



## **MODERN SLAVERY ACT STATEMENT**

Constellis Holdings, LLC, on behalf of Olive Group Limited, and all of its other subsidiaries and affiliates in scope for purposes of the U.K. Modern Slavery Act (collectively, “Constellis”), is committed to combatting human trafficking and slavery in our supply chain and in all areas of our operations.

### **Our Structure and Business**

Constellis is a leading provider of risk management and operational support services to government and commercial clients worldwide. From security, crisis response, and training; to logistics, life support, and technology services, Constellis offers a wide range of capabilities to help clients operate safely and efficiently no matter where they are in the world. Constellis is committed to providing high-quality services to its clients in a manner that complies with applicable local and international laws. By continually improving its operations and processes in order to maintain its best in class reputation of ethical business practices, Constellis focuses on the protection of safety, security, human rights, and fundamental freedoms of all internal and external stakeholders, including Constellis employees, its clients, third parties that act on behalf of Constellis, suppliers, and the local populations in areas where it operates.

### **Our Policies on Modern Slavery and Human Trafficking**

Constellis’ affiliate companies are founding members and signatories to the International Code of Conduct for Private Security Services Providers, which requires that security providers comply with international and host-state laws and reject slavery and trafficking in people. They are certified by the International Code of Conduct Association and also hold certifications under both the PSC.1 and ISO:18788 Standards.

Constellis’ Code of Business Ethics and Conduct (“the Code”) clearly states that the Company has “zero tolerance” for human trafficking and that that the Company is “committed to the eradication of human trafficking.” In addition to the Code, Constellis has multiple policies and procedures in place to ensure all Company personnel and suppliers know of the Company’s stance on ending all forms of slavery and human trafficking. These policies include its Human Rights Policy, its Anti-Human Trafficking Policy, and its Anti-Retaliation and Whistleblower Policy. These Policies further outline the Company’s commitment to the protection of human rights in all aspects of its business and provides avenues for the safe reporting of any violations. Constellis also maintains a Compliance and Quality Policy that outlines the Company’s commitment to ethical and compliant business practices and the safeguards we have in place to ensure all of our operations are conducted in accordance with all international and local laws and regulations as well as mandates from the United Nations and other certification bodies.

### **Due Diligence & Auditing Processes**

Prior to engaging in any business relationship with a third-party or supplier, Constellis performs an extensive review of the potential partner through a robust due diligence process. This process includes researching the company, its executives, and all personnel we will engage with through various database searches, banned parties lists, and local and international news outlets, among other channels. In addition to these reviews, depending on the level and type of work performed, the Company performs higher level reviews including in-country inspections of organizations and on the ground interviews to ensure that the supplier upholds Constellis’ high ethical standards and

shares its commitment to eradicating all forms of human trafficking and modern slavery. These searches are run throughout the lifetime of our engagement with the supplier. Therefore, if a concern or negative information related to the supplier arises after our initial engagement, the Company is able to take appropriate remedial action, including the potential termination of any contract for services. Depending on the service provided, Constellis requires third party suppliers to take training modules on its Code and other relevant policies to ensure understanding and to reaffirm the Company's commitments and further acknowledge the suppliers' understanding of its requirements.

Included in our due diligence process, Constellis requires all suppliers to certify that they will adhere to Constellis' Code. The Code requires that suppliers comply with its mandate in all aspects of their operations that relate to their business with Constellis. In the event Constellis learns of a potential violation of Constellis' Code, as described below, Constellis reserves the right to perform further audits and reviews of operations to ensure each supplier is upholding its mandate. If a violation is determined, depending on the relevant facts, Constellis will immediately terminate its relationship with the supplier or to work with the Supplier to implement corrective action to remedy the non-conformance, if remediation is possible.

### **Our Supply Chains and the High Risk Areas**

With operations around the world, many of which are in austere and high-threat locations, our supply chain helps us deliver critical services and supplies. Our supply base is diverse, including small and medium-sized businesses and companies owned, controlled, and operated by host-country citizens who are accustomed to operating under different laws and regulations. Many of our direct suppliers also have their own supply chains, connecting us with even more businesses worldwide. It is important that our suppliers share our commitment to human rights and represent and certify their compliance with our policies. In regards to modern slavery, our primary focus is on those areas of our supply chain with a higher risk, which includes, but is not limited to, our sub-contracted workforce and operations in developing countries. Constellis manages these risks through multiple mechanisms, including: utilizing its due diligence procedure to fully review all suppliers, getting locally involved by registering with host-counties as a local business, developing positive relationships with host-country authorities, and employing local nationals.

### **Compliance Effectiveness**

Constellis maintains an in-house governance program, which is led by the Company's Executive Management Team and managed by the Legal, Compliance and Quality Departments. The Company conducts internal audits of its operations, including review of its obligations towards human rights, and engages external internationally recognized auditors to assess its operations to both the PSC.1 and ISO 18788 Standards. Constellis monitors the effectiveness of its policies and prevention of slavery and human trafficking through these internal and external audits, and through reports made through its Ethics Hotline function, if any. Effectiveness is reported quarterly to the Compliance Committee of the Board of Directors. Constellis also employs a comprehensive risk assessment and mitigation process and regularly discusses major risks impacting its business, including the potential for human rights abuses, and takes action to mitigate or eliminate any associated risks.

Constellis undertakes enterprise-wide surveys of all of our other country national and local national personnel to ensure there are no violations of international standards related to the trafficking of persons or other human rights related concerns. In addition, as noted above Constellis continuously

reviews our suppliers and updates its due diligence reviews; it also performs periodic audits by visiting suppliers, reviewing their on-site files, and interviewing their employees. Finally, Constellis performs robust Human Rights Impact Assessments to review and monitor the effects and risks involved with its operations.

### **Training**

Employees are required to complete regular training related to the Company's Code, its commitment to protecting Human Rights, and to eradicating Human Trafficking. Constellis also periodically trains its supply management personnel regarding best practices for dealing with suppliers, including the Code, what it means, and how it applies to suppliers. As noted, Constellis requires certain suppliers to be trained on the Company's Code and its anti-trafficking mandate as well as certify compliance.

### **Conclusion**

Our people help shape security conditions in some of the world's most dangerous places and contribute to the training of first responders and security personnel across the globe. As 2022 continues, when carrying out these duties, Constellis will remain committed to taking all necessary steps to eliminate any risk of modern slavery or human trafficking being present in its business or supply chains.

The Constellis Board of Directors approved this statement to be signed on its behalf at its Board meeting on February 18, 2022.

A handwritten signature in black ink, appearing to read 'Terrence Ryan', with a stylized flourish at the end.

Terrence Ryan  
Chief Executive Officer