Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

OPEN COSMOS

SATELLITES TO UNDERSTAND
& CONNECT THE WORLD

Open Cosmos Group

Statement on Modern Slavery and Human Trafficking

for the financial year ended 31 December 2025



Published pursuant to Section 54 of the Modern Slavery Act 2015

OCTOBER 2026

@OPEN COSMOS 2026.

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513



SPAIN, DELTA EBRE

MULTI-500 | 01.09.2025 | FALSE COLOUR IMAGE OPEN COSMOS

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

OPEN COSMOS

Document Change Log

Issue	Status	Date	Description	Author
v0.1	Completed	23/10/2026	Document first published	AM, FV

Approved by the Board of Directors of Open Cosmos Ltd on 20th October 2026.

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

OPEN COSMOS

Table of Contents

Introduction 5

1. Organisation Structure, Business and Supply Chains 6

2. Policies in Relation to Slavery and Human Trafficking 6

3. Due Diligence Processes 7

4. Risk Areas and Steps Taken 7

5. Effectiveness 7

6. Training 8

Appendix 1 8

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

OPEN COSMOS

Introduction

The Open Cosmos Group ("Open Cosmos" or the "Group") takes a zero-tolerance approach to modern slavery and human trafficking. This Statement is made by Open Cosmos Ltd and applies to Open Cosmos Ltd and its subsidiary undertakings. It sets out the steps taken by the Group during the financial year ended 31 December 2025 to ensure these practices are not occurring in our business or supply chains.

Open Cosmos is committed to complying with the Modern Slavery Act 2015. Each Group company is committed to complying with the laws applicable to its operations, including laws relating to employment, labour rights, and the prevention of modern slavery and human trafficking and to acting ethically and with integrity across all of our business relationships.

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

OPEN COSMOS

1. Organisation Structure, Business and Supply Chains

Open Cosmos Ltd., **is a private limited company incorporated in England and Wales and the parent company of the Open Cosmos Group.** The Group is specialised in the design, manufacture, launch, and operation of advanced satellites, as well as the delivery of data- and connectivity-enabled services, empowering businesses and institutions worldwide. Founded in the United Kingdom in 2015, **Open Cosmos was established with the vision of simplifying access to space, enabling a wider range of organisations all over the world to benefit from the richness of actionable satellite data and services**, and building a world where insights from space improve life on earth.

Since its establishment, Open Cosmos has become one of the fastest growing companies in the European satellite sector, committed to put the satellites and the data they gather at the service of solving the biggest global challenges. Open Cosmos Ltd is incorporated in England and Wales and headquartered in the United Kingdom, and the Open Cosmos Group has an expanding footprint across Spain, Portugal, and Greece, employing over 300 dedicated professionals spanning engineering, programmes, bids and partnerships, market development, and finance across the wider group at the time of this Statement. The majority of the workforce has a scientific or technical background, complemented by expertise drawn from the most renowned space organisations, as well as from adjacent industries such as automotive and power, taking advantage of the latest technologies and knowledge.

Our key suppliers are established companies providing complex technical solutions relating to the space industry through highly skilled professional employees.. Our supply chains include:

- Suppliers of satellite components, electronic assemblies, and hardware, sourced from the UK, Europe, and internationally;
- software and technology licensors;
- launch service providers; and
- Ground station service providers
- Engineering advice and services
- Generic Contractors and Subcontractors

A substantial majority of suppliers are based in the European Union, United Kingdom, or United States of America.

2. Policies in Relation to Slavery and Human Trafficking

The following policies and employment practices **were in place within the relevant Group companies** and **were** directly relevant to our approach to combat modern slavery:

- Our Whistleblowing Policy provides a confidential mechanism for raising concerns, including any relating to labour exploitation or unsafe working conditions.

- Our Disciplinary Policy sets out the standards of conduct expected of all employees. Conduct that facilitates or conceals unlawful activity, including modern slavery **may constitute misconduct and may result in disciplinary action in accordance with the applicable policy and law.**

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

- Our Grievance Policy provides employees to whom it applies with access to a formal process for raising workplace concerns.

3. Due Diligence Processes

During the financial year ended 31 December 2025, the following due diligence practices were in place in the relevant Group operations and recruitment:

- BPSS screening: Where required for the relevant role or programme, UK personnel completed a Baseline Personnel Security Standard check prior to or on commencement of employment, covering identity, right to work in the UK, employment history, and a criminal record check relating to unspent convictions.
- Eligibility-to-work checks: Carried out for employees in accordance with the laws applicable in the relevant jurisdiction of employment.
- The Group engaged directly with its workforce and did not use labour providers that lacked any licence required by applicable law.
- Procurement decisions involved internal review of prospective suppliers, providing a degree of oversight of our direct supplier relationships

4. Risk Areas and Steps Taken

During the reporting period, we considered the risk of modern slavery within our direct UK operations to be low. Employees in those UK operations were engaged under UK-law-compliant contracts of employment, remunerated at or above the applicable National Minimum Wage or National Living Wage, as applicable, and subject to BPSS screening prior to joining where required for the relevant role or programme.

As stated above, a substantial majority of suppliers are based in the European Union, United Kingdom, or United States of America.. These suppliers provide complex technical solutions relating to the space industry through highly skilled professional employees. As a result, we consider the risk of modern slavery within our direct suppliers to be low.

5. Effectiveness

Given the early stage of our formal programme, during the financial year ended 31 December 2025, we have not, and do not currently measure performance against specific modern slavery indicators. During that financial year and up to the date of this Statement, no concerns or suspected breaches relating to modern slavery or human trafficking were reported to the Group through its formal reporting channels in relation to our operations or supply chains.

As our approach develops in the coming years, we may introduce measurable performance indicators against which to assess effectiveness in future reporting periods.

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

OPEN COSMOS

6. Training

During the financial year ended 31 December 2025, the Group did not provide formal training specific to modern slavery and human trafficking. The Group's Whistleblowing, Disciplinary and Grievance Policies, described in section 2, were in place during this period. They provide ways to raise concerns, including concerns about labour exploitation.

We recognise that training is an important part of an effective approach to modern slavery. We intend to introduce modern slavery awareness e-learning for all employees across the Group during the financial year ending 31 December 2027.

We will also provide more in-depth training for employees in roles where risk exposure is greatest, including procurement, human resources and senior management, informed by the supply chain risk work described in section 4.

Finally, we will record completion of training, so that we can report on its reach and effectiveness in future statements.

Appendix 1

This Statement is made by Open Cosmos Ltd pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Open Cosmos Ltd's slavery and human trafficking statement in respect of the Open Cosmos Group for the financial year ended December 2025. The statement applies to Open Cosmos Ltd and its subsidiaries. It was approved by the Board of Directors of Open Cosmos Ltd on 20th October 2026.

This Statement has been signed on behalf of Open Cosmos Ltd. by Aleix Megias in his capacity as a director.



Aleix Megias

Chief Operations Officer

Open Cosmos

23/10/2026

Docusign Envelope ID: E90D2446-6545-8B40-83D6-D1498AA92513

