



Policy, Supplier Code of Conduct

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Rev: A

POLICY

Supplier Code of Conduct

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1 Commitment to Integrity

Gilat Satellite Networks Ltd. and its affiliated entities (“**Gilat**”) uphold the highest standards of integrity and social responsibility across all areas of their business activities. In line with this commitment, Gilat expects its Suppliers (as defined below) to fully embrace and reflect these same principles.

This Supplier Code of Conduct (“**Code**”) sets forth the core values, minimum standards, and specific obligations that Suppliers must observe when conducting business with Gilat.

2 Scope and Applicability of the Code

This Code applies to all entities that supply Gilat with goods and/or services (hereinafter referred to as “**Supplier/s**”). These may include organizations that provide support services or goods directly to Gilat without interacting with Gilat’s customers such as vendors, landlords, consultants, financial institutions, or travel providers as well as those that operate in direct contact with Gilat’s customers in accordance with Gilat’s instructions.

Suppliers are expected to communicate the principles of this Code to their employees, affiliates, subcontractors, agents, group companies, and any other representatives, vendors or entities involved in delivering goods or services to Gilat on behalf of the Supplier or under its instructions (“**Supplier’s Personnel and Representatives**”), and to actively monitor compliance. Suppliers are also required to promoting these standards throughout their entire supply chain.

3 Global Compliance and Legal Standards

As a company operating in a global marketplace, we engage with various social customs, rules and regulations, cultures, and laws. We are committed to complying with all applicable laws in every jurisdiction where we operate, and we expect our Suppliers to adhere to the same standards.

This Code is not intended to replace existing norms. On the contrary, it is designed to reinforce and respect them, ensuring that our Suppliers implement and enforce these standards with integrity and diligence.

In cases where local law or regulation conflicts with this Code, the respective law or regulation should take precedence. However, the Supplier is required to promptly notify Gilat of any such conflict through the communication channels outlined in Section 7, so that the matter can be appropriately reviewed and addressed.

4 Gilat's Core Values and Principle

The principles outlined in this Code are based on Gilat's core values and ethical standards, which stem from the company's primary internal policies and procedures. These include, but are not limited to:

- ✓ **Corporate Governance Guidelines**
- ✓ **Code of Ethics**
- ✓ **Policy Prohibiting Bribery and Corruption**
- ✓ **Conflict Minerals Policy**
- ✓ **Privacy and Data Protection Practice**
- ✓ **Sustainability and Environmental Practice**
- ✓ **Global Human Rights and Fair Employment Policy**

Collectively referred to as the “**Policies**” these documents establish the ethical framework and compliance expectations that guide Gilat's business activities. This Code is intended to complement, not replace, the Policies and serves to reinforce the values and principles they promote.

Below is a summary of these values, along with principles and additional standards specifically applicable to Suppliers. Suppliers are encouraged to review the relevant policies available on [Gilat's official website](#) (including the ones that are available at [Corporate Responsibility - Gilat](#)) for more comprehensive information.

4.1. Ethical Conduct and Corporate Responsibility

Gilat is dedicated to operating with integrity, fairness, and a deep respect for human dignity. This section presents the essential ethical expectations for Suppliers, reflecting Gilat's enduring commitment to principled business practices.

➤ **Human Rights and Fair Labor Practices**

In line with [Gilat's Global Human Rights and Fair Employment Policy](#), and as part of its commitment to ethical conduct and respect for human dignity, Gilat supports measures to oppose human trafficking and modern slavery in both its human resources activities and throughout its supply chain. Suppliers are expected to comply with all applicable human rights and labor laws; treat all individuals they engage with in connection with Gilat with dignity, respect for human rights, and to adherence to fair labor practices such as prohibiting child labor and forced labor, safeguarding employees' freedom of association, and ensure fair, safe working conditions among other essential protections. Gilat conducts, from time to time, due diligence to identify and address risks of human trafficking and modern slavery within its supplier chain, may request Suppliers to demonstrate compliance, and reserves the right to audit Suppliers and their facilities. Suppliers must

communicate these standards throughout their organizations and supply chains and promptly report actual or suspected violations.

➤ **Non-Discrimination. Diversity**

Gilat promotes a multicultural and inclusive business environment, firmly believing that diversity and equality empower individuals and drive organizational success. We value the diverse perspectives brought by individuals from different backgrounds. Suppliers are expected to uphold these values by prohibiting any form of discrimination based on race, color, gender, age, sexual orientation, ethnicity, religion, family status, political affiliation, disability, or other protected characteristics in accordance with applicable laws.

Furthermore, Suppliers are encouraged to foster equal opportunities and actively support the recruitment and integration of people from underrepresented communities. This includes promoting fair labor practices and respecting the dignity and rights of all individuals involved in delivering goods or services to Gilat.

➤ **Harassment Prevention**

All forms of inappropriate behavior and harassment including those based on age, disability, race, religion, sex, sexual orientation, or gender identity are strictly prohibited. Suppliers are expected to always uphold this standard of conduct.

Sexual harassment, including unwelcome advances, requests for favours, or any verbal or physical conduct of a sexual nature, will not be tolerated in any business interaction.

➤ **Confidentiality**

Suppliers must respect and safeguard the confidentiality of all proprietary information disclosed during their engagement with Gilat. This obligation extends to intellectual property - including trade secrets, patents, trademarks, and copyrights as well as any non-public information related to Gilat's business, financials, marketing strategies, human resources, technical operations, administrative processes, or any other sensitive data.

Unauthorized use or distribution of such information is strictly prohibited and violate the company Policies, as well as applicable laws, potentially resulting in civil or criminal liability.

➤ **Anti-Bribery and Corruption**

Gilat conducts business with integrity and in full compliance with anti-bribery and anti-corruption laws across all jurisdictions. Suppliers are expected to adhere to the same standards and maintain a zero-tolerance approach to corruption.

Gilat is subject to the U.S. Foreign Corrupt Practices Act (FCPA), Israeli Penal law, and other global regulations (ABC Laws). All Suppliers must comply with these ABC Laws and with Gilat's Global Anti-Bribery and Anti-Corruption Policy.

➤ **Privacy and Data Protection Practices**

Gilat is committed to respecting privacy rights of individuals whose personal data we collect, process or store in the course of our business operations, and implements appropriate technical and organizational security measures to protect our systems and data against unauthorized access, loss or misuse, all in accordance with applicable data protection laws and regulations that apply to us in the territories that we operate in.

We expect our Suppliers to uphold the same high standards of privacy and data protection, and to ensure that their operations, interactions and services or work they render to Gilat do not compromise these standards.

The Suppliers shall comply with all applicable data protection and privacy laws and regulations in the jurisdictions in which they operate and with [Gilat's minimum information security requirements from Suppliers](#), and shall ensure that their subprocesses and their entire supply-chain comply with equivalent privacy and security standards.

Gilat may, from time to time, conduct periodic monitoring and audit activities to assess compliance with its privacy and data protection practices across its operations. Suppliers are expected to cooperate fully with these initiatives, and provide all necessary access, support and documentation. These obligations are supplementary and do not replace or limit any other obligations the Supplier may have under existing agreements or applicable data protection laws or regulations.

➤ **Sustainability and Environmental Practice**

Gilat is committed to protecting the environment and addressing climate change as part of its broader responsibility to the global community. We strive to act sustainably across all aspects of our operations, products, and services, continuously improving our environmental performance and deepening our knowledge to go beyond compliance. Our goal is to become a leader in environmental sustainability, and we view our Suppliers as essential partners in this journey.

We expect all Suppliers to comply with applicable environmental laws, regulations and standards, as well as with Gilat's environmental practices and policies, as we issue from time to time. Suppliers are encouraged to implement environmental management systems (e.g., ISO 14001 or equivalent) and to adopt sustainability practices that reduce environmental impact, improve resource efficiency, and support long-term sustainability.

We may conduct periodic assessments of selected Suppliers to evaluate their environmental and sustainability practices. Such assessment may include certifications and compliance with specific standards and requirements. These evaluations help identify areas for improvement and ensure alignment with our sustainability goals. Our Suppliers and their respective supply chain are considered an integral part of our quality and environmental systems, and we expect active collaboration in transparency in maintaining high environmental standards.

4.2. Integrity in Business Interactions



The following sections outlined the expected conduct of Suppliers in their business activities with Gilat. These standards are essential to fostering responsible, lawful, and transparent collaboration across all interactions and transactions.

➤ **Conflicts of Interest**

Suppliers must proactively avoid any actual or perceived conflicts of interest in their business relationship with Gilat. A conflict of interest may arise, for example, when a Gilat employee or their immediate family member (including parent, child, spouse, or sibling) holds a significant ownership interest or shareholder position in the Supplier’s company.

Personal relationships and social interactions must remain within accepted cultural business norms. Any relationship or circumstance that could reasonably be viewed as a conflict of interest must be disclosed to Gilat without delay. Upon identification of a potential conflict, Suppliers are expected to report the matter immediately through Gilat’s reporting channel specified in section 7 below and take appropriate corrective action to prevent any improper influence or misconduct.

Additionally, if a Gilat employee requests that the Supplier engage or subcontract with a specific third party, this must be reported promptly to Gilat via the designated reporting mechanism.

➤ **Authorized Business Contact Channels**

Suppliers must engage exclusively with Gilat’s designated procurement personnel for all sales-related communications. These individuals serve as the sole authorized point of contact for any commercial discussions involving Gilat. This includes, but is not limited to, negotiations related to pricing, payment terms, delivery schedules, contractual conditions, incentives, complimentary items, and service arrangements. Engaging with non-procurement personnel on such matters without prior consent from Gilat’s procurement team is prohibited.

➤ **Contractual Engagement Requirements**

Suppliers must not provide products or services to Gilat unless an applicable purchase order, supply agreement, or service contract, whichever is relevant, has been negotiated with Gilat’s Procurement Department, or with another department within Gilat as informed by Gilat’s Procurement Department or by Gilat’s Legal Department, and duly approved, accepted, and/or executed by the authorized representatives of both Gilat and the Supplier (hereinafter, the “**Contractual Framework**”). Any engagement outside of these formal arrangements may be considered unauthorized and will not be recognized by Gilat for payment or performance purposes.

This policy is designed to ensure accountability, quality control, and legal compliance across all Supplier engagements. Exceptions may only be made where the Contractual Framework explicitly allows for such alternative arrangements.

➤ **Transparent Pricing and Invoicing**

Suppliers must ensure that all pricing and invoicing practices are transparent, accurate, and aligned with the commercial terms agreed upon with Gilat. This includes providing itemized quotations and invoices that clearly reflect the scope of goods and/or services delivered, without hidden charges, inflated costs, or ambiguous line items. For example, any additional fees such as freight, handling, or service charges, must be explicitly stated, justified in advance and approved by Gilat. Gilat expects Suppliers to maintain integrity in

all financial transactions and to ensure that billing practices support fair, predictable, and verifiable commercial engagement.

➤ **Responsible Marketing and Product Representation**

Suppliers must ensure that all marketing and advertising materials accurately represent their products and services. Misleading claims, exaggerated benefits, or omissions that could distort expectations, particularly in business-to-business contexts, are not acceptable in engagements with Gilat. All communications should support informed, transparent decision-making.

➤ **Fair and Equitable Contract Terms**

The Contractual Framework between Gilat and its Suppliers must be established through fair negotiation, conducted in good faith and free from coercion or undue influence. Gilat expects Suppliers to avoid exploitative clauses or practices that could compromise the integrity or balance of the commercial relationship. All contractual terms should reflect mutual respect, transparency, and a shared commitment to responsible business conduct.

4.3. Supplier Regulatory and Trade Compliance

Gilat requires its suppliers to comply with all applicable laws and regulations related to international trade, commercial practices, and product sourcing. The following paragraphs outline specific compliance areas that are essential to maintaining lawful and responsible business conduct, and to ensuring legal and regulatory integrity throughout Gilat’s entire supply chain.

➤ **Conflicts Minerals**

Publicly traded companies subject to U.S. Securities and Exchange Commission (SEC) regulations, such as Gilat, are required to disclose whether the products they manufacture, or contract to manufacture, contain conflict minerals specifically gold, tin, tungsten, or tantalum originating from the Democratic Republic of the Congo (DRC) or neighboring countries, where such minerals are essential to the product’s functionality or production.

To support Gilat’s compliance efforts, the Supplier is expected to conduct reasonable due diligence on the origin and sourcing of any conflict minerals contained in the goods or services provided to Gilat. The Supplier will promptly provide all relevant, complete and accurate information regarding their origin and sourcing and shall ensure that these requirements are communicated and enforced throughout its supply chain. Suppliers are encouraged to review Gilat’s Conflict Minerals Policy on Gilat website, as referenced above in Section 4.

➤ **Export Control and Trade Compliance**

Suppliers engaged on behalf of Gilat in the transfer of hardware, software, technology, or information subject to export or import control laws must ensure that such transfers comply with all applicable regulations. This includes but is not limited to those of the United States (such as the Export Administration Regulations (EAR) and related restricted party lists), the State of Israel and any other relevant national or international trade controls, embargoes, or sanctions. Suppliers are expected to remain informed of regulatory developments and coordinate with Gilat’s Legal or Procurement teams where appropriate.

➤ **Fair Competition**

Suppliers must comply with all applicable local and international laws governing fair competition and antitrust. Any conduct that may distort or restrict competition is strictly prohibited. This includes entering into arrangements or coordinated actions with competitors that could undermine market fairness, as well as the exchange of non-public or commercially sensitive information.

➤ **Money Laundering**

Suppliers must take proactive steps to prevent money laundering within their operations and business relationships. This includes implementing internal controls, monitoring financial transactions, and complying with all applicable anti-money laundering laws and regulations. Gilat expects full cooperation in identifying and reporting any suspicious activity.

➤ **Insider Trading**

Suppliers who gain access to non-public information about Gilat or any other company must not use or disclose such information for securities trading or to influence investment decisions. The misuse of confidential information for financial gain or to “tip” others is unethical and illegal.

Gilat requires all Suppliers to comply with applicable insider trading laws and related company policies. Violations may result in civil or criminal liability and termination of the business relationship.

5 Implementation and Continuous Improvement

Gilat is committed to fostering long-term, responsible partnerships and will work collaboratively with Suppliers to improve performance on topics covered by this Code. Suppliers are expected to engage constructively with Gilat to jointly address relevant challenges and promote continuous improvement.

Suppliers may be periodically required to reaffirm their compliance with this Code. Upon request, Suppliers must provide written documentation detailing their internal policies, procedures, and practices that support adherence to the standards outlined herein.

Suppliers are also required to notify Gilat without delay upon becoming aware, or having reasonable grounds to suspect, any non-compliance with the Code by itself or any of Supplier’s Personnel and Representatives. This notification must include a detailed description of the issue and any corrective actions already taken to restore compliance.

Gilat reserves the right to conduct assessments and audits of its Suppliers. These evaluations may include documentation reviews, site visits, and interviews, as deemed necessary by Gilat. Suppliers are expected to cooperate fully and respond in a timely manner to all audit-related requests.

In cases where deviations from agreed standards or guidelines are identified, Suppliers must develop and implement both corrective and preventive action plans to address the issues and prevent recurrence.

6 Violations and Termination



The Supplier acknowledges full responsibility for any violations of this Code, whether committed directly or through any of Supplier’s Personnel and Representatives. Gilat expects Suppliers to proactively ensure compliance and maintain effective oversight of all such parties.

Failure to take timely and appropriate action to prevent, investigate, or remediate suspected violations, particularly when corrective measures are not implemented following confirmation of non-compliance, will be deemed a material breach of the Contractual Framework. Such breaches compromise the integrity of Gilat’s operations and reputation and may result in immediate termination of the contractual relationship with Supplier, at Gilat’s sole discretion, without compensation of any kind for Supplier and with no liability to Gilat.

In addition to termination, Gilat reserves the right to report any confirmed violations that constitute a breach of applicable laws or regulations to the relevant legal or regulatory authorities.

7 Communication Channels

The Suppliers may report any concerns, doubts, or suspected breaches related to this Code to Gilat’s Legal Department, as follows:

Chief Legal Officer and Compliance Officer: Doron Kerbel.

Contact Person in the Legal Department: Amos Linetzky, Corporate Legal Counsel – Regional Lead-.

Email: amosl@gilat.com

Phone number: (972) 3 9252440

All reports will be treated with appropriate confidentiality and handled in accordance with Gilat’s internal compliance procedures.



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	Name	Position Title	Date
Prepared by	Amos Linetzky	Corporate Legal Counsel - Regional Lead	December 2, 2025.
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