SpaceX Code of Ethics and Business Conduct

Space Exploration Technologies, Corp. ("SpaceX") is dedicated to conducting business consistent with the highest standards of business ethics. We have an obligation to our employees, shareholders, customers, suppliers, community representatives and others with whom we interact to be honest, fair and forthright in all business activities.

As a result, all suppliers of goods and services to SpaceX ("suppliers") and the SpaceX employees who work with them are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to our company's stature to maintain high ethical standards by adhering to all applicable laws and avoiding even the perception of impropriety or conflict of interest. We expect suppliers of goods and services to SpaceX to maintain the same high standards of business ethics by adhering to all laws and avoiding the appearance of impropriety or conflict of interest.

It is SpaceX policy to cooperate fully with governmental and regulatory authorities in investigating possible violations of applicable laws and regulations. If appropriate, SpaceX will assist authorities in the prosecution of persons who engage in illegal conduct. Without limitation, suppliers of goods and services to SpaceX, as well as any subsidiary, affiliated and/or member entities supplying goods and services to SpaceX, are expected to observe and comply with the following:

1. Suppliers shall conduct their business activities in compliance with all applicable laws and regulations while conducting business with and or on behalf of SpaceX. This includes, but is not limited to elimination of human trafficking and slavery, export laws and regulations, and to the extent applicable, small business rules and regulations, Affirmative Action and Equal Employment Opportunity rules and regulations, any applicable wage and hour and labor laws, and the rules regarding suspension and debarment of companies from doing business with the U.S. Government.

2. Suppliers shall not offer any SpaceX employee a gift that would give the appearance of impropriety or as an attempt to actually influence doing business with the supplier. This would include gifts of cash or its equivalent or any other business courtesy given in an attempt to motivate a person to do anything that is prohibited by law, regulation or SpaceX policy. Similarly, the same policy applies in the reverse; suppliers shall not accept any gifts or business courtesies from SpaceX employees for the same reason.

3. Suppliers shall not enter into a financial or any other relationship with a SpaceX employee that creates or gives the appearance of a conflict of interest. Even the appearance of a conflict of interest can be damaging to SpaceX and to the supplier and must be disclosed and approved by the SpaceX Purchasing Director, Compliance Officer, CFO or President.

4. Suppliers shall not engage in price fixing, price discrimination, collusive bidding practices, or unfair trade practices in violation of any antitrust laws.

5. Suppliers shall promptly notify SpaceX of any known or suspected improper behavior by suppliers relating to their dealings with SpaceX, or any known or suspected improper behavior by SpaceX employees by using any one of the following methods:

   Email: lindsay.chapman@spacex.com
   Phone: (202) 649-2718
   Mail: SpaceX, Attn: Compliance Officer, 1 Rocket Road, Hawthorne, CA 90250

SpaceX will not tolerate any retaliation taken against any individual who has, in good faith reported misconduct or sought help regarding known or suspected violations of these SpaceX policies or the law. All suppliers must acknowledge their agreement with the foregoing (or equivalent certification approved by SpaceX) by signing and returning this acknowledgment form.

Signature ____________________________ Date ____________________________
Print Name ____________________________ Title ____________________________
Company ____________________________