



# TELESAT CORPORATION

## Modern Slavery Report 2025

This Modern Slavery Report (the "**Report**") addresses the period January 1, 2025 to December 31, 2025 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)(the "Act"). This Report is made on behalf of Telesat Corporation and its subsidiaries, Telesat GEO Inc. and Telesat LEO ULC (collectively, "Telesat", also "we", "us" or "our").

### **1. Introduction**

As a leader in the global satellite industry, Telesat acknowledges that we have a role to play in helping to ensure that vendors in the supply chains that support our global satellite operations adhere to high ethical standards and take steps to prevent and mitigate the use of forced labour and child labour in the manufacture of products that may be supplied to us. This Report sets out the steps we have taken to reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Telesat or of goods imported into Canada by Telesat.

### **2. Our Business, Business Segments, and Supply Chains**

Telesat is a leading global satellite operator, providing its customers with mission-critical communications services since the start of the satellite communications industry in the 1960s. Telesat Corporation was incorporated under the *Business Corporations Act (British Columbia)* on October 21, 2020. We directly or indirectly own 100% of our operating subsidiaries, including Telesat GEO Inc. and Telesat LEO ULC. Telesat Corporation is a publicly traded company listed on both the TSX and the NASDAQ.

Background on satellite systems. A generic satellite system consists of a space segment and an earth segment. The "space segment" is comprised of the satellites and the Telemetry, Tracking and Control ("TT&C") systems and facilities used to control and monitor the satellites. The "earth segment" is made up of all of the communication earth stations and other devices that access operational satellites.

Geostationary or "GEO" satellites circle the earth from orbital locations approximately 22,300 miles (35,700 kilometers) above the equator. The speed at which they orbit

the earth corresponds to the speed of the earth's rotation. As a result, each GEO satellite appears fixed over a geographic area—and, in essence, “blankets” that area with its signals—and an earth station antenna located in that area can communicate continuously with a particular satellite if it is pointed to, and has an unobstructed view of, that satellite's orbital location.

Non-geostationary satellites operate in low earth orbit or “LEO”, with an altitude typically between 200 and 870 miles (325 to 1,400 kilometers). Unlike GEO satellites that operate in a fixed orbital location above the equator, LEO satellites travel around the earth at high velocities requiring antennas on the ground to track their movement.

Our GEO business. Telesat GEO Inc. operates our GEO business. Our GEO satellite fleet is comprised of 12 satellites and offers global satellite coverage with a concentration over the Americas. Our GEO satellite fleet and ground infrastructure provide a platform supporting (i) video distribution and direct-to-home (DTH) in North America, and (ii) connectivity satellite services for customers around the world for backhaul, corporate networks, maritime and aero services, and video distribution and contribution.

Our primary Satellite Control Center (“SCC”) is the hub for our GEO satellite-related activities and is located at our headquarters in Ottawa, Ontario. Our earth station in Allan Park, located northwest of Toronto, Ontario on approximately 65 acres of owned land, is the single point of contact for our GEO customers internationally and is also the main earth station complex providing Telemetry, Tracking and Control services for the satellites that we operate. In addition to the Ottawa headquarters and the Allan Park earth station, we operate a number of other earth stations to support our GEO business, located primarily in North America and a few other places around the globe.

Purchases of goods required to support our operations in Canada, including our headquarter operations and the activities undertaken at our SOC and Allen Park landing station are generally limited to items such as computers, small antennas, satellite modems, and networking equipment, which we procure from reputable suppliers based primarily in Canada and the United States.

Our LEO business. Our LEO business is organized under Telesat's indirect wholly-owned subsidiary Telesat LEO ULC. After decades of successfully operating our GEO business, Telesat is building what we believe will be one of the world's most advanced constellations of LEO satellites and integrated terrestrial infrastructure, called “Telesat Lightspeed”. We believe that Telesat Lightspeed has the potential to revolutionize global broadband internet connectivity and allow Telesat to rapidly and profitably grow its business.

In 2025, Telesat advanced steadily toward the launch of Telesat Lightspeed. Working closely with MDA Space, its prime satellite contractor, Telesat continues to advance the program from landing station site buildouts in Canada and abroad to executed development agreements and Critical Design Reviews (CDRs) completed or underway across all program segments. Our workforce grew by eighteen percent in 2025. Telesat will launch global Telesat Lightspeed service in 2028.

### **3. Our Policies**

As described in more detail below, our procurement activities and the supply chains that support them differ between our mature, well-established, and operational GEO business and our future LEO business. That said, Telesat has adopted a broad range of standards of conduct and procurement practices that will allow us to reduce the risk of forced or child labour across all business segments.

Telesat's Tone at the Top. Throughout Telesat's almost six decades as a leading global satellite service provider, its Board of Directors and senior management have fostered Telesat's commitment to setting an ethical tone at the top and engaging in ethical and socially responsible decision-making. They have adopted wide-ranging policies that embrace environmental, social and governance principles and created a heartfelt culture of integrity throughout the organization. Telesat's commitment is manifested through policies and protocols that embody ethical and socially responsible principles, including employee safety and well-being, respect for the law and human rights, fair and honest business practices, and conscientious and mutually beneficial engagement with the community and other stakeholders.

ESG Policy. Telesat's Board of Directors formally adopted an Environmental, Social & Governance (ESG) policy in November 2022 that was in force during the reporting period and is still in force to date. The policy articulates the Corporation's approach and commitments in the areas of business ethics and integrity, environmental health and safety, fair and honest treatment of stakeholders, employee relations, human rights and community investment. With respect to human rights, the policy states: "Telesat strives to work with governments, agencies, and other organizations to support and respect human rights within its sphere of influence. Telesat prohibits human rights abuses and strives to avoid engaging in any activity that violates those rights. Telesat strives to demonstrate respect for human dignity and rights in its relationships, including respect for cultures, customs and values of individuals and groups." The formal ESG policy is the capstone in Telesat's decades-long effort to develop and implement many longstanding policies and principles that advance ESG goals and commitments.

Code of Ethics. Telesat’s Code of Ethics articulates our unwavering commitment to conducting business with integrity, honesty, and respect, all while adhering to applicable laws, regulations, and policies. Our aim is to preserve Telesat Corporation’s reputation and prevent unethical behavior and wrongdoing. As demonstrated below in the context of our procurement activities, our commitment to the principles in the Code of Ethics resonates across every facet of our operations. The Code extends to all individuals associated with Telesat Corporation and its global subsidiaries—members of the Board, officers, employees, consultants, contractors, vendors and agents. Adherence to the Code of Ethics is a fundamental requirement for employment or service provision at Telesat. We hold our representatives to high standards of honesty and integrity. The Code outlines specific commitments across the workplace, marketplace, and community.

Employee-related Policies. Our desire that every individual in our supply chain should be employed legally and safely is rooted in the respect that we demonstrate for our own employees through our policies and practices:

Telesat’s Code of Ethics strictly prohibits “any discrimination or harassment, including on the basis of age, color, creed, disability, ethnic origin, gender, sex, marital status, family status, national origin or place of origin, political belief, race, ancestry, religion or creed, sexual orientation, gender identity, gender expression, citizenship status, military and/or veteran status or any other characteristics protected by law.” The Code prohibits workplace violence of any kind.

Telesat has adopted additional specific policies to further enhance workplace safety and employee well-being. Under the General Health & Safety Policy, the Corporation commits to providing and maintaining a safe and healthy working environment for all employees in compliance with legislative and acceptable industry requirements and to providing adequate training related to employees’ specific job requirements to eliminate foreseeable hazards.

Telesat has adopted a Workplace Harassment and Violence Prevention Policy that prohibits any work-related act of harassment by any employee of Telesat or any person conducting business with Telesat. The policy spells out a complaint process to protect, support and assist any person subjected to workplace harassment. Additionally, the policy prohibits any act of violence or threat of violence by any employee of Telesat as well as any customers, contractors and visitors.

Telesat's Health & Safety Policy Committee and its Workplace Health & Safety Committee meet regularly to identify and address corporate health and safety concerns, develop policies, develop and promote programs to educate and train employees, and monitor, maintain data and report accidents, injuries and health hazards in accordance with applicable legislation.

Procurement Policies. Telesat has adopted procurement policies intended to promote lawful and ethical conduct by its suppliers. Telesat's basic purchase order terms and conditions (see [www.telesat.com/terms](http://www.telesat.com/terms)) require suppliers to "comply with all the laws applicable to the supplier and to the supplies provided under this purchase order, including but not limited to applicable securities, health & safety, environmental, ethics, child and other labour laws." In addition, each supplier must agree "to comply and ensure that any subcontractors comply with the following Telesat policies: Anti-Bribery Policy, Code of Ethics, Disclosure Policy, Insider Trading Policy, and Whistleblower Policy."

In order to ensure that suppliers are reputable and inclined to comply with Telesat's procurement requirements, Telesat relies on "layers" of due diligence, depending on the vendor, that is performed prior to entering into a new or renewed business relationship with a vendor. These layers include some or all of the following:

- Individual Telesat employees self-assessing whom they wish to purchase products and services from, as per Telesat core policy;
- Selecting well-known established vendors with an international reputation for high reliability, corporate ethics, quality, and the ability to operate in all economic conditions;
- Requesting and reviewing commercially available risk reports (such as risk reports from Dun and Bradstreet) for new material vendors;
- Screening vendors from potential countries of concern against applicable sanctions and denied parties lists using a subscription third-party screening service; and
- Procuring in 2024 a tailored supply chain management tool to map and monitor supply chains against multiple risk factors including ESG, Cyber, Financial, Legal, Regulatory, Geopolitical, Catastrophic and other, using thousands of proprietary data points external to the user. It allows oversight of vendors or any other 3rd parties (it can be utilized for customers or other partners) down to 3rd tier connections exponentially increasing the depth of examination.

#### 4. Assessing Our Risk

This section discusses, as required by the Act, the parts of Telesat's business and supply chains that carry a risk of forced labour or child labour being used and the steps that Telesat has taken to assess and manage that risk.

Assessing and Managing Risks of Forced Labour and Child Labour in Telesat's GEO Business. As mentioned in the description of our GEO business, the amount and level of procurement of manufactured goods necessary to support the business on an ongoing basis is relatively low. Purchases of goods required to support our operations in Canada, including our headquarter operations and the activities undertaken at our SOC and Allen Park landing station are generally limited to items such as computers, small antennas, satellite modems, and networking equipment. We manage risks of forced labour or child labour being present in the supply chain by procuring such items, without exception, from reputable suppliers based primarily in Canada and the United States. We further minimize the risk by making all procurements subject to Telesat's terms and conditions, discussed above, which require compliance with applicable laws—expressly including, child and other labour laws—and Telesat's Code of Ethics.

Assessing and Managing Risks of Forced Labour and Child Labour in Telesat's LEO Business. Our LEO business is progressing although full construction, launch and post-launch operations of the Lightspeed constellation—and certain of the procurements associated therewith— will take place in the near future.

As part of the diligence required by our prospective lenders, in 2022, Telesat hired a well-known third-party consulting firm to undertake a human rights assessment of the Telesat Lightspeed project. In 2024, in order to ensure the accuracy and continued alignment with current project realities and lender expectations, Telesat engaged an independent project consultant firm to review and update the 2022 assessment, the key conclusions of which include the following:

- Telesat has robust policies and procedures that set high standards and expectations related to labour management.
- The Lightspeed Project facilities and project-related facilities reside within OECD "Designated Countries" and project partners are primarily expected to be located and operate in OECD countries. These countries have robust legislation and institutional capacity, definitive guidelines, due diligence recommendations, and associated provisions. Risks related to the rights of workers or affected communities directly or indirectly associated with the Project are expected to be reduced in these countries; and

- Telesat’s suppliers operate primarily in Canada and other OECD countries, and are required to comply with robust legislation to protect workers in these jurisdictions. Telesat’s agreements with these suppliers include requirements to comply with local regulations and a separate requirement to act in accordance with their country’s labour and safety employment laws.

Last year, MDA Space Ltd., Telesat’s principal satellite manufacturer for the Telesat Lightspeed program, filed its own Modern Slavery Report for the period January 1-December 31, 2024. In addition to documenting robust MDA’s policies and practices, the report states with respect to the risk of the existence of forced or child labor in MDA’s supply chains as follows: “With respect to our supply chain, our risk identification methodology consisted of an internal mapping assessment whereby we analyzed the countries on our supplier list from 2024 against the Global Slavery Index. Based on this risk assessment, we concluded that MDA Space does not directly source materials or services from suppliers located in countries reputed to have the highest prevalence of Modern Slavery. When conducting our risk assessment, we also cross-compared our suppliers with the Corruption Perceptions Index to determine whether any of our suppliers are located within any high-ranking countries. This initial mapping exercise led to a conclusion that MDA Space’s supply chain carries a low risk of Modern Slavery.” (p4 of the MDA report, which is available at MDA Space’s public website.)

## 5. Our Commitments

In order to reduce the risk of the occurrence of forced labour or child labour in our supply chains, Telesat will continue to implement policies and practices to assess and reduce such risks, including:

- In 2025, Telesat implemented an Environmental and Social Management System (ESMS) for the Telesat Lightspeed program. The ESMS has created a governance structure bringing together Telesat’s organizational capability, sound policies, risk assessment practices, and monitoring and reporting so that environmental, social, health and safety risks associated with the Lightspeed project are systematically identified, prioritized and mitigated.
- As part of its ongoing risk mitigation efforts, Telesat procured and is implementing:
  - A third-party supply chain risk management technology solution to enable it to assess vendors against multiple risk types, including ESG

risks such as forced and child labor, environmental impacts, concentration and poor corporate behavior; and

- A human rights complaint grievance mechanism for Telesat Lightspeed facilities.
- In the agreements with our primary Lightspeed satellite manufacturer and our agreements with Lightspeed landing station operators globally, the respective suppliers or facilities operators are required to comply with Telesat's environmental and social management plans for the project, which includes supplier commitments to ensure that products and services provided are not linked to severe human rights impacts. This is part of Telesat's ongoing plan to develop and implement effective contractor verification mechanism to address such risks.

Telesat's employee training program does not currently include dedicated training on forced and child labour.

## **6. Our Progress and Effectiveness**

Given the low risk of the use of forced labour and child labour in the supply chain supporting our existing GEO satellite business and the current state of implementation of our future LEO business, Telesat has not yet undertaken a formal assessment of our "effectiveness" in preventing and reducing risks of forced labour and child labour in its activities and supply chains. As the foregoing report demonstrates, however, Telesat has undertaken reasonable and appropriate diligence and risk assessment of its supply chain, and is implementing various tools to mitigate such risks. Telesat's implementation of an overarching ESMS means that Telesat is well-positioned to make such an effectiveness assessment, as appropriate, as the implementation of Telesat Lightspeed unfolds.

## **7. Approval & Signature**

In accordance with paragraph 11(4)(b)(ii) of the Act, this Report was approved by Telesat's Board of Directors on May 1, 2026 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at <https://www.telesat.com/investor-relations/investor-relations-resources/>.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Telesat Corporation. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Telesat Corporation.



**Christopher S. DiFrancesco**

**Vice President, General Counsel and Secretary**

**May 22, 2025**

This Report contains statements that are not based on historical fact, including policies applicable to Telesat's future LEO system, future effectiveness assessments, and future due diligence efforts among others. When used herein, statements which are not historical in nature or which contain words "will", "may", "prepared to", "estimate", "opportunity", "subject to" or similar expressions, are forward-looking statements. The actual outcome of such statements may differ materially from the expectations expressed or implied in the forward-looking statements as a result of known and unknown risks and uncertainties. All statements made in this Report are made only as of the date set forth at the beginning of this Report. Telesat undertakes no obligation to update the information disclosed in this Report in the event facts or circumstances subsequently change after the date of this Report.

These forward-looking statements are based on Telesat's current expectations and are subject to a number of risks, uncertainties and assumptions. These statements are not guarantees of future performance and are subject to risks, uncertainties and other factors, some of which are beyond Telesat's control, are difficult to predict and could cause actual outcomes to differ materially from those expressed or forecasted in the forward-looking statements. Known risks and uncertainties include, but are not limited to, (1) Supply chain complexities that could result in lower visibility in monitoring and addressing risks of forced and child labour for lower tier suppliers; (2) availability of reputable suppliers and vendors; (3) Insufficient budget, staff, or expertise dedicated to forced and child labour risk mitigation; (4) regulatory risks, such as the effect of industry and government regulations that affect Telesat; (5) changes in political stability, regulations, or enforcement mechanisms in countries where Telesat vendors operate or sources from; and (6) other risks. The foregoing list of important factors is not exhaustive. Readers should review the other risk factors discussed in Telesat's annual report on Form 20-F for the year ended December 31, 2025, that was filed on March 17, 2026, with the United States Securities and Exchange Commission (SEC) and the Canadian securities regulatory authorities on the System for Electronic Document Analysis and Retrieval + (SEDAR+) and may be accessed on the SEC's website at [www.sec.gov](http://www.sec.gov) and SEDAR+'s website at [www.sedarplus.ca](http://www.sedarplus.ca).]