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| <b>HUMAN RIGHTS POLICY</b><br><b>Issued: 05/30/2017</b>                           |  |                             |                                     |

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**1.0 Purpose**

The purpose of this Policy is to set forth Constellis Holdings, LLC’s and its subsidiaries and affiliates (the “Company’s”) position with regard to the observance of human rights and international humanitarian law in the context of the Company’s business and operations. This Policy references the overarching human rights principles that guide the Company in the performance of its work.

**2.0 Policy**

The Company will treat all persons with dignity and respect for human rights. The Company recognizes and respects all fundamental human rights and is guided in the conduct of its business by the United Nations Universal Declaration of Human Rights (the “*Universal Declaration*”) and other applicable human rights documents and principles.

The Company’s core business is providing security and safety to persons and property. In following the guidance set forth in this Policy, it is important to remember that the Company’s work at times may require Company personnel to take actions that put the lives and property of others at risk in order to provide safety and security to our customers and clients. The purpose of this Policy is not to reduce or constrain our level of service to our customers, but rather to provide guidance on permissible activity in the conduct of our business.

**3.0 Scope**

This Policy applies to all Company personnel, particularly those employees and contractors who carry weapons or perform work in hostile environments.

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#### 4.0 Human Rights Principles

##### 4.1 Human Rights Obligations

The Company supports the enjoyment of the rights stated in the Universal Declaration, and the enjoyment of the other commonly recognized human rights. These basic rights include the following:

- J **Right to life, liberty, and security of person.** We recognize the right to pursue life, liberty, and the value of personal security. The safety of our employees and business partners is paramount and it is the Company’s policy to provide a safe, healthy and productive workplace.
- J **Freedom from torture or cruel, inhumane treatment or punishment.** We do not tolerate actions that subject individuals to cruel or inhumane treatment, including any form of torture (as defined in the Convention Against Torture).
- J **Right of Recognition.** We support the right of individuals to be recognized as persons before the law, with due process before appropriate tribunals.
- J **Freedom of expression and opinion.** We support the rights of individuals to express their thoughts and opinions.
- J **Anti-Discrimination/Equality of Opportunity:** We recognize and value diversity and inclusion of all individuals with whom we work and work to maintain a workplace that is free from any form of discrimination or harassment. We prohibit and do not support discrimination based on employees’ personal characteristics or beliefs. Employment decisions are made based on qualifications, performance, skills and experience.
- J **Freedom of Engagement:** We respect our employees’ right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. We prohibit and do not support the use of bonded labor, prison labor, slavery or other forms of forced labor.

In addition to the basic human rights laid out in the Universal Declaration, the Company is also guided by the relevant principles, obligations, voluntary commitments, and good practices of the following:

- J Montreux Document on Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict (2008);
- J International Code of Conduct for Private Security Service Providers (2010);
- J United Nations Guiding Principles on Business and Human Rights;
- J The Voluntary Principles on Security and Human Rights (2000);
- J Guiding Principles on Business and Human Rights; Implementing the United Nations “Protect, Respect and Remedy” Framework (2011).
- J Management System for Quality of Private Security Company Operations (PSC.1)
- J Management System for Private Security Operations (ISO 18788:2015)

The above lists provide examples of commonly-recognized human rights, and is not intended to be exclusive or exhaustive. Other commonly recognized sources of international human rights include: the Chemical Weapons Convention, the Convention on the Elimination of All Forms of Racial Discrimination, Covenant on Economic, Social, and Cultural Rights, the Convention Against Torture, and The Geneva Conventions (including Protocols Additional to the Geneva Conventions).

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#### **4.2 Additional Obligations**

In addition to the human rights principles identified above, the Company is also guided by the following basic principles:

- J We support fundamental human rights and avoid participating in business activities that abuse human rights and in areas where our actions will directly contribute to the breach of these rights;
- J We act in a legal, moral, and ethical manner, and within the laws, customs, and traditions of the countries in which we operate;
- J We are committed to supporting international and local efforts to combat and eliminate corruption and financial crimes;
- J We respect the values, cultures, and customs of the communities in which we operate; and
- J We provide information and training to our personnel to help them understand appropriate conduct and actions in the performance of their work including training on the Company's commitment to protecting human rights and combatting trafficking in persons.

#### **5.0 Reporting Human Rights Issues**

In conformance with requirements of the Code of Business Ethics and Conduct as well as the Constellis Incident Reporting Policy, personnel aware of or who suspect possible violations of this Policy must report these circumstances by notifying their manager, the Chief Legal Officer, or by using the Company's anonymous Ethics Hotline. The Ethics Hotline is hosted by a third-party provider so employees or third parties can make reports to the Company on a totally confidential and anonymous basis if so desired. Ethics Hotline reports can be made via the web at [constellis.ethicspoint.com](http://constellis.ethicspoint.com) or through the following telephone numbers:

- Employees or third parties based in any country or in the **United States**: dial **1-844-637-6751**.
- Employees or third parties based in **Afghanistan or Iraq**: use an outside line to contact your local operator and request a reverse charge or collect call to be placed to the United States using the following numbers: **Afghanistan (5033526170)** or **Iraq (5033526174)**. All reverse charge or collect calls will be accepted by the contact center using an automated English message.
- For employees or third parties in the **United Arab Emirates**, use an outside line and dial the direct access number as provided below for your location and then at the English prompt dial **844-637-6751**:
  - **UAE—8000-021**
  - **UAE (du)—8000-555-66**
  - **UAE (Military-USO and cellular)—8000-061**

#### **6.0 Potential Violations and Discipline**

Any employee or third party acting on behalf of the Company who directly or indirectly engages in any activity that violates this Policy face discipline up to and including termination of employment or any contract.

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**RELATED DOCUMENTS**

- ) **Code of Business Ethics and Conduct**
- ) **Anti-Trafficking in Persons Policy**
- ) **Anti-Retaliation and Whistleblower Policy**
- ) **Incident Reporting Policy**
- ) **Modern Slavery Act Statement**

**VERSION HISTORY**

|   | <b>Version</b> | <b>Version Date</b> | <b>Author</b>       | <b>Description</b>  |
|---|----------------|---------------------|---------------------|---|
| 1 | 1.0            | 05/30/2017          | Melissa Taylormoore | Initial version   |
| 2 | 1.1            | 8/28/2017           | Chris Glover        | Revised to include references to PSC.1 and ISO 18788:2015 standards.  |
| 3 | 2.0            | 11/26/2018          | Todd Rouse          | Revised to include additional specifics on protections/prohibitions as well as references to other documents. |