

**HUGHES COMMUNICATIONS, INC.
CODE OF CONDUCT
FOR DIRECTORS, OFFICERS AND EMPLOYEES**

Hughes Communications, Inc. (the "Company") conducts all aspects of company business with the highest standards of integrity, honesty, and fair dealing. The Company requires that all officers, employees, directors, consultants, and representatives avoid activities that involve or might appear to involve a conflict of interest between personal and professional relationships. The Company also requires compliance with both the letter and the spirit of the laws and regulations of the United States as well as other countries and jurisdictions in which the Company operates.

All employees are required to:

- Avoid even the appearance of misconduct or impropriety.
- Conduct all dealings with customers, contractors or subcontractors, suppliers, and competitors with honesty and fairness, exercising good judgment and the highest ethical standards in business or personal interactions that may reflect upon the Company in any way.
- Avoid actual or apparent conflicts of interest between personal and professional relationships, including, but not limited to any investment, interest, or association that interferes, or potentially could interfere with independent exercise of judgment in the best interest of the Company.
- Never use the assets, information, or relationships of the Company or any of the Company's affiliates for personal gain.
- Know, understand, and comply with all applicable U.S. and non-U.S. laws, regulations, rules, and policies governing the conduct of the Company's business, both domestic and foreign, including all export laws and regulations (e.g., the Foreign Corrupt Practices Act), employment issues, marketing activities, and insider trading restrictions.
- Assist the Company in complying with its obligations under the U.S. Federal Securities Laws to provide full, fair, accurate, timely, and understandable disclosure in each report or other document filed with or submitted to the SEC and in any other public communication made by or on behalf of the Company or any of its affiliates.
- Ensure that all transactions are handled honestly, are compliant with acceptable accounting principles, and are recorded fully and accurately in the books and records of the Company as well as on the books and records of any of the Company's affiliates.

- Respect the right of all employees to fair treatment and equal opportunity, free from discrimination, retaliation, or harassment of any type.
- Safeguard information that belongs to the Company and affiliates of the Company. Treat all such information as confidential and do not disclose it outside of the Company except when specifically authorized.
- Except under a non-disclosure agreement entered into in accordance with the Hughes Information Protection Policy, not solicit, obtain, or disclose any proprietary data concerning suppliers, contractors or subcontractors, customers, or competitors.
- Avoid any conduct that could potentially obstruct a government proceeding or investigation, including falsifying or failing to maintain or produce records, documents, and information.
- Promptly report any perceived violation of this Policy by any director, officer, or other employee, or any consultant to your manager or to the Company's Corporate Ethics Officer. A manager of the Company who receives a report of a perceived violation is required to advise the Company's Corporate Ethics Officer of such. Alternatively, you may report any perceived violation anonymously and with complete confidentiality using the Company's Corporate Ethics HelpLine.

If you are an executive officer or director of the Company, your request to waive any provision of this Code may be approved only by the Board of Directors of the Company and must be disclosed to shareholders, along with the reasons for the waiver.

Any director, officer or employee who violates any laws, governmental regulations or this Code will face appropriate, case specific disciplinary action, which may include demotion or immediate discharge.