
Supplier and Partner Code of Conduct

For Public Dissemination

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Maxar Supplier and Partner Code of Conduct

Maxar Intelligence (“Maxar”) follows core principles in daily interactions and relationships:

- Always Acting with Integrity in our Personal Behavior and in All Business Dealings,
- Complying with Laws and Regulations, and Ethical Conduct,
- Avoiding Conflicts of Interest and Disclosing Potential Conflicts,
- Protecting Confidential Information and Intellectual Property of Others, and,
- Complying with International Export Laws and Regulations.

Maxar is committed to meeting these principles and expects that all of our suppliers, sellers, vendors, contractors, subcontractors, consultants, and partners (hereinafter referred to as “Suppliers”) will adhere to these same principles, if applicable due to terms of the contract. This Supplier and Partner Code of Conduct communicates the expectations Maxar has of our Suppliers and is closely aligned to the standards we set for our own employees, as included in Maxar’s Code of Ethics and Business Conduct. Thank you for your shared commitment to meeting these principles.

Integrity

Maxar expects Suppliers’ behavior and activity to be consistent with this Supplier and Partner Code of Conduct, the Maxar Procurement Agreement terms and conditions, and all applicable federal, provincial, state and local laws and regulations. Maxar also expects Suppliers to develop ethics and compliance programs that are consistent with Maxar's values in all material respects.

Maxar frequently collaborates with government and commercial business partners in various aspects of our operations and Maxar earns their trust and business through the same hard work and integrity applied to all our relationships and activities. Maxar never seeks to gain advantages through unfair, unethical or illegal business practices and expects Suppliers to act with the same level of integrity.

Supplier Responsibilities

All Suppliers are expected to, regardless of location:

- Be familiar with this Supplier and Partner Code of Conduct and follow its requirements at all times.
- Comply with all applicable governmental laws, rules and regulations when engaging in any activity in support of business relationships with Maxar.
- Be aware of and avoid any situation that could lead to inappropriate business conduct or even the appearance of inappropriate conduct.
- At all times conduct the Supplier's business with the highest standards of ethics and integrity.

Codes of Conduct for Lower-Tier Suppliers

Maxar expects Suppliers to have management systems in place, based on the size of their business, to support compliance with laws, regulations, and expectations related to or addressed expressly within this Supplier and Partner Code of Conduct. Maxar encourages Suppliers to implement their own written code of conduct, and to flow down the principles of a code of conduct, laws, regulations and ethical standards to the entities that furnish goods and services (lower-tier suppliers) to the Supplier.

No Retaliation

Maxar expects Suppliers to support their employees in adherence to this Supplier and Partner Code of Conduct and Suppliers must not take any adverse action against anyone who reports conduct that he or she reasonably believes to be illegal or otherwise in violation of this Supplier and Partner Code of Conduct. It will be a violation of this Supplier and Partner Code of Conduct for any employee to be discharged, demoted, suspended, threatened, harassed, or in any way subject to adverse treatment in connection with their employment because he or she reported conduct that he or she reasonably believed to be illegal or in violation of this Supplier and Partner Code of Conduct.

Fair Competition and Antitrust Compliance

Maxar expects Suppliers to fully comply with all applicable antitrust and competition laws. Maxar will not tolerate unethical and manipulative practices to obtain or maintain business. Some of these include:

- Price Fixing, including setting prices at certain levels outside market rates, or bid rigging or any manipulation of the bid process to secure award.
- Dividing markets or territories.
- Requiring the purchase of one product on the condition of the purchase of another product.

Anti-Bribery and Anti-Corruption Compliance

Maxar complies with all applicable laws designed to combat corruption wherever business is conducted, such as the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other similar laws according to Maxar's Anti-Bribery and Anti-Corruption Policy and expects Suppliers to do the same.

Maxar prohibits anyone conducting business on our behalf, including Suppliers, from offering or making improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. Suppliers must not offer, promise, give or authorize any sort of bribe or other thing of value in order to obtain or retain business or an improper business advantage on behalf of or for Maxar. A "bribe" can be anything of value—money, gifts, travel expenses, personal favors or entertainment—that may be seen as an attempt to obtain improper advantage for Maxar or our Suppliers. Anti-corruption laws also prohibit Maxar and our Suppliers from accepting a bribe. Additionally, they require Maxar and our Suppliers to characterize our business relationships accurately and to maintain accurate company books and records, as well as adequate internal controls.

Business Courtesies, Gifts and Entertainment

Maxar expects Suppliers to comply with all applicable laws, regulations and contractual requirements pertaining to gratuities.

Giving and receiving gifts or entertainment can build strong working relationships and goodwill between Maxar, Suppliers, and those with whom we do business, but any such gifts or entertainment must be reasonable, infrequent, and transparent, and serve a legitimate business purpose. It is never acceptable to give or offer cash. To ensure compliance with our company's policies and regulatory obligations:

- The total value of any gift, business courtesy, or entertainment provided to a recipient must not exceed \$100 per recipient, per year.
- Any gift, courtesy, or entertainment exceeding this threshold must be pre-approved by the Compliance department.
- Suppliers and partners are required to report any such courtesies to the Compliance team to ensure adherence to this policy.

In any business relationship, Maxar expects Suppliers to ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact the reputation of Maxar. In particular, note that Maxar's employees who are in any way involved in procurement decisions are subject to even more strict limitations, and may not accept any business courtesies, with the exception of very low value promotional items. Additionally, no business courtesy may be provided on Maxar's behalf or for the direct or indirect benefit of Maxar to a current or prospective government customer without prior written approval of Maxar's Chief Compliance Officer.

Laws and Regulations**Familiarity with the Law**

Maxar expects Suppliers to comply, both in letter and spirit, with all applicable laws, rules and regulations. In our business, this means that, among other things, Suppliers be familiar with the laws that are applicable to their function, including but not limited to applicable remote sensing regulations, export control restrictions, trade sanctions and embargoes, government procurement regulations, and requirements related to the safeguarding, handling, access and control of classified systems and classified information.

International Export Laws and Regulations

Maxar expects Suppliers to comply with all export control and import laws and regulations that govern the delivery and receipt of commodities, products, technology and technical data, including items that are hand-carried as samples or demonstration units. See Maxar's Trade Compliance Policy for more information.

Government Procurement

Maxar, as a contractor to the U.S. Government, must take special care to comply with the unique and special rules that apply to contracting with the U.S. Government. Maxar expects Suppliers supporting a contract with the U.S. Government will: follow the U.S. Government's rules for competing fairly; honor restrictions applying to U.S. Government employees (e.g., receipt of gifts and employment); deliver products and services that conform to specifications, laws and regulations; adhere to government accounting and pricing requirements; claim only allowable costs; ensure the accuracy of data submitted; and comply with all other applicable U.S. Government requirements. U.S. Federal Acquisition Regulations, supplemental regulations, and reporting requirements applicable internationally require government contractors to disclose to the Inspector General of the Department of Defense (or to the Inspector General of the relevant government agency holding the contract), and to the contracting officer, certain suspected violations of law. Therefore, it is important that Maxar Suppliers promptly report suspected violations of this Supplier and Partner Code of Conduct, law, or regulations to the Maxar Corporate Compliance Office department or to the Office of General Counsel.

Security in Supply Chain

Maxar expects Suppliers will implement practices and procedures to ensure the security of their supply chain. Suppliers and their lower-tier suppliers who either ship directly or package goods for shipment shall participate in, or comply with all requirements of SAFE Framework security programs of the destination country (e.g. the Customs-Trade Partnership Against Terrorism (C-TPAT) Initiative of the United States Department of Homeland Security, Authorized Economic Operator ("AEO"), or similar programs).

Ethical Conduct**Respect Human Rights**

Corporate responsibility is at the core of Maxar's culture and underlies business and operating strategies. Maxar's policies, practices and procedures reflect a strong commitment to human rights as set forth in the UN Universal Declaration of Human Rights and Maxar's Human Rights Statement, and Maxar expects Suppliers' policies, practices and procedures to reflect the same.

Non-Discrimination, Inclusivity, Mutual Respect, Fairness and Dignity

Maxar expects Suppliers to provide a healthy, safe, and productive workplace where their employees and representatives are treated with respect, appreciation, and dignity. Maxar expects all Suppliers to act in a professional, business-like manner at all times and will not exhibit bias, prejudice, or engage in the harassment of others. Maxar expects Suppliers to provide equal employment opportunity without discrimination or harassment on the basis of race, ethnicity, color, national origin, religion, sex, age, disability, pregnancy, marital status, veteran status, sexual orientation, gender identity or any other status protected by law. Where applicable, we expect Suppliers to comply with Affirmative Action requirements. Maxar will not tolerate any type of harassment in the workplace of and by Supplier personnel, including sexual harassment or any type of threatening conduct, racial or religious slurs, or any other comments or conduct that, in the judgment of Maxar, creates, encourages or permits an offensive or intimidating work environment.

No Human Trafficking or Child Labor

Maxar expects Suppliers to be committed to a work environment that is free from human trafficking and slavery, which for purposes of this Supplier and Partner Code of Conduct, includes forced labor and unlawful child labor. Human trafficking includes harboring, transporting, provisioning or obtaining a person for labor or services, through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery. Maxar will not tolerate or condone human trafficking or slavery in any part of our global organization or that of our Suppliers.

We expect our Suppliers to ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed. For more information, see Maxar's Anti-Human Trafficking and Human Slavery Statement.

Drug-Free, Safe and Healthy Environment

Maxar expects Suppliers to be committed to providing a safe, healthy and drug-free work environment for everyone. Laws against the possession, distribution or use of illegal and legal drugs and intoxicants vary from country to country, state to state and province to province. Maxar also expects Suppliers to maintain a workplace free from illegal drugs.

Avoiding Conflicts of Interest and Disclosure of Potential Conflicts

Maxar expects Suppliers to avoid any activity or situation that creates or appears to create a conflict between their representatives' personal interests and the interests of Maxar. Suppliers are also expected to avoid and disclose to Maxar any actual, perceived, or potential Organizational Conflicts of Interest in accordance with Government regulations, and solicitation and/or contractual requirements.

Protection of Confidential Information and Intellectual Property of Others

Maxar expects Suppliers must protect information, including confidential, proprietary, and personal information. Maxar information provided to the Supplier should not be used for any purposes beyond the scope or purpose of the agreement with Maxar. Suppliers must also respect the rights of third parties, including third party trademarks and copyrights. See Maxar's Privacy Policy for more information.

Records

Maxar expects Suppliers to accurately record, maintain, and report business documentation and data deliverables, including but not limited to, financial information, quality reports, time and expense records and other information to Maxar, the customer and other Government and regulatory authorities.

Supplier Diversity

Maxar abides by supply chain diversity requirements where applicable and expects the same of Suppliers. Supply chain requirements vary by country. Accordingly, Suppliers should be aware that Maxar often has customer-directed Supplier inclusion goals that may necessitate use of in-country supply channel providers both by Maxar and our Suppliers. These may additionally be defined as small business, small disadvantaged business, woman owned small business, HUBZone certified business, vet-

eran-owned small business, service-disabled veteran-owned small business, small/medium size business, or aboriginal business.

Conflict Minerals

Maxar expects Suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries. See Maxar's Conflict Minerals Policy for more information.

Counterfeit Parts

Maxar expects Suppliers to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, and mark parts obsolete as appropriate.

Cyber Security and Data Protection

Maxar expects Suppliers to safeguard and protect all information provided by Maxar and information generated or developed in support of Maxar programs from unauthorized access, destruction, use, modification or disclosure. Suppliers must have risk-based cybersecurity programs designed to mitigate threats to their information systems, products, services, and supply chain, and to comply with all applicable contractual and legal requirements.

Environmental

Maxar expects Suppliers to operate in a manner that actively manages risk, conserves natural resources, prevents pollution, and protects the environment. Suppliers should seek to minimize energy consumption and reduce greenhouse gas emissions and are expected to report greenhouse gas emissions data and communicate efforts to achieve emissions reductions. Suppliers should apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, as well as opportunities for business growth through operational and product stewardship. See Maxar's Environmental Health and Safety Statement for more information.

Maxar's Ethics Hotline

Maxar has established a Compliance Program through the Corporate Compliance Office ("Compliance Office") within the Maxar Legal Department that serves as a mechanism for Suppliers to ask questions and report integrity concerns without fear of retaliation. Suppliers must have confidence that they can freely report concerns about compliance with or violations of legal or ethical standards, whether or not based in this Supplier and Partner Code of Conduct, and that their concerns will be reviewed by the Maxar's Chief Compliance Officer and objectively investigated by the appropriate internal department

and/or outside specialists, if necessary, with appropriate individual and remedial action and without fear or favor.

Any concern, question or complaint may be raised by contacting the Maxar's Ethics Hotline, www.maxar.ethicspoint.com or +1-866-594-7164, which is available 24 hours a day, 7 days a week, or by e-mailing the Compliance Office at Compliance@maxar.com.