

MTNSAT HOLDINGS LLC/FMC GLOBALSAT, INC.
and
MTN GOVERNMENT SOLUTIONS LLC
CODE OF BUSINESS CONDUCT AND ETHICS

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MTNSAT HOLDINGS LLC/FMC GLOBALSAT, INC.
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INTRODUCTION

This Code of Business Conduct and Ethics (“Code”) applies to all MTNSat Holdings LLC and FMC GlobalSat, Inc. entities, affiliates and subsidiaries worldwide and all domestic and international subsidiaries referenced herein as the “Company”. MTN Government Solutions LLC (“MTNGS”) specific requirements appear in Appendix A. This Code is not a contract and does not create any contractual rights or guarantees of continued employment. This Code is designed to promote:

- honest and ethical conduct;
- compliance with applicable laws and regulations;
- proper handling and protection of confidential information;
- accurate financial and business records;
- responsible use of company assets;
- fair dealing with customers, suppliers, and partners;
- avoidance of conflicts of interest;
- prompt reporting of potential misconduct; and
- accountability for adherence to this Code.

This Code applies to all employees, officers, directors, contractors, consultants, vendors, resellers, partners, temporary workers, and any other individuals acting on behalf of the Company. All vendors, contractors, suppliers, resellers, and other third-party partners must comply with this Code as a condition of doing business with the Company.

While this Code provides broad standards, it cannot cover every situation. Use common sense, good judgment, and when unsure, ask for guidance from Legal, Human Resources (“HR”), or management.

This Code supplements (and does not replace) any other policies or procedures applicable to your position.

YOUR RESPONSIBILITIES

All personnel must:

- Read, understand, and follow this Code.
- Uphold these standards in daily work.
- Report suspected violations promptly through EthicsPoint or another approved channel.
- Cooperate in good faith with investigations.
- Avoid retaliation or conduct that discourages reporting.

If you are unsure about a situation or the interpretation of this Code, seek guidance before acting.

GENERAL STANDARDS OF CONDUCT

You must always act honestly, ethically, and in the best interest of the Company.

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Compliance with Law

You are responsible for complying with:

- U.S. federal, state, and local laws;
- international laws applicable to your work;
- anti-corruption laws (including the U.S. FCPA, UK Bribery Act, and local equivalents);
- export controls and trade compliance rules;
- data privacy and cybersecurity standards.

Report concerns immediately if you become aware of potential violations.

No Discrimination or Harassment

The Company provides a workplace free of discrimination, harassment, and retaliation. Harassment or discrimination based on any protected characteristic is strictly prohibited.

CONFLICTS OF INTEREST

A conflict of interest exists when personal, financial, or relational interests interfere or appear to interfere with your ability to act in the Company's best interest. Examples include:

- personal financial interests in a customer or supplier
- outside employment that competes with the Company
- family relationships influencing business decisions
- accepting gifts or favors that may influence judgment

You must disclose any potential conflicts to Legal and Compliance or Human Resources.

Outside Employment & Directorships

You may not:

- work for or advise a competitor, supplier, or customer
- serve as a director of a competitor

Prior written approval from Legal/HR is required for outside engagements impacting the Company.

Financial Interests

You must disclose any financial interest in entities that compete, supply, or transact with the Company.

Corporate Opportunities

You may not use company property, information, or your position for personal gain.

Improper Benefits

You may not receive compensation, gifts, or favors that could create obligations or influence business judgment.

Gifts & Hospitality (Commercial Context)

Gifts must be:

- modest
- infrequent
- not cash
- not intended to obtain favorable treatment

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Government-specific restrictions appear in Appendix A - MTNGS.

Seeking Guidance

If unsure whether a situation presents a conflict, ask Legal.

PUBLIC COMMUNICATIONS

Communications on Behalf of the Company

Only authorized personnel may speak publicly for the company.

Media Requests

Refer all media, press, or analyst inquiries to the approved communications representative.

Social Media

Do not disclose confidential or internal information publicly.

FINANCIAL INTEGRITY & RECORDKEEPING

Accuracy of Records

All Company books and records must be complete, accurate, and truthful.
False entries, misstatements, or omissions are prohibited.

Appropriate Controls

Follow internal approval processes and financial controls.

Fraud Prevention

You must never:

- falsify documents
- misstate financial information
- hide or misclassify transactions
- misuse or misappropriate funds

Report suspected fraud immediately.

SAFEGUARDING COMPANY ASSETS

You are responsible for protecting the Company assets, including:

- equipment
- systems
- intellectual property
- confidential information
- funds

Information Security & Confidentiality

You must protect:

- customer data
- employee data

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- trade secrets
- business strategies
- technical information

Confidential information may not be shared outside the Company unless authorized.

Cybersecurity

Follow all cybersecurity standards, including:

- password protection
- encryption
- device security
- reporting of suspected breaches

Unauthorized access, sharing, or misuse of data is prohibited.

RESPONSIBILITIES TO CUSTOMERS, SUPPLIERS & THIRD PARTIES

Fair Dealing

Deal honestly, fairly, and lawfully with all customers, suppliers, and competitors.

Improper Payments

Bribes, kickbacks, or “anything of value” intended to secure business are prohibited.

Anti-Corruption

All personnel must comply with:

- FCPA
- UK Bribery Act
- local anti-corruption laws

Side payments, facilitation payments, or concealed commissions are prohibited.

Selecting Suppliers

Base decisions on merit, quality, price, and reliability. Personal relationships must not influence supplier selection.

Handling Nonpublic Information

Respect third-party confidentiality obligations.

Competition Laws

Do not engage in:

- price fixing
- bid rigging
- market allocation
- sharing confidential competitive information

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WORKING WITH GOVERNMENTS & REGULATED ENTITIES

Government customers are subject to additional restrictions. General principles apply company-wide; MTNGS specific rules appear in **Appendix A**.

Lobbying

You may not engage in lobbying activities on behalf of the Company without authorization.

Political Contributions

Company funds or assets may not be used for political contributions without Legal approval.

Trade Compliance & Export Controls

You must comply with:

- U.S. export controls
- Sanctions regulations
- Import/export documentation requirements

REPORTING VIOLATIONS & NON-RETALIATION

Obligation to Report

You must report known or suspected violations of this Code.

EthicsPoint (NAVEX) Hotline

The Company and MTNGS uses EthicsPoint, an independent reporting system available 24/7.

You may report by filing a report online and by phone. Please navigate to:

<https://secure.ethicspoint.com/domain/media/en/gui/1000204/index.html> for more information on how to file a report and Ethics Point.

Anonymous Reporting

You may report anonymously where permitted by law.

Non-Retaliation

Retaliation against anyone who reports in good faith is strictly prohibited.

INVESTIGATIONS & DISCIPLINARY ACTION

The Company will investigate alleged violations promptly and fairly. Discipline may include:

- coaching or corrective action
- reassignment
- suspension
- termination
- termination of vendor or contractor relationships

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PROCEDURAL MATTERS

Distribution

All employees and third parties subject to this Code will receive a copy upon engagement.

Acknowledgment

All personnel must sign an acknowledgment confirming they have read and understood this Code.

Amendments

The Company may amend, modify, or update this Code at any time by approval from Legal and Compliance and HR.

Seeking Guidance

Questions should be directed to Legal, HR, or EthicsPoint.

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APPENDIX A
MTNGS GOVERNMENT COMPLIANCE REQUIREMENTS

This Appendix applies ***only*** to MTNGS personnel, contractors, partners, and suppliers supporting U.S. Government programs.

1. U.S. Government Contracting Requirements

Personnel must comply with:

- FAR & DFARS principles
- Procurement Integrity policies
- Mandatory disclosure rules
- Truthful Cost or Pricing Data standards

2. Organizational Conflicts of Interest (OCI)

MTNGS personnel must avoid:

- biased ground rules
- impaired objectivity
- access to nonpublic competitor information

All potential OCI must be disclosed to MTNGS.

3. Personal Conflicts of Interest (PCI)

Employees must not accept gifts, favors, employment opportunities, or financial benefits that could influence decisions related to government work.

4. Anti-Kickback Act Compliance

No payments, gifts, or benefits may be offered or accepted to improperly obtain subcontract awards.

5. Gifts & Entertainment Rules

Government officials:

- cannot receive gifts, meals, travel, entertainment, or anything of value
- Exceptions are extremely limited and must be pre-approved by MTNGS.

6. Procurement Integrity Act

Prohibits:

- accessing competitor bid information
- revealing source selection information
- offering or accepting employment during procurement processes

7. Mandatory Reporting

MTNGS must disclose credible evidence of:

- fraud
- bribery
- conflict of interest
- violations of procurement rules

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8. Supplier Ethics Requirements

Suppliers supporting MTNGS must:

- follow government ethics rules
- provide accurate cost/pricing information
- maintain business records
- cooperate with audits