



# TELESAT CORPORATION

## Modern Slavery Report 2023

This Modern Slavery Report (the "**Report**") addresses the period January 1, 2023 to December 31, 2023 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 Canada and Telesat LEO Inc. (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. Telesat Corporation is the general partner of Telesat Partnership LP, which was formed under the *Limited Partnership Act (Ontario)* on November 12, 2020. We directly or indirectly own 100% of all of our operating subsidiaries, including Telesat Canada and Telesat LEO, Inc. 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.

The non-geostationary orbit includes satellites operating 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 Canada operates our GEO business. Our GEO satellite fleet is comprised of 15 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 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 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, Inc. After decades of successfully operating our GEO business, Telesat commenced the development of 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.

Telesat's suppliers for Lightspeed operate primarily in Canada and other OECD countries. In 2023, Telesat contracted a Canadian space technology company as prime satellite manufacturer for the Telesat Lightspeed LEO constellation. Telesat will launch global Telesat Lightspeed service once the first 156 satellites are in orbit, which is expected to occur in 2027. Telesat will also procure ground-based infrastructure consisting of landing stations and terrestrial network segments. As of this time, Telesat has only selected landing stations and terrestrial segment networks in Canada, and is in the process of determining the location of landing stations and terrestrial segment networks outside of Canada.

### **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 in-development LEO business. The risk profile for forced labour or child labour in the supply chains of these two business segments also differs because so much of the procurement activity for the LEO business is to be undertaken in the future. 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 in Telesat's Lightspeed supply chain.

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; and
- Screening vendors from potential countries of concern against applicable sanctions and denied parties lists using a subscription third-party screening service.

#### 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. As mentioned above, this risk differs between Telesat's GEO and LEO businesses because of the unknowns inherent in future procurement activity.

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 in development, with the future construction, launch and post-launch operations of the Lightspeed constellation—and the procurements associated therewith – to take place within the next few years. With our selection of a Canadian company as our primary satellite manufacturer and the finalization of our financing arrangements, we are now poised to begin to execute the Telesat Lightspeed program.

In anticipation of these activities, and 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. Some of the key conclusions of the assessment were:

- 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 all project partners are assumed 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.

- 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.
- With respect to the risks within Telesat's upstream supply chain, Telesat publicly discloses the companies its contracts with for satellite manufacturing, assembly and transportation, and Telesat's agreements with contractors include requirements to comply with local regulations and to act in accordance with their country's laws.

## 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 the procurement policies described earlier, including use of reputable suppliers, appropriate diligence, and requirements that suppliers comply with Telesat's Code of Ethics and applicable law, including child labour law and other labour law. Recognizing that the execution of the Telesat Lightspeed constellation will present a future expansion of our supply chain, and with it, concomitant risk of the possible use of forced labour or child labour by indirect suppliers, Telesat has laid the ground work to undertake additional diligence and impose supplemental requirements on suppliers to mitigate such risk. In the agreement with our primary satellite supplier for Lightspeed and our model agreement with landing station operators, for example, Telesat requires the agreement of the respective supplier or facilities operator that they will comply with Telesat's environmental and social management plans for the project, which may include supplier commitments to ensure that products and services provided are not linked to severe human rights impacts through supply chains.

We are aware that it may be necessary to implement additional employee training in order to enhance our monitoring and diligence efforts to reduce supply chain risks. Telesat has already established successful employee education programs to raise awareness of the imperative of lawful and ethical conduct. Our employees, for example, must acknowledge each year that they have read and understand the Code of Ethics. In 2023, Telesat arranged for third party experts to provide training to our employees to help them better understand our workplace anti-harassment and anti-violence policies so that they can easily recognize and flag any work-related acts of harassment or violence. We also reinforce the importance of workplace safety

through our new-hire orientation program, which details safety expectations and policies.

As Telesat's employee training does not currently include dedicated training on forced and child labour, Telesat will need to assess whether and how employee training efforts may be developed and implemented to manage supply chain risks related to the use of forced labour and child labour. Telesat did not identify any instances of forced or child labour in our operations or supply chain during the reporting period. Accordingly, we did not implement any measures to remediate forced or child labour or to remediate the loss of income to the most vulnerable families arising from such measures.

## **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 undertaken specific actions to assess our "effectiveness" in preventing and reducing risks of forced labour and child labour in their activities and supply chains. As the foregoing report demonstrates, however, Telesat has undertaken reasonable and appropriate diligence and risk assessment of its supply chain, including by undertaking a human rights assessment of the Telesat Lightspeed project in 2022. We believe that we will be 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 7, 2024 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 [www.telesat.com/modern-slavery-report](http://www.telesat.com/modern-slavery-report).

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 30, 2024**

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, 2023, that was filed on March 28, 2024, and its 6-K that was filed on March 28, 2024, 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.com](http://www.sedarplus.com).]