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Category	GENERAL EMPLOYMENT POLICIES	
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Issued By	Human Resources	
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Introduction and Statement of Policy

KVH Industries, Inc. (including its subsidiaries, “KVH”) operates in a wide range of legal and business environments. As a company, we are committed to complying with the anti-corruption laws of all of the countries in which we do business, and we strive to conduct ourselves according to the highest standards of ethical conduct. Even the appearance of wrongdoing can severely damage our reputation. Therefore, it is strictly against KVH policy to engage in or tolerate bribery or any form of corruption.

The United States, the United Kingdom, and many other countries have laws and regulations which make it unlawful to pay, offer or promise anything of value to a government official with the intent to influence an official act or other decision to award or maintain business, to grant or deny a permit, license or other governmental benefit, to avoid or reduce any penalty or fine, or to provide any other business advantage. Many countries also have laws prohibiting commercial bribery or other illicit payments to influence the decision to award or maintain business or obtain any other business advantage in the private sector. Many of these anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act of 1977 and the United Kingdom Bribery Act of 2010, have extraterritorial effect, and all of them carry potentially severe penalties, including substantial fines and prison terms.

KVH prohibits our personnel and anyone else acting on our behalf from paying, giving, offering or promising any bribe, kickback or other corrupt payment of anything of value to any person with the intent to improperly influence the obtaining or retaining of business or to gain an improper business advantage.

KVH prohibits corrupt payments of any kind to obtain or retain business from, or to advance our interests with, any government, government agency or instrumentality or public international organization. This includes corrupt payments directly to any government official outside the United States, regardless of rank, and also includes political parties or candidates as well as all levels of officials at any government instrumentality, state-owned commercial enterprise or public international organization. This also includes corrupt payments made to such officials in any indirect way, for example, in the form of payments to a family member or other third party in a manner intended to benefit the official indirectly. This further includes facilitating, expediting, or “grease” payments made to government officials in order to ensure the provisioning of routine government services such as mail delivery or the provisioning of utilities. KVH personnel may not make such payments themselves, and may not authorize, direct or permit others, including agents, consultants or other representatives, to make such payments on KVH’s behalf.

Applicability

This Policy is applicable to all of KVH’s operations worldwide. This Policy applies to all of KVH’s directors, officers and employees. We hold any agents, consultants, joint venture partners and any other third-party representatives with whom we work to a similarly high standard and expect that they will conduct themselves in a manner consistent with this Policy.

Permissible gifts, meals and entertainment, and travel or other expense reimbursement

A small gift or token of esteem or gratitude is often an appropriate way to display respect for a customer or customer representative. Any such gifts or tokens of esteem or gratitude must have a good faith business or promotional purpose and must be of modest value. Any provision of meals and entertainment, or reimbursement of travel or hotel expenses, must be a good faith expenditure with a legitimate business purpose, related directly to the promotion, demonstration or explanation of our products or services, or to the performance of a project for a customer. Any such expenditure must be lawful under local law, must be reasonable in value, must be approved in accordance with KVH's Business Travel Expense policy where applicable, and must be documented accurately and completely in accordance with the Company's Business Travel Expense and Code of Business Conduct and Ethics policies. If you have any questions about whether a contemplated gift, expenditure for meals/entertainment, or travel/expense reimbursement is permissible under this policy, you should consult with KVH's Vice President and General Counsel and obtain prior approval.

Compliance: Advice and reporting: Retaliation prohibited

Company directors, officers and employees must be familiar with and perform their duties according to the requirements set out in this Policy. Any KVH personnel who engages in activities in violation of this policy or of any applicable anti-corruption law may be subject to disciplinary action up to and including immediate termination, and may be subject to criminal prosecution.

If you have any questions about understanding any aspect of this policy, you should consult with KVH's Vice President and General Counsel. If you know of, or have any reason to suspect, any actual or attempted bribery, kickback or other unlawful payment, or any other violation of this policy, you must immediately report the matter to KVH's Vice President and General Counsel. KVH may at times undertake a more detailed review of certain events or transactions, and requires all directors, officers and employees to cooperate with KVH, outside legal counsel, outside auditors, or other similar parties. The failure to cooperate in such an internal review is a violation of this policy.

KVH prohibits any threats or acts of retaliation against any personnel who in good faith seeks advice, raises a question or concern, makes a report, or assists KVH in identifying or investigating actual or possible misconduct or violation of this policy or of any applicable anti-corruption law. Such retaliatory conduct will not be tolerated, and is subject to disciplinary action up to and including immediate termination. Any personnel who believes that he or she has been subjected to any threats or acts of retaliation should report that belief immediately to KVH's Vice President and General Counsel.

Dissemination and Amendment

This Policy shall be distributed to each new director, officer and employee of KVH upon commencement of his or her employment with KVH.

This document is not an employment contract between KVH and any of its directors, officers and employees and does not constitute a promise of employment for any period of time.

KVH Representative who makes a payment to ensure an individual's safety must report the matter to the General Counsel as soon as practical.

Accounting

It is KVH policy that all books and records accurately and fairly reflect the transactions of the business and to devise and maintain an adequate system of internal accounting controls. The policy prohibits the mischaracterization or omission of any transaction on KVH's books or any failure to maintain proper accounting controls that result in such a mischaracterization or omission. Everyone must follow applicable standards, principals, laws and follow common practices for accounting and financial reporting. Additionally, personal or third party funds are not to be used to accomplish what is otherwise prohibited by this policy.

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