



Document name: Gilat Global Anti-Bribery and Anti-Corruption Policy	
Document Number:	Rev: 00
Department: Legal	

# Gilat Global Anti-Bribery and Anti-Corruption Policy

## 1. About This Policy

Gilat operates in various business arenas worldwide and according to different applicable laws. Gilat is fully committed to complying with applicable laws prohibiting bribery and corruption.

As part of this commitment, Gilat sees crucial importance in preventing bribery and corruption in its actions and in the activities of anyone acting on its behalf at all echelons of business. Therefore, this Policy applies to and obligates all Gilat's entities and all Gilat's directors, officers, and employees wherever located. This Policy also applies to Business Partners (as defined below) operating on behalf of Gilat or other parties with which Gilat collaborates.

This Policy is reflected in and consistent with our Code of Ethics and Business Conduct which aims to ensure that Gilat conducts business according to the highest ethical standards. This Policy also operates in conjunction with our Anti-Bribery and Corruption Procedure and other specific procedures, which describe specific compliance programs and processes designed to implement and uphold this Policy.

## 2. Our Policy Statement / What is Bribery?

All Gilat's personnel are expected to conduct Gilat's' business legally and ethically. Gilat does not tolerate any form of bribery or corruption, either directly or indirectly. Gilat conducts every business transaction with integrity, regardless of differing local customs or business practices, and complies with the applicable laws and regulations of each country in which we do business.

Gilat does not promise, offer, give, or authorize the giving of, directly or indirectly, anything of value to anyone in an attempt to improperly influence or reward any act or decision, to obtain or retain business, or to secure any improper advantage for Gilat.

In addition, Gilat does not accept any such promises, gifts, or inducements, and all Gilat personnel are strictly prohibited from accepting, requesting, receiving, or agreeing to receive, directly or indirectly, anything of value or any advantage intended to influence or reward any act or decision.

Gilat further maintains internal accounting controls designed to ensure the accuracy of its books and records relating to all transactions, including gifts and other payments of things of value covered by this Policy.

## 3. What Laws Apply to Our Business?

Gilat fully complies with the US Foreign Corrupt Practices Act (the "FCPA"), the anti-corruption provisions of Israel's Penal Law, and other local and national anti-corruption and anti-bribery laws and regulations, as applicable ("ABC Laws"). Our suppliers, business partners, and affiliates are also required to comply with our standards fully, and we prohibit receiving or offering a bribe on behalf of Gilat, as well as disguising or attempting to disguise sources of illegally obtained funds.

*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, facilitation payments, and charitable donations.*

## 4. Government Officials

ABC Laws, as well as this Policy, prohibit the payment of "anything of value" to any "government official" with the intention of obtaining or retaining business or a business advantage. The term "government official" generally refers to government officials and other representatives of government, but the term is interpreted very broadly by certain ABC Laws, and for the purposes of this Policy, government officials include Employee, official, or other representatives of any of the following:

- National, state, or local government body, department, ministry, agency or military organization;
- Public international organization;



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- Political party or employee, official or other representative thereof;
- Elected official or candidate for public office;
- Any immediate family members of any of the foregoing, even if they are not otherwise associated with a government or public office; or
- Company or other legal entity wholly or partly, directly or indirectly, owned or controlled by or acting in an official capacity on behalf of any of the above.

Please remember that an individual who may not appear to be or is not classified under local law as a government official may constitute a “government official” under applicable ABC laws and this Policy.

## 5. Commercial Bribery

Many ABC Laws expressly prohibit the offering or accepting of financial or any other advantages to or by employees and other representatives of private-sector (non-governmental) persons and entities if the intention is to induce the recipient to act improperly. Such conduct amounts to “commercial bribery.” Gilat strictly prohibits all commercial bribery, including kickbacks, in all countries in which we do business.

## 6. Gifts and Hospitality

Gilat does not seek to gain any advantage by giving anyone gifts, entertainment, hospitality, gratuities, or other courtesies. Similarly, the impartial judgment of Gilat personnel must not be compromised by receiving any such courtesies. As part of Gilat’s anti-bribery and corruption compliance program, all giving and receiving of any such courtesies must comply with the principles, procedures, and record-keeping requirements set forth in the Gifts & Hospitality guidelines.

## 7. Business Partners

Gilat may be liable under applicable ABC Laws for corrupt payments made or received not only by Gilat personnel but also indirectly by an agent, distributor, vendor, or any other business partner acting for or on behalf of Gilat (collectively, “Business Partners”). Accordingly, all Business Partners engaged by Gilat must always operate in compliance with applicable ABC Laws and this Policy. In addition, a Gilat employee’s awareness, inducement, or facilitation of an act by a Business Partner that would violate this Policy is itself a violation of this Policy.

In order to ensure compliance with this Policy by all Business Partners, Gilat has implemented a Business Partner anti-bribery and corruption risk management process, as described in our anti-bribery and corruption procedure. That Procedure establishes a process for the risk-based due diligence, approval, and monitoring of Business Partners that Gilat engages. No Gilat personnel may engage any Business Partner other than for a legitimate business need and only when all required processes have been followed, and approvals have been obtained pursuant to that procedure.

## 8. Books and Records and Internal Controls

Our CEO, CFO, and finance department employees must provide accurate, complete, objective, relevant, and understandable information.

In addition, we use internal controls and audits to ensure that our books and records and all other public disclosures and information are complete, accurate and timely. Any form of altering, destroying, mutilating, or concealing a record, document, or other objects, or attempting to do so, intending to impair the object’s integrity or availability for use in an official proceeding, is prohibited.

## 9. Oversight and Enforcement

**Oversight.** Our senior management is responsible for overseeing compliance with the standards and principles set in this Policy.

Our General Counsel, who acts as our Compliance Officer, periodically reviews the Policy’s suitability, adequacy, and effectiveness and is responsible for recommending improvements as appropriate.



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**Risk Assessment.** Our Compliance Officer is responsible for taking measures to identify, assess, define, and address any risks that may arise within the Company or by its affiliates and Business Partners.

**Due Diligence.** We are committed to conducting risk-based due diligence and regular oversight of our Business Partners to ensure compliance with this Policy.

**Remediation.** We take action to decrease any identified risks, and we remediate misconduct.

**Reporting.** Any employee or any other party that becomes aware of any illegal or unethical conduct or possible violation of this Policy is required to report all relevant information to the Compliance Officer.

Alternatively, our employees may also report the relevant conduct to his/her supervisor, who will report the matter to the General Counsel, or

Report the relevant conduct to the Gilat "Report a Misconduct" section on Gilat Intranet, or

Raise the matter to higher levels of management, including ultimately to the Chief Executive Officer and the Board.

**Training.** Our employees and new hires are required to review, understand, certify, and comply with this Policy. New hires and employees with specific roles and responsibilities are required to complete our training program regarding this Policy.

**No Retaliation.** We prohibit any forms of retaliation, or discriminatory or disciplinary action, against anyone who: (a) provides any information in good faith or reports any such corrupt conduct and/or activity; or (b) makes a good faith and appropriate complaint regarding a violation of this Policy; (c) assists in any investigation. Any employee who believes that he or she has been the subject of any retaliation is strongly encouraged to immediately report it to the SVP of Human Resources and/or the General Counsel directly. Any claims will be confidential and conducted with a full and fair investigation.

**Disciplinary Measures.** Any violation of this Policy may result in disciplinary action and the termination of employment. Gilat may impose sanctions, including dismissal, report to the relevant authorities, etc., for violations of this Policy as appropriate under the circumstances.

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	Name	Position Title	Date
Prepared by	Doron Kerbel	General Counsel & Company Secretary	2.7.2023
Checked/ Approved by	BOD		7.8.2023

## Revision History

Rev	Author	Description/change description	Date
0	GC & Compliance Officer	Initial release	12.10.2023
1			
2			