Economic Sanctions Laws Compliance Policy

Policy

Section 1 Overview

Telesat Corporation, and all subsidiaries and branches (collectively, the "Company") is committed to doing business consistent with the highest ethical standards and legal requirements everywhere we operate and expects all employees and other persons acting on the Company's behalf to uphold this commitment. As a company incorporated in Canada and operating internationally, the Company, including all of its officers, directors and employees ("Company Personnel") and all agents, third-party representatives, lead generators and other intermediaries acting on behalf of the Company ("Third Parties" and, together with Company Personnel, "Covered Persons") are required to comply with Canadian and U.S. Sanctions, and other sanctions as applicable. The Company is committed to compliance with all applicable laws and regulations, including those related to economic sanctions (collectively, "Sanctions").

Consistent with this commitment, the Company has adopted this Economic Sanctions Laws Compliance Policy (the "Policy"), which outlines the Company's responsibilities to comply with applicable economic sanctions laws and regulations of Canada, the United States and any country in which the Company operates. The pages that follow provide a general guide to economic sanctions laws compliance but do not address every potential scenario that may implicate issues bearing on compliance with this Policy. Therefore, any persons who have any questions concerning the requirements of this Policy should consult with the Company's General Counsel.

This Policy is focused on compliance with Sanctions, and requires that all Covered Persons:

- Not to purchase or sell any products or provide any services to, or otherwise do any business involving, countries or territories subject to U.S. Comprehensive Sanctions (as defined below) or similar Canadian sanctions, unless permitted under applicable Sanctions and approved by the Company's General Counsel;
- Not engage, directly or indirectly, in any business with persons (*i.e.* individuals or entities) that are designated on U.S., Canadian or other applicable restricted party lists, or with the property of those persons; and
- Comply with all Sanctions as are applicable to the Company.

Any exceptions to this Policy must be consistent with applicable laws and will be made only with the explicit written approval of the Company's General Counsel.

Violations of this Policy may result in civil and criminal liability for the Company and individuals and appropriate disciplinary actions, including possible termination of employment.

Adopted: September 11, 2026

If you have any questions about your obligations to comply with Sanctions and this Policy, or if you suspect that any violation has occurred, you should contact a member of the Company's Legal Department.

Section II Scope

This Policy applies to everyone employed by the Company or retained by the Company, including all Covered Persons.

Section III Policy

Overview of Sanctions

The U.S. Department of the Treasury, Office of Foreign Assets Control ("OFAC") and Global Affairs Canada ("GAC")[1] are the primary government agencies in, respectively, the United States and Canada, responsible for administering Sanctions, which are laws and regulations that restrict business with certain countries, individuals, and entities in order to advance specific foreign policy and national security priorities.

OFAC maintains four types of sanctions programs, as follows:

1. **Comprehensive Sanctions.** OFAC currently administers comprehensive economic sanctions against **Cuba, Iran, North Korea, and the Crimea, so-called Donetsk People's Republic, and so-called Luhansk People's Republic regions of Ukraine.**[2] U.S. persons (defined as U.S. citizens, U.S. lawful permanent residents, persons located in the United States, and U.S.-incorporated entities and their non-U.S. branches) cannot engage in **any** transactions or dealings with any counterparty located in a comprehensively sanctioned country, directly or indirectly, unless authorized under U.S. law. In addition to the above programs, OFAC maintains an embargo on the **Government of Venezuela**, which, when combined with the other sanctions on Venezuela described below, makes Venezuela a country subject to nearly comprehensive economic sanctions.

   With respect to all issues concerning trade with Cuba (which is subject to Comprehensive U.S. Sanctions, as noted above) you must consult with the Company's General Counsel because of conflicting obligations imposed under Canadian and U.S. law.

[1] U.S. and Canadian sanctions regimes largely overlap, although there are some important differences, including with respect to the persons or jurisdictions targeted by them.

[2] This list of comprehensively sanctioned countries is up to date as of July 27, 2026.

2. **List-Based Sanctions.** OFAC sanctions target entities and individuals designated on OFAC's sanctions lists, including the List of Specially Designated Nationals and Blocked Persons (the "SDN List"). [3] **Importantly, OFAC considers any entity 50% or more owned, directly or indirectly and in the aggregate, or controlled by individuals or entities identified on the SDN List to be "blocked" and subject to the same restrictions as SDNs, even if the entity is not itself designated on the SDN List.** OFAC's list-based country sanctions currently target SDNs relating to the following countries and regions: **Afghanistan, the Balkans (*i.e.* Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia), Belarus, Burma (Myanmar), Central African Republic, Democratic Republic of the Congo, Ethiopia, Hong Kong, Iraq, Lebanon, Libya, Mali, Nicaragua, Russia, Somalia, South Sudan, Sudan, Syria, Ukraine, and Yemen.** These jurisdictions are generally higher-risk jurisdictions for sanctions compliance.

3. **Sectoral Sanctions.** These sanctions target specific sectors of a country's economy. Currently, the primary sectoral sanctions that OFAC imposes relate to the **Belarus, Burma (Myanmar), Russia, Ukraine, and Venezuela** sanctions programs. Designated persons under sectoral sanctions are added to OFAC's Sectoral Sanctions Identifications ("SSI") List. Unlike with persons added to the SDN List, U.S. persons may engage in most business with persons on the SSI List, because only certain types of dealings are prohibited.

4. **Secondary Sanctions.** Secondary sanctions target non-U.S.-person individuals and entities that provide support for sanctioned jurisdictions, entities, or individuals. Currently, secondary sanctions mainly target certain sectors and activities related to **Iran, North Korea, Russia, and Venezuela.**

Canada maintains both autonomous sanctions measures and measures that give effect to United Nations sanctions. These take various forms, including: embargoes on arms and related materials; dealings bans on individuals and entities; export and import restrictions; financial prohibitions; and, technical assistance prohibitions. Currently, jurisdictions subject to Canadian sanctions are: Belarus, Burma/Myanmar, Central African Republic, China, Democratic People's Republic of Congo, Guatemala, Haiti, Iran, Iraq, Libya, Moldova, Myanmar, Nicaragua, North Korea, Russia, Somalia, South Sudan, Sri Lanka, Sudan, Syria, Ukraine, Venezuela, Yemen, and Zimbabwe.

[3] The SDN List is available on OFAC's website at https://www.treasury.gov/resource-center/sanctions/sdn-list/pages/default.aspx and is searchable here. Other OFAC sanctions lists also are available online at https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/consolidated.aspx. A consolidated list that includes all OFAC sanctions list, as well as other U.S. restricted party lists, is available at https://legacy.export.gov/csl-search#/.

Canada also maintains sanctions with respect to Terrorist Entities, and Extremist Settler Violence in the West Bank, Gaza, and East Jerusalem.[4]

Notably, U.S. and Canadian persons are prohibited from providing assistance of any kind that would facilitate transactions with sanctioned countries or persons by third parties, including referrals of sales opportunities, approvals, or brokering. Put differently, a U.S. or Canadian person may not assist a third party in performing transactions with sanctioned countries or persons, even if that third party is able to do so under the laws that apply to the third party.

Sanctions Compliance

A. The Company will not provide services to or engage in any business in or with countries, territories, entities, or individuals targeted by applicable Sanctions, whether directly or indirectly, except to the extent not prohibited by such Sanctions or permitted under all applicable laws.

B. The Company's General Counsel and Legal Department will be responsible for ensuring all such transactions are only conducted if permitted under applicable Sanctions.

C. If Company Personnel or Third Parties become aware of business in a jurisdiction subject to comprehensive economic sanctions or with a person located in such a jurisdiction, they should **raise the conduct to the Company's General Counsel immediately**.

D. Company Personnel or Third Parties should exercise heightened caution when engaging in business involving a higher-risk jurisdiction, as listed in **Appendix A**.

E. Due diligence shall be performed on all potential new Third Parties (*e.g.*, agents, suppliers, lead generators, vendors, employees, contractors, and other business partners).

    i. Enhanced due diligence will be taken with respect to third parties located, incorporated, or operating in the higher-risk jurisdictions listed in **Appendix A** prior to on-boarding and periodically thereafter to confirm that such parties (and their owners, where applicable) are not the target of Sanctions, and to confirm that such business or engagement does not

[4] The Consolidated Canadian Autonomous Sanctions List maintained by Global Affairs Canada, is a searchable list of individuals and entities listed subject to sanctions measures under the principal Canadian autonomous sanctions laws. However, it is not always fully up-to-date.

involve any countries or parties targeted by Sanctions or export restrictions.

ii. The Company's Global Trade Compliance will ensure screening all Third Parties against the SDN List, Canadian sanctions lists, and other applicable restricted party lists at the time of inquiry to confirm whether such parties are the target of Sanctions, as outlined in the *Restricted Party Screening Procedures*, as outlined in **Exhibit A**.

iii. All Sanctions screening activity shall be documented and maintained to ensure transparency and accountability.

F. All Company Personnel are responsible for ensuring that appropriate diligence has been conducted prior to providing any services to or engaging in any business with Third Parties or the Company's customers/applicants in the higher-risk jurisdictions listed in **Appendix A**. Company Personnel should raise any questions or red flags to the Company's General Counsel.

G. If a country or person subject to Sanctions may be involved in a potential transaction or other agreement, do not proceed. **Report the situation to the Global Trade Compliance team.**

H. The Company will distribute this Policy to all Company Personnel and Third Parties. Company Personnel may be required to complete training on compliance with Sanctions, in connection with this Policy. All Covered Persons are required to read, understand, and comply with this Policy.

I. The Company's Legal Department is responsible for promptly updating the Policy upon any material changes to Sanctions Laws and recirculating to all Company Personnel and Third Parties.

Section IV Additional Guidance & Compliance

This Policy does not address every aspect of compliance with Sanctions Laws. Given the complex and fact-specific nature of the issues that can arise under Sanctions Laws, Covered Persons involved in transactions that may involve risk under Sanctions Laws or interpretation of the issues set forth in this Policy, should promptly seek guidance from the Legal Department when questions arise.

In addition to Sanctions Laws, the Company is committed to complying with all applicable anti-money laundering laws ("AML Laws"). Certain "red flag" indicators that may be considered suspicious under AML Laws include:

A. the presentation of identifying documents that appear forged, altered, or otherwise invalid;

B. multiple persons or accounts that share the same identifying information but otherwise appear unrelated;

C. accounts funded by one individual or entity and then transferred to an apparently unrelated individual or entity; and

D. financial activity that generally appears inconsistent with a Third Party's stated objectives or financial circumstances, or the Company's understanding of the Third Party's organization.

Company Personnel who suspect that any money laundering or other unlawful conduct is occurring should report it *immediately* to the Company's General Counsel. Company Personnel may **not** inform any other party, including the Third Party in question, regarding any such suspicion, as doing so could be a violation of AML Laws.

Section V Violations

Adherence to this Policy and its procedures is very important. Violations of Sanctions may result in civil and criminal penalties, secondary sanctions, and reputational damage.

The Company will address violations of this policy consistent with its human resource practices, including possible disciplinary action.

Section VI Questions and Reporting

Any Company Personnel or Third Parties who have knowledge of, or reason to suspect, a violation of this Policy must **contact the** Company's **General Counsel *immediately***.

Failure to report known or suspected violations of Policy may result in disciplinary action.

Reports of known or suspected violations that are made honestly and in good faith will not result in adverse employment-related action or retaliation.

EXHIBIT A – RESTRICTED PARTY SCREENING PROCEDURES

In accordance with our Economic Sanctions Compliance Policy and our risk-based approach to compliance, the Company will screen all Third Parties (*e.g.*, agents, suppliers, lead generators, vendors, and other business partners) and the Company's customers/applicants located in comprehensively sanctioned countries or the higher-risk jurisdictions listed in **Appendix A** (each an "International Third Party") prior to enrollment to ensure that such dealings do not involve or otherwise relate to any countries or parties subject to relevant economic sanctions.

The Company, including its management and employees, may not:

- Engage any customers in, or otherwise do any business involving the following countries or regions: **Cuba, Iran, North Korea, Syria, and the Crimea, so-called Donetsk People's Republic, and so-called Luhansk People's Republic, Kherson and Zaporizhzhia regions of Ukraine**, unless permitted under applicable Sanctions and approved by the Company's General Counsel;

- Engage in any business, directly or indirectly, with persons or entities that are designated on Canadian, U.S. and other relevant international terrorism and restricted party lists; or

- Otherwise engage in sales or transactions that violate Sanctions.

Whom to Screen

The Company's General Counsel is responsible for ensuring screening is conducted on all International Third Parties located, incorporated, or operating in the higher-risk jurisdictions listed in **Appendix A** against the SDN List and other applicable restricted party lists to confirm whether such parties are the target of Sanctions.

For International Third Parties with addresses in higher-risk jurisdictions (*i.e.*, jurisdictions subject to comprehensive, list-based, sectoral, or secondary sanctions, as well as China), screening should also be conducted on owners and senior management of International Third Parties, to the extent the Company is aware of such owners and senior management, to ensure that such parties are not owned fifty percent or more, directly or indirectly and in the aggregate, by parties designated on the relevant U.S. government economic sanctions and export controls restricted parties lists.

For purposes of these procedures, those lists include, but are not limited to, OFAC's List of Specially Designated Nationals and Blocked Persons and Sectoral Sanctions Identification List, BIS' Entity List, and the Consolidated Canadian Autonomous Sanctions List (collectively, "Sanctions Lists"). The Company's General Counsel may designate an employee or a group of employees in the Company's Legal Department, Global Trade Compliance Department, and Procurement and Global

Supply Chain Department (the "Screening Team") who will be responsible for identifying and performing this screening exercise on International Third Parties.

When to Screen

Screening by the Screening Team will occur before the Company conducts or proposes to conduct any business with a new International Third Party, such as entering into a contract with an International Third Party or enrolling an International Third Party in one of its programs.

A. Resolving Questions

When warranted, the General Counsel will conduct a review to determine whether there is a valid match. As noted above, no business may be conducted with an International Third Party before the General Counsel has confirmed that any possible hits have been "cleared."

The Screening Team member inputting an International Third Party is responsible for creating and maintaining records of all screenings conducted and all activities undertaken to "clear" potential matches using the template provided at **Appendix B** below.

Questions?

If you have any questions about these procedures, please contact the Company's General Counsel.

APPENDIX A – HIGHER RISK JURISDICTIONS

- Afghanistan
- Balkans (i.e., Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia)
- Belarus
- Burma/Myanmar
- Central African Republic
- China (including Hong Kong SAR and Macau)
- Cuba
- Democratic Republic of Congo
- Ethiopia
- Guatemala
- Haiti
- Israel (West Bank)
- Iraq
- Iran
- Lebanon
- Libya
- Mali
- Moldova
- Nicaragua
- North Korea
- Russia
- Saudi Arabia
- Somalia
- South Sudan
- Sri Lanka
- Sudan/Darfur
- Syria
- Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia regions of Ukraine
- United Arab Emirates
- Venezuela
- Yemen
- Zimbabwe