Legal Statements

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Modern Slavery Act of 2015 Disclosure Statement—Fiscal Year 2019

The Viasat Group of companies ("Viasat") are committed to conducting business ethically and with integrity. We respect international principles of human rights, including those in the UK Modern Slavery Act of 2015, and embody these principles and commitments in our corporate policies. Viasat’s efforts to prevent slavery and human trafficking in its supply chain and own business include the following:

Supply Chain

It is expected that all suppliers to Viasat operate their own businesses in accordance with the highest ethical standards. To that end, our Guide to Business Conduct requires that Viasat’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. Viasat will not knowingly use any supplier that uses forced, prison, or indentured labor. Viasat 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.

Supplier Certifications and Training

Viasat requires all of its suppliers to certify that they are compliant with these concepts. Further, Viasat includes language in its supply contracts which prohibits its suppliers from utilizing forced, prison, or indentured labor, or subjecting workers to any form of compulsion or coercion. Suppliers are informed that they should comply with all laws regarding slavery and human trafficking in the countries in which they do business. Viasat’s suppliers are requested to pass these requirements on to their own suppliers as well, and Viasat expects all of its suppliers to police their own supply chains in order to prevent modern slavery of any kind. Moreover, Viasat’s supply chain personnel receive training to recognize health, safety, and labor red flags, including red flags relating to forced labor, and to report and investigate suspicions of improper conduct.

Our Own Business and Policies

Viasat does not use slave labor in its own business, nor does Viasat condone forced or compulsory labor, or human trafficking. Such conduct violates Company policy, and Viasat endeavors to monitor its businesses to prevent such behavior taking place inside the company. Viasat encourages anyone with information regarding modern slavery or human trafficking taking place at the Company, or anywhere in its supply chain, to make a report to the Company’s Ethics and Compliance Hotline: (+1)-888-475-8376

California Transparency in Supply Chains Act Disclosure

Viasat Inc. is committed to ensuring that its supply chain represents its values and respect for human rights. To that end, our Guide to Business Conduct provides:

- Viasat’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. Viasat will not knowingly use any supplier that uses forced, prison, or indentured labor. Viasat will only work with suppliers who comply with all laws regarding slavery and
Viasat implements this policy by obligating its suppliers to certify that they are compliant with these concepts. Further, Viasat contractually obligates 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 Seller is doing business.” Viasat’s suppliers are obligated to flow these requirements to their suppliers as well. Key personnel in Viasat’s procurement department receive training on how to identify human trafficking and forced labor issues. Although Viasat 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. Suppliers that fail to meet the contractual requirements set forth above are terminated. Employees who violate Viasat’s Guide to Business Conduct are subject to disciplinary action up to and including termination of employment.

Statement on Conflict Minerals

Viasat condemns the ongoing conflict and resulting humanitarian harm in the Democratic Republic of the Congo, which is fueled in part by financing from trade in the ores from which tin, tantalum, tungsten, and gold are derived. These elements have come to be known as “conflict minerals”; when they originate in mines operated or taxed by the warring factions, they can be referred to as “conflict minerals from conflict mines.”

Conflict minerals are common constituents of products ranging from jewelry, toys, and lightbulbs to airplanes, vehicle airbag systems, and electronic and computer parts. Because the minerals in these products typically enter supply chains many layers removed from companies like Viasat, it is difficult to determine whether they support armed conflict. At the same time, millions of Congolese workers rely on artisanal mining or work in legitimate mines to support a subsistence living. Avoiding purchase of all conflict minerals from the DRC region would cause severe hardship for them and their dependents.

To promote the advancement of fundamental human rights, Viasat is committed to work toward eliminating from our products conflict minerals that support armed groups in the DRC or in the surrounding countries, while minimizing unintended consequences for legitimate subsistence miners and their dependents. Viasat will:

- Continue to work toward the elimination, over time, of all conflict minerals from conflict mines in our products, and endeavor to improve, year-over-year, our ability to track conflict minerals in our supply chain, report on their origin, and eliminate those that originate in conflict mines.
- Comply with the requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, which requires companies to inquire into the origin of tantalum, tin, tungsten and gold in their supply chains and report on the reasonable inquiry or due diligence they conduct to determine whether their purchase supported armed groups in the DRC.

Viasat expects its suppliers to reasonably assure that the tin, tantalum, tungsten, and gold in the products they manufacture are conflict free. If Viasat becomes aware of a supplier whose supply chain includes conflict minerals from conflict mines, Viasat will take the appropriate actions to remedy the situation in a timely manner, including reassessment of supplier relationships. Viasat expects our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

Conflict Minerals FAQ

- What are “conflict minerals”?
  - Conflict minerals are described as tin, tantalum, tungsten or gold; commonly referred to as the 3TG. The 3TG may be present in products that are manufactured or contracted to be manufactured. More information can be found at: https://www.sec.gov/divisions/corpfin/guidance/conflictminerals-faq.htm

- What is Viasat’s policy on conflict minerals?
  - Viasat is committed to ethical business conduct and the responsible sourcing of minerals through our global supply chain. To support this we are committed to sourcing components and materials from suppliers that share our values and comply with the legislation. Viasat is committed to comply with federal requirements, and we need your help to support our compliance. Viasat’s conflict minerals policy is published on our website. Please see https://www.viasat.com/legal/legal-statements.

- What information is needed by Viasat?
  - If you have 3TG in products that you provide to Viasat, Viasat will need you to complete an industry standard survey about conflict minerals in your products. Your help is needed in completing the surveys we send you and answering the questions relative to the source of the 3TG contained in the product(s) you supply to Viasat. The survey is to be completed in the specified format known as the Conflict Mineral Reporting Template (CMRT). Information regarding the Responsible Minerals
What resources are available to Viasat’s suppliers in reference to conflict minerals?

- There are a variety of resources available to Viasat suppliers. They are:
  - Responsible Minerals Initiative (RMI) - [http://www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)
  - SEC “Fact Sheet – Disclosing the Use of Conflict Minerals” - [https://www.sec.gov/News/Article/Detail/Article/1365171562058](https://www.sec.gov/News/Article/Detail/Article/1365171562058)