



## **CONFLICT MINERALS POLICY (THE “POLICY”)**

(Effective as of January 1, 2019)

Maxar Technologies Inc. and each of its controlled subsidiaries (together, the “**Company**”) is committed to corporate social responsibility and sourcing materials for its products in a socially and environmentally responsible way.

### **Policy**

As part of the Company’s commitment to corporate social responsibility, it is the Company’s goal to use Conflict Minerals (as defined below) that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (together, the “**DRC**”) while continuing to support responsible mineral sourcing in the region. The Company expects its suppliers to comply with the Responsible Business Alliance (“**RBA**”) Code of Conduct and conduct their business in alignment with the Company’s supply chain responsibility expectations. “Conflict Minerals” are defined as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, tin, tantalum and tungsten. Conflict Minerals are widely used in manufacturing electronic devices like those used in the Company’s products. Under the rules of the U.S. Securities and Exchange Commission, the Company is required to undertake an inquiry in an effort to determine the source and chain of custody of Conflict Minerals that are necessary to the functionality or production of its products and to report publicly on an annual basis regarding its use of Conflict Minerals from the DRC in the Company’s products.

The Company has initiated and is in the process of refining its compliance program for Conflict Minerals consistent with the framework promulgated by the Organization for Economic Cooperation and Development (“**OECD**”) and its “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” and evaluating its internal controls for Conflict Minerals, and encourages its suppliers to do the same with their respective suppliers.

The Company will:

- provide, and expects its suppliers to cooperate in providing, due diligence information, to assist us in confirming that any Conflict Minerals in its supply chain are “conflict free”;
- work with its suppliers and others on industry-wide solutions to enable products that are DRC conflict free, including: (a) encouraging its suppliers to purchase materials from smelters who are listed on the Responsible Minerals Assurance Process (“**RMAP**”) conformant Smelter List and have been certified as conflict-free by an independent auditor through the RMAP administered by the RBA and the Global e-Sustainability Initiative (“**GeSI**”); and (b)

- supporting industry efforts to expand the smelter certification program; and
- make available reports on our progress to relevant stakeholders and the public.

### **Questions and Concerns**

Concerns about, and violations of, this Policy should be reported to the Company's Compliance Officer.

You may use the following methods to file a report on the Compliance Hotline:

- Via the Company's online portal, [www.maxar.ethicspoint.com](http://www.maxar.ethicspoint.com); or
- Call +1-866-594-7164.

Questions about this Policy should be directed to your supervisor, the Legal Department or the Compliance Officer, who is currently the General Counsel.

The Compliance Officer may be reached at [compliance@maxar.com](mailto:compliance@maxar.com).

Suppliers and other external parties are encouraged to contact their regular procurement or business contact at the Company if they wish to seek guidance on this Policy.