

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

VIASAT, INC.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	2/8
2. Internal Controls	6	0/12
3. Support to Employees	7	3/14
4. Conflict of Interest	4	2/8
5. Customer Engagement	7	1/14
6. Supply Chain Management	5	0/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	3/8
10. State-Owned Enterprises	0	N/A
TOTAL		11 / 102
BAND		F

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
<p>There is evidence that the company has a publicly stated commitment to 'integrity' and 'high ethical standards' which is supported and endorsed by the Chairman and CEO. Although this statement does not explicitly mention anti-bribery and corruption, it forms part of the company's wider code of conduct, which outlines the company's commitment to anti-bribery and corruption.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1</p> <p>[p.0] Dear Fellow Employees: Although ViaSat has experienced a good deal of growth and change over the last 18 years, one thing has not changed at ViaSat – the way we conduct ourselves every day. Our commitment to integrity and ethical behavior in all that we do has been in place since the company started – and it remains strong today. This commitment has enabled ViaSat to establish a reputation for operating with the highest ideals of character and business conduct. These ideals are vital to securing and maintaining the respect and trust of our stockholders, employees, customers, government officials, and communities.</p> <p>In most cases, common sense and sound judgment are strong foundations for ethical business behavior – doing the right thing, the right way, all the time. However, in some situations, more guidance may be needed. That is the purpose of our Guide to Business Conduct. The Guide offers an explanation of ViaSat's ideals and standards for ethical behavior in easy-to-understand terms. It is not designed to provide an answer to every possible question or issue you may face. The Guide, along with regular training, will provide you the resources necessary to make good decisions in difficult situations. I ask each employee to make a personal commitment to conduct themselves in a manner that reflects the ViaSat ideals and standards reflected in this Guide.</p> <p>Ultimately, it is our hope and expectation that the Guide will be continually marginalized by the higher standard set by ViaSat employees in the course of each day – not because it is required, but because it is the right thing to do.</p> <p>Sincerely,</p> <p>Mark D. Dankberg Chairman and Chief Executive Officer</p> <p>[p.15] Compliance with Applicable Law</p> <p>All ViaSat employees must follow all laws, regulations, and company policies that govern their work. Laws and regulations may differ, depending on the country or state in which we work. Because ViaSat is a U.S. based company, some U.S. laws apply to subsidiaries outside the U.S. These include the Foreign Corrupt Practices Act, as well as laws and regulations about boycotts, and import and export activities. No excuse or pressure justifies breaking the law. Do not use a consultant, representative or contractor to break the law. In some countries, certain conduct is banned but the ban is not currently enforced. This does not excuse any illegal action by a ViaSat employee. If ViaSat has an internal standard that is stricter than what is required by local law, all ViaSat employees and representatives must follow ViaSat's higher standard.</p> <p>Key points</p> <ul style="list-style-type: none"> ◆ Follow all laws, regulations, and company policies that apply to your work. ◆ Do not give money or anything of value to government officials to influence their decisions. ◆ When ViaSat's standards are higher than what is required by local law, we meet the higher standards.

[p.16] Foreign Corrupt Practices Act

The U.S. Foreign Corrupt Practices Act (FCPA) forbids giving money or anything of value, directly or through other parties, to foreign officials in order to influence their decisions. Different types of foreign officials include:

- ◆ Officials and employees of national, regional, or local governments
- ◆ Military personnel
- ◆ Candidates for political office and political parties
- ◆ Officers of commercial businesses or other businesses that are owned or controlled by national, regional, or local governments
- ◆ Employees and officials of public international organizations

For more information about the FCPA (as well as the UK Bribery Act of 2010), please see ViaSat's Anti-Corruption Guidelines.

[p.18] What would you do?

Question: Government agency officials have hinted that things would go more smoothly if I gave them an extra payment. Can I?

Answer: Probably not. In the U.S. this practice is not allowed. All payments must be directly related to products and services outlined in contracts or cost schedules, and must be made to the government, not to individuals. Check with ViaSat legal counsel before acting.

Question
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
1
Comments
<p>There is evidence that the company's Guide to Business Conduct provides details on its anti-bribery and corruption policy. There is evidence that it prohibits payments to public officials and that the policy applies to all employees.</p> <p>However, the company receives a score of '1' because its policy does not specifically refer to commercial bribery and it does not extend beyond a general commitment to comply with anti-bribery legislation. Although the company describes facilitation payments, it does not clearly refer to them by name and does not prohibit them. In addition, the company does not clearly indicate that its anti-bribery and corruption policy applies to board members, or the staff and leadership of subsidiaries and other controlled entities. There is some indication that the company has an additional anti-corruption document, however this does not appear to be not publicly accessible.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.4] All ViaSat employees must comply with the company's values and principles. No one may ask any ViaSat employee to break the law, or go against the company's policies and values.</p> <p>[10] If you are aware of credible evidence of: (a) a significant government overpayment; (b) a violation of Federal criminal law involving fraud, conflicts of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or (c) a violation of the civil False Claims Act, you should immediately report such evidence to your supervisor or someone in ViaSat management.</p> <p>[p.15] Compliance with Applicable Law</p> <p>All ViaSat employees must follow all laws, regulations, and company policies that govern their work. Laws and regulations may differ, depending on the country or state in which we work. Because ViaSat is a U.S. based company, some U.S. laws apply to subsidiaries outside the U.S. These include the Foreign Corrupt Practices Act, as well as laws and regulations about boycotts, and import and export activities. No excuse or pressure justifies breaking the law. Do not use a consultant, representative or contractor to break the law. In some countries, certain conduct is banned but the ban is not currently enforced. This does not excuse any illegal action by a ViaSat employee. If ViaSat has an internal standard that is stricter than what is required by local law, all ViaSat employees and representatives must follow ViaSat's higher standard.</p> <p>Key points</p> <ul style="list-style-type: none"> ◆ Follow all laws, regulations, and company policies that apply to your work. ◆ Do not give money or anything of value to government officials to influence their decisions. ◆ When ViaSat's standards are higher than what is required by local law, we meet the higher standards. <p>[p.16] Foreign Corrupt Practices Act</p> <p>The U.S. Foreign Corrupt Practices Act (FCPA) forbids giving money or anything of value, directly or through other parties, to foreign officials in order to influence their decisions. Different types of foreign officials include:</p> <ul style="list-style-type: none"> ◆ Officials and employees of national, regional, or local governments ◆ Military personnel ◆ Candidates for political office and political parties ◆ Officers of commercial businesses or other businesses that are owned or controlled by national, regional, or local governments ◆ Employees and officials of public international organizations

For more information about the FCPA (as well as the UK Bribery Act of 2010), please see ViaSat's Anti-Corruption Guidelines.

[p.18] What would you do?

Question: Government agency officials have hinted that things would go more smoothly if I gave them an extra payment. Can I?

Answer: Probably not. In the U.S. this practice is not allowed. All payments must be directly related to products and services outlined in contracts or cost schedules, and must be made to the government, not to individuals. Check with ViaSat legal counsel before acting.

[4] 10K Report 2019

Accessed 10/09/2019

<http://investors.viasat.com/static-files/c9af6458-5162-48cf-aba7-f48e38be355a>

[p.66] We have adopted a code of ethics applicable to all of our employees (including our principal executive officer, principal financial officer, principal accounting officer and controller). The code of ethics is designed to deter wrongdoing and to promote honest and ethical conduct and compliance with applicable laws and regulations. The full text of our code of ethics is published on our website at www.viasat.com.

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
0
Comments
<p>There is no evidence that the company has a designated board committee or individual board member responsible for anti-bribery and corruption. There is some indication that the company has a managerial-level Ethics Committee, which reports to the Vice-President of Human Resources, Chief Financial Officer, and General Counsel. It is not clear that the Ethics Committee reports to the board or a designated board committee.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.1] ViaSat operates a corporate-wide program to coordinate, implement and monitor compliance with corporate values, laws and regulations, and policies.</p> <ul style="list-style-type: none"> ◆ Oversight of the Ethics and Compliance Program is the responsibility of the Ethics Committee, which is comprised of representatives from ViaSat's security, legal, finance, government contracts, and human resources departments. ◆ The Ethics Committee reports to ViaSat's Vice-President of Human Resources, Chief Financial Officer, and General Counsel. <p>[6] Corporate Governance Guidelines Accessed 10/09/2019 http://investors.viasat.com/static-files/fe0ee34b-c515-4360-a42a-6b234baf250e [p.3] Committees. The current three standing committees of the Board are the Audit Committee, Compensation and Human Resources Committee, and Nominating and Corporate Governance Committee. From time to time the Board may establish a new committee or disband a current committee depending upon the circumstances.</p>

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
0
Comments
There is evidence that the company has an Ethics Committee that reports to the Vice-President of Human Resources, Chief Financial Officer, and General Counsel. However, it is not clear whether any of these individuals, or any other managerial-level individual, is ultimately responsible for implementing and managing the company's anti-bribery and corruption programme.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1</p> <p>[p.1] ViaSat operates a corporate-wide program to coordinate, implement and monitor compliance with corporate values, laws and regulations, and policies.</p> <ul style="list-style-type: none"> ◆ Oversight of the Ethics and Compliance Program is the responsibility of the Ethics Committee, which is comprised of representatives from ViaSat's security, legal, finance, government contracts, and human resources departments. ◆ The Ethics Committee reports to ViaSat's Vice-President of Human Resources, Chief Financial Officer, and General Counsel.

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
0
Comments
Based on publicly available information, there is no evidence that the company has a formal risk assessment procedure that is used to inform its anti-bribery and corruption programme.
Evidence
No evidence found.

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
0
Comments
Based on publicly available information, there is no evidence that the company's anti-bribery and corruption programme is subject to audit or review.
Evidence
No evidence found.

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
0
Comments
<p>There is no evidence that the company has a publicly stated procedure for dealing with bribery and corruption allegations, incidents or whistleblowing reports, despite some indication that it provides a whistleblowing helpline. There is no evidence that the company commits to investigating reported concerns or allegations, nor does it provide information on the conduct of internal investigations, such as whether cases are handled by an independent team and/or report to an independent board member. There is no evidence that a central body reviews summary information on all ongoing investigations on a regular basis.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.2] Values Line - ViaSat's Ethics and Compliance Helpline</p> <p>In addition to normal resources available for help, the Values Line (ViaSat's ethics and compliance helpline) works seven days a week, 24 hours a day for requesting information or reporting concerns. ViaSat's ethics and compliance helpline is operated by an independent third party, so calls will remain anonymous at your request.</p> <p>[...] You can reach the Values Line ViaSat's ethics and compliance helpline at (888) 475-8376</p> <p>For federal government customers or contracts, you can report suspected fraud, waste, or abuse on the DoD Hotline at (800) 424-9098, or http://www.dodig.mil/hotline.</p>

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
Based on publicly available information, there is no evidence that the company assures itself of the quality of its internal investigations, for example, by ensuring that staff conducting investigations are properly trained or by stipulating a procedure to handle complaints about the investigation process.
Evidence
No evidence found.

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
0
Comments
Based on publicly available information, there is no evidence the company's investigative procedure includes a commitment to report material findings to the board and, if necessary, to relevant authorities.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.2] Values Line - ViaSat's Ethics and Compliance Helpline</p> <p>[...] Disciplinary action, up to and including the termination of employment, may occur to any employee who goes against ViaSat's ethical business practices, or who knowingly gives a false report.</p>

Question
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
Evidence
No evidence found.

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
0
Comments
<p>There is some evidence that the company provides its employees with regular training, however it is not explicitly clear that this training covers anti-bribery and corruption. There is no evidence to indicate how frequently employees are required to undertake training, nor whether training is provided to all employees across all divisions and countries of operation, and in all appropriate languages.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.0] Dear Fellow Employees</p> <p>[...]</p> <p>The Guide, along with regular training, will provide you the resources necessary to make good decisions in difficult situations.</p> <p>[...]</p> <p>Sincerely, Mark D. Dankberg Chairman and Chief Executive Officer</p>

Question
3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: a) Employees in high risk positions, b) Middle management, c) Board members.
Score
0
Comments
There is no evidence that the company provides tailored anti-bribery and corruption training for employees based on an assessment of their role and exposure to corruption risk.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.0] Dear Fellow Employees</p> <p>[..]</p> <p>The Guide, along with regular training, will provide you the resources necessary to make good decisions in difficult situations.</p> <p>[...]</p> <p>Sincerely, Mark D. Dankberg Chairman and Chief Executive Officer</p>

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
0
Comments
There is no evidence that the company measures and reviews the effectiveness of its anti-bribery and corruption or compliance programme.
Evidence
No evidence found.

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive schemes for employees incorporate anti-bribery and corruption principles. There is some evidence to indicate that the promotion of an ethical culture forms part of the incentive structure for the company's leadership, however there is no evidence that this applies across the organisation to all employees.
Evidence
<p>[3] Proxy Statement August 2019 Accessed 10/09/2019 http://investors.viasat.com/static-files/ddb80dcb-277c-40f3-a4c1-1693e6f496e4 [p.9] Factors considered for the CEO's fiscal 2019 annual bonus</p> <p>Leadership performance</p> <p>[...]</p> <p>Directed commitment to creating an ethical culture; employee engagement level exceeding the industry.</p>

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
1
Comments
<p>There is some evidence that the company commits to support and protect employees who refuse to act unethically, when where such decisions may result in a loss of business or profit. The company's Guide to Business Conduct encourages employees to ask questions about workplace behaviour if necessary and states that employees should not deviate from company values in order to make a profit.</p> <p>However, the company receives a score of '1' because there is no evidence that it assures itself of its employees' confidence in this statement through anonymised surveys or other clearly stated means.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.0] The Guide, along with regular training, will provide you the resources necessary to make good decisions in difficult situations.</p> <p>[...]</p> <p>Sincerely, Mark D. Dankberg Chairman and Chief Executive Officer</p> <p>[p.2] Every ViaSat employee should raise questions or concerns about workplace behavior. If doubt exists – ask. Many unethical actions are caused by someone not having the proper information, not understanding the information they have or by a desire to “just get things done,” rather than by poor character or dishonest intentions.</p> <p>[...] An employee, who in good faith seeks advice, raises a concern or reports improper behavior is doing the right thing.</p> <p>[p.4] All ViaSat employees must comply with the company's values and principles. No one may ask any ViaSat employee to break the law, or go against the company's policies and values.</p> <p>[p.7] Conduct involving our business partners</p> <p>Key points</p> <p>[...]</p> <p>Do not compromise our values to make a profit.</p>

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
1
Comments
<p>There is evidence that the company has a publicly stated policy of non-retaliation against whistleblowers and employees who report concerns around unethical business practices.</p> <p>However, the company receives a score of '1' because there is no evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means. There is also no clear evidence that this policy applies to those engaged by the group as third parties, suppliers and joint venture partners.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.2] Resulting actions</p> <p>ViaSat will not accept retaliation by anyone at any level in the company against an individual for doing the right thing. ViaSat bans all personnel from taking any form of negative action against an employee who reports a concern.</p> <p>Disciplinary action, up to and including the termination of employment, may occur to any employee who goes against ViaSat's ethical business practices, or who knowingly gives a false report.</p>

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
1
Comments
<p>There is evidence that the company provides multiple channels for employees to report instances of suspected corrupt activity and seek advice on the company's anti-bribery and corruption programme. There is evidence that these channels are sufficiently varied to allow the employee to raise concerns across the management chain and to external bodies through an independent third party hotline. These channels allow for anonymous reporting and there is evidence that they are available to employees in countries of operation where the company has a significant presence.</p> <p>However, the company receives a score of '1' because it does not indicate that reports are treated confidentially and there is no evidence that channels are available in all countries of operation or all appropriate languages. Moreover, although suppliers are able to use the whistleblowing line, there is no indication that third parties and joint venture partners are also invited to use the channels.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.2] Values Line - ViaSat's Ethics and Compliance Helpline</p> <p>In addition to normal resources available for help, the Values Line (ViaSat's ethics and compliance helpline) works seven days a week, 24 hours a day for requesting information or reporting concerns. ViaSat's ethics and compliance helpline is operated by an independent third party, so calls will remain anonymous at your request. If reporting a concern, be prepared to give the following information about the situation:</p> <ul style="list-style-type: none"> ① Time and place ① Individuals involved ① Other information that might help with follow up <p>You can reach the Values Line ViaSat's ethics and compliance helpline at (888) 475-8376</p> <p>For federal government customers or contracts, you can report suspected fraud, waste, or abuse on the DoD Hotline at (800) 424-9098, or http://www.dodig.mil/hotline.</p> <p>Accountability and Actions</p> <p>Compliance with local law and ViaSat's policies, procedures and values is not optional. These exist to protect employees, customers, suppliers, and the company from improper conduct.</p> <p>[...] An employee, who in good faith seeks advice, raises a concern or reports improper behavior is doing the right thing.</p> <p>If you are calling from abroad, we have set up international numbers for those locations where ViaSat has a significant presence. From Australia, please call 1-800-20-8932 or 1-800-14-1924. From China, please call 10-800-711-0631 or 10-800-110-5077. From India, please call 000-800-100-1075. From Switzerland, please call 0800-56-1525. From England, please call 0808-234-7051.</p> <p>[p.4] All ViaSat employees must comply with the company's values and principles. No one may ask any ViaSat employee to break the law, or go against the company's policies and values.</p> <p>[p.10] If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position. If you are aware of credible</p>

evidence of: (a) a significant government overpayment; (b) a violation of Federal criminal law involving fraud, conflicts of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or (c) a violation of the civil False Claims Act, you should immediately report such evidence to your supervisor or someone in ViaSat management. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your supervisor or ViaSat legal counsel.

[p.19] If you are not sure what to do, start asking some of the following questions and keep asking them until you are certain you are doing the right thing.

- ◆ Am I doing the right thing the right way?
- ◆ Are my actions legal?
- ◆ Am I being fair and honest?
- ◆ Will my action stand the test of time?
- ◆ How will I feel about myself afterwards?
- ◆ How would it look in the newspaper?
- ◆ What would I tell my child to do?
- ◆ How would I feel if my family, friends and neighbors knew what I was doing?

If you are still not sure what to do, first contact your manager. If you do not feel comfortable doing this, contact the following other ViaSat resources:

- ⑥ Legal Department
- ⑥ Human Resources Department
- ⑥ Security Department
- ⑥ The Values Line – ViaSat’s ethics and compliance helpline
- ⑥ Other communication channels you think could help

[9] Policy Concerning Entertainment, Gifts and Ethics

Accessed 10/09/2019

https://p.widencdn.net/cefkyt/Entertainment_Gifts_Viasat_Policy_070PR034

[p.1] 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.”

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
1
Comments
<p>There is evidence that the company has a policy on conflicts of interest for its employees, which specifically refers to actual and perceived conflicts. There is evidence that the categories of conflict it covers include employee relationships and financial interests. The company also has a separate policy that applies to its board members and refers to actual, potential and perceived conflicts.</p> <p>However, the company receives a score of '1' because its employee conflict of interest policy does not cover government relationships or other employment, and its board member policy does not discuss any of the possible categories of conflict outlined in the scoring criteria.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1</p> <p>[p.4] All ViaSat employees must comply with the company's values and principles. No one may ask any ViaSat employee to break the law, or go against the company's policies and values.</p> <p>[p.5] Personal relationships</p> <p>ViaSat recognizes that all individuals have the right to work at ViaSat. In some cases, employees may have family members or close personal friends also working for ViaSat. In these situations ViaSat will strive to avoid where possible work situations that create a direct reporting relationship between family members or individuals with a close personal relationship.</p> <p>[p.7] Conflicts of Interest</p> <p>Business decisions must be based on sound judgment, not on personal interest or gain. Avoid any situation that creates, or appears to create, a conflict. No employee should represent ViaSat in a business deal if he or she, a family member, or a close friend has a financial interest. No employee should take any business action for personal benefit, or to benefit a relative or close friend. Employees must report to ViaSat legal counsel any situation that may appear to be a conflict of interest.</p> <p>[...]</p> <p>Key points</p> <p>Avoid conflicts of interest and identify situations where they may occur</p> <p>[6] Corporate Governance Guidelines Accessed 10/09/2019 http://investors.viasat.com/static-files/fe0ee34b-c515-4360-a42a-6b234baf250e</p> <p>[p.2] I. Conflicts of Interest. Directors are expected to avoid any action, position or interest that conflicts with the interests of the Company or gives the appearance of a conflict. If an actual or potential conflict of interest develops, the director should immediately report the matter to the Chairman of the Board. If any significant conflict of interest cannot be resolved, the director should consider resignation from the Board. If a director has a personal interest in a matter before the Board, the director will disclose the interest to the Board, excuse himself or herself from discussion on the matter and not vote on the matter.</p>

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
1
Comments
<p>There is evidence that the company has procedures to identify, declare and manage conflicts of interest. The company states that employees must inform the company's legal counsel of any apparent conflicts, while directors must inform the chairperson of the board. In situations where board members are found to have conflicts, there is evidence that they may be required to resign from the board or be exempt from voting on related matters.</p> <p>However, the company receives a score of '1' because there is no evidence that all employee and board member declarations are held in a dedicated central register that is accessible to those responsible for oversight of the process. The policy also does not mention examples of criteria for recusal and does not specifically state that disciplinary measures apply if the company's policy on conflicts is breached.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1</p> <p>[p.4] All ViaSat employees must comply with the company's values and principles. No one may ask any ViaSat employee to break the law, or go against the company's policies and values.</p> <p>[p.5] Personal relationships</p> <p>ViaSat recognizes that all individuals have the right to work at ViaSat. In some cases, employees may have family members or close personal friends also working for ViaSat. In these situations ViaSat will strive to avoid where possible work situations that create a direct reporting relationship between family members or individuals with a close personal relationship.</p> <p>[p.7] Conflicts of Interest</p> <p>Business decisions must be based on sound judgment, not on personal interest or gain. Avoid any situation that creates, or appears to create, a conflict. No employee should represent ViaSat in a business deal if he or she, a family member, or a close friend has a financial interest. No employee should take any business action for personal benefit, or to benefit a relative or close friend. Employees must report to ViaSat legal counsel any situation that may appear to be a conflict of interest.</p> <p>[...]</p> <p>Key points</p> <p>Avoid conflicts of interest and identify situations where they may occur</p> <p>[6] Corporate Governance Guidelines Accessed 10/09/2019 http://investors.viasat.com/static-files/fe0ee34b-c515-4360-a42a-6b234baf250e</p> <p>[p.2] I. Conflicts of Interest. Directors are expected to avoid any action, position or interest that conflicts with the interests of the Company or gives the appearance of a conflict. If an actual or potential conflict of interest develops, the director should immediately report the matter to the Chairman of the Board. If any significant conflict of interest cannot be resolved, the director should consider resignation from the Board. If a director has a personal interest in a matter before the Board, the director will disclose the interest to the Board, excuse himself or herself from discussion on the matter and not vote on the matter.</p>

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
0
Comments
There is no evidence that the company has a policy regulating the employment of current or former public officials.
Evidence
No evidence found.

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company reports details of the contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
<p>There is some evidence that the company has a policy on corporate political contribution. The company's policy indicates that it does not make political contributions in the United States in line with local regulations, but states that it may make political donations in other countries where permitted and subject to prior approval. Although there is evidence that any donations must be properly documented and recorded, there is no evidence that approval must be given from an individual with legal expertise. The company also states that it does not currently make donations through a Political Action Committee but indicates that it may in the future.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.16] Political Activities and Contributions</p> <p>ViaSat encourages all employees to vote and be active members in political processes. In the U.S., laws limit the use of any corporate funds or resources for U.S. Federal elections. Similar laws exist in many states. U.S. election laws allow companies to create and support political action committees. Although it may do so in the future, ViaSat at this time does not sponsor such committees. In the U.S., ViaSat has the following rules:</p> <ul style="list-style-type: none"> ◆ ViaSat funds may not be donated to any political party, candidate or campaign. ◆ ViaSat property or work time may not be used to assist any political party, candidate or campaign. ◆ Employees may not be reimbursed for personal political activity. <p>Some states and countries, other than the United States, permit companies to donate to political parties and candidates. An authorized executive of the company must review in advance, and approve in writing, any such donation. The donation must be fully documented, properly identified and recorded on the company's books.</p>

Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
0
Comments
There is no evidence that the company publishes any details of its political contributions.
Evidence
No evidence found.

Question
5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
0
Comments
<p>There is no evidence that the company has a policy or procedure covering charitable donations and sponsorships, despite evidence that it engages in such activities. The company provides some information on the types of charitable initiatives that it supports on its website, but does not disclose specific details such as the recipient, amount, country of recipient, or which corporate entity made the payment.</p>
Evidence
<p>[11] Giving (webpage) Accessed 10/09/2019 https://www.viasat.com/about/giving Viasat In The Community</p> <p>STEAM Education</p> <p>We believe all youth should have access to STEAM education that encourages their imagination to take them anywhere.</p> <p>Our hands-on approach involves educational entities and partnerships that allow us to bring students onto our campus for tours, activities, and interactions with the same engineers who are solving some of the world's toughest communications problems.</p> <p>Veteran and Military Support</p> <p>Whether it's through our technology, hiring veterans, or helping military families in our communities, we're committed to supporting those who protect and serve.</p> <p>Employee Driven Outreach</p> <p>We're on a mission to connect communities, everywhere. Whether it's helping out after a natural disaster, mentoring students to foster a passion for technology, supporting military families or strengthening our communities – these causes spark our employees' passions. We empower and support them through donation matching, volunteer grants, and team fundraising that impact their communities. Together, we can change the world for good.</p> <p>Request for Viasat to support your organization If you're interested in submitting a request, please CLICK HERE</p> <p>If there is interest in your submission, a team member from Viasat Social Impact will reach out for more information.</p>

5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
0
Comments
<p>There is some evidence that the company has controls in place to regulate lobbying activities by requiring employees to comply with all relevant laws. There is some indication that the company's legal counsel has oversight of lobbying activities but this is not clear.</p> <p>The company receives a score of '0' because there is no evidence that it publicly defines lobbying, nor that it outlines what it considers to be responsible lobbying principles. Additionally, the company's policy is unclear and does not mention standards of conduct or specific oversight mechanisms that apply to all types of lobbyists. The company does not outline any controls or guidelines. It is also not clear whether this policy applies to board members and third parties engaged in lobbying activities on the company's behalf.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.16] ViaSat has a responsibility to customers, shareholders, employees and the general public to build an understanding and acceptance of the company's position at all levels of government. It is acceptable for the company to express its view to governments on subjects that might affect the company's welfare. Communicating to government employees and officials on the company's position can make the employee and the company subject to applicable lobbying laws. We must comply with those laws. Please consult with ViaSat legal counsel.</p>

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
0
Comments
There is no evidence that the company publishes any information on its lobbying aims, topics or activities. The company states that it will express its views to governments on subjects that might affect the company's welfare, but provides no further information on the topics that this may include.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.16] ViaSat has a responsibility to customers, shareholders, employees and the general public to build an understanding and acceptance of the company's position at all levels of government. It is acceptable for the company to express its view to governments on subjects that might affect the company's welfare. Communicating to government employees and officials on the company's position can make the employee and the company subject to applicable lobbying laws. We must comply with those laws. Please consult with ViaSat legal counsel.</p>

Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
There is no evidence that the company provides any details about its global lobbying expenditure.
Evidence
No evidence found.

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
1
Comments
<p>There is evidence that the company has a policy on the giving and receipt of gifts and hospitality to ensure that such promotional expenses are bona fide and not used for bribery. The company's policy indicates that employees should generally refuse gifts and hospitality, and specifically states that the giving and receipt of promotional expenses to/from government officials is not permitted under any circumstances.</p> <p>However, the company receives a score of '1' because it does not specify financial limits or approval procedures for different types of gifts and hospitality. There is also no evidence that all gifts and hospitality above a certain threshold are recorded in a dedicated central register that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[9] Policy Concerning Entertainment, Gifts and Ethics Accessed 10/09/2019 https://p.widencdn.net/cefkyt/Entertainment_Gifts_Viasat_Policy_070PR034 [p.1] As a general rule, Viasat employees are prohibited from soliciting or accepting any kind of gift, entertainment or article of value.</p> <p>Exceptions to this general rule include the following:</p> <p>(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.</p> <p>(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.</p> <p>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.</p> <p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.7] Gifts and entertainment</p> <p>In many industries and countries, gifts and entertainment are common practices used to strengthen business relationships. Throughout the world, ViaSat's position is clear: no gift, favor, or entertainment should be accepted or provided if it will obligate or appear to obligate the person who receives it. Receiving or giving gifts of cash or cash equivalents is never allowed. Further, if you are doing business with the government, gifts, entertainment or other items of value may not be offered or exchanged under any circumstances to or with any employees of the U.S., state or local governments. Company employees may accept or give gifts, favors, and entertainment only if they meet all of the following criteria:</p> <ul style="list-style-type: none"> ⓐ They are not against the law or the policy of the other parties' company ⓐ They are consistent with customary business practices in the country or industry ⓐ They are reasonably related to business relationships ⓐ They do not cost too much, and are consistent with any existing department guidelines ⓐ They cannot be construed as a bribe, payoff, or improper influence ⓐ Public disclosure of the facts would not embarrass the company or the employee ⓐ They do not violate our business values or ethics in any other manner

If you are offered a gift that falls outside the list shown above, you should politely refuse. There may be rare cases, such as a public presentation, where refusal of a gift may not be possible, or in some countries, cultural norms may prevent refusing a gift without being rude. In those situations you may accept the gift and promptly turn it over to ViaSat. It is not acceptable to request or ask for personal gifts, favors, entertainment, or services.

[p.9] Business with the government

[...]

In your interactions with the government, you should:

[...]

Never offer or exchange any gifts, gratuities or favors with, or pay for meals, entertainment, travel or other similar expenses for, government employees.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
0
Comments
There is no evidence that the company requires and ensures the involvement of its procurement department in the establishment and/or oversight of its supplier base. The company provides a description of good practice in procurement within its Guide to Business Conduct but this does not mention the procurement department or a central team responsible for the process.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.9] Supplier relations</p> <p>All procurement decisions will be based on the best value and service received by ViaSat. Good procurement conduct includes the following:</p> <ul style="list-style-type: none"> ① Use established agreements and terms ① Obtain competitive bids ① Confirm the financial and legal status of the supplier ① Verify quality and service claims on a regular basis ① Make sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment, and the applicable rate or fee ① Avoid reciprocal agreements ① Encourage support for small, disadvantaged, and minority-owned businesses

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its suppliers. The company states that it will not engage with suppliers with a history of fraudulent or unethical activity, but it is not clear how the company assures itself of this.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.9] Supplier relations</p> <p>[...]</p> <p>ViaSat will not knowingly use suppliers who participate in the following activities:</p> <ul style="list-style-type: none"> ⊗ Supply unsafe products or services ⊗ Break laws or regulations ⊗ Fraudulent or other unethical activities

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
0
Comments
<p>There is evidence that the company expects certain standards of conduct from its suppliers, but there is no clear evidence that the company ensures that its suppliers have specific anti-bribery and corruption standards in place that meet a high standard. The company's General Terms and Conditions of Purchase simply state that suppliers must comply with anti-corruption laws.</p>
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.7] Business partners</p> <p>Our values, honesty, and behavior do not stop with our actions, or at our doors. We expect the same from our suppliers, customers, and others who do business with us.</p> <p>[10] General Terms and Conditions of Purchase Accessed 10/09/2019 https://p.widencdn.net/srgf5l/Terms_and_Conditions_Solicitation_Purchase_PR001076 [p.4] Seller warrants that in performance of all work under the Purchase Order, Seller and its consultants and subcontractors have complied with or will comply with all applicable federal, state, local and foreign laws, orders, rules, regulations, and ordinances, including, without limitation, the Foreign Corrupt Practice Act of 1977, as amended, and other regulations aimed at preventing bribery and corruption.</p>

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
0
Comments
There is no evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required throughout the supply chain.
Evidence
No evidence found.

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
0
Comments
There is no evidence that the company has a policy covering the use of agents. The company states that employees should not use a consultant or other presentative to break the law, but it is not clear that this specifically includes agents nor does it outline controls to prevent this from occurring.
Evidence
<p>[1] Guide to Business Conduct Accessed 10/09/2019 http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1 [p.15] Compliance with Applicable Law</p> <p>All ViaSat employees must follow all laws, regulations, and company policies that govern their work. Laws and regulations may differ, depending on the country or state in which we work. Because ViaSat is a U.S. based company, some U.S. laws apply to subsidiaries outside the U.S. These include the Foreign Corrupt Practices Act, as well as laws and regulations about boycotts, and import and export activities. No excuse or pressure justifies breaking the law. Do not use a consultant, representative or contractor to break the law.</p>

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its agents or intermediaries.
Evidence
No evidence found.

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
0
Comments
There is no evidence that the company aims to establish the beneficial ownership of its agents. The company does not commit to not engaging or terminate its engagement with agents or intermediaries if beneficial ownership cannot be established.
Evidence
No evidence found.

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
0
Comments
There is no evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries.
Evidence
No evidence found.

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company recognises incentive structures as a risk factor in agent behaviour, nor that incentive structures are designed to minimise bribery or corruption risks.
Evidence
No evidence found.

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the agents currently contracted to act for and/or on behalf of the company.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption-related investigations, incidents or the associated disciplinary actions involving agents.
Evidence
No evidence found.

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures.
Evidence
No evidence found.

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?
Score
0
Comments
There is no evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures.
Evidence
No evidence found.

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no evidence that the company commits to taking an active role in preventing bribery and corruption in its joint ventures.
Evidence
No evidence found.

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the company addresses the corruption risks associated with offset contracting, nor is there evidence that a dedicated body, department or team is responsible for monitoring the company's offset activities.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.

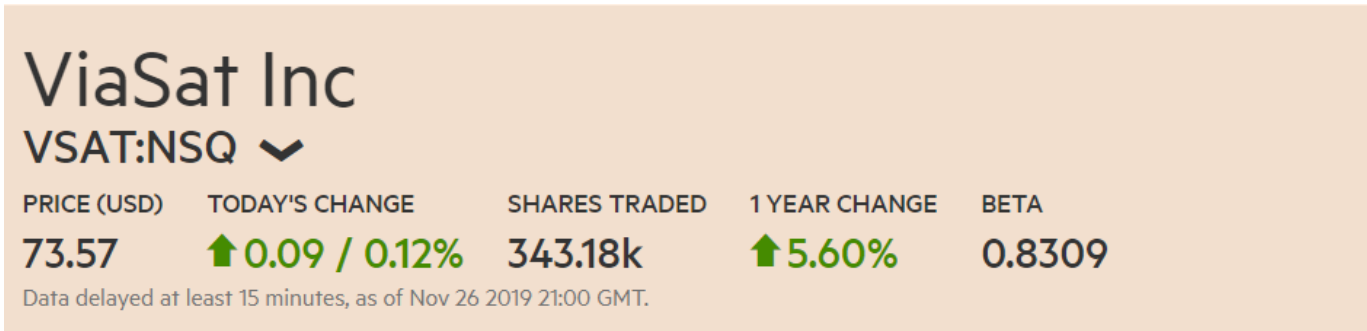
Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on its behalf.
Evidence
No evidence found.

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
There is no evidence that the company publishes any details of its offset obligations and/or contracts.
Evidence
No evidence found.

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
0
Comments
There is no evidence that the company acknowledges the corruption risks of operating in different markets, nor that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
No evidence found.

Question																																																																																											
9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?																																																																																											
Score																																																																																											
1																																																																																											
Comments																																																																																											
<p>There is evidence that the company provides a list of its subsidiaries in its annual filing to the U.S. Securities and Exchange Commission. For each entity, the company lists the country of incorporation. Since this information is published in an annual reporting document, it is understood that this list is updated on an annual basis.</p> <p>However, the company receives a score of '1' because the company does not provide further details for each entity such as the percentage ownership and country of operation. Although it the list forms part of an annual reporting document, this list is not accompanied by a statement that it is complete at the time of publication so it is not fully clear whether the list includes all of the company's holdings such as joint ventures or associates.</p>																																																																																											
Evidence																																																																																											
<p>[4] 10K Report 2019 Accessed 10/09/2019 http://investors.viasat.com/static-files/c9af6458-5162-48cf-aba7-f48e38be355a [Exhibit 21.1]</p>																																																																																											
<div style="text-align: right;">Exhibit 21.1</div> <table> <thead> <tr> <th>Subsidiaries</th><th>State or Other Jurisdiction of Incorporation or Organization</th></tr> </thead> <tbody> <tr><td>Carmel Comunicaciones, S.A. de C.V.</td><td>Mexico</td></tr> <tr><td>Engreen, Inc.</td><td>California</td></tr> <tr><td>Engreen India Private Limited</td><td>India</td></tr> <tr><td>Horsebridge Defence and Security Limited</td><td>United Kingdom</td></tr> <tr><td>IOM Licensing Holding Company Limited</td><td>Isle of Man</td></tr> <tr><td>MBC Croatia d.o.o</td><td>Croatia</td></tr> <tr><td>MBC Czech Republic s.r.o.</td><td>Czech Republic</td></tr> <tr><td>MBC France S.A.S</td><td>France</td></tr> <tr><td>MBC Netherlands B.V.</td><td>Netherlands</td></tr> <tr><td>MBC Poland LLC sp. z o.o.</td><td>Poland</td></tr> <tr><td>MBC Switzerland Sarl</td><td>Switzerland</td></tr> <tr><td>mmWaveBroadband Co</td><td>Delaware</td></tr> <tr><td>V3GS Austria GmbH</td><td>Austria</td></tr> <tr><td>V3GS MBC Hungary Ltd</td><td>Hungary</td></tr> <tr><td>V3GS SI d.o.o</td><td>Slovenia</td></tr> <tr><td>VGlobal Corp, S.A. de C.V.</td><td>Mexico</td></tr> <tr><td>Viasat (IOM) Limited</td><td>Isle of Man</td></tr> <tr><td>Viasat Antenna Systems S.A.</td><td>Switzerland</td></tr> <tr><td>Viasat Australia Pty Limited</td><td>Australia</td></tr> <tr><td>Viasat Brasil Participações Limitada</td><td>Brazil</td></tr> <tr><td>Viasat Brasil Serviços de Comunicações Limitada</td><td>Brazil</td></tr> <tr><td>Viasat Broadband Holdings B.V.</td><td>Netherlands</td></tr> <tr><td>Viasat Canada Corp.</td><td>Canada</td></tr> <tr><td>Viasat Carrier Services, Inc.</td><td>Delaware</td></tr> <tr><td>Viasat China Services, Inc.</td><td>Delaware</td></tr> <tr><td>Viasat Colombia S.A.S</td><td>Colombia</td></tr> <tr><td>Viasat Europe Sarl (Switzerland)</td><td>Switzerland</td></tr> <tr><td>Viasat Germany GmbH</td><td>Germany</td></tr> <tr><td>Viasat India Pvt. Ltd.</td><td>India</td></tr> <tr><td>Viasat Ireland Limited</td><td>Ireland</td></tr> <tr><td>Viasat Israel Ltd.</td><td>Israel</td></tr> <tr><td>Viasat Italy S.r.l.</td><td>Italy</td></tr> <tr><td>Viasat Netherlands B.V.</td><td>Netherlands</td></tr> <tr><td>Viasat Peru S.R.L.</td><td>Peru</td></tr> <tr><td>Viasat Satellite Holdings Limited</td><td>United Kingdom</td></tr> <tr><td>Viasat Satellite Ventures Holdings Luxembourg S.a.r.l.</td><td>Luxembourg</td></tr> <tr><td>Viasat Services Holding Co</td><td>Delaware</td></tr> <tr><td>Viasat Technologies Limited</td><td>United Kingdom</td></tr> <tr><td>Viasat Tecnologia S.A. de C.V.</td><td>Mexico</td></tr> <tr><td>Viasat UK Limited</td><td>United Kingdom</td></tr> <tr><td>Viasat VS3 Holdings Limited</td><td>United Kingdom</td></tr> <tr><td>Viasat Worldwide Limited</td><td>Delaware</td></tr> <tr><td>VParent, Inc.</td><td>Delaware</td></tr> <tr><td>VService, Inc.</td><td>Delaware</td></tr> </tbody> </table>		Subsidiaries	State or Other Jurisdiction of Incorporation or Organization	Carmel Comunicaciones, S.A. de C.V.	Mexico	Engreen, Inc.	California	Engreen India Private Limited	India	Horsebridge Defence and Security Limited	United Kingdom	IOM Licensing Holding Company Limited	Isle of Man	MBC Croatia d.o.o	Croatia	MBC Czech Republic s.r.o.	Czech Republic	MBC France S.A.S	France	MBC Netherlands B.V.	Netherlands	MBC Poland LLC sp. z o.o.	Poland	MBC Switzerland Sarl	Switzerland	mmWaveBroadband Co	Delaware	V3GS Austria GmbH	Austria	V3GS MBC Hungary Ltd	Hungary	V3GS SI d.o.o	Slovenia	VGlobal Corp, S.A. de C.V.	Mexico	Viasat (IOM) Limited	Isle of Man	Viasat Antenna Systems S.A.	Switzerland	Viasat Australia Pty Limited	Australia	Viasat Brasil Participações Limitada	Brazil	Viasat Brasil Serviços de Comunicações Limitada	Brazil	Viasat Broadband Holdings B.V.	Netherlands	Viasat Canada Corp.	Canada	Viasat Carrier Services, Inc.	Delaware	Viasat China Services, Inc.	Delaware	Viasat Colombia S.A.S	Colombia	Viasat Europe Sarl (Switzerland)	Switzerland	Viasat Germany GmbH	Germany	Viasat India Pvt. Ltd.	India	Viasat Ireland Limited	Ireland	Viasat Israel Ltd.	Israel	Viasat Italy S.r.l.	Italy	Viasat Netherlands B.V.	Netherlands	Viasat Peru S.R.L.	Peru	Viasat Satellite Holdings Limited	United Kingdom	Viasat Satellite Ventures Holdings Luxembourg S.a.r.l.	Luxembourg	Viasat Services Holding Co	Delaware	Viasat Technologies Limited	United Kingdom	Viasat Tecnologia S.A. de C.V.	Mexico	Viasat UK Limited	United Kingdom	Viasat VS3 Holdings Limited	United Kingdom	Viasat Worldwide Limited	Delaware	VParent, Inc.	Delaware	VService, Inc.	Delaware
Subsidiaries	State or Other Jurisdiction of Incorporation or Organization																																																																																										
Carmel Comunicaciones, S.A. de C.V.	Mexico																																																																																										
Engreen, Inc.	California																																																																																										
Engreen India Private Limited	India																																																																																										
Horsebridge Defence and Security Limited	United Kingdom																																																																																										
IOM Licensing Holding Company Limited	Isle of Man																																																																																										
MBC Croatia d.o.o	Croatia																																																																																										
MBC Czech Republic s.r.o.	Czech Republic																																																																																										
MBC France S.A.S	France																																																																																										
MBC Netherlands B.V.	Netherlands																																																																																										
MBC Poland LLC sp. z o.o.	Poland																																																																																										
MBC Switzerland Sarl	Switzerland																																																																																										
mmWaveBroadband Co	Delaware																																																																																										
V3GS Austria GmbH	Austria																																																																																										
V3GS MBC Hungary Ltd	Hungary																																																																																										
V3GS SI d.o.o	Slovenia																																																																																										
VGlobal Corp, S.A. de C.V.	Mexico																																																																																										
Viasat (IOM) Limited	Isle of Man																																																																																										
Viasat Antenna Systems S.A.	Switzerland																																																																																										
Viasat Australia Pty Limited	Australia																																																																																										
Viasat Brasil Participações Limitada	Brazil																																																																																										
Viasat Brasil Serviços de Comunicações Limitada	Brazil																																																																																										
Viasat Broadband Holdings B.V.	Netherlands																																																																																										
Viasat Canada Corp.	Canada																																																																																										
Viasat Carrier Services, Inc.	Delaware																																																																																										
Viasat China Services, Inc.	Delaware																																																																																										
Viasat Colombia S.A.S	Colombia																																																																																										
Viasat Europe Sarl (Switzerland)	Switzerland																																																																																										
Viasat Germany GmbH	Germany																																																																																										
Viasat India Pvt. Ltd.	India																																																																																										
Viasat Ireland Limited	Ireland																																																																																										
Viasat Israel Ltd.	Israel																																																																																										
Viasat Italy S.r.l.	Italy																																																																																										
Viasat Netherlands B.V.	Netherlands																																																																																										
Viasat Peru S.R.L.	Peru																																																																																										
Viasat Satellite Holdings Limited	United Kingdom																																																																																										
Viasat Satellite Ventures Holdings Luxembourg S.a.r.l.	Luxembourg																																																																																										
Viasat Services Holding Co	Delaware																																																																																										
Viasat Technologies Limited	United Kingdom																																																																																										
Viasat Tecnologia S.A. de C.V.	Mexico																																																																																										
Viasat UK Limited	United Kingdom																																																																																										
Viasat VS3 Holdings Limited	United Kingdom																																																																																										
Viasat Worldwide Limited	Delaware																																																																																										
VParent, Inc.	Delaware																																																																																										
VService, Inc.	Delaware																																																																																										

Question
9.3 Does the company disclose its beneficial ownership and control structure?
Score
2
Comments
There is evidence that the company is publicly listed on the Nasdaq Stock Market and therefore it automatically receives a score of '2'. The company also indicates that it is publicly listed in its report to the U.S. Securities and Exchange Commission.
Evidence
<p>[12] Financial Times Markets Data (webpage) Accessed 27/11/2019 https://markets.ft.com/data/equities/tearsheet/summary?s=VSAT:NSQ</p>  <p>[4] 10K Report 2019 Accessed 10/09/2019 http://investors.viasat.com/static-files/c9af6458-5162-48cf-aba7-f48e38be355a [p.1] Name of Each Exchange on which Registered</p> <p>The Nasdaq Stock Market LLC</p>

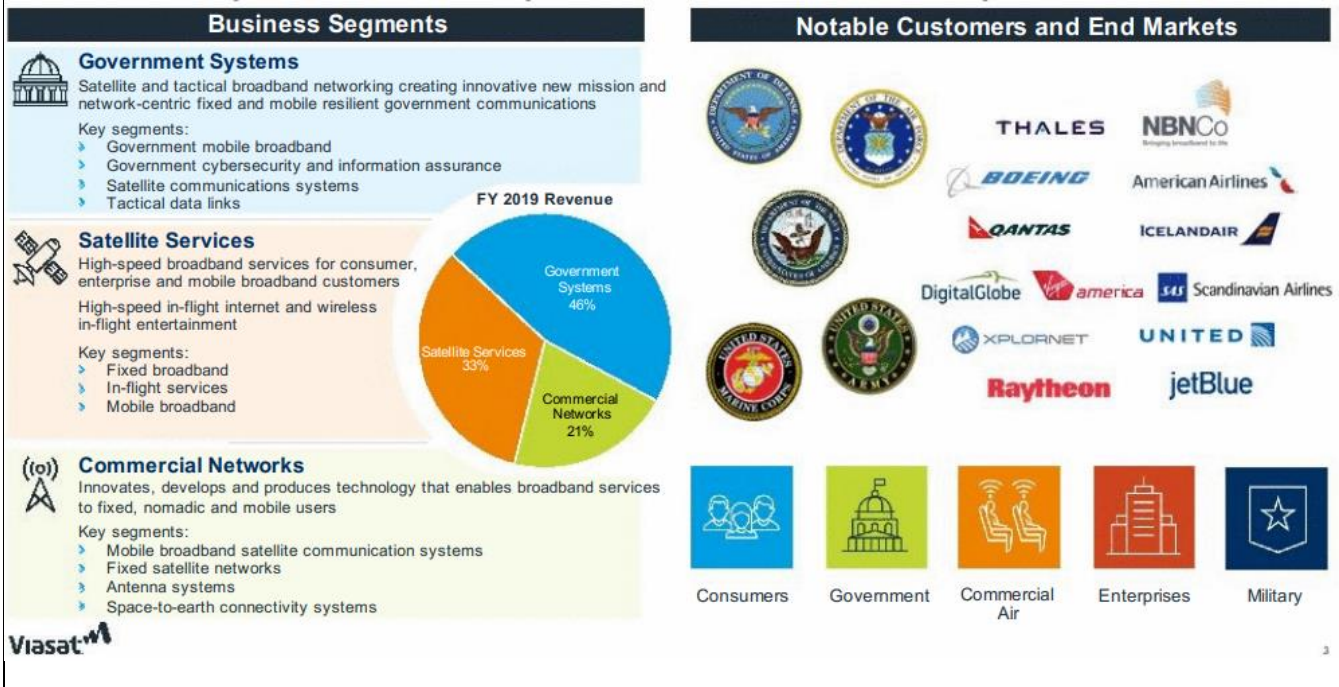
Question																						
9.4 Does the company publish a percentage breakdown of its defence sales by customer?																						
Score																						
0																						
Comments																						
<p>There is evidence that the company provides some information on its major customers in its filing to the U.S. Securities and Exchange Commission. The company indicates that the U.S. government comprised approximately 25% of its revenue in 2019 but this figure is understood to represent a portion of overall company sales rather than defence specifically. The company does not provide a percentage breakdown of sales for other customers and therefore does not reach the minimum threshold of 50% to receive a score of '1'.</p>																						
Evidence																						
<p>[4] 10K Report 2019 Accessed 10/09/2019 http://investors.viasat.com/static-files/c9af6458-5162-48cf-aba7-f48e38be355a [p.9] Our customer base is highly diversified. Customers in our satellite services segment include those customers leveraging our broadband internet and Wi-Fi services—obtained through either our direct or U.S. or international partner distribution channels—and include: residential customers, customers accessing our services via our Community or Urban Wi-Fi hotspots, small and medium-sized businesses, enterprise customers and commercial airlines, among others sectors. The customers of our government systems and commercial networks segments include the DoD, U.S. National Security Agency, the U.S. Department of Homeland Security, FVEY and other allied foreign governments and militaries, select other U.S. federal, state and local government agencies, commercial and defense contractors, satellite network integrators, large communications service providers and enterprises requiring complex communications and networking solutions. We enter into government contracts either directly with U.S. or foreign governments, or indirectly through domestic or international partners or resellers. In our commercial networks segment, we also act as both a prime contractor and subcontractor for the sale of equipment and services.</p> <p>Revenues from the U.S. government as an individual customer comprised approximately 26%, 31% and 29% of total revenues for fiscal years 2019, 2018 and 2017, respectively. None of our other customers comprised 10% or more of total revenues in fiscal years 2019, 2018 and 2017.</p> <p>[2] Annual Report 2019 Accessed 10/09/2019 http://investors.viasat.com/static-files/743e5c27-c611-4a1c-ab86-63b66b82451b [p.24] Customers of our government systems segment include the U.S. Department of Defense, those serving the Five Eye intelligence alliance (Australia, Canada, New Zealand, the United Kingdom and the United States), allied foreign governments, allied armed forces, public safety first-responders and remote government employees.</p> <p>[p.33]</p> <p>Government systems segment <i>Revenues</i></p> <table><tr><th rowspan="2">(In millions, except percentages)</th><th colspan="2">Fiscal Years Ended</th><th rowspan="2">Dollar Increase (Decrease)</th><th rowspan="2">Percentage Increase (Decrease)</th></tr><tr><th>March 31, 2019</th><th>March 31, 2018</th></tr><tr><td>Segment product revenues</td><td>\$ 709.1</td><td>\$ 556.8</td><td>\$ 152.3</td><td>27%</td></tr><tr><td>Segment service revenues</td><td>246.5</td><td>215.3</td><td>31.2</td><td>15%</td></tr><tr><td>Total segment revenues</td><td>\$ 955.6</td><td>\$ 772.1</td><td>\$ 183.5</td><td>24%</td></tr></table>	(In millions, except percentages)	Fiscal Years Ended		Dollar Increase (Decrease)	Percentage Increase (Decrease)	March 31, 2019	March 31, 2018	Segment product revenues	\$ 709.1	\$ 556.8	\$ 152.3	27%	Segment service revenues	246.5	215.3	31.2	15%	Total segment revenues	\$ 955.6	\$ 772.1	\$ 183.5	24%
(In millions, except percentages)		Fiscal Years Ended				Dollar Increase (Decrease)	Percentage Increase (Decrease)															
	March 31, 2019	March 31, 2018																				
Segment product revenues	\$ 709.1	\$ 556.8	\$ 152.3	27%																		
Segment service revenues	246.5	215.3	31.2	15%																		
Total segment revenues	\$ 955.6	\$ 772.1	\$ 183.5	24%																		

[3] Proxy Statement August 2019

Accessed 10/09/2019

<http://investors.viasat.com/static-files/ddb80dcb-277c-40f3-a4c1-1693e6f496e4>

[p.3]



10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No	Type (Webpage or Document)	Name	Download Date	Link
01	Document	Guide to Business Conduct	10/09/2019	http://investors.viasat.com/static-files/b66dd428-a9ae-4995-9fc4-a6bf2db898d1
02	Document	Annual Report 2019	10/09/2019	http://investors.viasat.com/static-files/743e5c27-c611-4a1c-ab86-63b66b82451b
03	Document	Proxy Statement August 2019	10/09/2019	http://investors.viasat.com/static-files/ddb80dcb-277c-40f3-a4c1-1693e6f496e4
04	Document	10K Report 2019	10/09/2019	http://investors.viasat.com/static-files/c9af6458-5162-48cf-aba7-f48e38be355a
05	Document	Audit Committee Charter	10/09/2019	http://investors.viasat.com/static-files/c1030c41-cd17-496a-b7e7-d46c39b99cac
06	Document	Corporate Governance Guidelines	10/09/2019	http://investors.viasat.com/static-files/fe0ee34b-c515-4360-a42a-6b234baf250e
07	Document	Nomination, Evaluation and Corporate Governance Committee Charter	10/09/2019	http://investors.viasat.com/static-files/93a14718-107b-42c1-8afc-9026eae3fae3
08	Document	Compensation and Human Resources Committee Charter	10/09/2019	http://investors.viasat.com/static-files/81c56d02-c28c-4a8e-aeac-e83ff7e57049
09	Document	Policy Concerning Entertainment, Gifts and Ethics	10/09/2019	https://p.widencdn.net/cefkyt/Entertainment_Gifts_Viasat_Policy_070PR034
10	Document	General Terms and Conditions of Purchase	10/09/2019	https://p.widencdn.net/srgf5l/Terms_and_Conditions_Solicitation_Purchase_PR001076
11	Webpage	Giving	10/09/2019	https://www.viasat.com/about/giving
12	Webpage	Financial Times Markets Data	27/11/2019	https://markets.ft.com/data/equities/tearsheet/summary?s=VSAT:NSQ