

RigNet Code of Ethics and Business Conduct

Our Values

Integrity ° Respect for People ° Teamwork ° Safety Passion for Excellence

About the Code

At RigNet, building trust with people and partners around the globe is essential to our success. Our values provide the operating framework for building this trust while also defining who we are and how we behave. We have created this Code of Ethics and Business Conduct (the “Code”) to provide simple guideposts to help us operate ethically and legally in a complex global environment. While the Code won’t tell you what to do in every situation, it will help you navigate complex situations and help you decide when to ask for assistance. By focusing on our values and this Code, we create an environment where we are proud to say we work.

No Retaliation

Part of establishing trust is being able to speak up when you believe something is not right. RigNet does not tolerate retaliation against anyone who reports possible violations of the law, the Code, or company policies; or who questions unethical conduct or participates in an internal investigation. If you have questions or concerns about the Code or legal compliance and ethics at RigNet, contact your supervisor, the Human Resources Department, or the Legal Department. You may send an email to compliance@rig.net or call +1 281.674.0708.

Safe and Secure Workplace

RigNet is committed to providing a safe and secure work environment. Each of us is responsible for our own safety and for the safety of others.

Honest and Fair Relationships

Maintaining our reputation for fair, honest and ethical conduct in all our business activities is critical to our success. We do not engage in dishonest, unethical or illegal activity to win business.

Diversity and Equal Opportunities

Our culture supports diversity and encourages intellectual curiosity, creativity, and openness. We value the strength of our differences, provide equal opportunities throughout our business and do not tolerate unlawful discrimination of any kind.

Respect for Others

A great part of our success is grounded in our open and collaborative work environment which helps us achieve excellence and meet the needs of our customers. We are and must be professional and honest with our colleagues, customers and business partners and treat each other with high respect and regard. RigNet will not tolerate harassment of any kind.

Don't Make Improper Payments

In some parts of the world, paying a bribe to get business may be something others are doing. At RigNet, we are truthful and transparent in our interactions with our customers and recognize that corruption hurts many people. We have a zero-tolerance policy toward bribery and corruption and prohibit employees and anyone acting on our behalf from securing business through bribes, kickbacks or other improper benefits. Our policy applies to everything we do and everywhere we do it— regardless of local custom or practice.

Compete Fairly

Competing fairly ensures that we meet our business objectives with our integrity intact. Maintaining our reputation for fair conduct in all our business activities is critical to our success. We sell our products and services strictly on their merits, based on price, terms and quality, and comply with the laws that regulate competition.

Avoid Conflicts of Interest

Each of us has a personal responsibility to act in the best interests of RigNet. We must avoid situations where our personal interests, relationships or activities interfere, or appear to interfere or make it difficult to perform our work fairly and objectively. While many conflicts of interest can be resolved in a mutually acceptable way, full disclosure to your manager and the Legal Department must be made at the earliest possible time to protect you and the company.

Trade Controls

We are committed to complying with the laws and regulations that cover our imports and exports of goods, software, technology, technical data and services across national borders, including laws covering international boycotts. To avoid inadvertent violations, and as part of our corporate responsibility, we comply with the U.S. laws that restrict our dealings with certain countries, persons, groups and organizations wherever we do business.

Government Requests and Contracting

We cooperate fully and appropriately with government requests and investigations based on the recommendations of our advisors. We must also comply with the special rules that apply when we do business with government agencies.

Gifts and Hospitality

Gifts and business-related entertainment (including meals) can build goodwill and help develop business relationships but they can also raise questions about our personal integrity or appear to create an unfair business advantage. But gifts, meals or trips that are extravagant or lack transparency or a legitimate purpose may be viewed as bribes or inappropriate. Because of this, we must always use good judgment when deciding whether to offer or accept a gift or business-related entertainment.

Privacy and Data Protection

RigNet respects the privacy and protects the personal information of employees, customers, suppliers and other business partners. We are committed to complying with all applicable laws and policies that cover our collection, use, transfer and storage of personal information.

Careful Communications

Our reputation is our most important asset. Everything we say and do can potentially strengthen and elevate or damage our reputation. For this reason, we should always be careful and clear in our business communications, including emails, and follow best practices when we use social media.

Insider Trading

Using material non-public information about RigNet or another company that you learn through your work at RigNet to buy or sell its securities or provide investment “tips” to others violates the company’s policy and may be illegal insider trading. These restrictions apply until the information has been made available to the public and there has been time for the public to digest it.

Accurate Books and Records

Our books and records must be complete and reliable and accurately reflect the true nature of our transactions and activities. We must never be dishonest or deceptive in the company records we prepare or maintain or attempt to mislead anyone.

Accurate Communications

RigNet’s communications with our stakeholders must be accurate, timely and consistent and comply with applicable legal requirements. Because of this, RigNet has authorized certain individuals—and only those individuals— to communicate publicly on behalf of RigNet and to speak on behalf of the company to the investment community and the media.

Responsible Use of Assets

Each of us is personally responsible for protecting company assets and property our customers and business partners entrust to us and making sure that they are used appropriately for RigNet’s business purposes. Company assets include our funds, facilities, equipment (including computers and smart phones), information and information systems, and intellectual property.

Confidentiality and Proprietary Information

Our confidential information and intellectual property are important business assets that we must preserve and protect. We must also respect the intellectual property rights of others and safeguard confidential information that others entrust to us. Improper use and disclosure can damage our competitive position, impair our business operations and even lead to financial losses.

Where to Get More Information

Our Code provides guideposts for our business. Sometimes, however, laws and policies are complicated. If you have any questions about this Code or a particular situation, you should discuss those questions with your supervisor, the Human Resources Department, or the Legal Department. You may send an email to compliance@rig.net or call +1 281.674.0708.