
MAXAR CODE OF ETHICS AND BUSINESS CONDUCT

**This document is approved in accordance with the Maxar Policy Governance program.
Records of the: review, approval and version history of this document are retained in PolicyTech.**

TABLE OF CONTENTS

1. Scope.....	5
2. We Always Act with Integrity.....	5
2.1. Employee Responsibilities Under the Code.....	5
2.2. Manager’s Additional Responsibilities.....	6
2.3. We Make Ethical Decisions.....	6
3. We Also Act with Integrity in All Business Dealings.....	7
3.1. Integrity in Maxar Relationships.....	7
3.2. Fair Competition and Antitrust Compliance.....	8
3.3. Anti-bribery and Anti-corruption Compliance.....	8
3.4. Business Courtesies, Gifts and Entertainment – Commercial.....	9
3.5. Business Courtesies, Gifts and Entertainment – Government Officials.....	9
3.6. Truthful Cost or Pricing Data.....	10
4. We Comply with Laws and Regulations.....	10
4.1. Familiarity with the Law.....	10
5. We Provide Equal Employment Opportunities and a Respectful Workplace.....	11
5.1. Be Inclusive and Treat Each Other with Mutual Respect, Fairness and Dignity.....	11
5.2. Do Not Tolerate Retaliation.....	11
5.3. Protecting Your Personal Information.....	11
5.4. Respect Human Rights.....	12
5.5. No Human Trafficking.....	12
5.6. Drug-Free, Safe and Healthy Environment.....	12
5.7. Security.....	14
6. We Protect and Properly Use Company Resources.....	14
6.1. Acceptable Use of Company Resources.....	14
6.2. Intellectual Property and Technology Developed During the Course of Employment.....	14
6.3. Protection of Company Confidential and Proprietary Information.....	15
7. Protection of Confidential Information and Intellectual Property of Others.....	15
7.1. Protection of Third Party Confidential and Proprietary Information.....	15
7.2. Protection of Government Customer Information and Property.....	16
7.3. Protection of Export-Controlled and Classified Information.....	16

7.4.	Protection of Third-Party Intellectual Property Rights	16
8.	We Avoid Conflicts of Interest and Disclose Potential Conflicts.....	16
8.1.	Conflicts of Interest.....	16
8.2.	Lobbying and Political Contributions	17
8.3.	Legal Holds and Document Preservation.....	17
8.4.	Government Organizational Conflict of Interests.....	17
8.5.	Comply with the Rules When Hiring Former Government or Competitor Employees.....	18
8.6.	Outside Employment	18
9.	We Comply with International Export Laws and Regulations.....	19
10.	We Never Engage in Insider Trading.....	20
10.1.	Insider Trading	20
10.2.	Pre-Clearance Required for Directors, Officers and Designated Insiders.....	20
11.	We Will Keep Accurate Books, Records and Internal Controls.....	20
12.	We Will Comply with the Code	21
13.	We Will Annually Acknowledge Our Commitment to the Code	21
14.	Waivers of the Code.....	21
15.	We Promptly Report Violations and Acts of Misconduct	21
	ANNEX I - Annual Attestation	23
	ANNEX II – INTERNATIONAL HOTLINE DIAL-IN PHONE NUMBERS BY COUNTRY	24

From the Office of the CEO, Dan Jablonsky

Maxar Technologies is committed to conducting business ethically, legally and in a manner consistent with our core values. It is therefore essential to the continued success of Maxar, including its subsidiaries and affiliates worldwide (the “Company”) that all Company directors, officers, employees, contractors, agents, and consultants (individually, “Employee” and collectively “Employees”) act with integrity and adhere to sound ethical and honest business practices, be in compliance with applicable laws in all jurisdictions in which the Company operates, and conduct our business in a manner that reflects favorably on the Employees and the Company.

The Maxar Code of Ethics and Business Conduct (“the Code”) sets forth the requirements for business conduct and serves as a foundation for our Company policies, procedures and guidelines, all of which provide additional guidance on expected behaviors. It also contains information, resources and support to help you comply with the laws and regulations affecting our business.

Laws vary from country to country, and we must always comply with them. At times, the Code may require conduct that exceeds the ethical and legal standards strictly required by law. In those situations, you should always follow the Code even if applicable law may permit conduct meeting a lower standard.

Although the Code will help you navigate through potential difficult choices, it is general in nature and may not have the answer to every ethical question or scenario you will encounter. Therefore, you should review all applicable Company policies, procedures and guidelines for more specific instruction. You are also encouraged to reach out to the Legal or Human Resources Departments if you have any questions.

Complying with our Code is about creating a fair and respectful environment where we can do our best work, overcome challenges and celebrate our successes – because we act legally, with honesty and integrity.

In order for the Code to be truly effective, you have a responsibility to speak up when you are in a situation or are aware of a situation that you believe may violate or lead to a violation of the Code, Company policy or the law. Whenever we become aware of a violation of the Code, Company policy or the law, we will act to address the problem and prevent future occurrences. Depending on the circumstances, corrective and preventive steps might include training, counseling and disciplinary actions up to and including termination of employment, or the termination of contract or consultancy. Our “Reporting Up Policy,” which is described later in this Code, provides guidance on the various ways to bring your concerns to the attention of the Company, including mechanisms for reporting concerns anonymously.

Please read the Code carefully. It reminds each of us of our shared responsibilities to our shareholders, our customers, our business partners, and each other. It calls on us to do the right thing and to seek guidance when needed. By adhering to our Code and acting with integrity, we will continue to show that maintaining high ethical standards is not simply the right thing to do, it also makes good business sense.

Thank you for helping to make Maxar a fair and respectful place to perform our best work, for upholding our reputation for excellence and integrity in all that we do, and for standing strong in honoring our core values:



~ Daniel Jablonsky, Chief Executive Officer and President, Maxar.

1. Scope

The Maxar Code of Ethics and Business Conduct (“the Code”) applies worldwide to all Board members, directors, officers, employees, contractors, agents and consultants (“Employees”) of Maxar Technologies Inc. and its subsidiaries, affiliates, partnerships and ventures worldwide (the “Company”). All officers and managers of the Company are responsible for communicating and implementing this policy within their specific areas of responsibility.

The Code is not intended to, and does not constitute a contract of continued employment, a promise of employment for a specified duration, or a guarantee of benefits or working conditions between any employee and Maxar.

2. We Always Act with Integrity

It is the responsibility of each Employee to ensure that their behavior and activity is consistent with the Code, Company policies and all applicable federal, provincial, state and local laws and regulations. We also expect our suppliers, vendors, contractors, consultants and joint venture partners to develop ethics and compliance programs that are consistent with our values in all material respects.

Maxar has established a Compliance Program through its Corporate Compliance Office (“Compliance Office”) within the Legal Department that serves as a mechanism for individuals to ask questions and report integrity concerns without fear of retaliation. All Employees and others with connections to our Company must have confidence that they can freely report concerns about compliance with or violations of legal or ethical standards, whether or not based in the Code, and that their concerns will be reviewed by the Company’s Chief Compliance Officer (Maxar General Counsel) 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 Company 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. If you work outside of the United States, please refer to Annex II at the end of this policy for local toll-free phone numbers you may call to lodge a complaint.**

The Code contains information, resources and support necessary to help us each fulfill our obligation to act honestly, with integrity and in compliance at all times with the law, regulations, and policies that affect our business.

2.1. Employee Responsibilities Under the Code

All Employees, regardless of location, are expected to:

- Be familiar with this Code and follow its requirements at all times.
- Comply with all applicable governmental laws, rules and regulations when engaging in any activity on behalf of the Company.
- 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 Company business with the highest standards of ethics and integrity.

2.2. Manager's Additional Responsibilities

As leaders, managers take on an added level of responsibility. Our managers are expected to set a good example and to create and maintain a comfortable, open work environment where everyone is safe to voice their opinions and concerns.

If you are a manager, you have a special duty to:

- Set a good example for those with whom you work.
- Create an environment where Employees are encouraged to ask you questions and express their concerns to you.
- Promptly escalate reports of suspected violations to the Legal or Human Resources Departments.

2.3. We Make Ethical Decisions

We recognize that not all ethical questions are easy to resolve, and it is impossible to address in this Code every situation that could possibly arise. Most situations, however, can be resolved by common sense application of some basic considerations. You should see a red flag if you hear, or think to yourself, things such as:

- No one will ever know.
- Everybody does it.
- It's just how business is done here.
- No one will get hurt.
- We didn't have this conversation.
- I could get in big trouble for this.
- Shred or delete it fast.

When in doubt about whether or not you should engage in a particular activity, ask yourself:

- Am I being fair and honest?
- What would I tell someone I care about to do?
- What would my family, friends and neighbors think if they knew?
- How would this look in the newspaper?
- Would I like to be treated this way?

- When I look back on this decision at the end of my career, will I be proud of my behavior?

Keep asking until you are certain you are doing the right thing.

At times, this Code may require conduct that exceeds the standards strictly required by law. All Employees are required to conduct themselves in accordance with this Code even if applicable law sets a lower standard in certain situations. Compliance with this Code and the obligation to act in an honest and ethical manner come before all business considerations.

3. We Also Act with Integrity in All Business Dealings

At Maxar we frequently collaborate with our government and commercial business partners in various aspects of our operations. We earn their trust and business through the same hard work and integrity we apply to all our relationships and activities. We never seek to gain advantages through unfair, unethical or illegal business practices.

3.1. Integrity in Maxar Relationships

- Marketing Maxar Products and Services

As Maxar Employees, we may only make accurate and truthful statements when discussing our products or services in business-related conversations, advertising or other public communications. Please consult with the Legal Department if you have any questions concerning laws or regulations that might apply when marketing or discussing our products or services.

- Quality of Products and Services

In order to ensure that Maxar maintains and builds good will with our customers, we must always be sure that our products and services meet our contractual obligations.

- Payments to Contractors

Payments to contractors should be made pursuant to the written terms of their contracts. If you have any questions about paying or entering into a contract, please consult the [Maxar Approval Authority Policy](#) (the “MAAP”) or consult with the Legal Department.

- Relationships with Business Providers

You must use care and good judgment in selecting and maintaining relationships with Maxar’s business providers. In the selection of business providers, you must act fairly and consistently with Maxar’s values. You are also responsible for informing business providers of their requirement to comply with applicable Maxar policies and the law. Before entering into an agreement with a business provider, you must ensure that the agreement is in writing and, when appropriate, you must consult with the applicable Maxar leader for approval as detailed in the MAAP.

- Anti-Kickback Act Compliance

Employees must comply with this law which prohibits any individual or company from providing, attempting to provide or soliciting, accepting or attempting to accept, any kickback. “Kickback” is defined as any money, fee, commission, credit, gift, gratuity, thing of value (including money,

trips, tickets, transportation, beverages and personal services) or compensation of any kind that is provided directly or indirectly to any individual or company for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or subcontract/supplier relating to a prime contract.

In addition, government contracts contain one or more clauses related to the Anti-Kickback Act which requires contractors to establish and follow reasonable procedures to prevent and detect possible kickbacks, and to report possible violations when there are “reasonable grounds” to believe that a violation has occurred.

3.2. Fair Competition and Antitrust Compliance

All Employees are expected to fully comply with all applicable antitrust and competition laws. We will not tolerate unethical and manipulative practices to obtain or maintain business. Specifically, you may not enter into any agreements, formal or informal, with customers, suppliers, or competitors to:

- Fix prices, including setting price floors or ceilings, or requiring resellers to sell at a specified retail price.
- Divide markets or territories.
- Require the purchase of one product on the condition of the purchase of another product.

You must avoid engaging in or discussing any of the above activities with competitors, suppliers, or customers. The antitrust and fair competition laws are complex. If you have any questions about whether a topic for discussion or an agreement is potentially anticompetitive, contact the Legal Department before participating in a discussion or pursuing an agreement about which you have concerns.

3.3. Anti-bribery and Anti-corruption Compliance

We comply with all applicable laws designed to combat corruption wherever we conduct business, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

You shall 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 the Company. 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 our Company. Anti-corruption laws also prohibit us from accepting a bribe. Additionally, they require us to characterize our business relationships accurately and to maintain accurate company books and records, as well as adequate internal controls.

We also strictly prohibit the use of “facilitating payments.” These are small payments, usually made in cash that are typically provided to a government official to speed up or guarantee a routine action that the official is already obligated to perform. Examples of these might be payments made in order to expedite work permits, visas, licenses, utility services or to obtain police protection. While commonplace in certain parts of the world, such payments are illegal in many countries and prohibited by Company policy.

Occasional exceptions to this Company policy may be made in extreme circumstances where there is a threat to life, health or safety. If such an extreme circumstance arises, you are required to report to the Legal Department the facilitation payment before it has been made or, if not possible, promptly after it is made so that it may be recorded accurately in the Company's books and records.

Be aware that different rules apply to gifts made to U.S. government and foreign government officials. For more detailed guidelines and requirements on the Company's rules regarding Business Courtesies and Gifts, please review the relevant sections of this Code and the [Maxar Anti-Bribery and Anti-Corruption Policy](#) (the "ABAC Policy").

If you have questions, please contact the Legal Department before taking action.

3.4. Business Courtesies, Gifts and Entertainment – Commercial

It is unacceptable for any Employee or member of his or her family to give or receive gifts, payments or other business courtesies to or from potential or current customers, resellers, agents, consultants, distributors, vendors or any other person with the intent to influence or appear to influence any business decision.

Giving and receiving gifts or entertainment can build strong working relationships and goodwill between Maxar 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. In rare circumstances, it may be appropriate to give or receive gifts or entertainment that exceed the monetary limits prescribed in our policies when they are connected to a legitimate business purpose and promote a company's products or services. In such cases, you must contact the General Counsel or General Counsel's authorized designee for prior written approval before giving or receiving it. **It is NEVER acceptable to give or offer cash.**

All business courtesies, gifts and entertainment (whether given or received) must be recorded accurately in our books and records.

For more detailed guidelines and requirements on the Company's rules regarding Business Courtesies and Gifts, please review the relevant sections of this Code, the ABAC Policy, and the [Travel and Entertainment Expense Policies and Procedures](#).

If you have questions, please contact the Legal Department before taking action.

3.5. Business Courtesies, Gifts and Entertainment – Government Officials

Most governments have regulations prohibiting their employees' acceptance of items of value from contractors or suppliers. We carefully follow these regulations and policies when dealing with government officials and their representatives. These regulations can be complex, so make sure you understand them.

Please refer to the ABAC Policy for more specific guidance on this subject. If you have any doubt as to whether or not it is permissible, seek guidance from the Legal Department.

3.6. Truthful Cost or Pricing Data

All proposals submitted to the U.S. government must comply with the Federal Acquisition Regulation (“FAR”) and the proposed contract requirements.

Where cost or pricing data are required to be submitted, such data must be accurate, complete and current as of the date of final agreement on price. Whether you are the contract negotiator, the cost estimator or the person responsible for furnishing the data to the cost estimator, you must ensure that the data meet these FAR requirements.

- Accurate means free from error.
- Complete data means all facts that a prudent buyer or seller would reasonably expect to have an effect on price negotiations, e.g., historic cost data, vendor quotations, “make or buy” decisions and other management decisions that could have a significant bearing on cost.
- Current data means data that are up to date. Because many months may pass after the original proposal and price were submitted, data should be updated through the close of negotiations to ensure they are current.

If you have questions about Truthful Cost or Pricing Data, please contact the Legal Department.

4. We Comply with Laws and Regulations

We are all responsible for our own conduct and for complying with the law and with this Code. Violations by even one individual can have significant impacts on the Company’s ability to carry on its business, our reputation, and the hard work of our Employees.

4.1. Familiarity with the Law

Employees are expected to comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities, states/provinces and countries in which the Company operates. In our business, this means that, among other things, Employees 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.

Although not all Employees are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. Questions about legal obligations compliance should be addressed to the Legal Department.

There are many ways to familiarize yourself with the various laws and regulations that apply to the Company, including attending training, reviewing policies, participating in Company presentations and, most importantly, by asking for help. If you have questions about any legal obligation, don’t hesitate to ask any member of the Legal Department. Ignorance of legal obligations is never an excuse or defense to misconduct, and penalties for failure to comply with the law can be severe, including fines, lawsuits, loss of business privileges and, in some cases, civil

or criminal prosecution. If you would like any additional training in these areas, please contact your supervisor or any member of the Legal Department.

5. We Provide Equal Employment Opportunities and a Respectful Workplace

5.1. Be Inclusive and Treat Each Other with Mutual Respect, Fairness and Dignity

Our Employees are our most valuable resource. As a Company, we are committed to providing our Employees with a healthy, safe, and productive workplace where they are treated with respect, appreciation, and dignity. We expect all Employees to act in a professional, business-like manner at all times and will not exhibit bias, prejudice, or engage in the harassment of others. It is our policy to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, pregnancy, veteran status, sexual orientation, gender identity or any other status protected by law. Where applicable, we comply with Affirmative Action requirements. The Company will not tolerate any type of harassment in the workplace, including sexual harassment or any type of threatening conduct, racial or religious slurs, or any other comments or conduct that, in the judgment of Company management, creates, encourages or permits an offensive or intimidating work environment.

If you encounter or observe discrimination or harassment in our workplace please report the matter immediately through any of the Company's communications channels, including reporting the matter to your supervisor, the Human Resources or Legal Department or the Maxar Ethics Hotline at 1-866-594-7164 or via the online portal, www.maxar.ethicspoint.com. This Ethics Hotline is operated 24/7 by an independent third party and provides you with the option to anonymously report suspected misconduct or other concerns to the Company. *If you work outside of the United States, please refer to Annex II at the end of this policy for local toll-free phone numbers you may also call to lodge a complaint.*

Please refer to the [Maxar Nondiscrimination and Anti-Harassment Policy and Complaint Procedure](#) for more specific guidance on this subject.

5.2. Do Not Tolerate Retaliation

Retaliation against those who in good faith raise integrity concerns is prohibited and is grounds for disciplinary action, up to and including termination of employment or consultancy. When concerns are raised about possible violations of our Company policies or the law, thorough and objective investigations will be conducted promptly, discreetly, and professionally. **Please note that in most cases, email communication cannot be sent anonymously. To ensure complete anonymity, please report any concerns to the toll-free Maxar Ethics Hotline or online portal.**

5.3. Protecting Your Personal Information

The Company acknowledges the importance of protecting the personal information of its Employees. Except as otherwise required by law, only authorized Employees with a valid, work-related reason may have access to employee personnel records kept by the Company. Those individuals with access are expected to keep all employee information in the strictest confidence and not to share such information except on a "need to know" basis associated with a legitimate business purpose. As a global business, however, you acknowledge that we may need to transfer personal information about you as an Employee to any of the countries where we do business. We will do so in compliance with any applicable laws, such as the EU and UK General Data

Protection Regulations. Although not all countries have data protection laws, our policies are intended to protect your personal information wherever it may be stored or processed.

For more detailed guidelines and requirements on the collection and handling of personal information, please review the [Maxar Personal Information and Privacy Policy](#).

5.4. Respect Human Rights

Corporate responsibility is at the core of our Company's culture and underlies our business and operating strategies. Our policies, practices and procedures reflect a strong commitment to human rights as set forth in the Universal Declaration of Human Rights. This commitment is grounded in our core values. We do not use or condone the use of child or forced labor, indentured servitude, human trafficking or other such violations of human rights.

5.5. No Human Trafficking

Maxar is committed to a work environment that is free from human trafficking and slavery, which for purposes of this Code, 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. The Company will not tolerate or condone human trafficking or slavery in any part of our global organization.

5.6. Drug-Free, Safe and Healthy Environment

We are 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. As a result, Maxar takes the following position on this matter, depending upon the location in which you work.

a. Drug-Free Workplace – Employees Located in Countries Except the United States

- The Company is responsible for the well-being of all Employees. Employees located in another country other than the U.S. are prohibited from working under the influence of intoxicants. Employees are also prohibited from possessing, distributing selling, dispensing or using illegal or legal drugs (including cannabis, regardless of prescription) or other unauthorized or mind-altering or intoxicating substances while on Company property (including parking areas and grounds), or while otherwise performing their work duties away from the Company's premises. Included within this prohibition are lawful controlled substances, which have been illegally or improperly obtained. This policy does not prohibit the possession and proper use of lawfully prescribed drugs taken in accordance with the prescription.
- Employees who work in a position that includes dangerous or safety sensitive duties cannot use cannabis (also known as marijuana) or any mind-altering or intoxicating substances while working. Any person who works in a position that includes dangerous or safety sensitive duties and receives a valid medical prescription for cannabis or other potentially intoxicating substance, must disclose the prescription, in confidence, to Company Human Resource personnel so that appropriate accommodations can be made so as to ensure the Employee can work safely.

- Consumption of alcohol on Company premises is only permitted with prior senior management approval for Company-sponsored events.

Exceptions. If you work at one of our non-U.S. locations and wish to request an individual exception to this policy, please contact your local HR representative for assistance. We will not discriminate or retaliate against you for making an exception request.

Because national, state, provincial and local laws vary, please contact your local HR Department or reference your business unit-specific drug testing policy and procedures.

b. Drug-Free Workplace – Employees Located in the U.S.

U.S. federal law, Maxar's U.S. Government ("USG") contracts and the maintenance of our USG facility clearances require our U.S. facilities to maintain a drug-free workplace, and prohibit our U.S. workers from possessing, distributing or using any illegal drug, including cannabis (also known as marijuana) which continues to be treated as an illegal controlled substance at the U.S. federal level regardless of whether or not it is considered legal in your state. Accordingly, our U.S.-located Employees are at all times prohibited from:

- Possession, distribution, sale, dispensation, or use of illegal drugs or any other controlled substance, including cannabis – even if legalized in your state.
- Being under the influence of illegal drugs, controlled substances (including marijuana – even if legalized in your state) or alcoholic beverages in the workplace. Please note that consumption of alcohol on Company premises is only permitted with prior senior management approval for Company-sponsored events.

Exceptions. If you work at one of our U.S. locations and wish to request an individual exception to this policy, please contact your local HR representative for assistance. We will not discriminate or retaliate against you for making an exception request. However, because of our status as a USG contractor with facility clearances, exceptions may rarely be granted.

Because national, state, provincial and local laws vary, please contact your local HR representative for specific drug testing policy and procedures.

c. Prohibition of Threats, Violent Behavior and Weapons – All Employees (Worldwide)

We do not tolerate violent behavior at any workplace, whether committed by or against our Employees. The following behaviors are prohibited: making threatening remarks, causing physical injury to someone else, intentionally damaging someone else's property, possessing or using weapons, or acting aggressively in a way that causes someone else to fear injury. Use good judgment and **promptly inform your supervisor, manager, the Human Resources or Legal Department, or Security if you observe behavior that could be dangerous or violent.**

The Company expects all Employees to observe posted warnings and advisories and promptly report any work-related accidents or injuries. Further, all Employees, regardless of location, are expected to conduct business in full compliance with applicable environmental, health, and safety laws and regulations.

5.7. Security

Employees shall at all times comply with the security requirements imposed by the Company and shall, to the maximum extent possible, honor the Company's security obligations to its customers.

We must all take reasonable steps to protect the security of any password or access number we use in connection with any computer, network or communication device. Before installing any electronic media (software, DVDs, CD-ROMs, thumb drives and files) acquired through public networks, such as the Internet, we must first check them for viruses or other malicious content.

You may only use approved and properly licensed software on systems and may only use appropriate software in accordance with the applicable software owner's licensing agreements. Additionally, you may not make an unauthorized copy of any software that may be either licensed to or owned by Maxar.

6. We Protect and Properly Use Company Resources**6.1. Acceptable Use of Company Resources**

Proper use of Company resources, including our physical assets, systems, and intellectual property, is critical to Company operations and reputational integrity. All Company assets are to be used for Company business only, although incidental personal use is permitted. As a general rule, Company resources are not to be used for any personal benefit or the personal benefit of anyone else. You may occasionally use Company resources (e.g., Internet or email) for personal use, provided the use does not interfere with your productivity, anyone else's productivity, and is never for an improper purpose. Examples of such improper purposes include sexually explicit messages, cartoons, jokes, unwelcome propositions, ethnic or racial slurs, or any other message that could be construed as harassment or disparagement of others on the basis of sex, race, religion, national origin, age, sexual orientation, disability or other protected status.

The Company reserves the right to access, inspect, and disclose at any time all aspects of those systems and networks, including but not limited to messages transmitted via its e-mail, collaboration tools, cellular phones, text messages and/or voice mail system regardless of content. In addition, the Company may ask to search an Employee's personal property located on or being removed from Company locations in order to protect its employees, assets and business interests. You are expected to cooperate with all such requests.

The Maxar [Acceptable Use Policy](#) provides more specific rules concerning authorized and unauthorized uses of Maxar information technology (IT) resources.

6.2. Intellectual Property and Technology Developed During the Course of Employment

We are all responsible for establishing, maintaining and protecting the Company's rights in its intellectual property. In this regard, we are required to cooperate fully with Maxar's efforts to patent, register or otherwise protect its ownership interests in its intellectual property.

All inventions, discoveries and improvements that an Employee conceives or makes during the course of his or her employment relating to the Company's business or arising out of or resulting from such employment are the property of the Company.

If you have questions about intellectual property, please contact the Legal Department.

6.3. Protection of Company Confidential and Proprietary Information

At Maxar, we safeguard our proprietary information, intellectual property rights and goodwill. We share proprietary or confidential information only with authorized Company Employees having a legitimate need to know or with third parties subject to prior approval and appropriate safeguards, such as non-disclosure agreements. Company information is a valuable Company asset. Protecting this information plays a vital role in the Company's ability for continued growth. The Company's competitive advantage from this information could be jeopardized if the information is improperly disclosed, even if the disclosure is inadvertent. To help maintain the value of our confidential and proprietary information, it is critical that you follow all Company policies and guidelines for protecting our confidential and proprietary information.

Although it is not possible to list all information that may be considered confidential and/or proprietary, examples include:

- Business plans and projections, research projects, new product concepts, corporate objectives, corporate strategies, records, and databases.
- Personnel information, including salary and benefits data, and employee medical information.
- Customer, employee and supplier information.
- Any unpublished financial or pricing information, including bid and proposal information.
- Company intellectual property, such as trade secrets, patents, trademarks and copyrights.

Any questions regarding whether information is confidential and/or proprietary or regarding disclosure of information should be directed to your manager or the Legal Department.

Once it is determined that information is confidential and/or proprietary, it must be handled appropriately and in accordance with the Company's policies and procedures relating to confidential and proprietary information.

The obligation to protect the Company's proprietary and business confidential information continues even after leaving the Company. Upon the termination of employment, Employees are required to return all Company property, including all documents and other materials containing Company and third-party intellectual property, confidential and/or proprietary information, and must not disclose such information to others after leaving the Company.

7. Protection of Confidential Information and Intellectual Property of Others

7.1. Protection of Third Party Confidential and Proprietary Information

Just as we value the protection of our own confidential and proprietary information and intellectual property, our suppliers and customers value the protection of theirs. Accordingly, it is our policy to respect the confidential and proprietary rights of others as we would expect them to respect ours.

7.2. Protection of Government Customer Information and Property

In addition to the obligations regarding the confidential and proprietary information of the Company, our customers, suppliers and subcontractors, it is Company policy that special attention will be paid to use of information and property made available to the Company by U.S. or other government customers. Specifically, no information regarding any government customer, including use of the name of the customer may be released publicly, without the approval of the customer. Any requests to release such information or to use the name of the customer must be approved by the Legal Department.

7.3. Protection of Export-Controlled and Classified Information

Employees will strictly comply with export control and security requirements concerning access to, use, transmission and storage of Company or third-party export-controlled or classified information. You should be particularly careful when using phones or video conferencing systems of any type, especially cellular phones, for export-controlled or classified conversations. This also applies to use of computers, facsimile machines, cellphone cameras and other equipment used to transmit and store export-controlled or classified information or data. Finally, only authorized personnel are allowed to use a camera within Maxar facilities.

Any questions or concerns relating to use, protection and storage of export-controlled information should be directed to the Legal Department.

Any questions or concerns relating to use and protection of U.S. Government classified information should be directed to the Facility Security Officer (FSO) or his/her designee.

7.4. Protection of Third-Party Intellectual Property Rights

As part of our overall compliance commitment, the Company expects all Employees to respect the rights of third parties, including third party trademarks and copyrights. Employees should assume that all software used by the Company is copyrighted, and that the Company does not have the right to make copies of that software except for backup purposes. This includes not only the substantial software programs the Company may utilize, but also the smaller so-called shrink-wrap programs typically used for word processing, spreadsheets and data management. In addition, the terms and conditions of any applicable license agreement must be strictly followed. You must also follow applicable Security and IT procedures before downloading any software on any Company device.

8. We Avoid Conflicts of Interest and Disclose Potential Conflicts**8.1. Conflicts of Interest**

All Employees have an obligation to act in the best interest of the Company. Employees are expected to avoid any activity or situation that creates or appears to create a conflict between their personal interests and the interests of the Company. Although it is not possible to list every conceivable impermissible conflict, the following are some common examples of situations that should be avoided:

- Working, in any capacity, for a competitor, customer or supplier while employed by the Company.

- Competing with the Company for the purchase or sale of property, services or other interests.
- Having an interest (other than routine investments in publicly traded companies) in a transaction involving the Company, a competitor, a customer or supplier.
- Receiving a loan or guarantee of an obligation from a competitor, customer or supplier as a result of one's position with the Company.
- Directing Company business to a supplier owned or managed by Employees, or which employs a relative or friend.

Situations involving a conflict of interest may not always be obvious or easy to resolve. Therefore, if there is any doubt as to whether a conflict of interest or a potential conflict of interest exists, or whether there may be the appearance of such a conflict of interest, you must disclose the matter to your supervisor or the Legal Department as soon as the potential conflict is reasonably foreseeable. You may not undertake an act in furtherance of any of the common examples of situations to be avoided that are listed above unless approved in writing by the Legal Department.

In order to avoid conflicts of interests, all Maxar Vice Presidents and above (collectively, "V.P.") must disclose to the Maxar General Counsel, in writing, any Board of Director memberships sought or held by the V.P.. This pertains to both for-profit and not-for-profit organizations. Disclosure must be provided at the time that the membership is sought, or, in the case of continuing memberships, upon the V.P.'s annual attestation of this Code.

8.2. Lobbying and Political Contributions

Employees, as individual citizens, are encouraged to take part, on an entirely voluntary basis, in political and governmental affairs with your own time and resources. The political party to which an employee belongs, his or her views on the candidates and issues, and the extent of financial support and activities are entirely matters of personal choice.

Do not contribute any Company funds or other assets directly or indirectly to any political party or to the campaign for or against any candidate for political office if prohibited by law. Seek legal advice before contributing any Company funds to a charity that is affiliated with a politician.

8.3. Legal Holds and Document Preservation

Any and all records that may reasonably be used in or may reasonably be relevant to an actual, pending or reasonably anticipated legal proceeding, or internal or external investigation ("Legal Proceeding") must be carefully preserved and maintained for the duration of the Legal Proceeding or the time period set forth in any "Legal Hold" or "Preservation Notice" distributed in connection with any Legal Proceeding, in addition to any retention period set forth in the applicable records retention policy. You must consult with the Legal Department before disposing of any records relating to a Legal Proceeding.

8.4. Government Organizational Conflict of Interests

The Company is an important supplier of satellites, robotics, spacecraft, imagery, geospatial analytics and related products and services for the U.S. and other governments. We value our

federal, state, provincial and local government customers. Doing business with the government is a public trust and involves a variety of procurement and ethics laws and regulations.

The Company will conduct business with its government customers in strict compliance with these rules and in a manner that avoids even the appearance of any conflict of interest. You are expected to know and follow the procurement and ethics laws and regulations as they may impact the Company's customers, both government and commercial.

An organizational conflict of interest ("OCI") exists where, because of activities or relationships with other persons, a person is unable or potentially unable to render impartial advice or assistance to the government, or the person's objectivity in performing the contract work is, or might be otherwise impaired, or a person has an unfair competitive advantage. All Employees are expected to fully comply with any OCI Mitigation Plans that the Company may, from time to time, have in place.

The laws and regulations relating to doing business with government customers and public officials are complex. Any questions or concerns should be raised with the Legal Department.

8.5. Comply with the Rules When Hiring Former Government or Competitor Employees

Any discussion or contacts with current or former government employees (military or civilian) for the purpose of exploring potential employment or consulting opportunities with the Company are subject to conflict-of-interest laws and regulations. Similarly, once hired or retained, these individuals may be prohibited from certain tasks and duties that relate to their prior responsibilities. ***Before entering into employment discussions with U.S. government employees or non-U.S. government employees, please consult your Legal or HR Department to ensure compliance with the law and Company policy.*** Also, when hiring an employee who has worked for a competitor or certain other third parties, we must ensure that proprietary information and intellectual property from a prior employer or government position is not brought into the Company or used by Maxar or its subsidiaries or affiliates in violation of an employee's obligations to his or her former employer.

8.6. Outside Employment

The Company recognizes that some Employees may want to engage in outside employment and other activities, including second jobs, consulting engagements, self-employment and volunteer activities. To protect the Company's and others' confidential and proprietary information, intellectual property, and other business interests while Employees are engaged in outside employment, all Employees must adhere to the following:

- Before beginning outside employment, Employees must give advance written notice of the outside employment to their supervisor.
- Outside employment must not interfere with the Employee's work performance or work schedule.
- Employees engaging in outside employment must comply with Maxar's policies, including those policies on conflicts of interest, the acceptable use of company resources, the protection of confidential and proprietary information, and corporate communications.

Employees or their supervisors who are not sure that outside employment complies with this or other Maxar policies should speak with the Legal Department, which will help determine whether the outside employment complies with applicable policies.

9. We Comply with International Export Laws and Regulations

Maxar and its Employees will 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. We will screen customers and suppliers to ensure that they do not do business with prohibited entities. We will obtain export licenses, permits and other government approvals prior to exporting products and technology controlled by the U.S. or other applicable government entities. In compliance with U.S. trade controls, no Employee may permit a foreign person to access the Company's technology without first determining whether such access triggers a licensing or permitting requirement. Failure to comply with these laws could result in heavy fines or the loss or restriction of Maxar's export or import privileges, which, in turn, could seriously and adversely affect a significant portion of the Company's business. Violations can also result in severe criminal and civil penalties for the Company and the individual(s) involved, as well as the Company's loss of export and government contracting privileges.

The Company's business activities may involve items or technologies subject to export control laws and regulations of the U.S. Department of State under the Arms Export Control Act and the International Traffic in Arms Regulations ("ITAR") for the regulation of defense articles, defense services and related technical data. The Company also handles the export of civilian and "dual-use" technology and materials, the export of which is subject to the Export Administration Regulations ("EAR") administered by the U.S. Department of Commerce, Bureau of Industry and Security ("BIS").

In addition to export rules, there are various economic sanctions we need to be aware of, such as:

- **Country Prohibitions and Restrictions.** Depending upon the country of origin, please be aware that exports of certain products, services, technologies and technical data to certain countries including Belarus, China, Cuba, Iran, North Korea, Syria, Venezuela, and areas of Sudan are prohibited by U.S. or international law, and that sales to other countries are significantly limited. This country list changes periodically. Please consult the Legal Department for specific guidance.
- **Boycotts and Embargoes.** There are strict prohibitions against participating in certain economic boycotts or embargoes.
- **Denied and Restricted Parties.** Sales to certain individuals and entities may be prohibited or restricted.

Awareness of, familiarity and compliance with the full body of legal and regulatory requirements are essential to Maxar's continued presence in the international marketplace. Conduct of our international business must therefore be in full compliance with all applicable export and import laws and regulations.

Please consult with the Legal Department and the [Maxar Trade Compliance Policy](#) for specific guidance.

10. We Never Engage in Insider Trading

10.1. Insider Trading

Directors, officers and Employees must comply fully with securities laws concerning insider trading. From time to time we may encounter material, nonpublic (or “inside”) information about our Company or our customers, suppliers and others in the course of our duties with Maxar. Our policies and the law prohibit us from trading in our stock or “put” or “call” options on Maxar stock, or the stock of other companies, while we possess material inside information regarding the company. We also may not share material inside information with family or friends, or even with colleagues who do not have a business need to know it. Material, nonpublic information generally includes nonpublic information where there is a substantial likelihood that a reasonable investor would consider it important when deciding to buy, sell or hold a company’s stock. Examples of material non-public information may include (but is not limited to) financial and key business data; merger, acquisition or divestiture discussions; award or cancellation of a major contract; changes in key management; forecasts of unanticipated financial results and other similar information. Failure to comply can result in substantial civil and criminal penalties. Questions about insider trading should be referred to the Maxar General Counsel.

10.2. Pre-Clearance Required for Directors, Officers and Designated Insiders

Prior to conducting any trading activity, a director or officer is required to contact the Corporate Secretary to ensure that the trading window is open and that a trade is permissible. Please refer to the [Maxar Insider Trading Policy](#) for rules concerning the trading in securities by directors and officers of the Company and its subsidiaries.

11. We Will Keep Accurate Books, Records and Internal Controls

We keep accurate records of all financial and business transactions. Our record-keeping procedures are essential to ensure that all costs are properly charged. It is your responsibility to record all costs accurately and to follow all accounting procedures. No false or misleading entries should be made in our books and records. You must follow carefully our policies on document retention, including electronic documents and e-mails. Never destroy any documents that you believe might be relevant as evidence in any civil, criminal or regulatory proceedings. This could expose you and the Company to severe penalties.

Maxar has a detailed financial control structure and related procedures designed in accordance with securities regulations which require companies to implement and evaluate internal controls for purposes of financial statement reporting integrity. Assessing the quality of these internal controls involves a continuous process of evaluating their design and operation and taking necessary corrective action to improve them as required. Through discussions with managers and review of Maxar’s documented practices and procedures, each employee must understand his or her role with regard to Maxar’s overall control structure and related procedures. An employee should report as soon as possible to his or her manager or other appropriate person in accordance with Section 8 of this Code any potential concerns he or she may have with respect to either his or her own role or performance or otherwise relating to Maxar’s control structure and related

procedures. Early identification of problems is critical to the strength of the Company's controls, as well as maintaining compliance with the law.

12. We Will Comply with the Code

All Employees are required to comply with this Maxar Code of Ethics and Business Conduct.

With respect to the Code, each Employee is expected:

- To read and understand this Code and its application to the performance of his or her business responsibilities.
- To conduct himself or herself in accordance with this Code and to seek to avoid even the appearance of wrongdoing or improper behavior.

Those who violate the standards in this Code will be subject to disciplinary action, which may include suspension, termination and/or the reporting of violative conduct to appropriate regulatory and criminal authorities. Any Employee who observes or otherwise becomes aware of conduct that violates, or could violate, the Code must make a prompt report of such violation to the Company. Any officer or Employee who fails to immediately report a Code violation, or perceived violation, or who violates any aspect of the Code may be subject to disciplinary action, up to and including termination of employment.

13. We Will Annually Acknowledge Our Commitment to the Code

After carefully reviewing this Code, you must acknowledge that you have received, read, understand and agree to comply with this Code. The acknowledgment must be returned in a manner provided for in Annex I to this Code within thirty (30) calendar days of your receipt of this Code and otherwise as required by the Company. Each Employee is required to annually certify compliance with the Code. The failure to certify such compliance or any false certification, even if directed by a supervisor, is grounds for disciplinary action by the Company, up to and including termination of employment.

14. Waivers of the Code

Only the Board of Directors or any Committee of the Board may, in its discretion, waive any provision of this Code for a Board member or an executive officer. Any waiver of the Code for a Board member or an executive officer shall be promptly disclosed as required by law or stock exchange rules. For all other waivers of the Code, the Maxar General Counsel should be consulted.

15. We Promptly Report Violations and Acts of Misconduct

If you have any reason to believe that a violation of this policy has occurred, please report it to the Maxar Ethics Hotline or your supervisor, the Human Resources Department or Legal Department. The Maxar Ethics Hotline was established by the Company to provide an independent channel for communication of problems should anyone feel uncomfortable with the standard management channels.

Reports can be made anonymously and confidentially via Internet or telephone, 24 hours a day, 7 days a week, by following instructions provided at www.maxar.ethicspoint.com or 1-866-594-

7164. The service provider will report all claims made to Maxar's Chief Human Resources Officer, General Counsel and Corporate Internal Audit. Claimants will be issued a file number that they can use to follow up on the status of their report through the website or telephone service. ***If you work outside of the United States, please refer to Annex II at the end of this policy for local toll-free phone numbers you may also call to lodge a complaint.***

Every report will be handled promptly, discreetly, and professionally.

ANNEX I - Annual Attestation

Instructions: If you are viewing this policy via PolicyTech, your acknowledgment will be electronically recorded and stored when you click the blue “Mark as Read” button at the top of the page. If you do not have access to PolicyTech, please sign below and forward the signed document to the Maxar Compliance Office at compliance@maxar.com.

ACKNOWLEDGEMENT OF RECEIPT

I acknowledge that I have received a copy of the Maxar Code of Ethics and Business Conduct and agree to comply with its terms.

Signed: _____

Name (please print): _____

Date: _____

ANNEX II – INTERNATIONAL HOTLINE DIAL-IN PHONE NUMBERS BY COUNTRY

Country	Dialing Type	Number(s)	Direct Access Codes				
Australia	Direct Access	866-594-7164	1-800-551-155	1-800-881-011			
Brazil	Direct Access	866-594-7164	0-800-888-8288	0-800-890-0288			
Canada	Domestic	844-761-7264					
Germany	Direct Access	866-594-7164	0-800-225-5288				
India	Direct Access	866-594-7164	000-117				
Mexico	Direct Access	866-594-7164	001-800-462-4240	001-800-658-5454	01-800-288-2872	01-800-112-2020	
Russia	Direct Access	866-594-7164	363-2400	363-2400	8^10-800-110-1011	8^495-363-2400	8^812-363-2400
Singapore	Direct Access	866-594-7164	800-001-0001	800-011-1111			
United Arab Emirates	Direct Access	866-594-7164	8000-021	8000-555-66	8000-061		
United Kingdom	Direct Access	866-594-7164	0-800-89-0011				