

Anti-Bribery & Anti-Corruption Policy

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1. Policy Statement

Maxar is committed to conducting our business honestly, ethically, transparently and in compliance with all laws, including those laws aimed at preventing corruption.

This Policy is straightforward: Maxar will not tolerate bribes, kickbacks or “grease payments” of any kind, or any attempt to improperly influence another person involved in a business transaction with the Company, whether dealing with government officials or within the private sector. This is true whether the improper payment or thing of value is made directly through a Maxar employee or through a third party representative, such as an agent. To that end, it is the Company’s policy to comply with all applicable anti-corruption and anti-bribery laws, including, but not limited to the U.S. Foreign Corrupt Practices Act of 1977, as amended (the “FCPA”) and the UK Bribery Act 2010 (the “UKBA”) (collectively the “Anti-Corruption Laws”).

2. Purpose

The purpose of this Policy is to set forth the requirement and expectation that the Company’s operations and activities be in compliance with all applicable Anti-Corruption Laws, and that Company personnel understand their responsibility to both ensure such compliance and to promptly report any non-compliance.

3. Applicability & Scope

It is essential to the continued success and reputation of Maxar, including its subsidiaries and affiliates worldwide (the “Company”) that all Company officers, directors, employees, contractors, consultants, agents, distributors, intermediaries, other third parties representing the Company, and joint venture partners and partners in similar business arrangements with the Company (collectively “Company personnel”), wherever located, comply fully with all applicable Anti-Corruption Laws. Specifically, Maxar strictly prohibits Company personnel, or anyone acting on behalf of Maxar, from engaging in any conduct that could be perceived or deemed to be bribery or an otherwise corrupt business practice. Maxar prohibits (a) bribery of U.S. and non-U.S. government officials, as well as (b) private sector (commercial) bribery (**“bribery”**), as further defined herein.

Company personnel must never, directly or indirectly, offer, promise, authorize or provide **“anything of value”** to **“any person”** (as further defined below) in order to obtain or keep business or otherwise gain an improper advantage, or to induce or reward the improper performance of any activity connected with our business. Company personnel are prohibited from requesting or authorizing any third party to make any such payment, promise or offer. Company personnel also must never demand, take, receive or accept anything of value in return for extending or providing benefits, preference or other favor to the individual or entity offering or providing the thing of value. Such behavior could constitute bribery or kickbacks and is prohibited business conduct wherever and with whomever Maxar operates or does business and wherever its products and services are sold or sourced.

While this Policy applies to all Company personnel, it is not intended to and does not create an employment relationship between any person and Maxar.

4. Key Definitions

For the purposes of this Policy, the below terms have the following meanings:

- **Anything of Value** means anything that is of potential benefit to Company personnel or the person a Company personnel is working with, and may include, but is not limited to, cash and cash equivalents (e.g. gift cards), gifts, gift certificates, travel, meals, entertainment, employment, sponsorships, donations or political contributions, regardless of the monetary value of the item or service. There is no minimum amount or threshold of value that must be exceeded before the “anything of value” becomes illegal. This means that there is no such thing as a bribe that is too small. Something that is worth \$2.00 USD, if offered as a bribe, is just as illegal as something that is worth \$20,000.00 USD.
- **Any Person** should be interpreted broadly to include any individual, including but not limited to U.S. and foreign government officials, members or employees of public entities, and members or employees of private sector entities (such as employees of commercial companies and workers at international organizations). This means that for purposes of this Policy Maxar does not distinguish between foreign officials and other customers or suppliers, and this Policy applies to interaction with ALL of our customers (including without limitation business partners, resellers, subresellers, channel partners, marketing partners, consultants, joint venture partners, OEMs, integrators) and suppliers, whether commercial or government-owned, as well as those who are foreign officials.
 - **Commercial Customer** (also referred to herein as a “**Private Sector Entity**” or “**Private Sector Individual**”) means any business client (company or individual) other than a federal, state, local, or foreign government customer.
 - **Government Customer** (also referred to herein as a “**Government Official**,” “**Foreign Official**,” or “**Public Official**”) means any officer, employee, or person acting in an official capacity for or on behalf of any level of U.S. or non-U.S. government, regardless of position, or whether paid or unpaid, including but not limited to:
 - Any employee of a government entity or subdivision, including elected officials or members of the military;
 - Customs officials or government licensing, taxation, inspection or permitting personnel;
 - Any private person acting on behalf of a government entity (such as an official advisor to the government or a consultant responsible for making procurement recommendations to a government), even if just temporarily;
 - Officers and employees of companies that are owned or controlled by the government (“State Owned Enterprises” or “SOEs”);

- Candidates for political office;
- Political party officials;
- Officers, employees and representatives of public international organizations, such as the World Bank and United Nations;
- Any employee of a state funded organization, such schools, universities, laboratories, hospitals or other healthcare facilities; and
- A member of a Royal Family.

While it may seem obvious, it is not always easy to know who is a public official. Any employee or representative, *at any level*, of a government agency or state-owned enterprise may be considered a foreign official. This includes, for example, any employee of a state-owned telecommunications or aerospace company or a professor or researcher at a publicly funded university or laboratory.

- **Bribery** means directly or indirectly paying, promising, giving, offering, receiving or authorizing to give Anything of Value to anyone for the purpose of influencing that person to misuse or take advantage of his or her position. The thing of value can be of any kind (e.g., gift, travel, entertainment, payment) and is not subject to any minimum amount or threshold of value. In addition, it is not necessary that the corrupt act succeed or that the person to whom the payment, offer, or promise is made actually accepts or receives the bribe.
- **Business Courtesy** is broadly defined to include gifts, entertainment, meals, travel, lodging, recreation, political contributions or other tangible and intangible items provided to a person at no charge or below its market value.
- **Due Diligence** means the undertaking of a reasonable and thorough investigative effort to evaluate the legality and propriety of potential business partners and transactions which is calibrated to the circumstances of the proposed transaction.

5. Compliance with Anti-Corruption Laws

Company personnel must abide by all applicable Anti-Corruption Laws, including the FCPA, the UKBA, and the local laws in every country in which we do business (for example, federal, regional, provincial, and state laws). Virtually every country in which we operate prohibits bribery. These laws generally prohibit both bribery of government officials and private sector (commercial) bribery.

5.1 Scope of the U.S. Foreign Corrupt Practices Act of 1977

As a publicly traded company in the United States, the Company is subject to U.S. law, including the FCPA. The FCPA prohibits corruptly offering, promising, or providing cash, cash equivalents or Anything of Value to any foreign official, non-U.S. political party or party official, or any candidate for non-U.S. political office in order to influence an act or decision that will assist the Company in obtaining or retaining business, directing business to anyone else, or securing an improper advantage. Under the FCPA, a bribe need not actually be paid or accepted in order to violate the law. The FCPA prohibits even an offer or promise to make a corrupt payment.

As a publicly traded company, the Company is also required under the FCPA to keep accurate books and records in reasonable detail and to maintain a system of internal controls sufficient to ensure the accuracy of the Company's books and records. These record-keeping and accounting provisions apply to all payments, regardless of the size or type of payment.

5.2 Scope of the U.K. Bribery Act

The UKBA likewise prohibits directly or indirectly promising or giving any financial or other advantage to a Government Official in order to obtain or retain business or an advantage in the conduct of business. The UKBA is even broader in scope than the FCPA, however, as it is not limited to the bribery of public officials. The UKBA also prohibits the offer and acceptance of bribes in the private, commercial context—offering, promising, or giving any financial or other advantage in order to induce any person to perform a private function or to reward the improper performance of a private function. It is also an offense under the UKBA for Company personnel to request, agree to receive, or accept any financial or other advantage in connection with the improper performance of Company personnel's duties for the Company.

5.3 Facilitating Payments Are Prohibited

Payments made to Government Officials to expedite or secure routine and non-discretionary governmental action – such as processing visas or scheduling inspections by a Government Official – are sometimes referred to as “facilitating payments” or “grease payments.” These payments generally are not permitted under the FCPA, UKBA and many other Anti-Corruption Laws. The Company prohibits facilitation payments of any kind, with one exception.

The only instance in which a facilitation payment may be made is to protect the health or safety of Company personnel from imminent physical danger, and then only when no other reasonable alternative exists. In such an event, the circumstances of the payment, including the reason for the payment, its amount, and the identity of the recipient, must be accurately recorded and reported to the General Counsel either before the payment has been made or as soon as practical thereafter.

5.4 Political Contributions

The Company recognizes the right of Company personnel to participate in political matters within their home countries, so long as their involvement and participation is at their own choosing, on their own time, at their own expense, and in compliance with local law. The Company's funds or

assets, including the work time of Company personnel, shall not be contributed, loaned, or made available, directly or indirectly, to any political party or the campaign of any candidate for political office, even if such contributions are permitted by law.

5.5 Charitable Contributions & Event Sponsorships

Maxar is committed to serving the communities in which it does business. To that end, it may sponsor events or make contributions to charities for educational, social or other legitimate purposes. Anti-Corruption laws do not prohibit legitimate donations and sponsorships. However, sponsorships and donations may raise issues under anti-corruption laws, for example, if a donation is made to a charity associated with or recommended by a Government Official.

Maxar is committed to ensuring that sponsorships and donations are not used to disguise bribery or made to improperly influence a business decision, and that contributed funds are used for the intended purpose and not diverted for illegitimate or unlawful purposes. Maxar may make contributions or sponsor events to known charities for legitimate business purposes only with approval of our General Counsel.

6. Business Courtesies – Commercial & Government Customers

As provided below, Company personnel may give or accept reasonable and appropriate gifts and hospitality for legitimate business purposes, such as building professional relationships, maintaining our image or reputation, or marketing, promoting, explaining or demonstrating our products and services.

To ensure compliance with the Anti-Corruption Laws, the Company has adopted the following restrictions for providing or receiving gifts, travel, entertainment or other business courtesies (“Business Courtesies”). Such Business Courtesies may only be received or expensed for reimbursement in accordance with this Policy and the Company’s Travel and Entertainment Expense Management Policy. In addition, all Company personnel must obtain and retain itemized receipts supporting all Business Courtesies expenditures.

All Company personnel, regardless of seniority, must adhere to the following rules when accepting or providing Business Courtesies:

Business Courtesies Must **Always** Be:

- For legitimate business purposes
- Consistent with customary business practices in the location
- Appropriate to the situation at hand
- Permissible under local law
- Permissible under the provider’s and the recipient’s policies
- Open, transparent and properly recorded in our books and records

Business Courtesies Must **Never** Be:

- In the form of cash or cash equivalents
- Extravagant or excessive in value
- Conditioned on providing or receiving any benefit or reciprocal action in return (no “*quid pro quo*”)
- Used to gain an improper advantage with actual or potential customers
- Used to obtain or facilitate approvals from government officials

6.1 Receiving and Providing Business Courtesies From/To Commercial Customers or Suppliers

- (a) Company personnel may accept or provide reasonable and customary gifts of a token or nominal value from or to Commercial Suppliers or Customers doing business or seeking to do business with the Company, such as items branded with corporate logos.
- (b) Company personnel may not accept or provide any Business Courtesy of more than token or nominal value to any Commercial Customer or Supplier with whom the Company has been in contract negotiations or an open bid during the six months preceding or following that period without advance written approval from the Compliance Office.
- (c) For Company personnel below the level of Vice President, the maximum value of Business Courtesies that may be offered or provided is \$100 per recipient per year without advance written approval from the Compliance Office.
- (d) All Company personnel must report Business Courtesies above \$100 per recipient per year to the Compliance Office.

6.2 Receiving and Providing Business Courtesies From/To Government Customers

In many cases, regulations or the Company's contracts impose strict restrictions on providing Anything of Value to U.S. and non-U.S. federal, state, and local government officials. Accordingly, **no Business Courtesy may be received from, nor provided to, a current or prospective Government Customer without prior written approval from the Compliance Office.**

7. Due Diligence of Agents & Third Parties

Under certain circumstances, Maxar may be legally responsible for the conduct of a third party business partner when it occurs in the course of their work for us. We expect our third party representatives to share our commitment to integrity, and to conduct their business in compliance with applicable laws and regulations. If we suspect a representative of engaging in corrupt, unlawful or unethical conduct, we will end our business relationship with them.

Accordingly, the Company will perform appropriate due diligence prior to engaging or retaining any agent, contractor, consultant, joint venture partner, sponsor, or other third-party representative acting on behalf of or in partnership with Maxar, who will have the power to bind the Company, or who may interact with any customers on behalf of the Company ("Third Parties").

The Company will follow the procedures for requesting a new relationship with a Third Party and conducting due diligence. Commercial and financial due diligence is not enough. Maxar will also consider the reputation and integrity of a proposed Third Party business partner.

No third party may represent Maxar unless and until it satisfies our due diligence review and the engagement is expressly approved by the Compliance Office. In addition, the Company must enter into a written contract with all Third Parties in a form acceptable to the Legal Team, which includes contractual protections, including termination rights if the Third Party breaches Anti-Corruption Laws and/or the terms of this Policy.

In addition, Maxar will continuously monitor our Third Parties. It is our responsibility to know our business partners. Burying one's head in the sand or deliberately ignoring signs of corruption can have the same consequences as if Company personnel had actual knowledge of improper conduct. Company personnel are considered to have knowledge of corruption if the individual (i) is aware that a corrupt payment is being made, (ii) is aware that a corrupt payment is likely to be made, or (iii) has reason to know that a corrupt payment is likely to occur. Maxar cannot turn a blind eye to suspicious activities of its agents, representatives or partners, hoping not to learn of prohibited activity.

8. Merger & Acquisition Activity

Maxar may from time to time engage in acquisitions of other businesses. By acquiring another company, Maxar can become liable for the prior conduct of that company. Maxar can also become responsible for continuing conduct that violates Anti-Corruption Laws. It is therefore our policy that anti-corruption due diligence will be performed pre-acquisition to enable the Company to identify and mitigate risks. Additionally, Maxar will endeavor to incorporate the acquired company into its internal controls and compliance program as soon as practicable following the acquisition, including through training new employees, reviewing the acquired company's third-party relationships, and conducting post-acquisition audits as appropriate.

9. Accounting Policies – Books & Records

The Company's policy is to make and keep books, records, and accounts that accurately and fairly reflect the transactions and dispositions of the Company's assets in reasonable detail. No undisclosed or unrecorded fund or asset may be established or maintained for any purpose. Company personnel are prohibited from (i) making false, misleading, incomplete, inaccurate, or artificial entries in our books and records, (ii) altering or falsifying financial or accounting records and supporting documentation, such as receipts, invoices, purchase orders and proofs of payment, (iii) establishing or using any "off-book," undisclosed or unrecorded accounts, and (iv) using personal funds or third parties, including partners, to circumvent Maxar financial and accounting procedures and controls, or to accomplish what is otherwise prohibited by Company policy. Company personnel also must take all reasonable care to ensure that any information provided to auditors is complete and accurate.

For additional information, refer to the Books, Records, and Internal Controls section of the Company's Code of Conduct.

10. Reporting Obligations

The prevention, detection and reporting of corruption is the responsibility of everyone at Maxar. Company personnel are required to report promptly any violations of this Policy or the Anti-Corruption Laws to the Compliance Office. It is the Company's policy that no one reporting an actual or suspected violation of the law in good faith will be subjected to any retribution or adverse employment action because of their report.

11. Penalties & Sanctions

Corruption and bribery are serious offences. Individuals who are convicted may be imprisoned and fined. Companies may be subject to severe criminal, civil, and administrative fines, penalties and disgorgement, and may be suspended, debarred or excluded from tendering for public contracts or doing business with the government. Companies also may suffer serious reputational damage.

Additionally, any Company personnel who violates an Anti-Corruption Law or this Policy may be subject to disciplinary action, up to and including termination. The Company will also terminate all contracts with persons or entities who provide services to the Company as contractors, consultants, or other agents for violations of an Anti-Corruption Law or this Policy. The Company will actively seek to recoup any losses that are incurred by the Company as a result of a violation of an Anti-Corruption Law or this Policy.

12. Communication, Training & Certification

This Policy will be distributed to all Company personnel upon engagement and periodically thereafter. As a part of the training requirement, Company personnel may be required to complete a certification in which Company personnel respond to certain questions and certify that they have read and understand this Policy, will adhere to this Policy, and are not aware of any violation of this Policy.

The Compliance Office will distribute this Policy to all joint venture partners, contractors, consultants, agents and other third parties representing the Company as part of the Company's Due Diligence Process, and it will be publicly available. Such third parties will be required to acknowledge their receipt and agreement to adhere by this Policy, electronically or in writing, as directed by the Compliance Office. The Compliance Office also will establish risk-based criteria for mandatory training regarding anticorruption principles for certain Third Parties.