

CODE OF CONDUCT

Excel Security Solutions is a Switzerland based company dedicated to uphold the integrity in all its mandates in all the territories it operates in. Excel Security Solutions affirms it has a responsibility to respect the human rights of and fulfil humanitarian responsibilities towards all persons affected by Excel Security Solutions' business activities. These persons include employees, contracted personnel, clients, suppliers, shareholders and the population of the area in which services are provided.

Excel Security Solutions recognize the importance of respecting the various cultures encountered in their work, as well as the individuals they come into contact with as a result of those activities.

Excel Security Solutions is committed to being legally sensitive to all laws and regulations and compliant with the International Code of Conduct Association's (hereafter: ICoCA) Code of Ethics.

Excel Security Solutions states that the entire organisation is committed to operate in accordance with the International Code of Conduct for private security service providers (hereafter: the Code) as determined by the ICoCA. Excel Security Solutions commits to the following, as set forth in the Code:

- a) to operate in accordance with the Code;
- b) to operate in accordance with applicable laws and regulations, and in accordance with relevant corporate standards of business conduct;
- c) to operate in a manner that recognizes and supports the rule of law; respects human rights, and protects the interests of their clients;
- d) to take steps to establish and maintain an effective internal governance framework in order to deter, monitor, report, and effectively address adverse impacts on human rights;
- e) to provide a means for responding to and resolving allegations of activity that violates any applicable national or international law or the Code;
- f) to cooperate in good faith with national and international authorities exercising proper jurisdiction, in particular with regard to national and international investigations of violations of national and international criminal law, of violations of international humanitarian law, or of human rights abuses.

HUMAN RIGHTS COMMITMENTS

Excel Security Solutions commits to unconditionally respecting the human rights as stated in the following conventions:

- The Universal Declaration of Human Rights (1947)
- The International Covenant on Civil and Political Rights (1966)
- The International Convention on Economic, Social and Cultural Rights (1966)
- The International Labour Organisation Declaration on Fundamental Rights at Work (1998)

GENERAL COMMITMENTS

1. Excel Security Solutions commits to operate in accordance with the principles contained in the Code. Furthermore, it requires that all their employees, contracted personnel, subcontractors or other parties carrying out security services under Excel Security Solutions contracts, operate in accordance with the principles contained in the Code.
2. Excel Security Solutions will implement appropriate policies and oversight with the intent that the actions of their personnel comply at all times with the principles contained herein.
3. Excel Security Solutions will make compliance with the Code an integral part of contractual agreements with personnel and subcontractors or other parties carrying out security services under their contracts.
4. Excel Security Solutions will adhere to the Code, even when the Code is not included in a contractual agreement with a client.
5. Excel Security Solutions will not knowingly enter into contracts where performance would directly and materially conflict with the principles of the Code, applicable national or international law, or applicable local, regional and international human rights law, and are not excused by any contractual obligation from complying with the Code. To the maximum extent possible, Excel Security Solutions will interpret and perform contracts in a manner that is consistent with the Code.
6. Excel Security Solutions will comply, and will require their personnel to comply, with applicable law which may include international humanitarian law, and human rights law as imposed upon them by applicable national law, as well as all other applicable international and national law. Excel Security Solutions will exercise due diligence to ensure compliance with the law and with the principles contained in the Code, and will respect the human rights of persons they come into contact with, including, the rights to freedom of expression, association, and peaceful

assembly and against arbitrary or unlawful interference with privacy or deprivation of property.

7. Excel Security Solutions agree not to contract with, support or service any government, person, or entity in a manner that would be contrary to United Nations Security Council sanctions. Excel Security Solutions will not, and will require that their personnel do not participate in, encourage, or seek to benefit from any national or international crimes including but not limited to war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, the trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary executions.
8. Excel Security Solutions will not, and will require that their personnel do not invoke contractual obligations, superior orders or exceptional circumstances such as an armed conflict or an imminent armed conflict, a threat to national or international security, internal political instability, or any other public emergency, as a justification for engaging in any of the conduct identified in paragraph 22 of the Code.
9. Excel Security Solutions will report, and will require their personnel to report, known or reasonable suspicion of the commission of any of the acts identified in paragraph 22 of the Code to the client and one or more of the following: the competent authorities in the country where the act took place, the country of nationality of the victim, or the country of nationality of the perpetrator.
10. Excel Security Solutions will take reasonable steps to ensure that the goods and services they provide are not used to violate human rights law or international humanitarian law, and such goods and services are not derived from such violations.
11. Excel Security Solutions will not, and will require that their personnel do not, consistent with applicable national and international law, promise, offer, or give to any public official, directly or indirectly, anything of value for the public official himself or herself or another person or entity, in order that the public official act or refrain from acting in the exercise of his or her official duties if such inducement is illegal. Excel Security Solutions will not, and will require their personnel do not, solicit or accept, directly or indirectly, anything of value in exchange for not complying with national and international law and/or standards, or with the principles contained within the Code.
12. Excel Security Solutions is responsible for establishing a corporate culture that promotes awareness of and adherence by all personnel to the principles of the Code. Excel Security Solution will require their personnel to comply with the Code, which will include providing sufficient training to ensure personnel are capable of doing so.