



VIASAT'S POLICY CONCERNING ENTERTAINMENT, GIFTS AND ETHICS

As a general rule, Viasat employees are prohibited from soliciting or accepting any kind of gift, entertainment or article of value.

Exceptions to this general rule include the following:

- (1) Business meals paid for by suppliers, provided such meals are part of a specific business related activity. Employees are encouraged to reciprocate in the event of more than one such meal being necessary to conclude negotiations.

- (2) Items of nominal value which are promotional in nature, which contain the name or logo of the supplier, which are for use in and around the office and which are part of a normal promotional campaign. Examples of acceptable items would include coffee cups, calendars, etc.

In any case, Employees are prohibited from accepting any gift or entertainment that would result in a situation of real or perceived indebtedness to any supplier, subsequently affecting their impartiality in dealing with that supplier.

In the event that a Seller has cause to believe that Viasat or any Viasat employee or agent has acted improperly or unethically, Seller will report such conduct to the Viasat ethics hotline at 888-475-8376. Copies of Viasat's Guide to Business conduct are available at <http://www.viasat.com> under "Investors-Corporate Governance." Although Viasat will not under any circumstances use the failure to make such a report as a basis for claiming breach of contract by Seller. Seller is encouraged to make such reports when warranted.