

CODE OF BUSINESS CONDUCT AND ETHICS

MESSAGE FROM OUR PRESIDENT AND CEO

Space is hard.

Every day, we process millions of data elements from our own satellite constellation and from the world's emerging sensor networks in order to empower our customers to be the first to know.

We could not achieve our mission without our continuous commitment to our core values. This Code of Conduct reflects those values and provides a framework for making ethical business decisions. Among other things, this Code reinforces our commitment to all our stakeholders— colleagues, customers, shareholders, business partners and communities—to conduct business honestly, responsibly and in a manner consistent with applicable laws in the countries where we operate. It is our expectation that all of us at BlackSky will act in this way, no matter who we are and no matter what we do for the organization.

This Code is a guide to our standards of business conduct and cannot cover every ethical issue or situation that may arise. We are all expected to use good judgment, to ask questions when we need guidance, to speak up if we are concerned, and to get assistance as needed from the various resources described in this Code. Please do not hesitate to reach out for help or to report any concerns.

Thank you all for your support as we continue our path forward. It is truly an honor to work with this team of dedicated and talented professionals every single day.

Sincerely,

Brian O'Toole

OUR OPERATING PRINCIPLES

Our Purpose

To provide talented people deeply meaningful work across a diverse set of technologies, driving our business. Connecting space more intimately with our world is complex, intellectually challenging, and enormously rewarding. By working at BlackSky, we will give you the chance to impact industries, change how businesses operate, and possibly alter the course of history itself.

Our Mission and Vision

Our mission and vision is to fundamentally improve our planet and society through the use of space by being the first to know and revealing the changes that matter most to you, and by enabling timely and affordable understanding of our planet.

Our Core Values

People First

We operate with respect and transparency. We provide an environment for people to grow, fulfill their ambitions, and achieve their full potential.

Accountability

We are accountable to meeting and exceeding our commitments to customers and shareholders.

Innovation

We are innovators and thought leaders. We are passionate and relentless about solving problems that matter.

High Integrity

We never compromise on ethics or honesty. Trust is paramount.

Diversity

We believe that diversity of background and opinion are essential to the strength of our culture. We are committed to an equitable and inclusive environment.

Positive Impact

We are here to contribute to a smarter and safer world. Our shared goal is to contribute to the good of society through the responsible use of our assets.

Celebration

We celebrate our wins and recognize the individual and collective accomplishments of our teams.

OVERVIEW

This Code sets forth our expectations regarding ethical conduct of business by all our employees worldwide. It applies to all our dealings, including those with customers, business partners, competitors, and colleagues. Unethical or illegal activities could damage BlackSky's reputation and result in serious adverse consequences for BlackSky and the individuals involved. Therefore, it is essential that you understand and comply with this Code. We also expect our agents, subcontractors, suppliers, and other business partners to develop and enforce ethics policies that are materially similar to the Code.

For ease of reference in this Code, we use "BlackSky" to mean BlackSky Technology Inc. and each of its wholly-owned or controlled subsidiaries and we use "employees" to mean all BlackSky directors, officers, and employees unless we specify otherwise.

BlackSky's Compliance Officer may designate others, from time to time, to assist with the execution of his or her duties under this Code. The Compliance Officer is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation.

OUR COLLECTIVE RESPONSIBILITIES

All BlackSky employees are expected to:

- know and follow the Code and all BlackSky policies;
- seek guidance when in doubt about the best course of action to take;
- comply with all applicable laws, whether or not specifically covered in the Code;
- conduct business with integrity;
- promote honest and ethical conduct in others;
- complete all BlackSky compliance requirements in a timely manner;
- report instances of observed or suspected misconduct; and
- cooperate fully with BlackSky compliance investigations.

New employees are required to read the Code during the corporate on-boarding process and complete the attached "Acknowledgement" form. Failure to read this Code or to sign an acknowledgment form does not excuse any person from the terms of this Code.

BlackSky's leaders at all levels are responsible for cultivating and enforcing an ethical work environment. BlackSky managers are expected to:

- serve as ethical role models for others;
- promote a culture of compliance with this Code, BlackSky policies, and applicable law;
- communicate and demonstrate intolerance of unethical behavior;
- identify compliance training needs and ensure that their teams complete all required training in a timely manner;
- foster an open work environment where employees can raise questions or concerns without fear of retaliation; and
- understand when to escalate concerns and seek support from additional resources.

All employees must respect and follow all laws when carrying out responsibilities on behalf of BlackSky

and refrain from illegal conduct. Employees have an obligation to be knowledgeable about the specific laws, rules and regulations that apply to their areas of responsibility. If a law conflicts with a policy in this Code, employees must comply with the law. Any questions as to the applicability of any law should be directed to BlackSky's Legal Department.

HOW WE REPORT CONCERNS

If you know of or suspect a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), or you have concerns about a situation that you believe does not reflect BlackSky's culture and values, you must report it by contacting:

- your manager;
- our People Ops department;
- the Compliance Officer (Compliance@blacksky.com);
- any attorney in BlackSky's Legal Department, including the General Counsel; or
- our Ethics Helpline at blacksky.ethicspoint.com.

Our Ethics Helpline is operated by an industry-leading third-party provider and allows a report to be made online or by telephone 24 hours per day, seven days per week.

The Helpline permits anonymous reporting and provides interpreters for callers who want to communicate in a language other than English. The U.S. toll-free number is 1-844-517-0921.

When you make a report, you will be assigned a unique code called a "report key" that you can use later to add details or to check the status of your report. When raising a concern, you should provide as much detail as possible. Due to confidentiality and other reasons, BlackSky generally does not disclose the specifics of any internal investigation, but you may be able to contact the Helpline to learn whether an investigation has been closed.

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law.

Investigations

Reported violations will be promptly and thoroughly investigated. As a general matter, the Board of Directors of BlackSky has designated the Audit Committee of the Board to oversee investigations of potential violations by or relating to directors or executive officers, and the Compliance Officer will oversee investigations of potential violations by or relating to other employees. It is imperative that the person reporting the violation not undertake an independent investigation of the matter. Rather, employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Employees should not withhold, tamper with, or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, employees are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with BlackSky and also may be a criminal act that can result in severe penalties.

Consequences

Employees who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, employees who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code will be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject employees to civil and criminal liability.

No Retaliation

We do not tolerate retaliation against anyone who reports a concern in good faith or cooperates with a compliance investigation, even when an allegation is not substantiated. Anyone found to have retaliated against a reporting or cooperating individual may be subject to disciplinary action, up to and including termination of employment.

Protected Activity

Nothing in this Code limits or prohibits employees from engaging for a lawful purpose in any protected activity. “Protected activity” means filing a charge or complaint, or otherwise communicating, cooperating, or participating, with any state, federal or other governmental agency, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, and the National Labor Relations Board. Employees are not required to obtain authorization from BlackSky prior to disclosing information to, or communicating with, such agencies, nor are employees obligated to advise BlackSky as to any such disclosures or communications. This said, in making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute BlackSky confidential information to any parties other than the relevant government agencies. Protected activity does not include the disclosure of any Company attorney-client privileged communications; any disclosure of attorney-client privileged communications, without BlackSky’s written consent, violates Company policy.

HOW WE TREAT ONE ANOTHER**Mutual Respect**

We strive to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.

We require each employee to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice, and harassment. We prohibit discrimination against or harassment of any team member on the basis of race, religion or religious creed (including religious dress and grooming practices), color, ethnic or national origin, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), nationality, national origin, ancestry, immigration status or citizenship, age, physical or mental disability, medical condition (including genetic information or characteristics, or those of a family member), military service or veteran status, marital status or family care status, sexual orientation, family

medical leave, gender (including gender identity, gender expression, transgender status or sexual stereotypes), political views or activity, status as a victim of domestic violence, sexual assault or stalking, or any other basis or classification protected by applicable federal, state or local law.

Misconduct, including discrimination, harassment, retaliation, or other forms of unprofessional behavior, will not be tolerated. For more information including information above reporting discrimination and harassment, please refer to the No Harassment and No Discrimination Policy in the Employee Handbook.

Diversity, Equity, and Inclusion

When we look at individuals along with teams and partners, we see differences in sex, color, creed, national origin, political affiliation, disability, and a variety of other unique factors not through a lens of exclusion—but through an inclusive understanding that all those individual differences are valuable and make us who we are as a company. We understand that our unique factors allow for more creativity and innovation, while solving complex problems in pursuit of our mission. Systemic inequality can only be overcome through ensuring that diversity, equity, and inclusion are at the core of all that we do, and we proudly hire based upon the unique combination of skills, differences, and backgrounds people bring to BlackSky.

Safe Working Conditions

We strive to maintain safe working conditions and to conduct business in an environmentally responsible manner. You are responsible for complying with relevant environmental, safety and health laws, regulations, warnings, policies, and procedures, and are required to report any accident, injury, or other safety or health concern immediately to a supervisor.

HOW WE MAINTAIN FINANCIAL INTEGRITY

Accurate Books and Records

Employees are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non-financial information that may be material to BlackSky to ensure full, fair, accurate, timely, and understandable disclosure in releases to the general public and in reports and documents that we file with the U.S. Securities and Exchange Commission or other applicable government agencies, in the U.S., or other countries.

Each employee involved in BlackSky's disclosure process must familiarize themselves with the disclosure requirements applicable to us and our business and financial operations, and must not knowingly misrepresent, or cause others to misrepresent, facts about BlackSky to others, whether within or outside the company, including to BlackSky's independent auditors, governmental regulators, and self-regulatory organizations.

Employees must maintain all BlackSky's books, records, accounts, and financial statements in reasonable detail, and reflect the matters to which they relate accurately, fairly, and completely. Furthermore, employees must ensure that all books, records, accounts, and financial statements conform both to applicable legal requirements and to BlackSky's system of internal controls. Employees must carefully and properly account for all assets of BlackSky. Employees may not establish any undisclosed or unrecorded account or fund for any purpose. Employees must not make any false or misleading entries in BlackSky's books or records for any reason or disburse any corporate funds or other corporate property without adequate supporting

documentation and authorization. Employees must not misclassify transactions related to accounts, business units, or accounting periods. Each employee bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

Anti-Money Laundering

We are committed to complying fully with all anti-money laundering laws. Money laundering generally involves conducting a transaction to conceal the illegal origins of funds or to facilitate illegal activity. We aim to conduct business only with reputable customers and business partners involved in legitimate business activities using funds derived from legitimate sources. You should be alert for unusual financial transactions that may indicate money laundering, such as irregularities in the way payments are made, payments made by third parties for the benefit of another party, and payments from offshore banking locations. Any suspicious financial activities or transaction should be reported.

Keeping the Audit Committee Informed

The Audit Committee of the Board of Directors plays an important role in ensuring the integrity of BlackSky's publicly filed reports or public filings. If an employee believes that questionable accounting or auditing conduct or practices have occurred or are occurring, they should notify the Audit Committee. In particular, any employee should promptly bring to the attention of the Audit Committee any information of which they may become aware concerning:

- the accuracy of material disclosures made by BlackSky in its public filings;
- material weaknesses or significant deficiencies in internal control over financial reporting;
- any evidence of fraud that involves an employee who has a significant role in BlackSky's financial reporting, disclosures or internal controls or procedures; or
- any evidence of a material violation of the policies in this Code regarding financial reporting.

HOW WE DEMONSTRATE INTEGRITY IN OUR BUSINESS DEALINGS

Personal Conflicts of Interest

Doing business with integrity means making decisions that align with the best interests of our company, without prioritizing any personal benefits you stand to gain. You should avoid any activity that could result in, or give the appearance of, a personal conflict of interest. A personal conflict of interest describes any circumstance that could cast doubt on your ability to act in BlackSky's best interests and to exercise sound business judgment unclouded by personal interest or divided loyalties.

Conflicts of interest may arise in many ways, including, for example, when you:

- continue to supervise an employee with whom you have a romantic relationship;
- direct BlackSky business to a vendor in which you have, or a family member has, a director indirect personal financial interest;
- perform outside work for, or serve on the board of, any of our customers, competitors, or suppliers; or
- take personal advantage of a BlackSky corporate opportunity.

The presence of a conflict does not necessarily mean that an activity will be prohibited. As soon as you have identified a potential conflict of interest, contact BlackSky's Legal Department.

Fair Dealing

We do not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with BlackSky's customers, service providers, suppliers, competitors, business partners and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

Bribery and Corruption Laws

BlackSky strictly prohibits all forms of bribery and corruption, regardless of whether they involve a public official or a private person. Bribery and corruption are antithetical to BlackSky's commitment to operating with integrity and transparency and are also prohibited under the laws of most countries around the world, including pursuant to laws such as the United States Foreign Corrupt Practices Act of 1977 and the United Kingdom Bribery Act of 2010.

Exchanging gifts and sharing meals and/or entertainment in connection with legitimate business purposes can foster constructive relationships with third parties. However, gifts, meals, and entertainment should not be offered or received as a means to obtain preferential treatment.

You may not solicit business courtesies such as gifts, meals, or entertainment from actual or potential customers, suppliers, or other business partners. You may exchange business courtesies with nongovernment personnel provided that doing so does not violate any policies of the recipient's organization, any contractual agreement with a customer, BlackSky policies, or applicable law. Any offering you make or receive must be reasonable and modest in cost, not include cash, and be justified by a legitimate business purpose consistent with the scope of your work responsibilities. Most importantly, an offering cannot be made to improperly influence the recipient's business judgment.

In rare circumstances, local customs in some countries may call for the exchange of gifts having more than nominal value as part of a business relationship. In these situations, guidance must be sought from BlackSky's Legal Department.

See BlackSky's Global Anti-Bribery and Anti-Corruption Policy for further guidance.

Antitrust Laws

Antitrust or "competition" laws are designed to foster competitive markets and prohibit activities that unreasonably restrain trade. In general, actions taken in combination with another company that unreasonably reduce competition may violate antitrust laws. Certain types of agreements with competitors (including, but not limited to, agreements on prices and output) are illegal. In addition, unilateral actions by a company with market power in the sale or purchase of a particular good or service may violate antitrust laws if those actions unfairly exclude competition. We are dedicated to complying with the numerous laws that govern competition. The laws governing this area are complex and can vary considerably in different countries and employees should reach out to the BlackSky Legal Department before taking any action that may implicate these laws.

International Trade Laws

We require compliance with laws and regulations governing trade in both the United States and in the countries where we conduct business. A number of countries maintain controls on the export of hardware, software and technology. Some of the strictest export controls are maintained by the United States against countries and certain identified individuals or entities that the U.S. government considers unfriendly or as supporting international terrorism. These controls include:

- restrictions on the export and reexport of products, services, software, information, or technology that can occur via physical shipments, carrying by hand, electronic transmissions (e.g., emails, distribution of source code and software) and verbal communications;
- sanctions and embargoes that restrict activities including exports, monetary payments, travel, and the provision of services to certain individuals (including individuals and entities included in, and owned or controlled by an individual or entity included in, the List of Specially Designated Nationals & Blocked Persons, the Sectoral Sanctions Identifications (SSI) List or Foreign Sanctions Evaders List maintained by the Office of Foreign Assets Control of the U.S. Department of the Treasury or any other applicable list of sanctioned, embargoed, blocked, criminal, or debarred persons maintained by any U.S. or non-U.S. government, the European Union, Interpol, the United Nations, the World Bank or any other public international organization relevant to Company business), companies and countries;
- international boycotts not sanctioned by the U.S. government that prohibit business activity with a country, its nationals, or targeted companies; and
- imports of products that are subject to the importing country's customs laws and regulations, which apply regardless of the mode of transportation, including couriershipments and carrying by hand.

Employees must comply with all applicable trade controls and must not cause BlackSky to be in violation of those laws. Any information suggesting that BlackSky has or may in the future engage in a transaction that could violate applicable trade laws must be reported to BlackSky's Legal Department.

HOW WE COMPLY WITH SPECIALIZED GOVERNMENT CONTRACTING REQUIREMENTS

As a U.S. government contractor, we must stay abreast of all laws and contractual requirements applicable to our dealings with the U.S. government and its employees, whether we are contracting directly with the government customer or indirectly through another government contractor. These rules are stricter than those that govern our work or relationships with commercial customers. The failure to comply with them may result in administrative, civil, or criminal penalties for the company and for the individuals involved in wrongdoing, including suspension or debarment from doing U.S. government work. The following is a brief summary of certain topics about which employees should be aware.

Procurement Integrity

U.S. law prohibits competitor companies from soliciting, obtaining, or disclosing contractor bid or proposal information or source selection information from the U.S. government or anyone else during the course of competition for an award. If you receive any information that might be construed as violating that law, contact BlackSky's Legal Department.

Recruiting and Employing U.S. Government Employees

U.S. law restricts employment discussions between a contractor and a current or former U.S. government employee involved personally and substantially in a procurement on which the contractor is bidding. Some former U.S. government employees or military personnel, even if permitted to be hired, may be precluded from performing some types of work or from engaging in communications with certain U.S. government

officials. Given the complexity of the requirements, you may not enter into employment discussions, even preliminary ones, with any individual employed by the U.S. government or the U.S. military without consulting BlackSky's Legal Department. It is never sufficient to rely upon a candidate's representation as to what legal restrictions apply.

Gifts, Meals, and Other Business Courtesies to U.S. Government Employees

U.S. government employees are subject to strict rules regarding acceptance of meals, travel, lodging, gifts, gratuities, and entertainment. As a general rule, you are not permitted to offer or give any item of value to any U.S. government employee without consulting BlackSky's Legal Department.

Organizational Conflicts of Interest

We cannot participate in a U.S. government contract if an Organizational Conflict of Interest (OCI) exists that cannot be effectively neutralized or mitigated. Each individual contracting situation must be examined on the basis of its particular facts and the nature of the proposed contract. Generally, the OCI rules are designed to prevent:

- the existence of conflicting roles that might bias a contractor's judgment; and
- unfair competitive advantage, as might occur when a contractor competing for work possesses proprietary information that was obtained from a government official without proper authorization.

The OCI rules are complex and require the exercise of common sense, good judgment, and sound discretion. At any point that you become aware of an actual or potential OCI, contact BlackSky's Legal Department.

Cost And Pricing Data

Cost and pricing data submitted to the U.S. government in support of a bid, proposal, or contract modification must be accurate, complete, and current. If you are involved in preparation of bids or proposals or contract negotiation, you must not knowingly make any untruthful or inaccurate statements, communications, or representations, or fail to disclose required information.

Submission of Claims

All customer invoices are required by law to be accurate, complete and conform to the related contractual requirements and applicable Federal Acquisition Regulation provisions. Only costs that are properly chargeable to a contract may be billed to, or reimbursed by, the U.S. government. We cannot, for example, submit "unallowable costs," such as those for alcohol, excess travel, and goods and services for personal use. If you are uncertain whether an item may be invoiced, ask your manager or contact BlackSky's Finance Department.

HOW WE PROTECT ASSETS AND INFORMATION

All employees should endeavor to protect BlackSky's assets and ensure their efficient use. Any suspected incident of fraud or theft should be reported immediately for investigation.

You are required to safeguard all sensitive information entrusted to you, including, without limitation:

- BlackSky proprietary or confidential data;
- competition-sensitive information;

- third-party data shared under a confidentiality obligation;
- information subject to access restrictions by government agencies; and
- an individual's personal data.

All such information must be used for legitimate business purposes only and be accessed by, and communicated to, only those authorized individuals who have a need to know such information and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

Use of Social Media

This Code applies to your online conduct (blogging, tweeting, commenting and other forms of online activity) just as much as it applies to your offline behavior. You cannot, for example, use any social media platform to harass someone or disclose proprietary or confidential information, or violate a third party's intellectual property rights. If you are using a personal social media account to discuss BlackSky-related matters, you are required to identify yourself as a BlackSky employee and make it clear that the views expressed are your own and do not necessarily reflect the views of BlackSky.

Communications with News Media

Unless you are an official BlackSky spokesperson, you are not authorized to speak on behalf of the company. All news media inquiries should be directed to BlackSky's Legal Department.

See the Company's External Communications Policy for more information.

Insider Trading

Under federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Because employees will have knowledge of specific confidential information that is not disclosed outside BlackSky which will constitute material non-public information, trading in BlackSky's securities or in the securities of those companies with which BlackSky does business by employees or persons employees provide material non-public information could constitute insider trading, violating the law. It is an employee's responsibility to comply with these laws and not to share material non-public information.

See the Company's Insider Trading Policy for more information.

Use of Company Assets

Employees should treat company-issued equipment with care and use the equipment and tools with BlackSky's interests in mind. Employees should also use good judgment in using company assets for personal matters. BlackSky permits reasonable personal use of company-owned equipment, but employees should be aware that all electronic information and equipment remain the sole property of BlackSky.

Additionally, please note that all company-issued devices, computers, hardware, cell phones, media, documents, records, and information are the property of BlackSky. As such, BlackSky requires employees to cooperate with any request made by the BlackSky Legal Department to preserve or produce any documents, records, information, devices, computers, hardware, cell phones, or other media. A legal hold issued by BlackSky's Legal Department suspends all document destruction procedures in order to preserve

appropriate records under special circumstances, such as litigation or government investigations. If a legal hold is placed on records for which you are responsible, you must preserve and protect the necessary records in accordance with those instructions. A legal hold remains effective until it is officially released in writing by the Legal Department. If you are unsure whether a document has been placed under a legal hold, contact the Legal Department directly.

HOW WE EXERCISE GOOD CORPORATE CITIZENSHIP

We are committed to good citizenship through active involvement in our communities and responsible engagement in the political process.

Charitable Activities

We believe that helping others is important, as manifested by the active involvement of our company and many of our employees in charitable organizations and community activities. We invite you to give back to our global communities.

Political Activities

We encourage you to participate in the political process and to support the political parties and candidates of your choice. In doing so, your participation must be on an individual basis, on your own time and at your own expense, unless your involvement is within the scope of your official duties. Many countries restrict or prohibit corporations from donating corporate funds, goods, or services (including employee work time), directly or indirectly, to political candidates. BlackSky does not make contributions to political candidates or political parties except as permitted by applicable laws, and you may not contribute any BlackSky funds or use any BlackSky assets or facilities for the benefit of political parties or candidates anywhere in the world, unless approved in advance by BlackSky's Legal Department.

An employee's personal lawful political contribution, or decision not to make a contribution, will not influence the employee's compensation, job security or opportunities for advancement.

WAIVERS OF THIS CODE

Any amendment or waiver of any provision of this Code must be approved in writing by the Board or, if appropriate, its delegate(s), and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of this Code for the principal executive officer, principal financial officer, principal accounting officer, controller, or any other persons performing similar functions in BlackSky will be promptly disclosed to stockholders if and as required by applicable law or the rules of the stock exchange on which the securities of BlackSky are listed.

AMENDMENT

BlackSky reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules, and regulations.

CONFIRMATION OF CODE OF BUSINESS CONDUCT AND ETHICS

I have received and read the BlackSky Technology Inc. (together with any subsidiaries, collectively the “**Company**”) Code of Business Conduct and Ethics (the “**Policy**”). I agree to abide by the Policy, and I understand the consequences of failure to comply with the Policy may result in disciplinary action, including termination of my employment. I further agree to cooperate with any internal investigation regarding a potential or actual violation of this Policy and that, failure to cooperate with an internal investigation, may result in disciplinary action, including termination of my employment.

Signature: _____

Name: _____

Date: _____