

Space-Communication Ltd. – Anti-Corruption Policy

Note: this document is a synopsis of the material elements of Spacecom's set of anti-corruption compliance policies, and is equally applicable to Spacecom employees, officers, directors and all of Spacecom's business partners.

1. Introduction and Purpose

Space-Communication Ltd. ("**Spacecom**" or the "**Company**") is committed to conducting business ethically, honestly and with integrity. As part of its code of ethics, the Company adopts this policy to ensure the Company to conduct its operations and activities in compliance with anti-corruption laws (the "**Policy**").

The Company is strongly opposed to corruption in all forms and has zero tolerance on corruption. Spacecom expects its directors, officers, employees and business partners to help ensure that this Policy is being followed and use the appropriate measures to ensure compliance. The consequences of failing to comply with this Policy and applicable laws are potentially severe for the Company and its employees.

This Policy is not designed to serve as a manual that covers every situation that may be encountered in the course of doing business. Moreover, this Policy neither intends to derogate from the laws and regulations in force in any country where Spacecom operates, nor does it derogate from existing agreements or commitments. The Policy is intended to serve as a guide that highlights key issues and identifies the policies and resources available to help the employee make decisions under the same ethical value we all share.

Each employee must report to the Company's Compliance Officer any action that appears to be in violation of the Policy. We shall not retaliate against an employee who honors the requirements to report in good faith any potential Policy violation.

If after reading the Policy's guidelines, you are not sure as to what you have to do, you should contact your manager or the Company's Compliance Officer. Reports may be submitted anonymously.

2. Anti-Corruption and Bribery

- 2.1. Bribery includes giving, offering, or receiving an improper benefit with the intention of influencing the behavior of someone (including a passive behavior) to obtain or retain a commercial, contractual, regulatory or personal advantage.
- 2.2. An improper benefit can have different forms, for example in the form of cash, cash equivalents, gifts, credits, discounts, travel, personal benefits, accommodation or services.
- 2.3. Employees must never ask for, accept, receive, offer or give a bribe and they must not use intermediaries, such as agents, consultants, advisors, distributors or any other business partners to commit acts of bribery. Spacecom does not distinguish between public officials and

private persons so far as bribery is concerned: bribery is not tolerated, regardless of the status of the recipient.

- 2.4. Always ask yourself before offering or giving money or anything else of value to any person if what you are considering to do could be viewed as having an illegitimate purpose. If the answer is yes, you must not proceed. If you are in any doubt, consult the Company's Compliance Officer or the legal department before proceeding.

3. Facilitation Payments

- 3.1. Facilitation payments are payments to public officials, government employees or members of political parties to expedite the performance of duties of a non-discretionary nature (e.g. payments to expedite visa issue or processing papers or issuing permits and licenses).
- 3.2. Spacecom prohibits facilitation payments, even when provided to facilitate or speed up a routine procedure. If you are asked to make a payment on the Company's behalf, you should always ask for a receipt, which details the payment's reason.

4. Gifts

- 4.1. Exchanging gifts with our customers or business partners can often maintain a good business relationship.

- 4.2. Giving Gifts

All directors and employees must exercise good judgment and moderation in entertaining and offering gratuities to customers, suppliers or other persons or entities doing or seeking to do business with our Company. Gift should be given in accordance with Spacecom's gifts policy. Employees must not offer a gift that, to the best of their knowledge, would cause someone to violate local laws, his or her own company's code of ethics, nor would it cause the Company embarrassment if publicly disclosed.

- 4.3. Accepting Gift

Our employees must exercise good judgment in accepting any gift or hospitality from any vendor, subcontractor, customer or any other person or corporation working with our Company. Employees may only accept token gifts or business entertainment or hospitality of small or nominal value. In case that you received any gift that is not consistent with outlined guidelines, you must return the gift to the person who gave it, or report it to the direct manager, who will decide if you are entitled to receive the gift or if you must make it available to the Company or otherwise return the gift.

Bribery, commissions or any payment that does not meet the appropriate business standards for business partners, government officials or any other external factor – is strictly prohibited.

- 4.4. Do not accept or offer gifts if there is reason to believe that its purpose is to improperly influence business decisions or which can lead to questions being raised about your or others' independence and integrity.
- 4.5. If you are unsure, please consult with your superior and/or the Company's Compliance Officer.

5. Implementation

5.1. Training and certifications

Spacecom employees, officers, directors, as well as selected business partners will be required to participate in anti-bribery training sessions that will be periodically held. All attendees will be required to sign certification forms, in which they certify their understanding of, and agreement to comply with, this Policy and applicable anti-corruption laws.

5.2. Reporting of Violations

Any employee who learns of a potential violation of applicable laws or this Policy is required to report his or her suspicion promptly. Anyone who reports a possible violation of applicable laws or this Policy will be protected from retaliation, harassment or discrimination in any form.

5.3. Breach of this Policy

Breaches of this Policy will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

5.4. Records

Spacecom must prepare and maintain books and records that accurately and in reasonable detail document the source of the revenues and the use that has been made of Spacecom's assets. All financial transactions must be documented, regularly reviewed and properly accounted for in the books and records of the Company. All relevant financial controls and approval procedures must be followed. The retention and archive of Spacecom's records must be consistent with Spacecom's standards, tax, and other applicable laws and regulations.

6. Compliance by Business Partners

Business partners are required to comply with the principles of our Policy and will be retained after appropriate due diligence is conducted, that is reasonable under the circumstances. Once a relationship with a business partner has been approved, a written agreement setting forth all of the terms of the business arrangement must be entered into. The agreement should include provisions that adequately protect the Company and increase the transparency and visibility of the Company into the business partner's activities and operations. Such provisions include, but are not limited to, anti-corruption certification language, termination, indemnification and audit right provisions. In order to ensure that all legal requirements are adequately addressed, all agreements with business partners must be reviewed and approved by the Legal Department prior to providing them to the business partner for execution.