



## **MODERN SLAVERY ACT STATEMENT**

Constellis Holdings, LLC, on behalf of its UK based entity, 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 responsible sourcing and combatting human trafficking and slavery in our supply chain.

### **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 national and international laws, and protects the 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 Constellis 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 the rejection of slavery and trafficking in people. Constellis performs robust due diligence checks on all companies that do business with Constellis (“Suppliers”). Once selected as a Supplier, Constellis requires all of its Suppliers to certify that they will adhere to Constellis’ Code of Business Ethics and Conduct (“the Code”) which, among other things, clearly states that the Company has “zero tolerance” for human trafficking and that that the Company is “committed to the eradication of human trafficking.” The Code requires Suppliers comply with its mandate in all aspects of their operations that relate to their business with Constellis. In the event of a violation of Constellis’ Code, Constellis reserves the right to 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. 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 any form of slavery or human trafficking. These policies include its Human Rights Policy, its Anti-Human Trafficking Policy, and its Anti-Retaliation and Whistleblower Policy. If applicable, Constellis provides training modules on the Code and other relevant policies to Suppliers and their staff to ensure understanding and to reaffirm commitments.

### **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 yet 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 and getting locally involved registering with host-counties as a local business, developing positive relationships with host-country authorities, and employing local nationals. In addition, Constellis periodically performs robust Human Rights Impact Assessments to review and monitor the affects and risks involved with it operations.

### **Auditing and Measuring Effectiveness**

Constellis maintains an in-house governance program, which is led by the Company's executive management team and managed by the Legal and Compliance Department and the Corporate Quality, Certifications and Safety Department. 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 Standard PSC.1 and ISO 18788. Constellis monitors the effectiveness of its policies and prevention of slavery and human trafficking through these internal and external audits, and through any reports made through its Ethics Hotline function. Effectiveness is reported quarterly to the Compliance Committee of the Board of Directors. In addition, Constellis performs periodic audits on our Suppliers including visiting Suppliers and reviewing their on-sight files and interviewing their employees.

### **Training**

Employees are required to complete regular training related to the Company's Code, its commitment to Human Rights and Anti-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 anti-trafficking mandate.

### **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. When carrying out these duties, Constellis remains committed to taking all necessary steps to combat any risk of modern slavery or human trafficking being present in its business and supply chains.

The Constellis Board of Directors approved this statement to be signed on its behalf at its Board meeting on November 15, 2018.



Timothy J. Reardon  
Chief Executive Officer