

## **GILAT POLICY PROHIBITING BRIBERY AND CORRUPTION**

### **Introduction**

1. As set forth in the **Code of Ethics**, Gilat Satellite Networks Ltd. (“Gilat” or the “Company”) is committed to act ethically and in compliance with applicable laws at all times. As part of this commitment, it is the fundamental policy of Gilat to prohibit the giving or receiving of improper payments or other benefits for commercial advantage.
2. This policy applies to all Gilat directors, officers and employees (together, “Employees”), wherever located, with respect to their activities on behalf of the Company. This policy also applies to business partners, including any joint venture partners, agents, representatives, sub-contractors, consultants and any other third parties with which Gilat agrees to collaborate and who engage or deal directly with Gilat’s customers (hereinafter collectively referred to as “Business Partners”).
3. The purpose of this policy is to ensure that all Employees and Business Partners of Gilat understand the requirements of all applicable anti-corruption laws.
4. Employees should not take any actions for the purpose of evading these requirements. For example, an employee should not ask or otherwise use a third party to do anything that Gilat is forbidden to do by this policy or applicable anti-corruption laws.

### **General Requirements to Prevent Bribery and Corruption**

5. As stated in the **Code of Ethics**, you may not directly or indirectly make, promise, approve, authorize or offer to give to anyone – or accept or solicit from anyone – anything of value if the purpose is to improperly induce the recipient to take (or to refrain from taking) action that would bestow a commercial benefit or advantage on Gilat, its affiliates or any other party.
6. The phrase “anything of value” is broadly defined and includes, but is not limited to, cash payments, gifts, business entertainment/hospitality, sponsored travel, political contributions and charitable donations.
7. It is clarified that modest and reasonable gifts are allowed provided that the gift is offered or given under widely accepted and customarily practiced circumstances in the relevant region, and that it is not made corruptly in return for official acts or omissions.
8. Giving things of value to family members, close associates or favored organizations of business partners, potential business partners or Government Officials (defined below) should follow the same limitations set forth for gifts, entertainment and hospitality generally, as such actions may be interpreted as attempts to evade these rules.

### **Government Officials**

9. While it is the policy of Gilat to prohibit bribery of all individuals (in both the private and public sectors), interactions with Government Officials must be monitored especially closely due to the increased risk for violations of applicable anti-corruption laws. Bribery of Government Officials is against the law in every country and often carries criminal penalties for both the employee and the company. For that reason any financial or business dealings, and any gifts or

entertainment/hospitality, involving such persons will be scrutinized with particular care, both by Gilat and by people outside the company.

10. In addition, many countries, including the United States, Israel and the United Kingdom, among others, have laws against the bribery of Government Officials in countries other than their own. Therefore, it is important to remember that any such bribe may, under certain circumstances, create problems for you and Gilat in more than one legal jurisdiction. Accordingly, all interactions with government officials should be consistent with this policy in order to avoid any appearance of impropriety on behalf of Gilat.
11. For the purposes of this policy, a “Government Official” is:
  - (a) any officer or employee of a government or any department, agency or instrumentality thereof (which includes a government-owned or government-controlled state enterprise) or of a public international organization, such as the World Bank and UN related organizations; or
  - (b) any person acting in an official capacity for or on behalf of a government or government entity or of a public international organization, any political party or party official or any candidate for political office (including, for example, consultants who hold government positions, employees of companies owned or controlled by governments, civil servants, administrative and judicial officers, political candidates and members of the military); and
  - (c) family members and close personal friends of any of the foregoing, even if they are not otherwise associated with a government or public office.

### **Employee Responsibilities In Support of This Policy**

12. The corporate books and records of Gilat must fairly, accurately and completely reflect Company transactions and activities, including the nature and purpose of the transaction or activity. No false, inaccurate or incomplete entry may be made in our books or records for any reason. Accounting and finance personnel, at the direction of the Controller, will confirm that Gilat books and records meet this requirement, through periodic reviews and other means.
13. To promote this Policy, Gilat requires that (i) all directors, officers, senior managers (including all finance personnel with authority to approve payments), and other business unit heads (collectively, “Gilat Senior Personnel”), and (ii) all employees who commercially lead engagements with Business Partners or customers (such persons collectively referred to as “Gilat Representatives”) undergo compliance training when and as determined by Gilat.
14. In addition, to ensure that we continue to enjoy a reputation for integrity and fairness in conducting business, Gilat Senior Personnel and Gilat Representatives must make sure that this Policy is clearly understood and followed by others acting on behalf of Gilat, including Business Partners.
15. Participation in, and adherence to, the principles and requirements set out in this Policy will be elements of each employee’s annual evaluation and will affect decisions concerning compensation, promotion and retention. Employees who violate this policy are subject to

disciplinary action, up to and including dismissal. Business Partners who violate this Policy are subject among other things to termination of all commercial relationships with Gilat.

16. Any suspected or actual violations of this Policy must be reported. Reports may be made to your supervisor, the Company Internal Auditor or the Audit Committee through the "Reporting of Suspected Misconduct" page at the Company's intranet website.
17. Any such report may be made anonymously. Under no circumstances will you be subject to retaliatory actions for reporting in good faith a suspected or actual violation. No one in the Company will be allowed to retaliate against you, and attempts to do so will be subject to disciplinary action.
18. Any questions regarding this Policy can be raised with your supervisor, the Internal Auditor, the General Counsel or the Audit Committee