
Trade Compliance Policy

TABLE OF CONTENTS

1. Policy Statement.....	1
2. Purpose.....	1
3. Applicability & Scope	1
4. Consequences of Violations	1
5. Export Compliance Requirements	2
6. Import Compliance Requirements	5
7. Compliance Procedures, Responsibility & Awareness	5
8. Reporting Obligations	6
9. Administration & Enforcement.....	6

1. Policy Statement

Maxar (the “Company”) and its management are committed to conducting all of the Company’s operations around the world in a manner consistent with the Maxar Code of Conduct and in compliance with all applicable laws. This Policy sets forth the requirements for proper trade compliance activities, including the export and import of goods, software, and technology, as established by various laws, including:

- The Arms Export Control Act (22 U.S.C. § 2778), the International Traffic in Arms Regulations (the “ITAR,” 22 C.F.R. Parts 120-130), the Export Administration Act (50 U.S.C. §§ 4611-13), the Export Control Reform Act of 2018 (50 U.S.C. Chapter 58), the Export Administration Regulations (the “EAR,” 15 C.F.R. Parts 730-774), and any other laws and regulations regarding the export, reexport, transfer, or import of goods, services, and technologies applicable to Maxar’s operations (collectively, the “*U.S. Export Control Laws*”).
- The International Emergency Economic Powers Act (50 U.S.C. Chapter 35), the Trading with the Enemy Act (50 U.S.C. Chapter 53), various other statutes, Executive Orders, the Foreign Assets Control Regulations (31 C.F.R. Parts 500-598), any sanctions administered by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) against targeted countries, regimes, individuals and entities (including banks and financial institutions), and any sanctions administered by the U.S. Department of State pursuant to various statutes and Executive Orders (collectively, the “*U.S. Sanctions Laws*”).
- Regulations of the U.S. Customs and Border Protection (“CBP”), a division of the U.S. Department of Homeland Security and the federal agency with primary responsibility for enforcing U.S. import laws and regulations; and the admissibility requirements of numerous other federal agencies, referred to as CBP’s partner government agencies (“PGAs”), at U.S. ports of entry.

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 import and export trade compliance regulations and laws, and that Company personnel understand their responsibility to ensure such compliance.

3. Applicability & Scope

This Policy applies to all Company subsidiaries, affiliates, 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 (“Company personnel”). In their business with or for the Company, all Company personnel are required to comply fully with any and all applicable U.S. Export Control Laws, U.S. Sanctions Laws, this Policy, and all other Company policies, procedures and instructions issued in furtherance of this Policy.

4. Consequences of Violations

Violations of U.S. Export Control Laws and U.S. Sanctions Laws may result in criminal, civil, and administrative penalties for both individuals and entities, including fines, imprisonment, seizure or forfeiture of items at issue, loss of export privileges, loss of ability to do business with the U.S. Government, and other penalties. Moreover, the reputational impact of violating these rules can be significant.

For Company personnel, violations of applicable laws or this Policy may result in employment sanctions including suspension or termination of employment, contract termination, or the pursuit of other legal remedies, including a letter of censure or suspension, or referral to criminal, civil, or administrative authorities.

Notably, *OFAC may impose fines for violations based on “strict liability,”* meaning that a company may be held liable for violating U.S. sanctions law even if it did not know or have reason to know its actions were prohibited. As such, and as repeated elsewhere in this Policy, Company personnel are expected to consult with the Compliance Office before engaging in any transaction where there is any question or doubt whether U.S. Export Control Laws and/or U.S. Sanctions Laws may restrict or prohibit the transaction.

5. Export Compliance Requirements

A. United States Export Control Laws

The United States’ principal export control laws are the **Export Administration Regulations (“EAR”)** and the **International Traffic in Arms Regulations (“ITAR”)**. Since exported items and technologies may be re-exported or diverted from commercial buyers to hostile actors, most U.S. export controls are based on an item or service’s *inherent technical capabilities*, not on its intended end use. For example, all launch vehicles are subject to restrictive export controls even if designed to serve purely commercial markets. In addition, the vast majority of commercial spacecraft and components fall under the jurisdiction of the EAR.

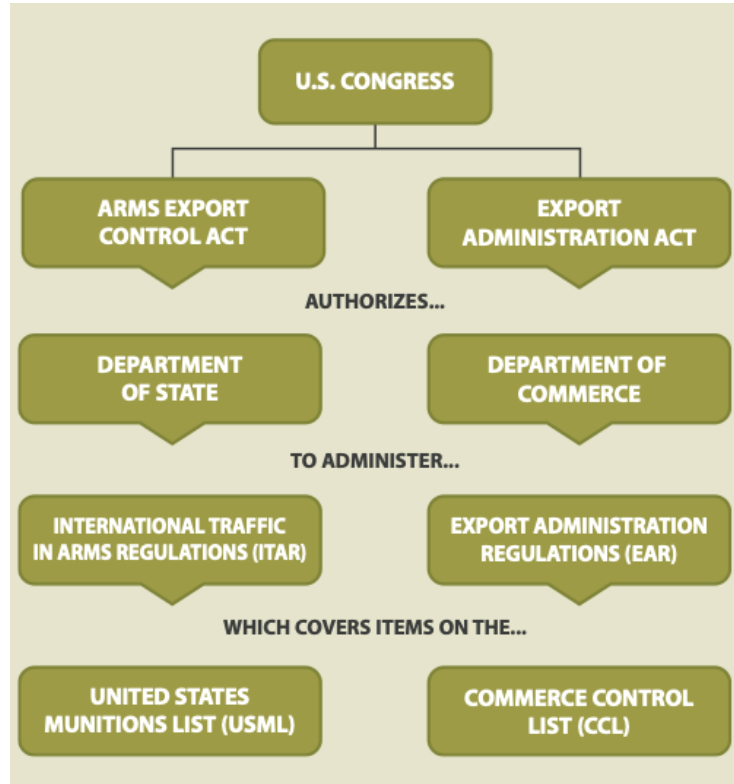
EAR: Items with both civilian/commercial and military applications are known as “dual-use items,” and are regulated by the U.S. Department of Commerce’s Bureau of Industry and Security (“BIS”), pursuant to the EAR. Items controlled for export under the EAR are listed on the Commerce Control List (“CCL”). Items with a specific Export Control Classification Number (“ECCN”) on the CCL generally require a license to export.

Items not specifically listed on the CCL are considered “EAR99.” Most commercial goods are not on the CCL and do not have an ECCN. These “EAR 99” goods commonly consist of low-level technology or consumer goods and generally do not require a license to export, unless the export will be to an embargoed country, to an end-user of concern, or in support of a prohibited end-use.

ITAR: Exports of defense articles and services are regulated by the U.S. Department of State’s Directorate of Defense Trade Controls (“DDTC”), pursuant to the ITAR. Items controlled for export under the ITAR are listed on the U.S. Munitions List (“USML”) and generally require a license to export.

Additionally, regardless of whether an item is listed on the CCL or USML, *U.S.-origin goods and technology may not be exported to certain parties identified on various lists maintained by U.S. agencies.* This is discussed further below under Section 6.B: U.S. Trade Sanctions Laws.

The following illustrates the principal U.S. Export Controls administration:



How these U.S. Export Control Laws apply to Maxar: Depending on the item, country of destination, identity of the recipient or end user, and the intended end use, the export of Maxar’s products or technology may require prior U.S. Government authorization in the form of a license, agreement, license exception or other authorization. Other events that may require U.S. Government authorization include reexports (from the original country of destination to a third country), in-country transfers and retransfers (from one end user or end use to another), releases (disclosure of technology or software source code through visual or other inspection or oral exchanges), and “deemed exports” (release or disclosure of technology or source code within the U.S. to a foreign national). U.S. Export Control Laws and other applicable laws and regulations, such as those administered by U.S. Customs and Border Protection, may also regulate the import or temporary import of certain items.

Accordingly, before engaging in activities that involve an export or other controlled event, the Company must understand and identify any potential export requirements and limitations.

KEY TAKE-AWAY

To comply with U.S. Export Control Laws we must determine:

- What are we exporting?
- Where are we exporting (the ultimate destination)?
- Who will ultimately receive the item (the intended end-user)?
- How will the item be used?

B. United States Trade Sanctions Laws

The United States Department of the Treasury's Office of Foreign Assets Control ("OFAC") administers and oversees a series of laws, regulations, and executive orders that impose trade sanctions against certain countries, entities, and individuals to further U.S. foreign policy and national security objectives. These trade sanctions prohibit individuals and entities from engaging in or facilitating commercial activities with sanctioned parties.

Trade sanctions are complex and subject to frequent updates. The scope of prohibitions and restrictions also varies by program. The list of U.S. sanctions programs administered by OFAC is available at <https://www.treasury.gov/resource-center/sanctions/pages/programs.aspx>.

Trade sanctions may target particular countries, geographic regions, individuals, entities, industries, or transaction types. Trade sanctions also include restrictions aimed at certain categories or lists of individuals and entities. These lists may include parties engaged in illicit activities or otherwise designated as terrorists, narcotics traffickers, money launderers, or international criminals. Current U.S. Sanctions Laws administered by OFAC include:

- Comprehensive embargoes prohibiting U.S. persons from engaging in or facilitating trade, business activities, and other transactions involving or benefitting specified embargoed countries (*e.g.*, Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine as of the date of this policy).
- Laws and regulations prohibiting or restricting U.S. persons from engaging in or facilitating specified business activities and transactions involving certain countries subject to targeted or sectoral sanctions measures (including Russia, Venezuela, and others).
- Targeted blocking orders prohibiting U.S. persons from engaging in or facilitating trade, business activities, and other transactions involving or benefitting:
 - (1) any entity, individual, or vessel specifically identified on the Specially Designated Nationals ("SDN") and Blocked Persons List (*see* <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>) (OFAC regularly updates this list); and
 - (2) any entity in which one or more SDNs owns, directly or indirectly, in the aggregate, a 50% or greater interest (regardless of whether that entity itself is identified as an SDN).
- In addition to the SDN List, transactions by U.S. persons with parties named on other lists maintained by OFAC or the U.S. Department of State may be prohibited or restricted. The U.S. Government's Consolidated Screening List, consisting of the lists of denied or restricted parties maintained by the U.S. Departments of State, Commerce, and Treasury, is available at <https://legacy.export.gov/csl-search>.

C. Anti-Boycott Provisions

The U.S. Export Control Laws also include anti-boycott regulations administered by BIS under the EAR, which encourage or require U.S. persons and foreign affiliates of U.S. companies to refuse to participate in or cooperate with foreign boycotts that the United States does not sanction.

Maxar will fully comply with all anti-boycott provisions imposed both by the United States and by those foreign nations exercising proper jurisdiction. Maxar will not comply with any boycott request or with any non-U.S. boycott law that would cause the Company to violate applicable U.S. laws or regulations.

All Company personnel must immediately report any boycott requests, written or verbal, to the Compliance Office.

6. Import Compliance Requirements

Under U.S. Import Laws, the CBP and other agencies regulate the import of goods brought into the U.S. from other countries. Customs and import controls laws govern most aspects of importing goods including the ability to enter goods and the process for doing so, the classification of goods, the marking of goods with the correct country of origin, the timely submission and retention of required documents and the payment of applicable duties, taxes, and fees.

7. Compliance Procedures, Responsibility & Awareness

Procedures: Maxar is committed, at a minimum, to the following three procedures:

- (A) Maxar will classify its goods, materials, equipment, software, services, training and technology to determine if any such items are listed in the CCL or USML or controlled for export.
- (B) Maxar will carefully screen all customers or purchasers and intended recipients of all exports or re-exports to determine if the individual or entity is located in an embargoed country or appears on a sanctions or prohibited parties list.
- (C) Maxar will refuse to participate in or cooperate with foreign boycotts that the United States does not sanction, and Maxar will comply with all reporting requirements. As noted above, all Company personnel are expected to promptly inform the Compliance Office of any boycott requests so that it can evaluate and fulfill any reporting requirements.

Responsibility: *It is the responsibility of all Company personnel to understand and comply with this Policy and any related procedures.* This Policy is particularly important for personnel who are directly involved with international transactions, such as those who participate in the sale, marketing, business development, customer service, foreign procurement, or shipment of products, services or technology to non-U.S. destinations, the reexport abroad of U.S.-origin products and technology, or the release of technology or technical services to non-U.S. persons wherever located. Company management at all levels is responsible for ensuring that those reporting to them are made aware of, understand, and comply with this Policy.

Awareness: To foster awareness of and compliance with this Policy and U.S. Export Control Laws and U.S. Sanctions Laws, the Company implements and maintains periodic education and communication to relevant personnel. The Company will also monitor developments in U.S. Export Control Laws and U.S. Sanctions Laws, assess their impact on the Company's operations, and update this Policy and any related procedures as appropriate.

8. Reporting Obligations

Ask Questions and Speak Up: If Company Personnel are ever in doubt about any transaction or situation, do not hesitate to ask questions. It is always best to exercise caution. Company personnel who have a question whether any action or transaction may violate applicable export control, trade sanctions or anti-boycott provisions, or who have questions or concerns regarding this Policy, should consult with their manager or the Compliance Office.

All Company personnel are expected to report any knowledge, awareness, or reasonable suspicion of a potential violation of this Policy, U.S. Export Control Laws or U.S. Sanctions Laws to the Company's Compliance Office.

Maxar will not tolerate retaliation against any Company personnel who make a good faith report under this Policy or who participate in an investigation regarding possible violations of this Policy.

9. Administration & Enforcement

The General Counsel, any designee of the General Counsel, and the Compliance Office established under the General Counsel shall have primary responsibility for administering and enforcing this Policy and issuing and updating any policies and procedures in furtherance of it.