

## WHISTLEBLOWER POLICY

### OF RADCOM LTD.

#### I. PURPOSE

Section 301 of the Sarbanes-Oxley Act of 2002, Section 10A of the Securities Exchange Act of 1934, as amended, Rule 10A-3 thereunder, Section 117(6) of the Israeli Companies Law 5759-1999 and the Charter of the Audit Committee of the Board of Directors of Radcom Ltd. (the “**Audit Committee**” and the “**Company**”, respectively) require the Audit Committee to establish procedures for:

- the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, auditing matters, or improprieties in the management of the business of the Company; and
- the submission by employees of the Company or other persons retained by the Company on a regular basis (each, an “**employee**”), on a confidential and anonymous basis, of concerns regarding questionable accounting or auditing matters or improprieties in the management of the business of the Company or violations of the Company’s Code of Ethics (the “**Code of Ethics**”).

The “whistleblower” procedure set forth herein is intended to facilitate disclosures, encourage proper individual conduct and alert the Audit Committee to potential issues before serious consequences result. References to the “**Company**” include any direct or indirect subsidiary of the Company.

#### II. PROCEDURE

1. Scope. Any employee of the Company may submit, on a confidential and anonymous basis, any complaints or concerns regarding (i) financial statement disclosures, accounting, internal accounting controls or auditing matters, (ii) violations of the Corporate Code of Conduct or the Code of Ethics, or (iii) improprieties in the management of the business of the Company.

2. Submission Procedure. Complaints and concerns regarding the matters covered under this policy may be reported anonymously and confidentially through (i) the Company’s compliance web link, or (ii) the submission of a sealed envelope to the Company’s outside counsel (the “**Outside Counsel**”) or the VP of Human Resources, as described below.

3. Treatment of Complaints. Complaints received through the web will be directed initially to the Company’s Outside Counsel. Complaints submitted through sealed envelopes should also be directed to the Outside Counsel. Complaints received by the Outside Counsel falling under the matters covered by this policy shall be forwarded to the Chairperson of the Audit Committee or any other member of the Audit Committee designated for this purpose at least once every quarter or, promptly, in the case of complaints regarding questionable accounting and auditing matters. If an employee wishes to discuss any matter with the Audit Committee, the employee should indicate this in his or her complaint. The Outside Counsel will inform the reporting person (if his or her identity is known) that the complaint has been received and, to the extent appropriate, provide him or her with the steps taken to investigate the complaint.

4. Evaluation and Investigation of Complaints. The Outside Counsel or any other person designated by the Chairperson of the Audit Committee will perform an initial evaluation of the complaint to determine if it involves any of the matters addressed by this policy. A complaint that, in the Outside Counsel’s opinion, is not related to any of the matters expressly covered by this policy will not be investigated by the Audit Committee. If the complaint does not appear to involve such matters, and includes the name or contact information of the complaining employee, the employee will be advised that such complaint does not fall under the scope of this policy and that he or she should consider submitting the

complaint to the Director of Human Resources or other manager, as appropriate, and if the complaint does not include the name or contact information of the complaining employee, it will be forwarded by the Outside Counsel to the appropriate manager for handling in a manner which such manager deems appropriate and in accordance with Company policies.

If the complaint appears to involve accounting, internal accounting controls, auditing matters, or violations of the Code of Ethics or its Corporate Code of Conduct, the complaint will be reviewed and, if necessary, investigated, by the Audit Committee in a manner to be determined by it.

One or more members of the Audit Committee or any other person designated for that purpose by the Audit Committee may be delegated the authority to investigate the complaint. In conducting any such investigation, the anonymity of the employee making a complaint or submission on a confidential basis, shall be maintained to the fullest extent possible consistent with the need to conduct an adequate review thereof. If the Audit Committee so requests, a written report to the Audit Committee of all findings of fact, conclusions and proposed recommendations for remedial action, if any, will be submitted within the timeframe set by the Audit Committee.

5. Meetings. Complaints submitted under this policy will be reviewed and discussed at the regularly scheduled Audit Committee meetings. The Chairperson of the Audit Committee may call a special meeting of the Audit Committee if he or she believes that an immediate attention to a complaint submitted is required.

6. Reporting. Upon concluding its review or investigation of a complaint, the Audit Committee shall prepare a written report regarding the nature of the complaint, the review or investigation process and its recommendations. The Audit Committee shall submit its report to the Chairperson of the Board of Directors.

In addition, the Committee will provide a regular update of the status of the investigation of any pending complaint to the Outside Counsel not less than once each fiscal quarter to evaluate whether any disclosure is required with respect to such complaint in the Company's filings with the SEC. In addition, the Audit Committee will promptly notify the Outside Counsel and the VP of Human Resources of any development with respect to a pending complaint that may be material to the Company.

### **III. ADMINISTRATION**

The Audit Committee is responsible for the administration of this policy. The Chief Executive Officer of the Company will take corrective and disciplinary actions, if appropriate, based on the findings of the investigations, which actions may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit salary increase, bonus or stock options, suspension without pay or termination of employment and any other actions in accordance with the Company's Code of Conduct. The Chief Executive Officer shall report to the Audit Committee of his or her determination. The Board of Directors shall decide on corrective and disciplinary action with respect to the Chief Executive Officer, if necessary.

### **IV. MISCELLANEOUS**

1. No Retaliation. The Company does not permit retaliation of any kind against employees for complaints submitted hereunder that are made in good faith.

2. Record Keeping. The Audit Committee shall retain as a part of the records of the Audit Committee any such complaints or concerns for a period of no less than seven (7) years from the date on which the complaint was submitted.

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