

REED INTERNATIONAL, INC.
CODE OF BUSINESS ETHICS AND STANDARDS OF CONDUCT
STATEMENT OF CONFORMANCE & APPLICABILITY

REED International, Inc. provides security services in remote, third world, multi-cultural, and high-risk geographical environments. The arenas within which we work are often torn by insurrection or military strife and complicated by terrorist activity. All of these factors regularly contribute to a weakened governance in oversight and an inability of the local authorities to enforce standard operating procedures across all operational sectors within the society. This results in a high risk of human rights violations, substandard business operations, and unethical practices. It is, therefore, critical that companies in our industry conduct operations in a safe and responsible manner that promotes the ethical treatment of people and best-in-class operations and that we uphold the highest of standards.

REED established a corporate, enterprise-wide policy and a commitment of our organization and persons working on our behalf to conform with its responsibility to respect human rights as reflected in the provisions of its QMS/SOMS and articulated in the following documents:

1. International Code of Conduct of Private Security Service Providers;
2. Montreux Document on Pertinent International Legal Obligations on Good Practices for States related to Operations of Private Military and Security Companies during armed conflict;
3. Guiding Principles on Business and Human Rights; Implementing the United Nations "Protect, Respect and Remedy" Framework 2011; and
4. Voluntary Principles on Security and Human Rights.

All persons working on behalf of REED shall be adequately trained to understand and abide by the operational and human rights expectations described in the above documents. Executive management, recognize that respect for human rights is a core business value and will review compliance to this at our business meetings.

In the 19 years of operating as a reputable and dependable Private Security Company, REED has developed very mature and well-established Standard Operating Procedures that define how we conduct our operations. These SOP's form the framework of our adherence to internationally recognized standards of ANSI/ASIS PSC.1-2012, ISO 9001:2015 and ISO 18788:2015, as well as the criteria required to maintain our membership in the ICoCA. REED is highly committed to our adherence to these standards and guiding principles, and we demand compliance from our all of our personnel. To enable our personnel to meet or exceed these standards, we conduct formal training and on-the-job training and provide documentation (including Employee Handbooks, Management Handbooks, and SOPs providing guidelines for all aspects of our operations) that require written acceptance of and a commitment to uphold the required standards.

REED's commitment to uphold the highest ethical and operational standards includes:

- Effective mitigation and management of both Internal and External risks through the diligent application of an established and standardized Risk Management Policy and Procedure.
- Selection of appropriately qualified personnel through effective application of our demanding recruiting, vetting, and screening processes in compliance with applicable laws and host country regulations.
- Selection of appropriate subcontractors and/or vendors through careful screening and vetting in conformance with the standards of PSC.1 and the ICoCA to provide a positive contribution to the communities in the regions within which we operate.
- Selection of business opportunities and targets using a Risk Management approach that ensures regulatory compliance and respect for Human Rights and the environment.
- Ensuring the health and safety of staff, clients, and communities, through the effective mitigation of environmental and physical risks and the provision of appropriate training and equipment required to execute tasks.

- Effective implementation, monitoring, and auditing of the REED's Quality Management System (QMS), the Security Operations Management System (SOMS) and the REED Corporate Management Handbook (CMHB) to ensure quality of service across all of our business processes and deliverables.
- Distribution of the REED handbook to all personnel and ensuring all REED personnel understand and commit to operating within the prescribed guidelines and framework.
- Providing fair compensation to employees, subcontractors, and/or vendors in accordance with applicable laws and regulations.
- Ensuring that all staff are trained and equipped to successfully execute their duties in compliance with the US Foreign Corrupt Practices Act (FCPA) and the (The Bribery Act 2010), in order to combat corrupt practices and bribery at all levels.
- Compliance with US and Host Country import/export regulations, including the Export Administration Regulations (EAR), the International Traffic in Arms Regulations (ITAR), and the US Commerce Department's Bureau of Industry and Security ("BIS") as related to the procurement and import/export of all equipment and technology required for the delivery of our services.

Through our Quality Assurance Management Systems, Quality Control Systems and Security Operations Management System (SOMS), REED strives to continually improve and mature our service offerings and operations worldwide in accordance with the requirements set out in the ISO 18788:2015 Management System for Private Security Operations – Requirements with guidance for use and ANSI/ASIS PSC.1-2012 Management System for Quality of Private Security Company Operations – Requirement with guidance standards.. We are fully committed to monitoring and policing any events that are found to be non-compliant or have the potential to risk our ability to comply with any of the internal or external standards that we have committed to upholding. In the event that we do discover or learn of a negative event, we commit to investigating the incident and taking the necessary steps to remedy the issue, document and learn from the event, implement, as far as possible, steps to ensure the negative event does not occur again, and were applicable, take the necessary disciplinary steps to ensure conformance with all internal rules and external regulations and laws.

REED is 100% committed to ensuring that our worldwide operations are conducted in a responsible, ethical, and ever-improving manner and to instilling a corporate culture where human rights and ethical operation considerations are at the forefront of every decision made and every action taken by every member of the REED Team.