
MAXAR NONDISCRIMINATION AND ANTI-HARASSMENT POLICY AND COMPLAINT PROCEDURE

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1. POLICY STATEMENT

Maxar is committed to providing all team members with a healthy, safe and productive work environment where they are treated with respect and dignity in accordance with Maxar's Values. Maxar strictly prohibits unlawful discrimination in all terms, conditions, and privileges of employment, including in recruiting, hiring, assignment, compensation, benefits, promotions, demotions, transfers, and discipline and termination; and prohibits any form of harassment based on race, color, religion, national origin, citizenship, gender (including pregnancy, childbirth and related medical conditions), age, disability, sexual orientation, marital status, military/veteran status, genetic information or any other characteristic protected by applicable law.

Maxar is committed to providing reasonable accommodations to qualified individuals with disabilities, and to provide reasonable accommodations for religious beliefs and practices, all in accordance with applicable law.

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No adverse employment action will be taken against team members for exercising their rights under applicable law, making good faith complaints, or assisting in investigations under this policy. Retaliation for any such protected activity is strictly prohibited.

In addition, this policy is intended to meet the requirements of all applicable law. It may require conduct that exceeds the legal standards strictly required by law. In those situations, you should always behave in accordance with our Values and avoid any behavior prohibited by this policy.

2. SCOPE AND APPLICABILITY

This policy applies to individuals working within and outside of the United States.

The behaviors described in this policy are prohibited in the work environment, regardless of whether the individuals involved are employees, customers, contractors, suppliers, guests or other third parties. This policy prohibits discriminatory behavior that occurs on Company premises or in connection with employment, and while individuals are working at non-Company locations, traveling on Company business, and attending work-related social functions.

3. TERMS AND DEFINITIONS

Term	Definition
Harassment	Harassment is unwelcome conduct that is disrespectful or unprofessional verbal, non-verbal or physical conduct based on a protected characteristic that creates an intimidating, hostile, degrading or offensive working environment, or that interferes with an individual's work performance. Harassment may include, but is not limited to, slurs, epithets, and disparaging remarks or jokes, as well as written or graphic material that denigrates or shows hostility to an individual because of a protected characteristic, including because of sex (which also includes pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity or gender expression. It may include physical conduct such as physically threatening another person, blocking someone's way or making physical contact in an unwelcome manner.
Sexual Harassment	As used in this policy, sexual harassment is defined as harassment based on sex or gender (as described above) or conduct of a sexual nature. It may include all of the actions described above as harassment, as well as other unwelcome sex-based conduct, such as unwelcome sexual advances, requests for sexual favors, and other verbal, non-verbal or

	physical conduct of a sexual nature, when, for example, (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexually harassing conduct need not be motivated by sexual desire and may include situations that began as reciprocal relationships, but that later cease to be reciprocal. Sexual harassment may constitute discrimination and be illegal under federal, state and local laws. Sexual harassment may include a range of behaviors and may involve individuals of the same or a different gender. These behaviors may include, but are not limited to, unwanted sexual advances or propositions; subtle or overt pressure for sexual favors; flirtation, teasing, unwelcome gifts, or sexual jokes; innuendos; verbal abuse of a sexual nature; graphic commentary about an individual's body, sexual prowess or sexual deficiencies; leering; whistling; touching; pinching; assault; coerced sexual acts; display of sexually suggestive objects or pictures; and other physical, verbal or non-verbal conduct of a sexual nature.
Bullying	Harassing or abusive conduct is considered "bullying" when it is not based on a legally protected characteristic such as gender, religion, ethnic origin, race, and so forth.

4. CONDUCT EXPECTATIONS

Harassment, Sexual Harassment and Bullying. Harassment on the basis of any protected characteristic is strictly prohibited. Moreover, it is Maxar's policy that every team member, regardless of position, deserves to be treated with respect and dignity in accordance with our Values. Threatening, intimidating or humiliating speech or conduct is contrary to the Maxar Values and will not be tolerated. This prohibition is not intended to prevent managers from coaching or working with employees to improve their performance, holding employees to high standards or utilizing tools such as performance improvement plans.

Consensual Relationships. It is important to understand that consensual romantic and sexual relationships between coworkers may lead to unforeseen complications. Entering a consensual romantic relationship is highly discouraged when the individuals involved are in a direct reporting relationship, and/or one individual has the ability to exercise influence over any aspect of the other individual's

performance, compensation and promotional potential. Such individuals are required to disclose the existence of or end to their relationship to their department managers or Human Resources Business Partners so that Maxar can assess the risks and impacts of the situation and take any action that it deems appropriate. Failure to timely report relationships as required by this policy may lead to discipline, up to and including termination. In the case of other consensual relationships, where a direct reporting relationship or the ability to exercise influence is not involved, Maxar also may take action if it determines the relationship presents a conflict of interest or will impact the performance or career of any team member.

5. COMPLAINT PROCEDURE AND OBLIGATION TO COOPERATE

Team members who believe they have been subject to or observed any conduct prohibited by this policy should report the matters promptly, using the complaint procedures outlined below. Any team member who violates this policy is subject to disciplinary action, up to and including termination of employment. Moreover, supervisors and managers have a responsibility to report any alleged conduct prohibited by this policy, and it will be considered a policy violation to be aware of prohibited conduct and not report it.

If you know or have reason to believe that any of the prohibited behaviors described in this policy have taken place in our work environment, do NOT remain silent. Immediately report the matter through one of Maxar's communication channels. Your direct supervisor is normally the best place to start. You may, however, make a report to any one of the following:

- Your Human Resources Business Partner (which you can identify in Workday by following these instructions: [https://www.myworkday.com/maxar/d/inst/1\\$7126/7126\\$125.html](https://www.myworkday.com/maxar/d/inst/1$7126/7126$125.html)) or the Senior Vice President and Chief Human Resources Officer.
- Any Vice President, Senior Vice President, or Executive Vice President, or the Chief Executive Officer.
- The Maxar Ethics Hotline, which is available 24 hours a day, seven days a week for anonymous and confidential reports and can be accessed online at www.Maxar.ethicspoint.com. Hotline complaints also can be made by phone by calling 1-866-594-7164 in the U.S. or Canada, or by calling the country-specific direct dial number found at www.Maxar.ethicspoint.com or in Annex I. Reporters, including anonymous reporters, will be issued a file number that they can use to follow up (via telephone or the website) on the status of their reports.

If you prefer to make a complaint in writing, you may use the sample complaint form attached at Annex II. Maxar encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Any reported allegations of prohibited behavior will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent possible, consistent with the needs of the investigation and appropriate corrective action. Failure to cooperate in an investigation may be grounds for disciplinary action.

False and malicious complaints of harassment, bullying, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

6. PROHIBITION AGAINST RETALIATION

Retaliation against an individual for reporting prohibited behavior, or for participating in an investigation of a claim, is unlawful and a violation of this policy. Retaliation, like harassment and discrimination itself, will result in disciplinary action, up to and including termination of employment. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

7. FILING A COMPLAINT OUTSIDE THE COMPANY

Individuals may file formal external complaints of discrimination, harassment or retaliation with an appropriate external agency or state or local authority. Individuals should contact the appropriate agency or authority directly for information about applicable laws and remedies, agency processes and time limits, and instructions on how to file a complaint. Contact information for the U.S. Equal Employment Opportunity Commission and select United States state agencies appears in Annex III. Individuals outside of the United States should contact their Maxar HR representative, or state or local authority, for more information.

8. ANNEX 1

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			
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	
Netherlands	Direct Access	866-594-7164	0800-022-9111				
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				

9. ANNEX 2**MAXAR COMPLAINT FORM FOR REPORTING DISCRIMINATION, SEXUAL OR OTHER WORKPLACE
HARASSMENT, OR RETALIATION**

If you believe that you have been subjected to discrimination, sexual or other workplace harassment, or retaliation, you are encouraged to complete this form and submit it to your direct supervisor, Maxar Human Resources Business Partner, or other person identified in the Maxar Nondiscrimination and Anti-Harassment Policy and Complaint Procedure (the "Policy"). If you are more comfortable reporting via the Ethics Hotline (by telephone at 1-866-594-7164 or online at www.Maxar.ethicspoint.com) or in another manner set forth in the Policy, please do so. Maxar will investigate any claims as outlined in the Policy, whether or not a written complaint is made. You will not be retaliated against for filing a complaint.

COMPLAINANT INFORMATION

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: ☐ Email ☐ Phone ☐ In person**SUPERVISORY INFORMATION**

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Your complaint of discrimination, sexual or workplace harassment, or retaliation is made about:

Name:

Title:

Work Address:

Work Phone:



1.1

Relationship to you: ☐ Supervisor ____ ☐ Subordinate ____ ☐ Co-worker ____ Contractor ____ ☐
Other ____

2. Please describe the conduct or incident(s) that is the basis of your complaint and your reasons for asserting that the conduct constitutes discrimination, harassment or retaliation. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) the conduct or incident(s) occurred:

Is the discrimination, harassment or retaliation continuing? ☐ Yes ____ ☐ No ____

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

The last question is optional but may help the investigation.

5. Have you previously complained or provided information (oral or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature: _____

Date: _____

10. Annex 3**AGENCIES TO CONTACT FOR INFORMATION ABOUT FILING AN EXTERNAL COMPLAINT IN THE UNITED STATES****FEDERAL AGENCY**

To learn more about federal (U.S.) discrimination laws and remedies, agency process and time limits, and how to file a complaint of discrimination, harassment or retaliation, contact the U.S. Equal Employment Opportunity Commission at www.eeoc.gov/how-file-charge-employment-discrimination.

STATE AGENCIES

Contact the enforcement agencies below for information regarding CA, CO, CT, FL, IL, MD, MI, MO, NY and VA state discrimination laws and remedies, and how and when to file a complaint of discrimination, harassment or retaliation. For states not listed below, you may contact the appropriate state government central office to learn whether there is an agency responsible for processing complaints, and if so, how to contact the agency directly.

CALIFORNIA**Enforcement Agency**

California Department of Fair Employment and Housing

<https://www.dfeh.ca.gov/>

Toll Free Tel.: (800) 884-1684

COLORADO**Enforcement Agency**

Colorado Civil Rights Division

<https://ccrd.colorado.gov/>

Toll Free Tel.: (800) 886-7675

CONNECTICUT**Enforcement Agency**

Connecticut Commission on Human Rights and Opportunities

<https://portal.ct.gov/CHRO>

Toll Free Tel.: (800) 477-5737

FLORIDA**Enforcement Agency**

Florida Commission on Human Relations

<https://fchr.myflorida.com/>

Tel.: (850) 488-7082

ILLINOIS

Enforcement Agency

Illinois Department of Human Rights

<https://www2.illinois.gov/dhr/Pages/default.aspx>

Tel. (Chicago Office): (312) 814-6200

MARYLAND

Enforcement Agency

Maryland Commission on Civil Rights

<https://mccr.maryland.gov/Pages/default.aspx>

Toll Free Tel.: (800) 637-6247

MICHIGAN

Enforcement Agency

Michigan Department of Civil Rights

<https://www.michigan.gov/mdcr/>

Toll Free Tel.: (800) 482-3604

MISSOURI

Enforcement Agency

Missouri Commission on Human Rights

<https://labor.mo.gov/discrimination>

Toll Free Tel.: (877) 781-4236

NEW YORK

State Enforcement Agency

New York State Division of Human Rights

<https://dhr.ny.gov>

Toll Free Tel.: (888) 392-3644

New York City Enforcement Agency

New York City Commission on Human Rights

<https://www1.nyc.gov/site/cchr/index.page>

Tel: (212) 416-0197

VIRGINIA

Enforcement Agency

Office of Civil Rights, Virginia Office of the Attorney General

<https://www.oag.state.va.us/programs-initiatives/civil-rights>

Tel.: (804) 225-2292

9. RECORDS AND RETENTION

This policy is retained in ordinance with Maxar's Record Retention Schedule.

Record	Storage	Retention Time
Current Revision of Released Document and associated Approval Records	Soft Copy: PolicyTech Document Library	Retained until revised or obsolete
Down Revisions, Archive, and Obsolete documents.	Soft Copy: PolicyTech Archive Library	<p>Down Revisions, Archive and Obsolete documents are to be retained in accordance with the:</p> <ol style="list-style-type: none"> 1. Maxar Document Retention Schedule, if any 2. Default – 5 years from date of obsolescence. <p>In the event retention dates conflict, apply the longest retention period set forth in the Maxar Document Retentions Schedule or the Default (5 years from date of obsolescence).</p>