



---

<b>Policy and Number</b>	<b>CODE OF BUSINESS CONDUCT AND ETHICS</b>	<b>1.12</b>
<b>Category</b>	GENERAL EMPLOYMENT POLICIES	
<b>Issue Date</b>	September 15, 2021	
<b>Issued By</b>	Vice President, Human Resources	
<b>Supersedes</b>	Code of Business Conduct and Ethics, dated August 4, 2020	

---

KVH Industries, Inc. is committed to maintaining its reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. Accordingly, all business and operations will be conducted within a framework that is legal and ethical. No illegal or unethical conduct will be tolerated. KVH Industries, Inc. and its subsidiaries are together referred to in this Code as “KVH.”

This Code applies to the employees, officers and directors, and consultants of KVH, collectively referred to as “Associates.” This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all actions in support of KVH. It is intended to promote honest and ethical conduct at all levels of KVH. All of our Associates should conduct themselves accordingly. Any Associate who commits a violation of this Code will be subject to prompt remedial action by KVH, which may include the termination of an Associate’s employment or other relationship with KVH, in accordance with KVH’s policies and applicable law.

If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you are expected to comply with the Code. Any variances between local customs or policies and this Code should be brought to the attention of KVH’s management or the directors for resolution. If you have any questions about these conflicts, you should first ask your supervisor how to handle the situation. As a basic premise, if you are in a situation that you believe may violate or lead to a violation of this Code, plan to follow the guidelines described in this Code.

### **Equal Opportunity and Equal Treatment**

Equal opportunities and equal treatment toward others are cornerstones of the workplace culture KVH strives to achieve. We desire a culture that is fair, unprejudiced and open to new and better ideas. We encourage mutual respect, team work, tolerance, and inclusiveness. We applaud diversity, not just for diversity’s sake but for the new, different, and better ideas diversity often brings. We treat everyone with equal respect and we do not discriminate or tolerate discrimination of any kind, whether based on race, gender, age, disability, national origin, sex harassment, pregnancy, or any other characteristics protected by law.

### **Occupational Safety and Health**

We are committed to maintaining a safe and healthy work environment. We emphasize safety and health policies, practices and attitudes. We abide by applicable safety and health laws. During your employment, make sure you learn, comply with, and stay up-to-date on our occupational safety and health rules and policies. Never put yourself, your colleagues, our business partners or a member of the public at risk. We also encourage you to pro-actively take appropriate precautions and make consistent and positive

contributions to promote your personal health. Always feel free to take advantage of our preventive healthcare and health promotion measures and initiatives.

### **Protecting Confidential Information**

KVH possesses certain confidential, proprietary, trade secret, and business-sensitive information that has been and may be revealed to Associates during their association with KVH. The protection of confidential business information and trade secrets is vital to the interests and success of KVH. Associates must take all appropriate steps to ensure that the confidentiality of such information is maintained. Proprietary, confidential, trade secret, and sensitive business information regarding KVH, other companies, customers, contractors, suppliers, vendors and anyone else doing business with KVH, must be treated with sensitivity and discretion and only be disseminated on a need-to-know basis. In addition, Associates may be required to sign an Assignment of Inventions, Non-Disclosure, Non-Solicitation and Non-Competition Agreement as a condition of employment or other relationship with KVH.

KVH expects that as a condition of their relationship with KVH, Associates will keep all proprietary information strictly confidential. All confidential, trade secret and proprietary information is the property of KVH even after the termination of an Associate's employment or other relationship with KVH, regardless of the reason for the termination, and Associates are obligated to not use and to maintain the confidentiality of this information even after termination of their employment or other relationship with KVH. During the term of an Associate's relationship with KVH and thereafter, an Associate may not, directly or indirectly, use or disclose to anyone, or authorize disclosure or use of, any internal information revealed to or learned by an Associate during the course of his or her employment or other relationship with KVH, unless such use or disclosure is both consistent with KVH's obligations and for the sole purpose of carrying out KVH's business or legal duties.

Confidential information includes all internal information that has or could have commercial business value or other utility in KVH's business, or the unauthorized disclosure of which could be detrimental to KVH's interests, whether or not such information is specifically identified as confidential information by KVH. By way of example and not limitation, confidential information includes any and all internal information, whether or not meeting the legal definition of a trade secret, concerning: (a) KVH's business plans, strategic plans, forecasts, budgets, sales, projections and costs; (b) KVH's personnel and payroll records, data and employee lists; (c) KVH's customers, prospective customers, including their identity, special needs, job orders, preferences, transaction histories, contacts, characteristics, agreements and prices; (d) marketing activities, plans, promotions, operations, and research and development; (e) business operations, internal structures and financial affairs; (f) systems and procedures; (g) pricing structure; (h) proposed services and products; (i) personal information, as defined in KVH's Personal Information Security Policy and (j) contracts with other parties.

Please refer to KVH's Securities Trading Policy for additional information.

Also, pursuant to the 2016 Defend Trade Secrets Act (DTSA): (1) no individual will be held criminally or civilly liable under federal or state trade secret laws for the disclosure of a trade secret, *provided* the disclosure: (A) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and made solely for the purpose of reporting or investigating a suspected violation of law; or, (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal so that it is not made public. Additionally, under the DTSA, an individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the individual's attorney and use the trade secret information in the court

proceeding, provided the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order

## **Fair and Honest Dealings with Everyone at KVH**

### **Communicating Honestly and Responsively**

KVH expects fair and honest dealings in all that we do and with everyone with whom we come in contact--whether it's with a member of KVH management, a co-worker, a customer, supplier, vendor, a governmental representative, or a member of the public.

Associates are required to disclose and record all KVH-related business transactions in a timely manner. No secret or unrecorded transactions, funds or records are permitted. Associates are required to ensure that recording of all transactions is timely, accurate and complete.

### **Protecting KVH's Rights, Property and Privileges**

Associates are required to protect KVH's rights, property and privileges. KVH's rights, property and privileges—including its equipment and facilities—will be used only for KVH's business benefit and purposes, and never for the personal benefit of individuals absent KVH's prior consent. For example, Associates' telephone numbers, job titles, addresses and business cards may be used only to promote KVH's business and objectives and may not be appropriated for personal use. Likewise, Associates are permitted to use KVH's name, logo and reputation only in connection with KVH business. In addition, wherever in the United States or the world KVH has been granted any rights or privileges, you are expected to exercise those rights and privileges only on KVH's behalf and to not make decisions or engage in conduct that will impair KVH's rights and privileges.

### **Conflicts of Interest**

Conflicts of interest are prohibited as a matter of KVH policy unless approved in advance as described below. A "conflict of interest" exists when a person's private interest interferes in any way with the interests of KVH. A conflict situation can arise when an Associate, or a relative of an Associate, takes actions or has interests that may make it difficult for the KVH Associate to perform his or her KVH work fully and effectively. Conflicts can arise through the exchange of gifts, loans, or other direct and indirect personal arrangements with customers, suppliers or competitors. The best way to prevent a conflict of interest is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on KVH's behalf. Any Associate who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in the section below entitled "Reporting Concerns".

Associates are required to ensure that their activities, commitments and ownership interests do not create any actual or perceived conflict of interest. Associates must never permit their personal interests to conflict, or even appear to conflict, with the interests of KVH, its customers, contractors, suppliers, vendors or anyone else doing business with KVH. Associates are required to avoid using KVH contacts to advance their private business or personal interests.

All transactions that could potentially result in a conflict of interest should first be discussed with an Associate's immediate supervisor. If the supervisor agrees that an approval of the conflict of interest is appropriate, the approval of the Chief Financial Officer must be obtained.

Any approved conflict of interest involving an executive officer or director must be approved in advance by the Audit Committee of the board of directors.

#### Other Employment

While employed by KVH, employees are not permitted to become employed by, or retained as a consultant by, or otherwise provide services to any customer, contractor, supplier, vendor or competitor of KVH. Employees may accept a position as a board member of an organization, public, private, for profit or not-for-profit, only after consultation with the Human Resources Department and approval by KVH. Before accepting any consulting or freelance work, employees should discuss the work with KVH's Human Resources Department to ensure that it does not conflict with KVH's interests.

#### Corporate Opportunities

Corporate property, information, or position should not be used for personal gain outside the normal course of advancing KVH's interests.

#### Protection and Proper Use of Business Assets

All Associates should endeavor to protect KVH's assets and ensure their efficient use. Any suspected incident of fraud or theft should be immediately reported for investigation. KVH equipment should not be used for non-KVH business, unless approved in advance by a supervisor or manager. The obligation of Associates to protect KVH's assets extends to its proprietary information. Proprietary information includes intellectual property such as, by way of example, customer data or information, trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized possession, use or distribution of this information violates KVH policy. It could also be illegal and result in civil or even criminal penalties.

#### **Fair and Honest Dealings with Competitors and Others**

##### Competition and Fair Dealing

KVH seeks to outperform its competition fairly and honestly. KVH seeks competitive advantages through superior performance and publicly available information, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or own public disclosure, or inducing such disclosures by past or present employees of other companies is prohibited. Each Associate should endeavor to respect the rights of and deal fairly with KVH's customers, suppliers, competitors and employees. No Associates should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Customary business entertainment and gifts in a commercial setting can be appropriate if used to create goodwill and sound working relationships, not to gain unfair advantage with suppliers and customers. No gift or entertainment should ever be offered, given, provided or accepted by any KVH Associate, family member of an Associate or agent unless it meets all of the following conditions: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff, and (5) does not violate any laws, regulations or this Code. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate.

### Payments to Government Personnel

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country. In addition, the U.S. government has a number of laws and regulations regarding business gratuities that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate KVH policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. KVH's Sr. Vice President and General Counsel can provide guidance to you in this area.

### **Fair and Honest Disclosure to the Public**

#### Record Keeping

KVH requires honest and accurate recording and reporting of information. General business records and communications should always be accurate and fairly stated. Associates should not make false representations, exaggerate, use derogatory remarks, guess, or inappropriately characterize people and companies. This applies equally to all communications and reports. In the event of litigation or governmental investigation, please consult KVH's Sr. Vice President and General Counsel. KVH's financial records and reports will, at all times, conform to public company requirements as defined by the Securities and Exchange Commission ("SEC"), Generally Accepted Accounting Principles ("GAAP"), and other government requirements, as they apply. KVH has adopted specific procedures regarding the receipt, retention and treatment of complaints and concerns regarding accounting, internal accounting controls and auditing matters and the confidential submission to KVH by Associates of concerns regarding questionable accounting or auditing matters. These procedures are described below in the section entitled "Reporting Concerns."

#### Data Destruction

In addition to other applicable data retention laws, Associates are required to retain for five (5) years any document which might be relevant to any proceeding in which financial or accounting misconduct was alleged to be in any way an issue. This mandate specifically prohibits data destruction, alteration or concealment with any intent to impair the integrity or availability for use of such data in any proceeding. Any Associate who has a question about whether data should be retained should consult with KVH's Sr. Vice President and General Counsel. Associates are also prohibited from engaging in the falsification of data or making a false entry that might impede, obstruct or influence the investigation of any matter within the jurisdiction of any department or agency of the United States or any bankruptcy case. Any employee who is found to have altered, destroyed, denied access to, or falsified data could face significant fines and/or imprisonment, pursuant to applicable law.

### Ethics Responsibilities of the Principal Executive, Financial and Accounting Officers

This Code is intended and designed to promote full, fair, accurate, timely and understandable disclosure in KVH's SEC filings and other public communications. KVH's Principal Executive, Financial and Accounting Officers - consisting of the Chairman and Chief Executive Officer, the Chief Financial Officer, and the Controller - hold an especially important and elevated role in corporate governance. They are vested with both the responsibility and authority to protect, balance, and preserve the interests of all of KVH's stakeholders, including shareholders, clients, employees, suppliers, citizens of the communities in which business is conducted, and the public at large. The Principal Executive, Financial

and Accounting Officers fulfill this responsibility by prescribing and enforcing the policies and procedures employed in the operation of KVH's financial organization and functions. The Principal Executive, Financial and Accounting Officers are required to exhibit and promote the highest standards of honest and ethical conduct through the establishment and operation of policies that:

- Encourage professional integrity in all aspects of the financial organization, by eliminating inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal, or alienation from the financial organization or the enterprise itself.
- Prohibit and eliminate the occurrence of conflicts between what is in the best interest of the enterprise and what could result in material personal gain for a member of the financial organization, including the Principal Executive, Financial and Accounting Officers.
- Provide a mechanism for any individual to inform senior management of deviations in practice from policies and procedures governing honest and ethical behavior.

In addition, the Principal Executive, Financial and Accounting Officers are required to establish and manage our reporting systems and procedures to provide a reasonable level of assurance that:

- Business transactions are properly authorized and completely and accurately recorded on our books and records in accordance with GAAP and established financial policy;
- The retention or proper disposal of records is done in accordance with applicable legal and regulatory requirements; and
- KVH's financial reports are made in accordance with applicable laws.

### **Dealings with Independent Auditors**

No Associates shall, directly or indirectly, make a materially false or misleading statement (including by omitting a material fact) to an accountant in connection with any audit, review or examination of KVH's financial statements or the preparation or filing of any document or report with the SEC. No Associate shall, directly or indirectly, take any action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of KVH's financial statements.

### **Fair and Honest Dealings Around the Globe**

The same principles explained in this Code regarding how we are expected to treat each other, our customers, and our business partners apply equally to our dealings around the globe. Whenever and wherever you are traveling around the world on behalf of the Company, always keep your commitment to this Code and its principles in mind.

### **Human Rights**

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.

## **Environmental Protection**

We feel responsible for the environmental compatibility and sustainability of our products, services, office locations, and property holdings. We focus on environmentally friendly and advanced technologies, as well as the functional lifecycles for our equipment and technological devices. We strive to manage natural resources carefully, reduce environmental impact where we can, and abide by environmental protection laws and regulations.

## **Waivers of This Code**

While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be possible. Any Associate who believes that an exception to any of these policies is appropriate in his or her case should first contact his or her immediate supervisor. If the supervisor agrees that an exception is appropriate, the approval of the Chief Financial Officer, Chief Compliance Officer, or General Counsel must be obtained.

Any executive officer or director who seeks an exception to any of these policies should contact the Sr. Vice President and General Counsel. Any waiver of this Code for executive officers or directors may be made only by the board of directors and will be disclosed as required by law or stock market regulation.

## **Procedures for Compliance with this Code**

### **Compliance Procedures**

If you are unsure about if an action conforms to our Code or the law, you should take one or more of the following steps:

- Make sure you have all the facts.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? Use your judgment and common sense. If something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In many situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor.
- Seek help from other KVH resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question, discuss it with Human Resources or KVH's Sr. Vice President and General Counsel.
- If you desire anonymity, you should direct your concern or question to KVH's Sr. Vice President and General Counsel or, as set forth under "Reporting Concerns" below, to KVH's independent messaging service, NAVEX Global/EthicsPoint ("NAVEX").
- Always ask first, act later: if you are unsure of what to do in any situation, seek guidance before you act.

## Reporting Concerns

Associates are encouraged to talk to supervisors, managers or other appropriate personnel about any observed illegal or unethical behavior and any violations of this Code or other KVH policies or rules.

In addition, KVH is subject to the Sarbanes-Oxley Act of 2002, which requires the company to have a process by which employees can report concerns about KVH's financial reporting, accounting and auditing practices. Communications must be handled confidentially unless the employee chooses to be identified. KVH's reporting process provides for the communication of concerns about financial accounting, reporting and auditing to the Audit Committee of the Board of Directors. Exhibit A to this Code provides information on how to report a concern to the Audit Committee. The Audit Committee consists of outside directors only. There are no KVH employees on the Audit Committee.

Other concerns can be reported by communicating through Human Resources, KVH's Sr. Vice President and General Counsel, or by communicating through an independent messaging service. Our messaging service is NAVEX. NAVEX will take concerns, transcribe them (if reported by phone) and transmit them to Human Resources, the Audit Committee and/or the Sr. Vice President and General Counsel. The message service is completely confidential, if the Associate so desires. NAVEX personnel are trained to receive reports of concerns about observed or otherwise known illegal or unethical behavior and any violations of this Code or other KVH policies or rules, as well as the type of communications that are covered by the Sarbanes-Oxley Act. Contact information for Human Resources, the Audit Committee, the Sr. Vice President and General Counsel and NAVEX are set forth on Exhibit A.

Also, nothing in this Code or in any other KVH document or agreement prohibits or impedes any KVH Associate from communicating directly with the SEC, the US Department of Labor, or any other authorized governmental authority, including making a report in good faith and based on a reasonable belief of any violation of law or regulation.

## Prohibition against Retaliation

KVH does not allow retaliation—i.e., some form of adverse employment action or harassment -- just because of good-faith reports of misconduct by others. Associates also are expected to cooperate honestly in internal investigations of misconduct. KVH prohibits retaliation against any Associate who reports a good-faith concern in accordance with this Code and the reporting process in Exhibit A. Similarly, pursuant to the anti-retaliation protections under U.S. securities laws, KVH prohibits retaliation against any Associate who provides information about actions or decisions reasonably believed to be a violation of securities law, rules of the Securities and Exchange Commission, or other applicable laws relating to fraud against shareholders, which are reported to a federal regulatory or law enforcement agency, Member of Congress, congressional committee, or to a person with supervisory authority over the Associate or who has the authority to investigate, discover or terminate the alleged misconduct. Any Associate who retaliates against any person for providing truthful information relating to a violation of this Code, other misconduct, or the commission of any Federal offense is subject to disciplinary action up to and including termination as well as possibly to significant fines and/or imprisonment pursuant to applicable laws.



### **Dissemination and Amendment**

This Code shall be distributed to each new Associate of KVH upon commencement of his or her employment or other relationship with KVH and it, and any updates or changes, shall also be distributed periodically to each Associate of KVH.

This Code was adopted by the Board of Directors of KVH and may be amended, altered or terminated by the Board of Directors at any time for any reason.

*This document is not an employment contract of any kind between KVH and any of its Associates and does not constitute a promise of employment or other business relationship for any period of time.*

### **RECEIPT OF CODE OF ETHICS**

I acknowledge that I have received a copy of the KVH Industries, Inc., Code of Business Conduct and Ethics. I read, understood and agree to abide by this Code.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

## **Exhibit A**

An employee who wishes to raise concerns may do so by submitting his or her concern(s) in writing to the head of Human Resources and any member of the Audit Committee, to the General Counsel, or by contacting NAVEX Global/EthicsPoint.

A concern can be reported to the head of Human Resources by contacting\_\_\_\_\_.

A concern can be reported through NAVEX by visiting <https://kvh.ethicspoint.com> or by calling the anonymous hotline (1-844-783-0017).

The General Counsel can be contacted as follows:

<b><u>Name</u></b>	<b><u>Email Address</u></b>	<b><u>Telephone Number</u></b>	<b><u>Mailing Address</u></b>
Felise Feingold	ffeingold@kvh.com	(401) 845-8148	KVH Industries, Inc. 50 Enterprise Center Middletown, RI 02842

Written information may be mailed to the Audit Committee in care of the Company. You may also contact the Chairman of the Audit Committee, Cielo Hernandez, c/o KVH Industries, Inc., 50 Enterprise Center, Middletown, RI 02842.