



Reporting Plan V.1.0

for

Skylark L

Issued to

Skyrora Limited

On

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Control Page

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1 SCOPE AND PURPOSE OF THIS REPORTING PLAN

- 1.1 This Reporting Plan sets out necessary information, reporting and notification requirements for Skyrora Limited (“the Licensee”) relating to (i) the Licensee’s obligations under its Spaceflight Operator Licence (“the Licence”), the Act and Regulations, and (ii) the Regulator’s monitoring of the activities permitted by the Licence.
- 1.2 This Reporting Plan must be read with and in the context of the terms and conditions of the Licence, the Act and the Regulations.
- 1.3 The definitions used within the Licence, the Act and the Regulations are adopted in this Reporting Plan.
- 1.4 This Reporting Plan may be updated by the Regulator during the period of the Licence. The Regulator will inform the Licensee prior to any update. Whenever this Reporting Plan is updated, a copy of the updated Reporting Plan will be provided to the Licensee.
- 1.5 The Regulator’s monitoring and enforcement powers set out in section 26 of the Act and at Part 14 of the Regulations, and the Licensee’s obligations under that Part, as well as under any other Part of the Regulations that applies to the Licensee, are not affected by this Reporting Plan. Where necessary, this may include the provision of further information by the Licensee, beyond what is specified in this Reporting Plan.
- 1.6 It is the Licensee’s duty to ensure that it is aware of, and compliant with, any ongoing obligations within the Licence, the Act and the Regulations. This Reporting Plan sets out specific reporting requirements at particular points: it does not duplicate all ongoing obligations that apply to the Licensee under the Licence, Act or Regulations.
- 1.7 The Licensee is required to comply with the requirements of this Reporting Plan in accordance with **condition 4.1** of the Licence. The Regulator may take enforcement action based on any non-compliance with this Reporting Plan and the results of its monitoring activities if necessary.

2 INFORMATION TO BE PROVIDED TO THE REGULATOR – BEFORE THE FIRST LAUNCH

- 2.1 The Licensee must provide the following information, documents and/or evidence to the Regulator no later than 60 days before the intended Launch Window (or as agreed in writing by the Regulator):
 - 2.1.1 evidence that the Licensee maintains the financial resources to do the things authorised by the Licence, including a copy of the Licensee’s most recent internal management accounts for their business and financial

forecast covering up to and including the period during which Licensed Activities are to have been completed.

- 2.1.2 Confirmation when Skyrora Limited have entered into a commercial contract with Shetland Space Centre Limited.

3 INFORMATION TO BE PROVIDED TO THE REGULATOR – BEFORE EACH LAUNCH

- 3.1 The Licensee must provide the following information, documents and/or evidence to the Regulator no later than 60 days before the intended Launch Window (or as agreed in writing by the Regulator):

- 3.1.1 Mission safety report with information specified in the most up-to-date safety case and the launch campaign timetable.

- 3.1.2 If not provided as part of the mission safety report in clause 3.1.1, a finalised safety analysis with finalised proposed hazard areas and risk controls.

- 3.1.3 If not provided as part of the mission safety report in clause 3.1.1, a finalised definition of the maximum required range for the functions of tracking, termination, and telemetry equipment, and a justified link budget for each of these functions.

- 3.2 The Licensee must submit the following information, documents and/or evidence to the Regulator for its review as soon as reasonably practicable after these become available, but prior to the intended Launch Window:

- 3.2.1 evidence that any required marine licences and permits have been issued;

- 3.2.2 confirmation of the radio frequencies to be used in the carrying out of the Licensed Activities and evidence that the Licensee has been granted the appropriate Office of Communications (OFCOM) radio frequency licences, or other radio frequency licence if the radio frequency used is not under UK jurisdiction;

- 3.2.3 evidence that the Licensee has completed verification and validation of the Flight Safety System (FSS) in line with the safety case;

- 3.2.4 evidence of the finalised delay time between receiving an instruction to terminate and the termination command being sent;

- 3.2.5 a copy of the insurance certificate, the signed policy wording, the schedule of security, any amendments or endorsements to the policy and such other information relevant to that insurance that the Regulator may require;

- 3.2.6 copies of appropriate Notices to Aviation (NOTAMs) that have been issued by the relevant air navigation service providers of any States affected by a proposed Launch as required by The Convention on International Civil Aviation (ICAO) Annex 11, (Attachment C, 6.3,6.4); and
- 3.2.7 appropriate marine notifications that have been issued by the relevant authorities of any States affected by a proposed Launch.
- 3.3 The Licensee must provide to the Regulator for its review confirmation of the intended Launch Window and launch trajectory, as soon as reasonably practicable after it becomes available but no less than 4 weeks in advance of the intended Launch Window (or as agreed in writing by the Regulator). This is to enable the Regulator to facilitate the issue of a notification under the Hague Code of Conduct against Ballistic Missile Proliferation (HCoC).
- 3.4 The Regulator may require the Licensee to submit a report ahead of a proposed launch ("Pre-Launch Report"), containing the following information, but only to the extent that it is available to the Licensee:
 - 3.4.1 actual launch vehicle parameters, including height (metres), number of stages, gross lift-off weight (kilograms) and propellant and ignitor type and quantities (kilograms);
 - 3.4.2 proposed timing of Launches;
 - 3.4.3 proposed launch trajectory and location of impact zone(s) for returning materials; and
 - 3.4.4 any other information as specified by the Regulator.
- 3.5 If a Pre-Launch Report is requested by the Regulator, it must be submitted to the Regulator by the date specified in writing by the Regulator (which will be a minimum of 10 days before each proposed launch).
- 3.6 The Licensee may submit a combined Pre-Launch Report with the holder of the Spaceport Licence for the relevant launch.
- 3.7 "Launch Window" means the time period during which an intended Launch is planned to take place.

4 NOTIFICATIONS AND INFORMATION REQUIRED TO BE PROVIDED TO THE REGULATOR – POST LAUNCH

- 4.1 The Licensee must provide to the Regulator within 10 days of launch post-launch information to enable the Regulator to:
 - 4.1.1 register details of the Launch as required under Section 61 of the Act.

- 4.2 The Regulator may require the Licensee to submit a report following a launch (“Post-Launch Report”), containing the following information, but only to the extent that it is available to the Licensee:
 - 4.2.1 nominal or off-nominal launch;
 - 4.2.2 actual launch vehicle parameters, including height (metres), number of stages, gross lift-off weight (kilograms) and propellant and ignitor type and quantities (kilograms);
 - 4.2.3 actual timing of launches;
 - 4.2.4 actual launch trajectory and location of impact zone(s) for returning materials;
 - 4.2.5 estimated debris amounts (based on launch vehicle parameters) reaching the marine environment and their fate;
 - 4.2.6 calculated greenhouse gas emissions for that launch; and
 - 4.2.7 any other information as specified by the Regulator.
- 4.3 If a Post-Launch Report is requested by the Regulator, the Licensee must submit it to the Regulator as soon as reasonably practicable (and in any case no later than 30 days following the relevant launch).
- 4.4 The Licensee may submit a combined Post-Launch Report with the holder of the Spaceport Licence for the relevant launch.

5 UPDATES AND NOTIFICATIONS TO BE PROVIDED TO THE REGULATOR – GENERAL

- 5.1 The Licensee is reminded that it must provide updates, notifications and information to the Regulator in all instances where required by the Regulations.
- 5.2 The Licensee must provide the Regulator with written notice of a change of any individual undertaking a prescribed role, in advance of the proposed change, as required by Regulation 13(1). Such notice must be accompanied by information about the individual’s suitability to carry out the prescribed role, to be provided sufficiently in advance of the proposed change to allow the Regulator to carry out any checks deemed necessary by the Regulator.
- 5.3 Further to clause 2.1.1 and in line with Regulation 84, the Licensee must submit the following information on an annual basis one calendar year after the first launch, or upon request by the Regulator:
 - 5.3.1 evidence that the Licensee maintains the financial resources to do the things authorised by the Licence, including but not limited to:
 - (i) a copy of the Licensee’s most recent internal management accounts for their business;

- (ii) financial forecasts for the following 12 months; and
- (iii) signed audited financial accounts, if available.

5.4 The Licensee must submit to the Regulator:

- 5.4.1 a report covering the period from the date of the grant of the Licence up until 15th December 2025 (the anniversary of the granting of SaxaVord Spaceport's Licence); and
- 5.4.2 thereafter, an annual report covering the same 12-month reporting period as SaxaVord Spaceport whilst the Licence remains in force (each such report is referred to as the "Annual Reports").
- 5.4.3 The Licensee must submit the Annual Report within six months from the relevant period end (or other date as agreed in writing by the Regulator) and must include the following information:
 - 5.4.3.1 the number of Launches and attempted Launches in the prior 12-month period, including dates and times;
 - 5.4.3.2 the number of Launches and attempted Launches carried out per calendar month, including dates and times;
 - 5.4.3.3 the number of Launches and attempted Launches carried out in any 24-hour period;
 - 5.4.3.4 the number of Launches and attempted Launches at night (between the hours of 23:00 and 07:00 local time), including dates and times;
 - 5.4.3.5 information on progress to reduce greenhouse gas emissions, including the implementation of the measures outlined in the Assessment of Environmental Effects; and
 - 5.4.3.6 any other information as specified by the Regulator.
- 5.5 The Regulator may require the Licensee to contribute to a report addressing the combined environmental effects of these operations alongside a variety of Operator launch vehicles operating at SaxaVord Spaceport over time.
- 5.6 The Licensee must cooperate with the holder of the Spaceport Licence for the purpose of reporting combined environmental effects.
- 5.7 The Regulator may require the Licensee to submit a separate report, or a new or revised Assessment of Environmental Effects, addressing the combined environmental effects of these operations alongside a variety of Operator launch vehicles operating at SaxaVord Spaceport over time.