology and exploration. This handbook sets forth our policies, procedures, and guidelines, reflecting our commitment to maintaining a safe, productive, and ethical work environment. These policies are based on applicable federal and state laws, including laws of the State of Delaware.

This handbook is not intended to serve as a contract of employment, express or implied, nor is it intended to alter the at-will employment relationship between you and the Company. Spacebourne reserves the right to amend or rescind any policy or provision in this handbook at any time, with or without prior notice.

1. Employment Policies

1.1 Employment At-Will

All employment at Spacebourne is on an **at-will** basis, meaning that either the employee or the Company may terminate the employment relationship at any time, with or without cause, and with or without notice. Nothing in this handbook or any other Company document should be interpreted to conflict with, eliminate, or modify your at-will employment status.

1.2 Equal Employment Opportunity (EEO)

Spacebourne is an **Equal Opportunity Employer**. We are committed to providing an inclusive environment free from discrimination in accordance with applicable federal, state, and local laws. Discrimination or harassment on the basis of race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, ancestry, citizenship, age, disability, genetic information, marital status, veteran status, or any other status protected by law is strictly prohibited.

1.3 New Hire Documentation

All new hires must complete appropriate paperwork (e.g., I-9, W-4, etc.) and provide valid documentation verifying their eligibility to work in the United States, as required by federal law. Failure to provide necessary documents within the legally required timeframe may result in termination.

1.4 Background Checks and Drug Testing

Where permitted by law, Spacebourne may conduct background checks and/or drug tests as a condition of employment, or as a condition of continued employment. The Company complies with all relevant federal, Delaware, Texas and California state regulations regarding the performance of these checks.

2. Workplace Conduct and Ethics

2.1 Code of Conduct

All employees, contractors, and volunteers are expected to conduct themselves in a manner that upholds the Company's reputation. Employees must:

- Follow all Company policies, procedures, and guidelines as described in the "Spacebourne Code of Conduct" Policy.
- Behave ethically, honestly, and responsibly.
- Treat colleagues, customers, and partners with respect and courtesy.
- Safeguard Company assets and confidential information.

Failure to adhere to the Code of Conduct may result in disciplinary action, up to and including termination.

The Spacebourne Code of conduct and all Company policies can be found at:
<https://spacebourne.com/policies>

2.2 Anti-Harassment and Anti-Discrimination

Spacebourne maintains a **zero-tolerance policy** for harassment or discrimination of any kind. This policy applies to all employees, contractors, vendors, and visitors.

Sexual Harassment includes any unwelcome sexual advances, requests for sexual favors, and/or verbal, visual, or physical conduct of a sexual nature. This behavior is prohibited when it:

- Explicitly or implicitly affects an individual's employment.
- Unreasonably interferes with an individual's work performance.
- Creates an intimidating, hostile, or offensive work environment.

Anyone who experiences or witnesses harassment or discrimination should promptly report it to their manager, Human Resources (HR), or another member of management. Investigations will be conducted promptly, and to the extent possible, confidentially. Retaliation against anyone who makes a good-faith complaint or provides information regarding such a complaint is strictly prohibited.

2.3 Ethics and Conflict of Interest

Employees must act in the Company's best interest and avoid any situation that might present a conflict of interest. Conflicts of interest arise when personal interests could influence—or appear to influence—professional judgment or responsibilities. Any potential conflict must be disclosed to management or HR for review. Examples of conflicts of interest include:

- Outside employment that interferes with job performance.
- Personal or financial interests in a competing company or in a company that does business with Spacebourne
- Using Company information or resources for personal benefit.

2.4 Confidentiality and Intellectual Property

1. **Proprietary Information:** Employees may not share or use any confidential, proprietary, or intellectual property (IP) of the Company without authorization.
 2. **Data Security:** Employees must protect Company data and systems, following all IT guidelines. Unauthorized access or sharing of sensitive data is strictly prohibited.
 3. **Intellectual Property Ownership:** Any invention, design, process, or other intellectual property that employees create within the scope of their employment at Spacebourne belongs to the Company (unless otherwise agreed in writing).
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3. General Employment Practices

3.1 Work Hours and Attendance

Standard business hours at Spacebourne are set by each department according to operational needs. Employees are expected to arrive on time and be ready to work as scheduled.

- **Overtime:** Non-exempt employees may only work overtime with prior approval from management.
- **Attendance:** Excessive absenteeism or tardiness may result in disciplinary action, up to and including termination.

3.2 Employee Classification

Employees at Spacebourne are classified for payroll and benefit eligibility purposes:

- **Full-time:** Regularly work at least 40 hours per week.
- **Part-time:** Regularly work fewer than 40 hours per week.
- **Exempt:** Not subject to minimum wage or overtime pay requirements under the Fair Labor Standards Act (FLSA).
- **Non-exempt:** Entitled to overtime pay for hours worked in excess of 40 per workweek, in compliance with federal and state laws.

3.3 Payroll Practices

- **Pay Periods:** Employees are paid bi-weekly (or per the schedule defined by the Company).
- **Time Records:** Non-exempt employees must accurately record all hours worked.
- **Deductions:** The Company deducts all applicable federal, state, and local taxes, as well as any authorized withholdings (e.g., healthcare premiums).

3.4 Performance Evaluations

Employees will receive periodic performance evaluations to assess job performance, discuss goals, and outline opportunities for professional development. These evaluations do not change the at-will employment status.

4. Safety and Security

4.1 General Safety Policies

Maintaining a safe workplace is a top priority. Employees must:

- Follow all safety procedures and aerospace industry regulations, including those from the Federal Aviation Administration (FAA) and other relevant agencies.
- Immediately report accidents, injuries, or safety hazards to a supervisor or HR.
- Wear required personal protective equipment (PPE) as mandated.

4.2 Substance-Free Workplace

Spacebourne is committed to a **drug-free and alcohol-free** workplace in compliance with all applicable state and federal laws.

- **Prohibited Conduct:** The use, possession, sale, distribution, or manufacture of illicit drugs or unauthorized consumption of alcohol on Company premises or during work hours is strictly prohibited.
- **Testing:** Employees may be subject to drug or alcohol testing following an accident, upon reasonable suspicion, or as otherwise required by law or Company policy.

4.3 Workplace Violence Prevention

Violence or threats of violence in the workplace are not tolerated. This includes:

- Aggressive or intimidating behavior toward others.
- Harassment or bullying.

- Possession of firearms, weapons, or explosives on Company property (unless legally permitted and with prior written permission from management, in accordance with Delaware state law).

Any employee who feels threatened should immediately report the issue to their supervisor, HR, or security if applicable.

5. Aerospace-Specific Requirements

5.1 Compliance with Regulatory Agencies

As an aerospace company, Spacebourne must comply with regulations from various governmental and international bodies. Employees working in areas affected by these regulations will receive specialized training. Failure to comply with these regulations may result in disciplinary action, up to and including termination.

5.2 Export Controls and ITAR (International Traffic in Arms Regulations)

Many aerospace technologies are subject to U.S. export control laws, including ITAR and the Export Administration Regulations (EAR). All employees must comply with the following:

- **Access Control:** Only authorized individuals may access controlled technical data or defense articles.
- **Licensing:** Ensure proper licensing and documentation before transferring controlled items or data to non-U.S. persons.
- **Reporting:** Immediately report any concerns about unauthorized disclosures or transfers.

5.3 Confidential Project Handling

Aerospace projects often involve sensitive intellectual property and confidential contractual obligations. Employees must handle project details and records with the highest level of confidentiality.

6. Leaves of Absence and Time Off

6.1 Holidays

Spacebourne observes a set number of paid holidays each year which generally aligns with federal holidays (to be published annually by management). Eligible employees will receive paid time off for these holidays. It must be understood, however, that there may be certain circumstances such as meeting critical deadlines where management may change proposed company-wide holiday dates and ask employees who are mission-critical to work.

6.2 Paid Time Off (PTO)

Full-time employees accrue PTO based on length of service, in accordance with Company policy. PTO can be used for personal reasons, vacation, or illness. Scheduling PTO requires advance notice to management (unless it is an emergency). Employees are encouraged to schedule time off around critical deadlines and to give at least 2 weeks notice to management.

Spacebourne is committed to the health, well-being, and work-life balance of its employees. This policy sets forth the guidelines for Paid Time Off (PTO), which includes personal/vacation/sick days in one single bucket, not including paid federal holidays.

6.3. Scope & Eligibility

1. Full-Time Employees:

- Must **consistently average 40+ hours per week** (based on a 12-week rolling period).
- Become eligible for PTO the pay period following confirmation they have met the 40-hour average.

2. Part-Time Employees:

- **Not eligible** for PTO.
- If a part-time employee later transitions to full-time and meets the 40-hour average requirement, PTO eligibility begins per the timeline above.

6.4. Annual PTO Allotment

1. Base PTO:

- **10 days** per year (equivalent to 80 hours, if 1 day = 8 hours).

2. Annual Increase:

- For **each additional year of service**, employees earn **1 extra PTO day** annually.
- Example:
 - Year 1: 10 days
 - Year 2: 11 days
 - Year 3: 12 days
 - ... up to the maximum.

3. Maximum Cap:

- **20 workdays** per year. Once an employee hits the cap, no further days accrue until the balance falls below 20 days.

6.5 Federal Holidays

1. **Federal holidays are not a part of employees PTO “bucket”:**
 - Paid time off for Federal holidays which fall on workdays (e.g., New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, Christmas) don’t count against employee’s PTO allotment.

6.6 Requesting & Using PTO

1. **Scheduling & Approval:**
 - Requests should be made at least **2 weeks in advance**, unless otherwise stated by management.
 - Management reserves the right to approve or deny requests based on business needs.
2. **Partial-Day Usage:**
 - PTO may be used in half-day (4-hour) increments (or other increments as approved by HR), to accommodate partial-day absences.
3. **Carry-Over & Accruals:**
 - Any carry-over limits or maximum accrual caps are determined by **Spacebourne** policy and in compliance with applicable laws. Check with HR for current carry-over guidelines.

6.7 New Hires & Waiting Period

1. **Waiting Period:**
 - New hires must typically complete 90 days of employment to begin using accrued PTO.
2. **Accrual Start Date:**
 - Accrual begins once the employee meets the 40-hour-per-week average requirement and any waiting period has passed.

6.8 Separation of Employment

1. **Payout:**
 - Upon resignation or termination, any **unused, accrued PTO** is handled in accordance with state law and company policy.
2. **Reinstatement:**
 - If a former employee is rehired, their PTO eligibility and balances are treated as if they were a new hire, unless otherwise required by law or previously agreed upon in writing.

6.9 Policy Administration & Changes

1. Record Keeping:

- Employees can view their current PTO balances via the company's HR portal or on their pay stub.

2. Policy Modifications:

- Spacebourne reserves the right to modify or terminate this policy at any time, with or without notice, to meet business or legal requirements.

For further information or clarification regarding this PTO policy, please contact the HR Department.

By creating a single-bucket PTO system, Spacebourne strives to provide employees with maximum flexibility and straightforward time-off management.

6.10 Family and Medical Leave (FMLA)

Eligible employees may take up to 12 weeks of unpaid, job-protected leave in a 12-month period for qualifying family and medical reasons, in compliance with the **Family and Medical Leave Act (FMLA)** and Delaware state laws. Examples include:

- The birth or adoption of a child.
- Caring for a spouse, child, or parent with a serious health condition.
- The employee's own serious health condition.

6.11 Other Leaves

- **Jury Duty:** Employees summoned for jury duty will be granted unpaid leave in accordance with Delaware laws.
- **Military Leave:** Employees are granted leave according to the Uniformed Services Employment and Reemployment Rights Act (USERRA).
- **Bereavement Leave:** Spacebourne may provide unpaid or paid bereavement leave for eligible employees. Check with HR for details.

7. Discipline and Termination

7.1 Progressive Discipline

Depending on the severity of the infraction, the Company may apply progressive disciplinary measures, including verbal warnings, written warnings, suspension, and termination. However, the Company reserves the right to determine the appropriate level of discipline for any offense, including immediate termination if deemed necessary.

7.2 Separation of Employment

Voluntary Resignation: Employees who intend to resign are requested to provide at least two weeks' written notice.

Involuntary Termination: Employees may be terminated for reasons including misconduct, poor performance, violations of policy, or Company reorganization.

Exit Procedures: Upon departure, employees are required to return all Company property and sign any required documentation, such as confidentiality agreements.

8. Complaint Resolution Procedure

8.1 Open Door/ Open Reporting Policy

Spacebourne encourages open communication. If you have questions or concerns about workplace issues, you are encouraged to speak with your immediate supervisor, department manager, or HR. We value your input and will investigate concerns promptly and impartially.

Open Reporting is the cornerstone of Spacebourne's commitment to integrity. As a result, we rely on all of our employees to raise issues when they see something that they believe may violate a law or Spacebourne policy. In a way, our employees are really our first and best line of defense.

8.2 What to Know

We promote an open environment, in which employees are encouraged to raise integrity concerns through a variety of channels and are comfortable doing so without fear of retaliation. We manage reported concerns through our Global Open Reporting & Ombuds Program. All employees are expected to promptly submit concerns regarding potential violations of law, regulation, or Spacebourne policy through one of the available Open Reporting Channels (see below). Employees do not need to be certain that a violation has occurred, but rather should raise a concern when they have a good faith belief that something improper, a violation of law or policy, has occurred.

Retaliation for raising a concern, or participating in an integrity investigation, is strictly prohibited. Violations of this policy will be dealt with seriously and swiftly. Employees are expected to fully cooperate with and participate in an investigation by making themselves available for interviews, providing requested documents and otherwise complying with the reasonable requests of an investigator. Employees are expected to be truthful in all dealings throughout the course of an investigation.

8.3 How to Raise a Concern:

(1) You may use any of the channels below to raise a concern. You can do so in person, by phone or in writing to:

- Your manager or supervisor
- A local: ombudsperson, compliance leader, Human Resources manager or legal counsel.
- The Spacebourne Board of Directors.

You can find contact information on the company directory.

(2) You may also choose to raise a concern anonymously at <https://spacebourne.com/report>.

If you do identify yourself, we can follow up and provide you with feedback.

How Concerns Are Investigated

Spacebourne thoroughly examines every integrity concern. During the investigation process, we:

Form an independent and objective investigation team which may include third parties.

- Obtain the facts through interviews and/or the review of documents.
- Reach conclusions, whenever possible from the facts the team is able to obtain.
- Recommend corrective action, if necessary.
- Provide the person who raised the original concern (if that person is known) with feedback on the outcome, while maintaining the confidentiality and privacy of all involved in the matter.
- Contact relative governmental agencies or law enforcement if deemed applicable by law.

8.4 How Employees Are Protected – Confidentiality & No Retaliation

Our commitment to confidentiality in the Open Reporting process is vital to maintaining employee trust and faith in the program. We keep concerns and related parties strictly confidential, to the extent possible consistent with a full and fair investigation. Investigators will release details only on a “need to know” basis. “Need to know” is defined as the group of people for whom the information is relevant to their official job duties and/or who can actively contribute to the ongoing investigation.

Spacebourne strictly prohibits retaliation against those who raise or help to resolve an integrity concern. Employees who believe that someone is retaliating against them for raising a concern or participating in an investigation should contact their ombudsperson, the investigator, or any of the other channels immediately. Any confirmed retaliation, whether direct or indirect, is grounds for discipline up to and including dismissal.

Penalties for Violation Employees who violate the spirit or the letter of Spacebourne’s policies are subject to disciplinary action up to and including termination of employment if allowed under applicable law. In addition, if laws are violated, employees or the Company may be subject to criminal penalties (fines or jail time) or civil sanctions (damage awards or fines). We could also lose government contracting privileges and export privileges.

8.5 Whistleblower Policy

Employees who report alleged wrongdoing within the Company (e.g., compliance violations, illegal activities) in good faith will be protected from retaliation. If you have a concern, notify your manager, HR, or the appropriate legal/compliance authority.

9. Technology and Social Media Policy

9.1 Acceptable Use of Company Technology

All Company computers, networks, and devices should be used primarily for business purposes. Occasional personal use is permitted if it does not interfere with productivity or violate any Company policy.

- **Prohibited Uses:** Viewing or distributing offensive, discriminatory, or illegal content.
- **Email and Communication:** Use professional language. Emails and messages can be monitored or audited.

9.2 Social Media Guidelines

Employees should exercise caution when posting on social media platforms if referencing Spacebourne or its clients.

- **Proprietary Information:** Do not disclose confidential or proprietary data.
 - **Professional Conduct:** Avoid any language or images that could harm the Company’s reputation.
 - **Personal Responsibility:** Any personal social media activity is the responsibility of the employee; make it clear that your views do not represent the Company’s official position unless authorized.
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10. Data Privacy & Cybersecurity

Spacebourne (“the Company”) is committed to protecting the security of its data, as well as the privacy of its employees, customers, partners, and any other individuals whose information is

entrusted to us. This notice outlines important policies and procedures regarding data privacy and cybersecurity to ensure compliance with federal and Delaware state laws, industry regulations, and Spacebourne's internal standards.

10.1 Purpose and Scope

1. Purpose:

- To safeguard the confidentiality, integrity, and availability of company and customer data.
- To maintain compliance with Delaware state laws (e.g., Delaware Identity Theft Enforcement and Protection Act) and federal regulations, including those specific to aerospace and defense (e.g., ITAR, EAR).

2. Scope:

- Applies to all employees, contractors, temporary workers, and any other persons who handle or have access to Spacebourne data or systems.
- Covers all information assets, including paper documents, electronic data, and cloud-based resources.

10.2. Definitions

- **Confidential Information:** Any information classified internally that, if disclosed without authorization, could harm the Company, its clients, partners, or employees. This includes proprietary data, trade secrets, customer information, protected health information, personally identifiable information (PII), or any other sensitive data.
- **Cybersecurity Incident:** Any unauthorized access, disclosure, misuse, modification, or destruction of data, or interference with system operations in an information system.
- **Personal Identifiable Information (PII):** Information that can uniquely identify an individual, such as full name, Social Security number, driver's license number, financial account numbers, or other identifying data.

10.3. Employee Responsibilities

1. Access Control

- Use only authorized credentials and follow multi-factor authentication (MFA) processes as instructed.
- Lock computer screens and devices when unattended.
- Never share passwords or access tokens with unauthorized individuals.

2. Data Handling and Storage

- Store all confidential information in approved, secure locations (e.g., encrypted cloud platforms or Company-approved storage systems).

- Do not save or transmit Company data through personal email accounts, unauthorized file-sharing tools, or personal storage devices.
- Follow the Company's document retention policies to ensure proper archiving and deletion of data.

3. Device Usage

- Use only Company-approved devices when handling confidential or regulated data.
- Immediately report any lost, stolen, or compromised devices to the IT Security Department.

4. Phishing and Social Engineering Awareness

- Never open suspicious emails, click on unfamiliar links, or download unexpected attachments.
- Validate the identity of senders before sharing sensitive information.
- Participate in Company-provided security awareness trainings and promptly report any suspected phishing attempts or social engineering attacks.

5. Remote Work and BYOD (Bring Your Own Device)

- Use secure, Company-approved virtual private networks (VPN) for remote access.
- Ensure personal devices meet Company security standards and that only authorized personnel use these devices to access Company data.

10.4. Data Protection and Privacy

1. Confidentiality Obligations

- Maintain the confidentiality of all Company data and intellectual property during and after employment with Spacebourne
- Disclose data to external parties only with the explicit approval of an authorized Company representative and under a non-disclosure agreement (NDA) if required.

2. Compliance with Laws and Regulations

- Comply with relevant aerospace industry regulations (e.g., ITAR, EAR) which may impose controls on the dissemination of technical data.
- Adhere to Delaware law regarding the protection and authorized use of PII (Delaware Identity Theft Enforcement and Protection Act).
- Immediately notify the IT Security Department if you suspect unauthorized disclosure of any regulated data.

3. Reporting Obligations

- Promptly report any cybersecurity incident or suspected data breach to your supervisor and the IT Security Department.
- Provide full cooperation during internal or external investigations related to data privacy or cybersecurity incidents.

10.5. Cybersecurity Incident Response

1. Notification

- Immediately inform the IT Security Department of any known or suspected breach or unauthorized disclosure of data.
- If you suspect your account or device is compromised, disconnect from the network (if possible) and notify IT Security.

2. Investigation and Containment

- IT Security will coordinate investigations and take necessary steps to contain and mitigate potential damage.
- Employees are required to fully cooperate, preserving all evidence and information relevant to the incident.

3. External Reporting

- In the event of a confirmed data breach involving Delaware residents, Spacebourne may be required under the Delaware Identity Theft Enforcement and Protection Act to provide notification to affected individuals and the Delaware Attorney General.
- All external communications regarding the breach will be handled by authorized Company spokespeople or legal counsel.

10.6. Disciplinary Action

- **Violations** of this policy, whether intentional or due to negligence, may result in disciplinary action, up to and including termination of employment.
- Certain breaches may also subject individuals to **civil or criminal liability** under applicable state and federal laws.

10.7. Policy Changes

- This notice may be updated at any time to reflect changes in law, regulations, or Company policies.
- Employees will be informed of any significant updates. Continued access to or use of Company resources after changes are communicated will constitute acknowledgment of the updated notice.

11. Ethics, Anti-Corruption, and Bribery Policy

11.1 Purpose

The purpose of this Ethics, Anti-Corruption, and Bribery Policy (“Policy”) is to establish clear guidelines to ensure that all SPACEBOURNE INC. (“the Company”) employees, officers, directors, agents, contractors, and any other individuals acting on behalf of the Company conduct business ethically and in full compliance with applicable laws and regulations. This Policy is designed to protect both the Company and its workforce from the legal, financial, and reputational risks associated with corruption and bribery, particularly in the aerospace industry.

11.2 Scope

This Policy applies to all individuals employed by or representing SPACEBOURNE INC. (collectively, “Employees”), including full-time, part-time, temporary, and contract workers, as well as any affiliate or subsidiary of SPACEBOURNE INC. This Policy is legally valid and enforceable in the State of Delaware but applies to the Company’s activities worldwide.

11.3 Legal Framework

1. **Delaware State Law:** Under the Delaware Penal Code §§ 36.02–36.10, bribery and certain improper gifts to public servants are prohibited. Employees must be aware that both the giving and receiving of improper benefits can be penalized under state law.
2. **Foreign Corrupt Practices Act (FCPA):** The FCPA is a U.S. federal law that prohibits offering or giving anything of value to a foreign official to obtain or retain business. It also requires accurate and transparent record-keeping to prevent and detect illegal payments.
3. **Other Applicable Federal Laws:** This includes but is not limited to the Federal Acquisition Regulation (FAR) and, if applicable, NASA-specific regulations or Department of Defense regulations for aerospace contracts.
4. **International Laws and Standards:** Employees must also be aware of local anti-bribery and anti-corruption laws in the countries where the Company conducts business, which may include the UK Bribery Act, the OECD Convention on Combating Bribery of Foreign Public Officials, and other laws relevant to specific jurisdictions.

11.4. Definitions

- **Bribery:** The offering, promising, giving, or receiving of any financial or other advantage (e.g., cash, gifts, travel, entertainment, or anything else of value) with the intent of influencing a public official, private individual, or entity to gain an improper business advantage.
- **Corruption:** The abuse of entrusted power for private gain.
- **Foreign Official:** Any officer or employee of a government, international organization, or any department/agency thereof; any person acting in an official capacity for a government entity; and officials of political parties or candidates for political office.

- **Gift or Hospitality:** Anything of value, such as goods, services, entertainment, tickets, discounts, loans, or travel accommodations, given or received without the giver receiving equal or greater value in return.

11.5. Prohibited Conduct

1. **Bribery and Corruption:** No Employee may, directly or indirectly, offer, promise, give, or receive a bribe or engage in any corrupt practice.
2. **Facilitation Payments:** These are small payments (sometimes called “grease” payments) to secure or expedite routine governmental action. Under the FCPA, such payments are heavily scrutinized, and in many jurisdictions, they are illegal. As a general rule, SPACEBOURNE INC. prohibits facilitation payments.
3. **Improper Influence:** Employees must not exert undue or improper influence over public officials, contract officers, or private parties in order to obtain or retain business or any improper advantage.

11.6. Gifts and Gratuities

1. **General Rule:** Gifts, entertainment, and hospitality must be reasonable, proportionate, and provided in good faith. They must never be offered or accepted with the intent of influencing a decision or creating a sense of obligation.
2. **Gifts to Government Officials:** Special care must be taken when providing anything of value to government officials. Strict limits and reporting requirements often apply. Before offering a gift or hospitality to a government official, Employees must obtain approval from the Company’s Compliance Officer or Legal Department.
3. **Value Limitations:**
 - The Company may establish a specific dollar threshold for permitted gifts and hospitality. Any gift or hospitality above the threshold requires written approval from the Compliance Officer or Legal Department.
 - Regardless of the value, no gift or hospitality should ever create a conflict of interest or the appearance of impropriety.
4. **Disclosure and Record-Keeping:** Employees must promptly disclose any gifts or gratuities offered or accepted, and maintain accurate records in Company systems for review or audit.

11.7. Interactions with Government Agencies

1. **Procurement Integrity:** In the aerospace industry, contracts often involve state and federal agencies. Employees involved in contract bids, negotiations, or execution must comply with all relevant regulations, including but not limited to the FAR, the NASA FAR Supplement, and any Department of Defense requirements (DFARS, if applicable).
2. **Lobbying and Political Contributions:** Any Company lobbying activities or political donations must comply with all federal and Delaware state laws. Employees must not make political contributions on behalf of the Company without prior approval from the Legal Department.

3. **Revolving Door Regulations:** Former government officials or Employees who join SPACEBOURNE INC. must comply with post-employment restrictions under federal and state law (e.g., cooling-off periods or limitations on lobbying).

11.8. Record-Keeping and Internal Controls

1. **Accuracy of Books and Records:** Under the FCPA and other applicable laws, SPACEBOURNE INC. is obligated to maintain accurate and detailed books, records, and accounts that reflect all transactions and dispositions of assets.
2. **Internal Accounting Controls:** The Company will implement and maintain internal controls to provide reasonable assurance that transactions are executed in accordance with management's authorization and properly recorded to maintain accountability for assets.
3. **Audits:** Routine internal and external audits may be conducted to ensure compliance with this Policy and legal requirements.

11.9. Responsibility for Compliance and Training

1. **Employee Responsibilities:** Each Employee is expected to understand and comply with this Policy, participate in required training, and report any suspected violations.
2. **Management Responsibilities:** Managers and supervisors are responsible for ensuring that Employees in their departments are aware of and comply with this Policy. They are also expected to model ethical behavior and support a culture of compliance.
3. **Training Requirements:** Employees who interact with public officials or who engage in international business must complete the Company's mandatory anti-bribery and anti-corruption training. Additional training may be required based on role, geographic region, or job function.

11.10. Reporting Violations

1. **Whistleblower Protections:** Employees who in good faith report suspected violations of this Policy or any applicable law will be protected from retaliation.
2. **Reporting Channels:** Employees may report concerns or seek advice by contacting:
 - Their immediate supervisor or manager
 - The Human Resources Department
 - The Legal Department
 - The Company's designated Compliance Officer
 - Anonymous hotline (if available)
 - <https://spacebourne.com/report>
3. **Cooperation with Investigations:** Employees are required to cooperate fully with any internal or external investigation into potential violations of this Policy.

11.11. Disciplinary Measures

1. **Consequences:** Violations of this Policy may result in disciplinary action, up to and including termination of employment, consistent with state and federal laws. Violations

may also expose Employees and the Company to criminal, civil, and administrative penalties.

2. **Third Parties:** Vendors, suppliers, consultants, and other third parties acting on the Company's behalf who violate anti-bribery and anti-corruption laws or this Policy may be subject to contract termination or other appropriate remedies.

11.12. International Business Compliance

1. **Local Laws:** Employees engaged in international business must comply with local anti-corruption laws, even if those laws are stricter than U.S. laws.
2. **Foreign Government Interactions:** Any transactions with foreign government officials or entities must be thoroughly documented, and Employees must always consult with the Legal Department when unsure.
3. **Joint Ventures and Partners:** The Company conducts due diligence on prospective partners, subcontractors, and joint ventures to ensure they share our commitment to anti-corruption and ethical business conduct.

11.13. Policy Review and Amendments

1. **Regular Review:** The Company will periodically review this Policy and update it as necessary to reflect changes in applicable laws, regulations, and best practices.
 2. **Employee Acknowledgement:** Employees will be required to review and acknowledge this Policy upon hire and periodically thereafter.
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12. Receipt and Acknowledgment

12.1 Acknowledgment of Receipt

All employees will be required to sign an **Employee Handbook Acknowledgment** form stating that they have received, read, and understand the Company policies. Failure to read the handbook does not excuse non-compliance.

12.2 Changes to the Handbook

Spacebourne reserves the right to revise, modify, delete, or add policies and procedures at any time. When changes are made, employees will be informed.

Conclusion

We at Spacebourne are dedicated to fostering a thriving work environment that values **innovation**, **ethics**, and **excellence**. Thank you for taking the time to familiarize yourself with these policies and for upholding the standards that keep our Company growing and thriving.

Employee Handbook Acknowledgment

I acknowledge that I have received and read the Spacebourne Inc. Employee Handbook. I understand it is my responsibility to become familiar with all policies, guidelines, and procedures contained within. I understand that this employee handbook as well as all Company policies are available and kept current on spacebourne.com/employeehandbook and spacebourne.com/policies. If I have any questions or need clarification, I will consult with my supervisor or Human Resources.

I also understand that the Company may modify or update the Employee Handbook at its discretion and that it is my responsibility to stay informed of any changes. By signing below, I agree to abide by all policies and procedures outlined in the Employee Handbook.

Employee Signature: _____

Printed Name: _____

Date: _____