



Gilat Satellite Networks Code of Ethics and Business Conduct

A Message from the CEO

Dear Colleague,

At Gilat, we pride ourselves on our commitment to always upholding high professional and ethical standards. Our goodwill and reputation are affected by what we do every day. By putting our commitment in writing, we clearly set out the core values, business practices, and overall Company culture we follow and set a clear standard of behavior for everyone associated with our organization.

Throughout this Code of Ethics and Business Conduct, Gilat promotes these core principles:

- ✓ Honest and Ethical Conduct.
- ✓ Integrity.
- ✓ Open Communication.
- ✓ Equal Opportunity and Diversity.

Please take the time to read our Code carefully and use it in guiding your day-to-day behavior. As a valued team member, you represent the company and are personally responsible for fully adhering to these standards.

Sincerely,

Adi Sfadia, CEO

Gilat Satellite Networks Ltd.



Introduction

This Code was created to benefit our employees, customers, partners, shareholders, and other stakeholders. Gilat strives to promote the common values addressed in this Code and establish a proper, decent, respectful, and pleasant workplace. This Code demonstrates our commitment to act responsibly and in accordance with all relevant laws and regulations.

This Code is supplemented by other company policies and procedures relating to ethics and compliance issues, including but not limited to:

- ✓ Global Anti-Bribery and Anti-Corruption Policy.
- ✓ Anti-Bribery and Anti-Corruption Compliance Procedure.
 - Engaging with Business Partners' guidelines.
 - Gifts and Entertainment Procedure guidelines.
- ✓ Insider Trading Policy.
- ✓ Whistleblowing Policy.
- ✓ Social Media Use and Representation Policy.

The Code applies to all Gilat (including Gilat subsidiaries) employees, officers, and directors in all business areas and locations. It also applies to contractors regularly working with Gilat.

Our Company's Code doesn't address every possible ethical situation you might face on the job, but it helps you stay on course and direct you to people who can help you.

Please note that most people do not intentionally (or knowingly) violate a law or policy. Violations usually occur when we face a difficult choice where the "right thing" is unclear.

If you are unsure what to do or how to act, - your direct manager is often a suitable address to start with for ethics or company policy questions. If you are uncomfortable approaching your manager, any member of the legal department will be happy to assist you in determining the best course of action. Of course, you can always contact the General Counsel, who also fills Gilat's Compliance Officer role. You can also contact the Gilat "[Report a Misconduct](#)" section on Gilat Intranet.

You are in charge of your decisions and actions. Always act legally and ethically even if someone tells you to do otherwise.

Remember, no one has the authority to violate or instruct you to violate the law or this Code. If you suspect illegal or unethical activities, share your concerns. You are helping us uphold an honest and ethical Gilat by speaking up.

It's important always to know and follow the Code. Anyone who violates the Code may be subject to disciplinary action, including termination and, in some cases, legal action.

As a company operating in a global marketplace, we engage with various social customs, rules and regulations, cultures, and laws. We must comply with all applicable laws wherever we operate. If a local law conflicts with the Code, you should follow the law, but please advise the General Counsel of the conflict. If you find, however, that a local business practice conflicts with the Code, you should follow the Code. Not sure? Ask for help.



Honest and Ethical Conduct

You are (together with each person subject to this Code) responsible for supporting Gilat in its endeavors to uphold the values and business practices addressed in this Code. To achieve this goal, you are expected to demonstrate high standards of integrity and honesty in work, mutual respect towards other individuals in your surroundings, good business practices, and acting honestly and ethically in conducting activities on behalf of the Company. Your responsibility applies to interacting with our officers, employees, and the Company. You are expected to act in good faith, with responsibility, due care, competence, and diligence. You should use your independent judgment with respect to questionable behavior and always conduct yourself in a manner that meets our ethical standards.

Workplace Wellness

We at Gilat know that our employees are our greatest assets. Therefore, we invest our efforts to provide them with a safe, respectful, and healthy working place where everyone can feel free and comfortable expressing themselves.

We expect all employees and entities to work together respectfully and openly.

Open Communication

Gilat endorses open communication and freedom of expression. We encourage an atmosphere of openness, courage, and respect so that our employees feel free to come forward with their thoughts, ideas, innovations, questions, and concerns. But we also expect our employees to conduct themselves professionally, to be kind to others, and to always act with respect, fairness, and sensitivity towards their colleagues.

Human Rights and Fair Labor Practices

The Gilat policy supports measures to oppose human trafficking and modern slavery concerning our human resources activities and those of our supply chain. You are expected to treat all people you may deal with in connection with the Company with dignity, respect for human rights, and fair labor practices.

Equal Opportunities

Gilat strives to provide equal opportunity to both applicants and employees and a work environment free from discrimination. We value and foster our employees' talent and diversity and ensure they are given fair and equal opportunities. Decisions regarding employment in Gilat are based on fair and relevant considerations only.

Our policy prohibits any forms of discrimination in the workplace. The prohibition against discrimination applies to all aspects of working relationships (such as recruitment, decisions relating to training, promotion, and working conditions in general) and our relationships with our customers, vendors, and business partners.



If you believe you have been the subject of any prohibited discrimination, please don't hesitate to report it to the SVP of Human Resources and/or the General Counsel.

Harassment

Gilat is committed to providing a work environment that is open, mutually supportive, and free of inappropriate behavior of all kinds and harassment due to age, physical disability, race, religion, sex, sexual orientation, or gender identity.

Gilat prohibits and does not tolerate any form of harassment by its employees, officers, directors, and contractors, particularly sexual harassment. Sexual harassment may include applying any force of a sexual nature, unwelcome sexual advances, requests for sexual favors, inappropriate promises of rewards in exchange for sexual favors, and other verbal or physical harassment of a sexual nature. We take allegations of harassment seriously and take severe actions against anyone harassing another in the workplace.

Social Media Use and Representation

At Gilat, we recognize the power and reach of social media as a tool for communication, connection, and business development. We also acknowledge the potential risks associated with its misuse. With this understanding, we highlighted in Gilat's Social Media Use and Representation Policy the guiding principles regarding our employees' use of social media in their professional and personal capacities. We trust in our team's good judgment and professionalism to navigate social media responsibly, respectfully, and in a manner that upholds Gilat's values and reputation.

Political Activity

Gilat supports the belief that democratic values and democratic institutions are essential for a thriving community, economy, and self-fulfillment. With that in mind, the Company's policy does not promote specific political affiliations. However, you are free to engage in political activities in your personal time so long as those activities do not interfere with your work for the Company and you do not involve or associate the Company with those activities in any way. Use of Company property or resources for political purposes is prohibited.

Protection and Proper Use of Company Assets

Company assets include all physical, financial, and intangible items, products, and resources. We expect all employees to use Company assets responsibly and ethically. You should handle the Company's assets with the same degree of care used to protect your own property and protect it, as theft, carelessness, and waste directly impact our profitability. When using Company's assets, please use all necessary precautions to protect them. Using Company's computer networks and other communication channels for inappropriate purposes is prohibited. Using computer networks and communication channels for personal reasons should be reasonable, kept to a minimum, and not interfere with business activities.

You should not:



- ✓ Use company property, assets, information, or position for personal gain or unlawful purpose.
- ✓ Compete with Gilat's business directly or indirectly.
- ✓ Exploit opportunities that are discovered through the use of the Company's information or position.

Confidentiality

The obligation of employees to protect Company assets includes our proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, copyrights, business, marketing, financial, human resources, and technical and administrative information that has not been properly released to the public domain. The unauthorized use or distribution of this information violates Company policy. It could also be illegal and result in civil or even criminal penalties. Except when disclosure is specifically authorized or legally required, you should maintain the confidentiality of all non-public information you obtain during your work activities, whether entrusted to you by the Company or by persons with whom we do business.

Compliance with Applicable Law

As a company operating in a global marketplace, we engage with various social customs, rules and regulations, cultures, and laws. We must comply with all applicable laws and regulations wherever we operate. If you believe a local law conflicts with the Code, contact the legal department for further guidance and instructions. The legal department will assist and advise you on how to comply with the provisions of the local law. If you find, however, that a local business practice conflicts with the Code, you should follow the Code.

Not sure? Ask for help.

Public Disclosure and Record Keeping

The Company's policy is to provide appropriate disclosure in all reports and documents that we file with or submit to applicable national securities authorities and stock exchanges, as well as in all other public communications made by the Company. The Company requires honest and accurate recording and reporting of information to make responsible business decisions. This includes documenting business expenses accurately, obtaining the necessary authorization for approving such expenses, and maintaining detailed and accurate records, accounts, and financial statements confirming legal requirements and internal policies.

Conflicts-of-Interest

Conflict of interest may occur when your private interests interfere or conflict with the Company's interests. While such potential conflict of interest situations may promote the Company's business, they require proper disclosure and will be decided upon on a case-by-case basis. The decision maker will not be the person involved in the conflict-of-interest situation. Some examples of conflict-of-interest situations include:



- ✓ Promoting your personal interest or promoting a business decision based on personal interest;
- ✓ Family/Friendship relationships with the Company's suppliers, customers, and partners;
- ✓ If a family member and/or friend is hired as an employee or contractor or provides services to the Company.

You should properly disclose to the SVP of Human Resources and/or the Compliance Officer any circumstances and report all facts relating to relationships or financial interests that may give rise to conflicts of interest. Directors and members of senior management should make similar reports to Gilat's Audit Committee and the Board of Directors through the General Counsel.

Insider Trading

If you have access to non-public information regarding Gilat (or any other company), you are not permitted to use or share that information for purposes of trading securities of Gilat (or any other company). Using non-public information for financial benefit or to "tip" others who might make an investment decision based on this information is unethical and illegal. Gilat employees must comply with our policy regarding insider trading. Violations of this prohibition against insider trading may subject you to criminal or civil liability, in addition to disciplinary action by the Company.

Anti-Bribery and Corruption

The Company is committed to conducting business with the highest ethical principles, including compliance with anti-bribery and corruption standards. Gilat maintains a zero-tolerance policy toward corruption. We are active in numerous markets, requiring compliance with many jurisdictions' anti-bribery and corruption laws. This includes applicable Israeli law. In addition to laws applicable to Israeli companies, since Gilat's shares are publicly traded on the Nasdaq, we are subject to the United States Foreign Corrupt Practices Act ("FCPA"). There are also other anti-bribery and corruption laws throughout the world which apply in the countries in which we do business. Our policy regarding anti-bribery and corruption compliance, as well as business entertainment and gifts, is contained in Gilat Global Anti-Bribery and Anti-Corruption Policy.

Restrictive Trade Practices and Fair Dealing

We are obliged to comply with all applicable antitrust and restrictive trade practices laws. These laws require us to deal fairly with our customers, vendors, and competitors. If you are uncertain whether a contemplated action raises restrictive trade practices issues, you should refer the issue to the Company Compliance Officer.

Reporting Illegal or Unethical Behavior and Code Violations

If you become aware of any illegal or unethical conduct, or possible violation of this Code, you should report the information to one of the following:



- ✓ the General Counsel (who also acts as the Compliance Officer).
- ✓ SVP of Human Resources.
- ✓ any legal department member.
- ✓ through the Gilat "[Report a Misconduct](#)" section on Gilat's Intranet.
- ✓ You may continue to raise the matter to higher levels of management, including ultimately to the Chief Executive Officer and the Board.

Executive Officers, Directors, and senior officers of the finance department should report any known or suspected violation of this Code by any Executive Officer to the Board or the Audit Committee of the Board.

Please note that you may be asked to cooperate in internal misconduct investigations.

Our policy prohibits any forms of retaliation against anyone who: (a) in good faith provides any information or reports any such corrupt conduct and/or activity; or (b) makes a good faith and appropriate complaint regarding a violation of this Code; (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.

Contact Information

For proper disclosure, reporting, and consulting on any questions regarding this Code and Business Conduct, don't hesitate to contact the Compliance Officer or the SVP of Human Resources.

Compliance Officer: doronke@gilat.com

Telephone: +972 3 9252969

SVP Human Resources: liorm@gilat.com

Telephone: +972 3 9252248

You may also contact any member of the legal department or use the "[Report a Misconduct](#)" section on Gilat Intranet to anonymously contact the Company's Compliance Officer, Internal Auditor, and/or Company Audit Committee Chairperson.

Directors and senior executive officers may report violations of this Code to any of the above email addresses or directly to the Board or the Audit Committee of the Board.

Publication of the Code of Ethics

This Code does not constitute a complete list of company policies. Gilat may update this Code and/or publish additional ethical policies, rules, and guidelines from time to time. This Code can also be found on the Gilat Satellite Networks website and Gilat Intranet. For additional information and more detail on the subjects addressed in this Code of Ethics and Business Conduct, please see our following policies, which can be found in the Policies & Procedures section on Gilat Intranet:

- ✓ Global Anti-Bribery and Anti-Corruption Policy.



- ✓ Anti-Bribery and Anti-Corruption Compliance Procedure.
 - Engaging with Business Partners' guidelines.
 - Gifts and Entertainment Procedure guidelines.
- ✓ Insider Trading Policy.
- ✓ Whistleblowing Policy.
- ✓ Social Media Use and Representation Policy.

Gilat Compliance Officer will direct our directors, officers, and all employees to be aware of this Code of Ethics and Business Conduct, and with the cooperation of the Gilat HR department, will ensure the training of the Company's relevant personnel and business partners about this policy.