

	Policy Level Enterprise-Wide	Policy No. CH-003	Page Page 1 of 4
	Department Executive Management Team	Version No. 3.3	Effective Date 9/9/2021
HUMAN RIGHTS POLICY Issued: 05/30/2017			

Table of Contents

1.0 Purpose1

2.0 Policy1

3.0 Scope1

4.0 Human Rights Principles2

4.1 Human Rights Obligations.....2

4.2 Additional Obligations3

5.0 Reporting Human Rights Issues.....3

6.0 Potential Violations and Discipline4

1.0 Purpose

The purpose of this Policy is to set forth the position of Constellis Holdings, LLC and its subsidiaries and affiliates (the “Company”) with regard to the observance of and respect for 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 will respect human rights. The Company recognizes 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. All Company personnel any anyone acting on behalf of the Company are required to uphold these standards.

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 employees and third parties working on behalf of the Company anywhere in the world, as well as to joint ventures and other subsidiaries and affiliates of the Company. All

HUMAN RIGHTS POLICY	Policy Level Enterprise-Wide	Policy No. CH-003	Page Page 2 of 4
	Department Executive Management Team	Version No. 3.3	Effective Date 9/9/2021

Company personnel are responsible for ensuring this Policy is understood and implemented consistently with these requirements.

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. The Company values its personnel, its contractors, and all of the individuals with whom they come in contact with while performing its business. In line with this commitment, the Company promotes all human rights, including the following:

- **Right to life, liberty, and security of person:** We recognize the right to pursue life and 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.
- **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 UN Convention against Torture).
- **Freedom from sexual exploitation:** Any actual or threatened physical act of a sexual nature, whether by force, unequal actual or perceived status, or other coercive conditions, is strictly prohibited. This includes any use by Company employees of sex workers, regardless of whether the industry is legal in the area of operations.
- **Right of Recognition:** We support the right of individuals to be recognized as persons before the law, with due process before appropriate tribunals.
- **Freedom of expression and opinion:** We support the rights of individuals to express their thoughts and opinions.
- **Anti-Discrimination/Equality of Opportunity:** We recognize and value diversity and inclusion of all individuals with whom we work, and we work to maintain a workplace 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.
- **Freedom of Engagement:** We respect our employees’ right to form, join, 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 also prohibits any form of child labor or the exploitation of minors including prohibiting the knowing recruitment of any minors or any other actions prohibited under U.S., U.K., or local law. The Company is further guided by the relevant principles, obligations, voluntary commitments, and good practices of the following:

- 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);
- International Code of Conduct for Private Security Service Providers (2010);
- United Nations Guiding Principles on Business and Human Rights;

HUMAN RIGHTS POLICY	Policy Level Enterprise-Wide	Policy No. CH-003	Page Page 3 of 4
	Department Executive Management Team	Version No. 3.3	Effective Date 9/9/2021

- The Voluntary Principles on Security and Human Rights (2000);
- UN Guiding Principles on Business and Human Rights; Implementing the United Nations “Protect, Respect and Remedy” Framework (2011);
- Management System for Quality of Private Security Company Operations (PSC.1);
- Management System for Private Security Operations (ISO 18788:2015).

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

4.2 Additional Obligations

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

- We support fundamental human rights and will not participate in business activities that abuse human rights or that take place in areas where our actions will directly contribute to the breach of these rights;
- We act in a legal, moral, and ethical manner, and within the laws, customs, and traditions of the countries in which we operate;
- We are committed to supporting international and local efforts to combat and eliminate corruption and financial crimes;
- We undertake periodic reviews of our operational impact on human rights through human rights impact assessments;
- We support all individuals who raise concerns related to any human rights violation and strictly prohibit any form of retaliation for raising those concerns; and
- 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 protect human rights and combat trafficking in persons.

5.0 Reporting Human Rights Issues

In conformance with requirements of the Company’s Code of Business Ethics and Conduct and our Incident Reporting Policy, personnel who are aware of or suspect possible violations of this Policy must report these circumstances to their manager, to 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 desired. Ethics Hotline reports can be made via the web at constellis.ethicspoint.com or through the following telephone numbers:

- In the United States & abroad: personnel and third parties can dial **1-844-637-6751**.
- In Iraq: personnel and third parties can make a reverse charge or collect call to the United States using the following number: **001-5033526174**. All reverse charge or collect calls will be accepted by the contact center using an automated English message.

HUMAN RIGHTS POLICY	Policy Level Enterprise-Wide	Policy No. CH-003	Page Page 4 of 4
	Department Executive Management Team	Version No. 3.3	Effective Date 9/9/2021

In order to meet its obligations under the Policy, all reports of potential violations will be thoroughly investigated. All personnel are required to participate and provide truthful and honest information in order for the Company to address any unlawful or unethical behavior.

If an individual reports allegations of human rights abuses directly to the authorities, they should also inform the CLO or his or her designee of the report to ensure the Company's obligations under governing federal regulations are met. The Company's Anti-Retaliation & Whistleblower Policy and its Open Door Policy protect any employees that report suspected human trafficking from any forms of retaliation.

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 faces discipline up to and including termination of employment or any contract.

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

	Version	Version Date	Author	Description
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.
4	3.0	05/23/2019	Todd Rouse	Revised including addition of information related to sexual exploitation and impact assessments.
5	3.1	10/26/2020	Todd Rouse	Update to Section 5.0
6	3.2	08/01/2021	Todd Rouse	Minor revisions throughout
7	3.3	9/9/2021	Todd Rouse	Updated Ethics Hotline Information