



Supplier and Business Partner Code of Conduct

Planet Labs PBC (together with its affiliates, "**Planet**") is committed to the highest standards of ethical conduct in its business practices and to sustainability and preservation of the Earth and its resources. Planet operates in compliance with applicable laws and regulations and seeks to produce its products in ways that respect human rights and the environment. We expect the suppliers, business partners and vendors (collectively "**Business Partners**") we engage with to share our values, as well as our commitment to corporate integrity, responsible product sourcing, and the safety and wellbeing of workers throughout the global supply chain; these values are of paramount importance to us. Our fundamental expectation is that our Business Partners, at a minimum, operate in full compliance with all applicable laws, rules and regulations and this Supplier and Business Partner Code of Conduct (the "**Code**"). Where this Code sets standards higher than required by law, we expect our Business Partners to comply with the Code.

How Planet Expects Its Business Partners to Conduct Business.

- **Compete Fairly and Comply with Laws.** Compete fairly and conduct your business with integrity, transparency and honesty. Fully comply with applicable laws and regulations in the countries and jurisdictions where you operate, and ensure that all of your personnel are adequately trained and educated to ensure such compliance, as well as compliance with this Code.
- **Anti-Bribery/Anti-Corruption.** Planet prohibits all forms of bribery and efforts to influence business, directly or indirectly, through bribes, facilitation payments, kickbacks and any other improper or unethical means. Gifts, political contributions and other things of value, such as entertainment and travel, may not be offered in connection with opportunities or work done for or on behalf of Planet. You are expected to understand and comply with the U.S. Foreign Corrupt Practices Act, wherever you do business, and with any other applicable anti-corruption laws applicable in the countries or jurisdictions where you operate or conduct business on behalf of Planet. You must ensure that you are aware of the real beneficiaries of transactions executed by your organization.
- **International Trade Compliance.** Refrain from sharing any export controlled information provided to you by Planet with unauthorized individuals within and outside your company and administer appropriate access controls. Do not do business with entities subject to economic sanctions by the United States government, international community or in the countries or jurisdictions where you operate.
- **Conflicts of Interest.** Avoid situations that may involve a conflict of interest and immediately disclose potential conflicts of interest to Planet. Planet information may not be used for your personal benefit or in competition with Planet and your relationship with Planet may not be used for your personal gain.
- **Books and Records.** Maintain books and records that accurately and completely reflect all transactions related to your business with Planet. Never make book entries that misrepresent a transaction and never alter, conceal or destroy documents related to transactions with Planet outside of your company's regular document retention policies.
- **Insider Trading.** Refrain from trading in Planet's securities when in possession of material, non-public information and refrain from disclosing such information to any third party.

- **Inclusive Supply Chain.** Promote an inclusive and resilient supply chain by providing fair opportunities to businesses to bid and acquire contracts.
- **Business Continuity.** Implement plans and procedures that minimize the impact of an emergency or other disaster on your business, including service assurance and recovery plans for products and services provided to Planet, and consider the need for redundancies to promote resiliency.

How Planet Expects Its Business Partners to Treat the Workplace.

- **Treat People Fairly and With Respect.** Treat workers fairly and with dignity and respect. Ensure that workers know of and have access to grievance mechanisms that follow a clearly outlined process and that allow for anonymous reporting, and that reported concerns and violations are addressed in a timely manner. Workers who speak up in good faith should be protected from retribution, retaliation and reprisal.
- **No Discrimination or Harassment.** Planet prohibits any form of discrimination or harassment, whether based on race, ethnicity, sex, sexual orientation, gender identity or expression, religion, age, marital status, national origin, ancestry, pregnancy or maternity, medical condition, disability or any trait or status protected by applicable law, and expects its Business Partners to do the same. Illegal work practices and discrimination or harassment in the workplace must be prohibited.
- **Prevention of Forced Labor and Human Trafficking.** Do not support or engage in slavery or human trafficking in any part of your supply chain. Ensure that all labor is voluntary and that no abusive, exploitative or illegal conditions (including, but not limited to, compelled or forced labor, bonded labor, debt or indentured labor, serfdom, prison labor, and illegal overtime) exist in your hiring or other human resources practices. Ensure that workers have the right to freedom of movement without delay or hindrance or the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation. Recruit responsibly and hold your agents, suppliers and recruiters to the same standards you adopt. If Business Partners use third party recruiting firms to provide labor, the Business Partners must ensure these firms' activities are conducted in compliance with this Code.
- **Promote Human Rights and Human Dignity.** You must comply with all local, national and international regulations concerning employment and professional relations, and at a minimum undertake to respect human dignity and rights and to comply with relevant international conventions protecting human rights.
- **Prevention of Underage Labor.** Employ workers who meet the applicable legal minimum age requirements or who are at least 15 years of age, whichever is greater. Implement and maintain a reliable system to verify the age and eligibility of all workers.
- **Lawful Employment/Freedom of Association.** Employ workers who are legally permitted to work in the host jurisdiction and follow applicable local laws and regulations governing the rights of workers to form and join worker organizations.
- **Wage and Benefits.** Pay your workers, at a minimum, at the wage mandated by local law, comply with applicable restrictions on the maximum number of working hours per day/week, and prohibit the use of forced overtime or unfair deductions from pay.
- **Health and Safety.** Provide a safe, secure and healthy work environment, and comply with all applicable legal requirements and industry best practices. Establish principles and/or processes, infrastructure, and equipment for health and safety management at work, and provide appropriate safety training for your employees.

How Planet Expects Its Business Partners to Treat Information.

- **Respect Privacy and Maintain Secure Systems.** Protect and respect the privacy rights of employees, customers and Business Partners. Implement and maintain secure systems, processes and services to protect personal data and information and comply with applicable data protection and privacy laws that govern the collection and use of personal information.
- **Protect Planet's Intellectual Property and Confidential Information.** Safeguard Planet's intellectual property and that of our customers and counterparties from unauthorized access, misuse and distribution. Proprietary information shared with you must be handled and used in compliance with applicable laws and the terms of your contract with Planet, should be accessed only by authorized personnel on a need-to-know basis and may not be disclosed to any third party without Planet's consent. Planet should be immediately notified if its information has been or is suspected to have been lost, stolen or inappropriately accessed, used or disclosed.

How Planet Expects Its Business Partners to Treat the Environment

- **Sustainable Business Practices.** Conduct your operations in a manner that meets industry best practices to minimize your impact on the environment and its natural resources. Monitor and reduce or eliminate your emissions and discharge of pollutants and other environmental effects that may arise from your operations. Work toward developing increasingly efficient and sustainable packaging for your products and appropriately limit your consumption of water, energy, natural resources and all raw materials required for your activities. Endeavor to reduce and/or prevent release of their airborne emissions and of effluents to the ground, underground and into water, and reduce and/or prevent the release of waste of all types resulting from your activities, particularly hazardous waste.
- **Responsible Sourcing of Materials.** Source materials responsibly and adhere to all applicable laws and regulations, including those applicable to products containing hazardous materials and conflict minerals. Know the type, origin, and chain-of-custody of materials used in the manufacture of products you sell to Planet, and assist Planet in identifying such information for its own records.
- **Permits and Reporting.** Obtain, keep current, and comply with all environmental permitting rules and reporting requirements applicable to your operations.

Compliance with the Code

- **Building Trust.** We aim to build trust-based relationships with our Business Partners to achieve mutual success while helping communities and the wider world thrive. We expect our Business Partners to cooperate with our reasonable requests for information, certifications, and/or audit access, including to verify compliance with this Code, whether from Planet or internal or external auditors appointed by us.
- **Addressing Concerns.** When there is a concern, our expectation is to work with the Business Partner to help identify possible improvements. However, when an issue can't be resolved with an acceptable corrective action plan, Planet reserves the right to take other appropriate actions under the particular circumstances.
- **Communication.** If you see or suspect any conduct or business practices that you think could violate this Code, please contact Planet directly. You may raise a concern or get help by contacting your Planet representative. Getting in touch with us quickly helps to prevent problems and correct any that have already occurred. We will handle all reports promptly, fairly, and as confidentially as possible.

It is ultimately the responsibility of each Business Partner to ensure compliance with this Code, both directly and indirectly through its own supply chain, and Planet disclaims any affirmation obligation to confirm any Business Partner's compliance with this Code.

For more information regarding how Planet does business, Business Partners are encouraged to review Planet's Code of Business Conduct and Ethics, which is available on our Investor Relations page at <https://investors.planet.com/>. In addition, Planet's Ethical Principles can be found at <https://www.planet.com/ethics/>.