



Disclosure under The State of California’s Transparency in Supply Chains Act of 2010
July 2, 2015

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 (“Act”) requires retailers and manufacturers doing business in California to disclose their efforts to eradicate slavery and human trafficking in their own direct supply chain. KVH Industries, Inc. (“KVH”) is committed to meeting the requirements of the Act and expects its suppliers to do as well.

KVH is committed to conducting its business in a lawful and ethical manner and expects its employees, contractors and suppliers to conduct themselves in the same manner. All of KVH’s employees, contractors and suppliers must adhere to its Code of Business Conduct & Ethics, which requires compliance with all laws, including laws addressing slavery and human trafficking. KVH’s Code of Business Conduct & Ethics provides:

“KVH’s supplier relationships are based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. KVH will not knowingly use any supplier that uses forced, prison or indentured labor. KVH will only work with suppliers who comply with all laws regarding slavery and human trafficking in the countries in which the suppliers are doing business.”

Verification and Certification

KVH implements this policy by contractually obligating its suppliers to “not utilize forced, prison, or indentured labor, or subject workers to any form of compulsion or coercion” and to “comply with all laws regarding slavery and human trafficking in the countries in which the Seller is doing business.” KVH’s suppliers are obligated to flow these requirements to their suppliers. KVH is also in the process of requiring all of its direct suppliers to certify that they are compliant with these concepts.

Training and Audit

Key personnel in KVH’s procurement department receive training on how to identify human trafficking and forced labor issues. Although KVH does not have a formal audit program, these personnel are trained to recognize health, safety and labor red flags, including red flags relating to forced labor, and to report and investigate all suspicions of improper conduct.

Internal Accountability

Any supplier that fails to meet the contractual requirements set forth above, or provide an action plan to achieve compliance within a reasonable period of time, are terminated. Employees or violate KVH’s Code of Business Conduct & Ethics are subject to disciplinary action up to and including termination of employment.