



ANTI-CORRUPTION AND ANTI-BRIBERY POLICY STATEMENT FOR MAXAR THIRD PARTIES (“ABAC”) Version 1.0 (2019)

Maxar Technologies, including its affiliates, (collectively referred to herein as “Maxar”) is committed to acting ethically and honestly in all business dealings, and does not tolerate corruption in any form. We expect our third parties to share the same commitment.

As used herein, the term “Third Parties” is defined as existing or prospective Maxar-contracted or potential sales agents, representatives, resellers, marketing partners, distributors, consultants, joint venture partners, suppliers and other third parties, regardless of title or the product/service represented or supplied.

All Maxar Third Parties must meet or exceed the requirements set forth herein and comply with all federal, state, provincial and other applicable anti-corruption and anti-bribery laws, including without limitation, the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act (“UKBA”), the Canadian Corruption of Foreign Officials Act (“CCFOA”) and the Organisation for Economic Co-operation and Development (“OECD”).

In selecting Third Parties, Maxar intentionally chooses reputable business partners who are committed to the highest ethical standards and business practices. Maxar competes on the merits of our products and services, and does not use the exchange of business courtesies to gain an unfair competitive advantage. We hold our Third Parties to the same standard. That means we expect our Third Parties to make business decisions and take appropriate actions that are ethical and in compliance with applicable legal requirements. This Anti-Corruption and Anti-Bribery Policy Statement for Maxar Third Parties (“ABAC Policy Statement”) summarizes our expectations.

ANTI-CORRUPTION, BRIBERY, EXTORTION AND KICKBACKS

As a Maxar Third Party, you shall not tolerate, permit, or engage in any form of corruption, bribery, extortion or kickback. This is true whether you are working with government officials or individuals in the private sector.

- **No Corruption, Bribery, Extortion or Kickbacks:**
 - *Corruption* is the payment of anything of value, with the intent to induce or influence a foreign official or an individual in the private sector to use his or her position in order to assist in obtaining or retaining business for or with Maxar, or directing business to Maxar.

THIRD PARTY ABAC COMPLIANCE DECLARATION

- *Bribery* is offering or giving something of value in order to improperly influence the recipient's actions. *Extortion* is the unlawful use of one's position or office to obtain money through coercion or threats. Bribery and extortion are illegal and the consequences for offering or accepting a bribe are severe. You must never offer, authorize, give, promise, or accept any form of a bribe, extortion payment, improper payment, gift, or benefit while working on Maxar's behalf.
- A *kickback* is the return of a sum paid, offered or due to be paid as a reward for fostering a business arrangement. Maxar prohibits the acceptance, promise or offer of a kickback.
- **No Facilitation Payments:** A *facilitation payment* is a tip or small payment made to a government official in order to expedite a routine government action—for example, issuing a permit, obtaining a license or providing utility services. Maxar prohibits the use of facilitation payments, even in jurisdictions where it may be lawful. Therefore, Third Parties acting on behalf of Maxar shall never offer, promise or pay a facilitation payment.

MONITORING AND AUDITING

Maxar relies on our books and records to report financial results, make required legal filings, and make business decisions. These records must be kept in accordance with applicable standard accounting practices.

Likewise, Maxar Third Parties shall keep, maintain and promptly provide to Maxar upon request, accurate accounting and business records of all matters related to the business you conduct on Maxar's behalf. Our Third Parties should monitor its own operations, including its third parties, through appropriate due diligence, audits, and similar activities.

Maxar reserves the right to assess and monitor Third Parties' compliance with this ABAC Policy Statement. Third Parties who are not in compliance may be terminated and/or precluded from consideration of future business. Third Parties shall promptly implement corrective actions.

TRAINING AND COMMUNICATION

We expect our Third Parties to establish policies and procedures to ensure compliance with this ABAC Policy Statement and all applicable laws and regulations. Your organization is responsible for the following:

- Communicating the principles in this ABAC Policy Statement to employees and third-party partners through training, policy, or other messaging
- Monitoring and managing compliance with this ABAC Policy Statement by employees and third-party partners
- Promptly reporting violations and concerns to the appropriate Maxar contact

THIRD PARTY ABAC COMPLIANCE DECLARATION

- Protecting employees from retaliation for making a report in good faith

RAISING QUESTIONS AND REPORTING CONCERNS

We count on our Third Parties to help our business succeed and to uphold our values and high ethical standards. To meet this expectation, we are committed to creating an environment where our Third Parties feel comfortable raising concerns and getting help. If you believe corrupt practices are occurring report your concerns to your Maxar business counterpart or the Maxar Ethics Hotline www.maxar.ethicspoint.com. You may also contact this company by email at compliance@maxar.com. Voicing concerns helps us all to do business ethically and proactively address problems or issues.