
Code of Business Conduct

Contents

CEO statement.....	2
Our commitment – The Vislink Mindset.....	2
Business Integrity	2
No bribes.....	2
Gifts, entertainment and hospitality	2
Fair competition and commitment to customers.....	3
Books and records.....	3
Confidentiality and privacy	3
Personal conflicts of interest	3
Use of Company property and expenses.....	3
Human rights/labor standards	4
Our employees.....	4
Diversity	4
Health and safety.....	4
Environmental sustainability.....	4
Political neutrality.....	4
Business partners	4
Agents, representatives and sub-contractors.....	5
Our suppliers.....	5
Charitable donations	5
Seeking guidance and reporting problems.....	5
Compliance and implementation	6



CEO statement

Vislink Technologies, Inc. (“Vislink”) has adopted a formal Code of Business Conduct for its company and employees to give a clear understanding of what is expected from them in conducting business. We expect our employees and businesses to adhere to the Code. You are encouraged to read and understand this Code and to conduct yourself and your business in accordance with its principles.

Our commitment – The Vislink Mindset

Vislink provides vital products and services that support the transmission and reception of exceptional images and information. Our commitment is founded on a set of core values that form the Vislink Mindset:

- **Product excellence** – everything we make and do is exceptional
- **Creative solutions** – we are constantly looking to break new ground
- **Integrity** – what you see is what you get
- **Customer focus** – we are nothing without our customers
- **Collaboration** – we work better when we work together

Vislink complies with both the letter and the spirit of local and international laws. We endorse the Universal Declaration of Human Rights. Similarly, we recognize the security concerns of the countries in which we live and work and respect all export and trade restrictions.

This Code of Business Conduct defines our commitment to our colleagues, customers, suppliers and other stakeholders. It applies to all Vislink companies worldwide. We expect our business partners to abide by standards that are compatible with our own.

Business Integrity

No bribes

Vislink abides by all applicable national and international laws in the countries where we operate.

Vislink does not tolerate bribery or corruption of any form (be it the making of bribes, receipt of bribes, undue payments or kickbacks in any form whether direct or indirect). This includes a prohibition on ‘facilitation payments’. Facilitation payments are small bribes paid to facilitate routine Government action.

Gifts, entertainment and hospitality

We prohibit the offer or receipt of gifts or other benefits that could affect either party’s impartiality, influence a business decision or lead to the improper performance of an official duty. This principle applies to our relationships with suppliers, officials and anyone else with whom we deal in the course of our work.

Vislink employees may offer and accept reasonable hospitality given in the normal course of business. However, in all cases they must ensure that the gift or benefit is offered as an expression of goodwill and not in expectation of a return favor.

Employees may not in any case offer or accept gifts or gratuities worth more than \$100 or the equivalent without advance approval from their line manager.



Fair competition and commitment to customers

We compete fairly and honestly, observing all applicable anti-trust and competition laws. We are truthful in every detail concerning our products and services when we advertise or solicit for business. We do not make misleading statements about offerings from our competitors.

We aim to offer products and services that are safe, consistently reliable, innovative and relevant to customers' needs. We take customer complaints seriously and aim to resolve any concerns in a quick, friendly and professional way.

Books and records

We take care to maintain accurate books and records that reflect our business transactions as they occur, and we keep them for as long as legally required. We never destroy records in an attempt to prevent investigations or disclosure.

Confidentiality and privacy

Vislink employees will only use confidential and Company information including personal data for its proper purpose and in strict performance of their employment and will adhere to confidentiality and data protection regulations.

For the avoidance of doubt, confidential information is information that is not, or not yet, public information and includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, customer lists and non-published financial or other data.

We respect the patents, copyrights, trademarks and proprietary information of our suppliers, as well as the confidentiality of others with whom we do business.

Personal conflicts of interest

Vislink employees must avoid conflicts of interest with the Company. For example, we do not compete with the Company, either directly or indirectly, or use knowledge gained while working for Vislink to help anyone else compete with it. Similarly, we do not do business on behalf of Vislink with a company from which we or a family member or another connected person may benefit. We do not have personal interests (either individually or through family) in companies that compete with or do business with Vislink unless we have agreed this with Vislink's senior management in advance, although we can of course own shares in publicly-traded companies.

A conflict of interest occurs when personal interests of an employee compete with the interests of Vislink.

'Family' includes spouse, children, parents, siblings, civil partner or stepchildren. Any conflict of interest that does arise should be raised with your Divisional COO or the Group Company Secretary.

Use of Company property and expenses

We treat Company property as if it was our own, but we remember that it's not. We do not use Company property for personal purposes unless previously authorized. We use Company telephone, mail services and Internet services for their proper commercial purpose and not for personal benefit.

We use IT equipment, including access to the Internet, for Company business only, and never for inappropriate purposes that would bring the Company into disrepute.

Employees' claims for expenses incurred in the proper performance of their duties must be reasonable and substantiated in a timely manner with documentary evidence.



Human rights/labor standards

In accordance with our commitment to the Universal Declaration of Human Rights, we support and respect internationally recognized labor rights, including freedom of association, the avoidance of discrimination, the abolition of forced labor and the abolition of child labor. We expect the same commitment on the part of our suppliers.

Our employees

Vislink is committed to fair treatment of its employees. People working for Vislink can expect competitive pay for doing their job and special rewards for extraordinary work or performance. Vislink will invest in the personal growth of its employees with appropriate training and will aim to offer stable employment in the communities where we are based.

Vislink respects employees' right to privacy and life outside of work.

Vislink employees respect each other and do not engage in conduct that may reasonably be perceived as offensive, objectionable, harassing or disrespectful to other employees, suppliers, customers or anyone with whom we interact.

Diversity

Vislink is committed to equality of opportunity in all its employment practices, procedures and policies. When we hire someone, we choose the best candidate, irrespective of age, race, national origin, disability, religion, gender, sexual preference or membership/non-membership of any trade union. We apply the same standards when selecting suppliers and other business partners.

Health and safety

Vislink attaches the greatest importance to the health and safety of its employees and complies with all relevant legislation and codes of practice relating to health and safety at work.

Environmental sustainability

While we believe our operations have only limited environmental effect, we work to minimize the impact of our products and operations on the environment and on the communities in which we operate.

Political neutrality

Vislink does not make donations to political parties nor to any cause that might bring either local business units or any part of the Group into disrepute.

Business partners

Vislink works with a broad range of business partners including agents, representatives, consultants, subcontractors, and suppliers. Vislink is committed to the principles of fairness and excellence in our dealings with all of them and expects the same commitment in return.



We require all business partners to apply ethical principles that are consistent with our own, including our anti-bribery policy and our commitment to fair labor conditions. Where problems arise, we will in the first instance use our influence to seek corrective action. Where this proves impossible, we reserve the right to withdraw from the business relationship.

Agents, representatives and sub-contractors

We select agents, representatives and sub-contractors on the basis of their professional expertise and not on account of personal contacts. All agents and distributors are to be appointed with written agreements setting out the services to be rendered, structure of fees and to include an express prohibition on bribery and compliance with the Company's Code of Business Conduct.

The fees and commissions agreed will be appropriate and justifiable remuneration for legitimate services rendered. Divisional COOs must review all commission arrangements in advance. Commission payments worth more than 10 per cent of a contract's value are subject to advance approval by the Group Chief Executive.

Our suppliers

We aim to develop long-term relationships with our suppliers and expect them to make a fair return on the investments they have made in doing business with us. We select them on the basis of objective criteria such as quality, delivery, performance and price.

Charitable donations

As part of its corporate citizenship activities, Vislink and its employees may donate time and money to a variety of local and international charities, particularly those that support children, personal development or media-related themes.

We apply the same standards of professionalism in our charitable donations as we do with our business partnerships. We only provide donations to organizations that serve a legitimate public purpose and are themselves subject to high standards of transparency and accountability. Our contributions will always be transparent and properly documented. All charitable donations are to be documented and to be reported on an annual basis at year end to the Group Company Secretary. Any charitable donation in excess of \$1,000 (£750) is to be cleared in advance with the Group Company Secretary. Charitable donations are publicly reported by Vislink in its Annual Report and Accounts.

Seeking guidance and reporting problems

If any employee wishes to seek guidance on the application of this Code, they are free to contact their immediate line manager, their business unit managing director or their Divisional Chief Officer.

Any third party may report a breach of the Code to the Company through the Vislink's Company Human Resources department.



Compliance and implementation

These principles are endorsed by the Board of Directors and apply to all Group member companies. It is the responsibility of senior management to ensure that they are disseminated and fully understood at every level throughout the Group.

Vislink will not criticize or penalize employees for any loss of business resulting from adherence to these principles. Similarly, we will not penalize employees who report concerns in good faith even if on closer investigation these turn out to be unfounded. However, we take infringements very seriously. Employees who fail to abide by these principles may face disciplinary action, including dismissal.