
Forced Labor Expectations for Contractors and Suppliers

November 3, 2021

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. In the interest of strengthening efforts by the international community and the United States to eradicate all forms of modern slavery and forced labor, KVH seeks to eliminate these practices in its operations and supply chains. KVH will not tolerate forced labor abuses by its contractors and suppliers, and will investigate allegations of such abuses when they are raised.

KVH recognizes the corporate responsibility to prevent all forms of modern slavery, including forced labor, as articulated in the International Labour Organization's Convention on Forced Labour. This includes the ILO's Protocol to the Convention, which observes that:

“[t]here is an increased number of workers who are in forced or compulsory labour in the private economy, that certain sectors of the economy are particularly vulnerable, and that certain groups of workers have a higher risk of becoming victims of forced or compulsory labour, especially migrants.”

It is KVH policy to comply with all applicable laws where it operates, including U.S. laws such as the Tariff Act of 1930, which prohibits goods made with forced labor from being imported into the United States, and the Trafficking Victims Protection Reauthorization Act of 2005, which require the U.S. government to maintain a public list of goods and their source countries that are believed to be produced by child labor or forced labor in violation of the ILO's Convention on Forced Labour and other relevant international standards.

In addition, KVH is committed to meeting the requirements of the California Transparency in Supply Chains Act of 2010, which requires retailers and manufacturers doing business in California to disclose their efforts to eradicate slavery and human trafficking in their own direct supply chain. As is the case with all other applicable laws and international standards, KVH expects that its contractors and suppliers will also comply with this Act.

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 modern slavery and forced labor. KVH's Code of Business Conduct & Ethics provides that:

“We respect, promote and protect the human dignity and rights of all persons and children with whom we interact around the world and who do not seek to do us harm. We strive to abide by all laws and regulations that protect and promote human rights. We reject the use of child labor, forced labor, and all forms of modern slavery and human trafficking.”

Verification and Certification

KVH implements this policy by contractually obligating its contractors and 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 [contractor or supplier] is doing business.” KVH's contractors and suppliers are obligated to flow these requirements to



their own contractors and suppliers. KVH requires 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. KVH also has an audit program to ensure these personnel are trained to recognize health, safety and labor red flags, including red flags relating to forced labor, and to report and investigate suspicions of improper conduct.

Internal Accountability

Any contractor or 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, will have its contract with KVH terminated. Employees who violate KVH's Code of Business Conduct & Ethics are subject to disciplinary action up to and including termination of employment.