

SALADIN CODE OF ETHICAL STANDARDS¹

Saladin often operates in an unstable environment where governance and the rule of law have been undermined from disaster or conflict. We respect the community in which we operate; the clients we support; and the people we employ. Saladin has implemented an auditable management system which meets the criteria set out in PSC.1 and demonstrates our commitment to conformity towards the principles of the International Code of Conduct for Private Security Service Providers; is consistent with respect to Human Rights; applicable to International Humanitarian Law; Legal and Regulatory compliance and Host Country Laws and Regulations.

Saladin Management System brings together all company policy and procedure which support our delivery of services to our clients and guide our employees with respect to standards of conduct and human rights. The Management System has been endorsed by top management, reviewed at board level, externally audited – in the case of Saladin Afghanistan, against internationally recognised industry sector standards² and is applicable to all our services within the scope. Senior Management is responsible for ensuring this Management System is communicated to all internal and external stakeholders

The purpose of this policy³ is to affirm, in a comprehensive statement, that all employees, subcontractors, suppliers and out-source partners are fully aware of the required standards for Saladin Security Ltd.

As a business our first priority is to keep our people safe. We will work in a manner that safeguards the health and safety of our clients, staff and all those that can be affected by our operations.

Our operating philosophy is based on respect for human rights whilst serving our clients with integrity and working responsibly amongst the communities in which we operate. Our vision is to become a market leading security provider, by exceeding client expectations for quality, safety and value.

Our clients' needs are paramount. We will listen, understand and define client requirements without creating false expectations. We will balance client needs and expectations with those of our suppliers, employees, investors and society and strive to satisfy all parties.

Saladin is committed to equality in employment and embraces the cultural diversity of our workforce. We involve our people in our development, utilise their knowledge and experience and recognise their contribution. We train, motivate and empower staff to realise their full potential in order to continually improve the efficiency and effectiveness of our services and Management System.

We will communicate our company vision and through our leadership promote unity, purpose and direction in order to achieve our mission. We will foster open communications with all stakeholders, develop alliances with our suppliers and work with them to jointly improve performance.

Saladin support the communities in which we operate and adhere to government employment practices. We believe in social responsibility and encourage similar behaviour in our employees and suppliers. We comply with international and local laws and applicable safety and environmental regulatory requirements.

Saladin will protect the integrity of the company, our staff, clients, stakeholders and the local community. Effective risk management guides our decisions and enables us to manage change. We will take all reasonable steps to avoid, prevent or reduce the risk of any event that may cause harm or damage to people or assets, the environment, or the reputation of Saladin, our clients or other stakeholders.

¹ And Statement of Conformance

² ANSI/ASIS PSC.1

³ Founded upon the UN Guiding Principles for Human Rights, the International Code of Conduct for Private Security Service Providers (ICOC), the Montreux Document and all applicable local, national and international laws and regulations.

We use metrics to measure our performance against objectives such as health and safety, quality and client satisfaction. Our aim is to continually improve effectiveness and efficiency through performance reviews, internal auditing, analysis, and implementing corrective and preventive actions.

Saladin strongly supports Private Security Industry regulations, including transparency and accountability of the industry. As an organisation we welcome and provide our continuous and ongoing support for the international agreement on the "Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies During Armed Conflict" ("Montreux Document") created in association with the ICRC and the Swiss Initiative in September 2008. Developed collaboratively between government and industry experts, the Montreux Document was agreed by 17 States including the US, the UK, Iraq and Afghanistan.

Saladin will respect freedom of association and the right to collective bargaining in accordance with local legislation and practice, employment will be freely chosen with no use of forced labour or child labour.

Employees will be paid and work hours at least as favourable as the terms established by national legislation or agreements or industry standards.

Employees will sign a declaration in regards to past known Human Right breaches.

Saladin will take measures to ensure that the work of its employees does not compromise internationally accepted human rights conventions, whilst recognising and respecting the diversity in local cultures across the different countries in which it operates. We will endeavour to ensure that we work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct. Saladin will work with customers to ensure that contractual requirements do not infringe human rights.

Saladin values all employees for their contribution to the business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude. Employers' obligations to employees under labour or social security laws and regulations must be respected. The businesses and their employees will work towards creating permanent long-term relationships.

To achieve a working environment in which team spirit and commitment to Saladin's goals and values are maintained, the company will ensure that individual employees are treated fairly and with dignity and respect. They will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

Saladin places the highest priority on promoting the health and safety of employees whilst at work. In particular, it will constantly review the effectiveness of its methods of operation to best protect those who work in a high-risk environment. In order to protect the interests of its customers and employees, and because of the nature of its business, Saladin will apply rigorous pre-employment screening and selection techniques.

Our Human Rights Policy sets out how we approach Human Rights and Professional standards, and the measures we have adopted to ensure continual improvement and compliance towards these behaviours.

Saladin will adhere to all applicable law and regulation. Our personnel are required to report in full on any incident in which they are involved, or which they witness which might involve an unlawful act, or breach towards human rights. Saladin will investigate fully any such report, or complaints from third parties, to the extent that the operational environment permits.

Violations of this statement are grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation and having as a primary objective furtherance of the Company's interest in preventing violations and making clear that violations are neither tolerated nor condoned.

Disciplinary action will be taken, not only against individuals who authorise or participate directly in a violation

of the Policy, but also against:

- Any employee who may have deliberately failed to report a violation of the Policy.
- Any employee who may have deliberately withheld relevant and material information concerning a violation of this Policy and The violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate leadership and lack of diligence.

The Company is committed to the principle of equal opportunity in employment.

Accordingly, management will ensure that recruitment, selection, training, development and promotion procedures result in no job applicant or employee receiving less favourable treatment on the grounds of age, disability, gender reassignment, marital/civil partnership status, pregnancy/maternity, race, religion/belief, sex, sexual orientation or on the basis of being a part-time or fixed term worker. The Company's objective is to ensure that individuals are selected, promoted and otherwise treated solely on the basis of their relevant aptitudes, skills and abilities.

Management has the primary responsibility for successfully meeting these objectives by:

- not discriminating in the course of employment against employees or job applicants
- not inducing or attempting to induce others to practise unlawful discrimination; and
- bringing to the attention of employees that they will be subject to action under the Disciplinary Procedure for discrimination of any kind.

You can contribute by:

- not discriminating against fellow employees, customers, suppliers or members of the public with whom you come into contact during the course of your duties
- not inducing or attempting to induce others to practise unlawful discrimination; and
- reporting any discriminatory action to senior management.

The successful achievement of these objectives necessitates a contribution from everyone and you have an obligation to report any act of discrimination known to you.

If you consider that you are a victim of unlawful discrimination you may raise the issue through the Grievance Procedure.

The Company is committed to creating a harmonious working environment, which is free from harassment and bullying and in which every employee is treated with respect and dignity.

It is committed to ensuring that individuals are not subject to any inappropriate behaviour and do not feel apprehensive because of their age, disability, gender reassignment, marital/civil partnership status, pregnancy/maternity, race, religion/belief, sex or sexual orientation.

Harassment and bullying are unacceptable behaviour at work and will be treated as misconduct, which may include gross misconduct warranting dismissal. All employees must comply with this policy.

Anyone who is requested to engage in any activity which is or may be contrary to this policy will promptly report such information to the manager whom the individual reports, or, if the employee was so directed by the manager, then to the Operations Manager.

Any employee that witnesses any abuses of human rights, or suspects that there may be an instance where a breach of human rights may occur, must report immediately through their chain of command.

Any employee who acquires information that gives the employee reason to believe that any other employee is engaged in conduct forbidden by the Policy will promptly report such information to senior management.

