



Phoenix Elite Security Services

CRISIS24

CODE OF ETHICS AND BUSINESS CONDUCT
2021

**PESSC24 CODE OF ETHICS
AND BUSINESS CONDUCT**

**PHOENIX ELITE SECURITY SERVICES CRISIS24
CO. LTD. (“PESSC24”)**

CODE OF ETHICS AND BUSINESS CONDUCT

2021 Edition

The most recent version of this document is available online through the Phoenix Elite Security Services CRISIS24 Co. Ltd. website on the World Wide Web

The PESSC24 Policies and Procedures identified in this Code are included only as references for Phoenix Elite Security Services CRISIS24 Co. Ltd. employees and are subject to change or elimination at the discretion of Phoenix Elite Security Services CRISIS24 Co. Ltd. Any change or elimination of PESSC24 Policies or Procedures will not change this Code. The current versions of all Policies and Procedures are available to employees on the Phoenix Elite Security Services CRISIS24 Co. Ltd. website.

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Letter from the CEO



To: All Phoenix Elite Security Services CRISIS24 Co. Ltd. Employees:

It is my pleasure to provide you with Phoenix Elite Security Services CRISIS24 Co. Ltd. Code of Ethics and Business Conduct for 2021. This is our ninth year of service to Myanmar and as in previous years, each and every action or decision at Phoenix Elite Security Services CRISIS24 Co. Ltd. will be based upon three key guiding principles: Performance, Compliance, and Conduct. This Code of Ethics and Business Conduct establishes requirements and direction to translate these principles into action, every day, and for everything you do at PESSC24. We all are expected to operate in a manner consistent with these principles and this Code. These principles are our foundation.

Compliance with all applicable laws, regulations, and best practices is essential. Our Company's reputation with our customers and the people of Myanmar requires our professional excellence, solid judgment, and uncompromising integrity. New laws, competition, budgetary constraints, technological innovations, and the increasing globalization of business make our operations even more demanding than in the past.

These increased demands serve to highlight the importance of business ethics. Cutting corners to obtain or retain business will not be our way. We will not take shortcuts; we will conduct business properly. Our challenging, fast pace environment requires an even greater commitment to our Code of Ethics and Business Conduct. **We will have zero tolerance for any violation of the provisions of this Code.**

This Code will provide a tool to help you better understand the policies and principles that drive our business and will make this a phenomenal place to work. Ultimately, the Code is designed to help you make the right decisions and to protect and preserve our business successes.

I ask each of you to read this Code carefully, to affirm its principles, and to adhere to its requirements in all of your professional endeavors. If you have any questions, please contact me at any time. We operate as a team which means no one of us is more important than the rest.

Thank you for your service and commitment to our values of Performance, Compliance and Conduct.

A handwritten signature in blue ink, appearing to read 'Mark Wilson', written over a faint circular stamp.

Mark Wilson
Chief Executive Officer



PESSC24 COMMITMENT AND VALUES

It is our commitment to conduct business honestly, ethically, and in accordance with best practices and the applicable laws of the U.S. and Myanmar or in any other country in which we operate. We are guided at all times by the highest standards of integrity, whether dealing with customers, co-workers, or others. By operating each day with this commitment in mind we can provide a solid return to our investors, develop meaningful work for our sub-contractors, and create something of value for our customers.



In order to keep this commitment, we must always be guided by our Core Values. These values shape our decision-making and the way we interact with one another:

- **Integrity**
Ours is a trust-based business. We seek individuals who recognize the benefit of, and the necessity for, the highest ethical standards.
- **Accountability**
Success begins with all associates holding themselves responsible for their decisions and their results.
- **Rigorous analysis**
Those who excel here are often analytical thinkers—asking questions, conducting thorough research and understanding the facts before coming to a conclusion.
- **Collaboration**
It's important to be willing to share ideas and discuss differing points of view. Associates who succeed here recognize that collaboration in conjunction with individual effort leads the best results.
- **Humility**
Successful associates at PESSC24 prefer to focus on the benefits to the business and not their own roles. We acknowledge that none of us have all the answers and we learn from our mistakes.
- **Long-term focus**
We seek individuals with good judgment and the ability to make decisions based on long-term impact on our business.
- **Consistency**
We look for individuals who can exercise sensible judgment and apply their experience, training and knowledge. There's no single way to do our work, but we believe in approaching each situation with common values and an emphasis \ on serving the needs of our investors.
- **Respect for individuals**
We will always treat our shareholders, clients and fellow associates with respect. We rely on associates to interact with one another honestly, constructively, with enthusiasm and compassion.

The following guidelines govern our daily workplace behavior:

- **We will adhere scrupulously to the highest standards of honesty, integrity, and fairness when engaged in any activity concerning PESSC24 and its relationships with customers, suppliers, and the general public.**
- **We will comply with the spirit and letter of all applicable laws and regulations.**
- **We will deliver the highest quality service to our customers.**
- **We will avoid business dealings that violate antitrust laws, conflict of interest principles, or procurement integrity guidelines.**

- We will offer equal employment opportunities and encourage workplace diversity and make employment decisions without regard to race, ethnicity, religion, color, national origin, gender, sex, sexual orientation, gender identity, age, veteran status, marital status, ancestry, genetic information, disability, or any status protected by federal, state, local or host country law. This applies to recruiting, hiring, promotions, transfers, terminations, compensation, administering benefits, training, disciplinary actions, performance assessments, and all other terms and conditions of employment.

YOUR RESPONSIBILITIES

All Phoenix Elite Security Services CRISIS24 Co. Ltd. (also referred to as —PESSC24 or —the Company) officers, directors, advisor or staff members, contractors, and agents are responsible for:

- **Reading the Code of Ethics and Business Conduct (also referred to as “the Code”);**
- **Understanding the requirements stated in the Code;**
- **Utilizing available resources to resolve questions or issues of concern; and**
- **Complying fully with the Code and with the Company’s policies and procedures.**

REPORT VIOLATIONS OF THIS CODE

The following channels are available to all who become aware of a violation of this Code or of any of PESSC24 policies:

Talk to a supervisor or someone in the management chain. Talk to anyone in the Human Resources Department Contact the Managing Director

The Company takes all claims seriously. All reports will be investigated. Claims can be submitted anonymously. No one will suffer retaliation for raising a good faith complaint through any of the avenues discussed in this Code.

BE ACCOUNTABLE FOR ENFORCING THE CODE

You are accountable for compliance with the provisions of this Code. You are expected to raise questions if you are concerned that the standards of this Code are not being met.

You are responsible for adherence to the standards of conduct set forth in this Code and for raising questions if you are concerned that these standards are not being met. Violations of this Code will result in disciplinary action up to and including termination of employment.

Managers and supervisors must be particularly careful with their words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to perform in a way that is contrary to the ethical standards set forth in this Code and Company policies. If someone approaches you with a question or concern related to the Code, listen carefully and ask for clarification and additional information to ensure that you fully understand the question or concern. If the concern raised requires that an investigation be conducted to determine compliance with the Code, refer it to one of the channels identified in the section entitled —Report Violations of this Code.

HOW WOULD YOU RESPOND?

Question: An employee believes that a colleague's behavior violates the provisions of the Code of Ethics and Business Conduct. The employee does not supervise this person or have any management responsibilities. Is it okay to ignore the questionable behavior and assume that a manager will take care of the problem?

Answer: No. We are all accountable for ensuring full compliance with this Code. The employee should raise his/her concerns to a manager, Human Resources professional, or the Managing Director. The report can be made anonymously if the employee prefers. In all cases, however, the employee is expected to report his/her concerns. In some situations an employee may be subject to discipline if he/she is aware of a violation of the Code or Company policy, but fails to take appropriate action.

FULLY COMPLY WITH ALL APPLICABLE LAWS

PESSC24 is committed to maintaining the highest professional and ethical standards. For this reason, compliance with the law is our minimum performance requirement. PESSC24 standards are higher and, at times, this Code establishes requirements that go beyond Compliance obligations.

You are expected to perform all of your duties on behalf of PESSC24 in compliance with all laws, regulations, and company policies – this is a minimum expectation. The Compliance Office will always be available to help you understand the laws and regulations that apply to your job and responsibilities. It should be understood, however, that upholding our Values and this Code requires more than mere compliance with laws and regulations.

If you work internationally, you are also subject to the laws and regulations of the countries in which we do business. Any questions related to your conduct or the requirements of international laws must be referred to the Managing Director. You may also find that, at times, there is a conflict between the laws of the countries in which we operate and the laws of the United States or Company policy. In those situations, as well, you must consult with the Managing Director to receive direction on how to resolve the conflict.

ZERO TOLERANCE FOR DISCRIMINATION AND/OR HARASSMENT

PESSC24 will provide a safe and respectful workplace without threats, harassment, violence, or discrimination. Respect will be an integral part of everything we do.

We will value diversity and promote an inclusive work environment. PESSC24 is committed to recruiting, developing, promoting, and retaining a well-qualified work force without regard to race, ethnicity, religion, color, national origin, gender, sex, sexual orientation, gender identity, age, veteran status, marital status, ancestry, genetic information, disability, or any status protected by federal, state, local or host country law.

We WILL NOT TOLERATE unlawful discrimination. Instead, we will actively seek to create a workplace in which employees, suppliers, contractors, and customers feel respected and valued. Our efforts to achieve diversity and equal employment opportunity are driven by more than compliance with the law; we firmly believe that an inclusive workplace will foster greater business success. Our supervisors and managers play a critical role in these efforts and we expect they will take affirmative steps to create a positive, inclusive, and diverse workplace.

Similarly, we have no tolerance whatsoever for harassment based on race, ethnicity, religion, color, national origin, gender, sex, sexual orientation, gender identity, age, veteran status, marital status, ancestry, genetic information, disability, or any status protected by federal, state, local or host country law. We treat all persons with dignity and respect. Further, although we are an employer with a diverse workforce subject to differing customs and standards, this policy applies to all employees. Harassment includes, but is not limited to, racist, sexist, ethnic, or other inappropriate comments, jokes, gestures, or any action or statement that demeans individuals or creates a hostile, intimidating, or offensive work environment. The Company will not allow any form of retaliation against persons who raise good faith complaints about conduct they believe violates this standard.

All PESSC24 employees deserve a workplace that is free from violence or the threat of violence. We are entitled to be treated with respect. We will not tolerate threatening, hostile, demeaning, or abusive language or behavior.

PESSC24 complies fully with the Uniform Services Employment and Reemployment Rights Act (USERRA). In compliance with this law, PESSC24 protects the job rights of employees who leave their positions to perform military service or qualified service in the National Disaster Medical System. PESSC24 also prohibits all forms of discrimination against past and present members of the uniformed services and applicants to the uniformed services.

HOW WOULD YOU RESPOND?

Question: An employee, a Navy Reservist, tells you he is being ordered to active duty and will soon be mobilized. He wants to protect his employment with the Company. What should you tell him?

Answer: You should remind him that PESSC24 complies fully with the provisions of USERRA. Employees who leave employment to perform service in the military have the right to re-employment as long as (1) they provide the Company with advance notice of their service; (2) the duration of their military leave is five years or less; (3) they return to work or apply for reemployment in a timely manner after the conclusion of service; and (4) they were not separated from service with a disqualifying discharge or under other than honorable conditions. You should remind the employee to comply with these requirements to protect his employment. You should also notify Human Resources for USERRA compliance, so he/she can track this employee and ensure that his rights to reemployment are protected.

Question: I understand that sexual harassment is an issue in the United States and other countries, but what about countries with other standards or differing cultures. Do these provisions of the Code apply throughout the world?

Answer: Yes. Our responsibility to treat all employees, contractors, vendors, and members of the public with respect is not limited by location. All employees throughout the world are entitled to a workplace where their colleagues treat them with dignity. Contact the Managing Director or Human Resources if you have questions about whether certain conduct is consistent with this workplace responsibility.

MAINTAIN A SAFE WORK ENVIRONMENT

*PESSC24 will provide all employees with a safe, healthy, drug-free workplace.
We will adopt environmentally sound practices in all our worksites.*

We are committed to providing a safe and healthy work environment. Employees, officers, directors, and consultants are responsible for complying with all health and safety laws and regulations. Managers and supervisors are responsible for providing employees with the personal protective equipment (PPE) necessary to perform their jobs safely and with training regarding the correct use of such PPE. Employees are expected to use such PPE as appropriate and will be subject to discipline, up to and including termination, for failing to use PPE correctly. Employees are also expected to report immediately any work-related accident or injury to their management. Employees should direct their questions regarding workplace health and safety matters to their supervisors or Human Resources.

The Company is also committed to providing a drug-free work environment. As part of this commitment, all employees subject to random drug screening before commencing work and may be subject to additional drug testing in appropriate circumstances during their employment.

We will not tolerate the use, sale, or purchase of drugs or the abuse of prescription or over the counter medications, alcohol or other substances. Employees should notify Human Resources if they take any medication that affects their ability to perform their jobs safely. You may not possess, serve, be under the influence of, or drink alcohol while on Company property or while conducting Company business. The only exceptions to this rule permit alcohol to be served at Company functions with prior approval from the PESSC24 Managing Director, or at external events at which you are representing PESSC24. Although alcohol may be served at such events, consumption is completely voluntary, should be in moderation, and **never in a manner that would embarrass or harm the Company**. In certain parts of the world, employees are wholly prohibited from possessing or drinking alcohol and no exceptions are allowed. Employees are expected to adhere to these requirements and to report any violations immediately to their Human Resources representative.

PESSC24 is also committed to environmentally sound business practices throughout the world. All employees are expected to perform their jobs in an environmentally responsible way and to report any potential environmental hazards immediately to management.

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HOW WOULD YOU RESPOND?

Question: I supervise an employee who behaves erratically and in a manner that leads me to believe he may be using drugs. What should I do?

Answer: Our Drug Testing Procedure allows for testing based on reasonable suspicion. You should document the reasons you believe this employee is using drugs and discuss your concerns with Human Resources and the Compliance Office. If the behaviors you have identified satisfy the reasonable suspicion standard, the employee will be tested. If the drug screen produces a positive result, the employee will be disciplined, up to and including termination of employment.

Question: I overheard a co-worker threaten another employee, who was afraid to report the situation. What should I do?

Answer: You should tell your supervisor or Human Resources representative about the incident immediately. PESSC24 will not tolerate acts or threats of violence and will investigate all reports. You have a responsibility to act when you know of an impropriety or a threat or risk to any of our people.

Question: I am planning to attend a work-related conference. During the evening welcoming reception, alcohol will be served. Can I drink alcoholic beverages at this reception?

Answer: Yes, unless you are located in a part of the world in which PESSC24 employees are prohibited from consuming or possessing alcohol at any time, you may have an alcoholic beverage at the reception. You must consume in moderation to avoid intoxication. You are representing PESSC24 and must behave professionally. You may never drink and drive.

Question: While at a restaurant for lunch, you are offered an alcoholic beverage. Can you drink during the business day?

Answer: No. Company policy prohibits employees from —being under the influence of alcohol while conducting Company business. Even one drink could affect your judgment and workplace behavior. For this reason, you may not have an alcoholic beverage during the working day. Employees who report to work at any point during the day after consuming alcohol, regardless of the quantity, will be subject to discipline, up to and including termination.

ACCURATELY CHARGE LABOR AND OTHER COSTS

Employees must understand and abide by the Company's Time Charging policy and the applicable procedures. Employees must take all steps necessary to ensure that PESSC24 time charging and cost accounting records are accurate and complete.

Employees and their supervisors are responsible for understanding and complying with the labor recording policies and procedures covering their contracts and programs. Strict compliance is essential. Employees must accurately complete daily time records. Employees are also responsible for properly accounting for labor, travel, material, and other costs, and for ensuring that these costs are accurately recorded and charged to the Company's records.

Knowingly mischarging the time that you work or falsifying your time records violates Company policy and possibly the law, and will result in disciplinary action up to and including termination. No employee shall knowingly charge an incorrect amount or cost objective, or knowingly approve such mischarging. Shifting costs to an improper account is also prohibited. Employees should contact the Office any time charging concerns or on any occasion when they have a question regarding the time charging instructions provided by a supervisor. Questions can be raised anonymously if you prefer.

Transactions between the Company and outside individuals and organizations must be promptly and accurately entered in our books. Under no circumstances should you misrepresent facts or falsify records.

HOW WOULD YOU RESPOND?

Question: Your supervisor tells you that a project is over budget and you should only report 3 hours a day regardless of the number of hours you work. Since these instructions come directly from your supervisor, are you justified in following these time charging procedures?

Answer: No. You must charge your time accurately. Charging time inaccurately is absolutely prohibited. Employees who mischarge their time, even if they are acting in compliance with a supervisor's instructions, will be subject to discipline up to and including termination. A supervisor who instructs employees to charge their time inaccurately will also be subject to discipline up to and including termination. An employee receiving such instruction must report the supervisor to the Compliance Office. Such concerns can be raised anonymously if you wish.

Question: You are concerned with the number of hours you have expended to date on a project and the impact it will have on the budget. Are you permitted additional time you work on the project to an overhead account?

Answer: No. Employees are prohibited from knowingly charging an inaccurate amount of time or from charging any time to an incorrect account or project. An employee who knowingly mischarges time will be subject to discipline, up to and including termination of employment.

PREPARE AND MAINTAIN ACCURATE BUSINESS RECORDS AND STATEMENTS

Accurate business records are essential.

PESSC24 must ensure that its books and records accurately reflect all transactions and fully satisfy applicable Compliance requirements, including the Sarbanes-Oxley Act of 2002. Therefore, employees must observe the following standards with respect to record keeping and communications:

- **Record all disbursements, receipt of funds, and other financial records accurately and promptly.**
- **Accurately maintain time reports in accordance with the Company's time reporting policies and procedures.**
- **Accurately record entries in the Company's books and records and in any internal or external correspondence or communication of any type.**
- **Submit accurate documentation in connection with any contract or proposal.**
- **Charge all labor and material costs accurately to the appropriate account, regardless of the status of the budget for that account.**
- **Conduct all required quality assurance procedures honestly. Be truthful when certifying compliance with any aspect of your work.**

Because it is a crime knowingly to make false statements or false claims to the US Government, employees who violate these standards could subject the Company and themselves to liability, damaging publicity, expensive and time-consuming audits and investigations, reduction in contract prices, and loss of government contracts.

Moreover, the Company and the individual employees may be subject to criminal or civil penalties (e.g., imprisonment, fines, and/or suspension or debarment from government contracting). Employees will also be subject to disciplinary action, up to and including termination.

No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.



HOW WOULD YOU RESPOND?

Question: While working on a project that is just barely within schedule, you realize that equipment provided by your supplier does not meet contractual standards. You believe that you can make the equipment work, and, wishing to avoid further delay, you install it. The contract requires you to certify to Government officials that all equipment meets the standards called for in the contract. Do you so certify?

Answer: No. Incurring a delay or installing different equipment would likely result in adverse consequences under the contract, but providing a false certification to Government officials is a criminal offense in violation of federal law. You cannot Certify compliance with the contract requirements in this case. It is better to suffer the consequences of delayed performance than to go to prison.

Question: You provide administrative support for a group of employees. You are responsible for ordering supplies and equipment for use on the job. In reviewing invoices, you realize that one supplier overbilled the Company. The amount is small and you believe the customer does not review invoices very carefully. Can you just pass the overstated invoice on for payment? After all, it will take considerable time to correct the problem and receive an accurate invoice.

Answer: No. Regardless of the amount of the error, you must make certain that all invoices and other financial records are accurate. You may never submit a document you know is inaccurate either internally or to a customer or outside vendor.

RESPOND PROPERLY TO GOVERNMENT INVESTIGATIONS

The rules regarding Government investigations are complex. Consequently, such investigations must be handled properly and with great care. The HR Department will direct all efforts in response to Government investigations.

The Company's policy is to cooperate fully with all Government investigations. Such investigations may be initiated by a number of agencies including Offices of Inspectors General (OIG), state Attorney Generals' offices, the Department of Justice, and the Department of Labor. The exposure and potential liability associated with the conduct of Government investigations is significant and requires the immediate involvement of the HR Department. Any employee who becomes aware of an investigation relating to the

Company, its employees, contracts, or subcontracts must immediately contact the HR Department. The HR Department will coordinate with the Government investigator on all matters pertaining to the Government's inquiry, including requests for interviews and documents.

Employees approached either at home or on the job by a government investigator regarding matters that involve work for the Company should follow these guidelines:

- **Ask to see identification (e.g., a badge), and make a note of the individual investigator's name, agency, and phone number.**
- **Politely explain the Company's policy – i.e., it is Company policy to cooperate, but that it will be necessary to consult with the HR Department before answering questions or turning over any requested documents. Provide the investigator with the name and telephone number of the HR Department.**
- **Immediately contact the HR Department for guidance.**
- **If the investigator serves a subpoena or other document requesting documents, immediately call the HR Department for advice while the investigator waits.**

HOW WOULD YOU RESPOND?

Question: You receive a telephone call. The caller identifies herself as a government agent and asks for files regarding several PESSC24 employees. You have access to the relevant files. Should you immediately provide the information requested?

Answer: No. You should request the investigator's name and contact information and politely explain the Company's policy to cooperate with Government investigations through our HR Department. You should tell the agent to contact the HR Department. You should then contact the HR Department directly and await further instructions.

FULLY COMPLY WITH LAWS GOVERNING ANTI-TRUST, BID RIGGING, AND COMPETITION

We value open competition. PESSC24 does not act to discourage competition or to create improper competitive advantages. We are confident that we can succeed in an open market and our success will always be based on integrity.

If you are involved in any dealings with competitors, you are expected to know that antitrust laws may apply to your activities and to consult with the HR Department before negotiating with or entering into any arrangements with potential competitors. In addition, you should know that any of the following conduct could violate antitrust laws and is highly problematic:

- **Fixing prices or agreeing with a competitor on prices or setting prices in concert with a competitor;**
- **Bid rigging or agreeing with a competitor to set the terms or direct the outcome of a bidding process;**
- **Boycotting suppliers or customers to coerce the suppliers or customers to stop dealing with a competitor;**
- **Pricing intended to drive competitors out of business;**
- **Disparaging, misrepresenting or harassing a competitor;**
- **Bribery, kickbacks or stealing trade secrets;**
- **Entering into agreements or understandings with competitors to divide the market in which they compete by allocating territories or markets, and/or limiting the production or sale of products or product lines;**
- **Conditioning the sale of one product/service on the sale of another unwanted product/service; and/or**
- **Conditioning the sale or purchase of products/services on the requirement that the seller or purchaser not do business with competitors of the Company.**

Employees must avoid engaging in or discussing any of the above activities with competitors, suppliers, or customers, and must report any instance in which such activities are proposed or discussed to the HR Department.

To comply with antitrust and competition laws, you must:

- **Not discuss pricing or terms of PESSC24 bids with a competitor.**
- **Not agree with competitors to target certain customers, products, services, or geographic territories.**
- **Not agree to boycott a customer, supplier, licensor or licensee.**
- **Not agree with a vendor or a customer on the prices at which a product will be sold to a third party.**

HOW WOULD YOU RESPOND?

Question: You have the opportunity to view financial, pricing, and proprietary data of a company that is wholly owned by the same group of investors that owns PESSC24. This information would be useful in preparing separate proposals for new work that each company plans to pursue independently. Is there a problem with viewing this information?

Answer: Yes. Even though the companies have the same owner, they are separate and independent competitors pursuing the same RFP as competitors. Federal rules against collusion, bid-rigging, and antitrust violations prohibit sharing this information, and could subject you and/or PESSC24 to criminal and civil sanctions. You must consult with the HR Department before engaging in any discussions with a competitor or potential competitor. You must also follow all applicable policies and procedures if planning a joint venture or any partnership with another company, even one with whom PESSC24 shares corporate owners.

Question: You meet an acquaintance who works for a competitor at a neighborhood social gathering. He suggests that you work together to —help your companies. He will provide confidential pricing data and other information about his company's bids if you will give him the same information. He suggests that sharing this information will improve both companies' ability to obtain new contracts. Can you share this information?

Answer: No. Your neighbor is suggesting anticompetitive behavior. Both you and the Company could face serious civil and criminal penalties if you agreed to his proposal. You should contact the HR Department if you are asked to provide confidential information to a competitor or if you have questions about antitrust rules.



TRAFFICKING IN PERSONS IS ILEGAL AND PROHIBITED

*The United States and Myanmar Governments have adopted a zero tolerance policy regarding contractors or their employees who engage in or support trafficking in persons, **procurement of commercial sex acts**, or use of forced labor. The Company is committed to full compliance with this policy and has also adopted a zero tolerance approach.*

All Company employees, contractors, consultants, and other agents and representatives are prohibited from engaging in or supporting any trafficking in persons, use or procurement of commercial sexual acts, or use of forced labor. Employees must immediately report any actual or perceived violations of this policy to the HR Department. Any person who violates this standard or fails to report violations of this standard shall be subject to disciplinary action, up to and including termination of employment.

Any questions regarding this zero tolerance policy should be directed to the HR Department.

CONDUCT BUSINESS ETHICALLY IN MYANMAR

PESSC24 operates in Asian countries and our commitment to ethical conduct governs all of our work locations. We have no tolerance for violations of any of the laws of the countries in which we do business. We hold our employees to the highest standards of ethical behavior.

Unless prohibited by U.S. or local law, you are responsible for complying with the national and local laws of the countries in which we operate. In the case of a conflict with U.S. or Myanmar law, you must obtain direction from the HR Department.

In particular, you must pay special attention to the following laws:

ANTI-CORRUPTION

Employees must strictly comply with the anti-corruption laws that govern our operations in the countries in which we do business. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws enacted by other countries. Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials, political parties, or candidates to obtain some improper business advantage. More specifically, they prohibit you, directly or indirectly, from corruptly giving, offering, or promising anything of value to foreign officials or foreign political parties, officials, or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep, or direct business or to gain any improper advantage. In addition, to prevent concealment of bribery, the FCPA prohibits knowingly falsifying a company's books and records or knowingly circumventing or failing to implement adequate internal accounting controls.

Violations of the FCPA may subject you and/or PESSC24 to criminal and/or civil sanctions. Host nation laws may also pose similar liability.

In accordance with applicable Company policy and procedures, FCPA due diligence by the HR Department is required for all agreements concerning all work performed prior to execution. Any person who violates this standard or fails to report violations of this standard shall be subject to PESSC24 disciplinary action, up to and including termination of employment.

You should raise any questions concerning compliance with the FCPA and other anti-corruption laws to the HR Department.

HOW WOULD YOU RESPOND?

Question: You are working on a proposal in a newly independent country to provide training to the country's police force. The Minister of Interior suggests that he will recommend PESSC24 strongly if the Company makes a contribution to his party's candidate in the upcoming presidential election. Would it be okay to recommend this contribution?

Answer: No. It would violate the FCPA to make a payment to a Government official of any country for the purpose of obtaining or retaining business. Political parties and candidates are expressly included in this prohibition. You and/or PESSC24 could be subjected to criminal and/or civil penalties by the U.S. Government. You must contact the HR Department before entering into any agreement regarding work performed outside the United States or making any payment that could possibly be covered by the FCPA.

Question: You are responsible for overseeing the work of a freight forwarder subcontracted to PESSC24 in a foreign country. The freight forwarder informs you that certain shipments are delayed at a foreign border because a foreign official insists on certain fees being paid. Can the freight forwarder make these payments? After all, it's the freight forwarder making the payments—not PESSC24—so won't PESSC24 be shielded from any potential FCPA violations?

Answer: No. PESSC24 will not be shielded from an FCPA violation even if a subcontractor actually makes an illicit payment. You could face criminal and/or civil sanctions as well. You should not assume that such payments to border officials will not violate the FCPA. Contact the HR Department prior to making or authorizing any such payment.

Question: In connection with a deal you are developing, a foreign government official has asked PESSC24 to pay a —processing fee to expedite clearing customs. What should you do?

Answer: You must obtain review and approval from the HR Department before making any —expediting payments.

TRADE RESTRICTIONS

The United States and Myanmar Governments impose restrictions on the export of certain technical data, technology, software, and/or services (particularly those related to U.S. national defense, security, or intelligence) to foreign countries and to certain foreign persons, without first obtaining a license from a duly authorized U.S. Government agency.

Employees contemplating transactions involving such material or information must contact the HR Department for guidance and information. Failure to comply fully with export laws and regulations could result in heavy fines or the loss or restriction of PESSC24 export or import privileges, which, in turn, could seriously and adversely affect a significant portion of the Company's business.

OFAC COMPLIANCE

The regulations promulgated by the Office of Foreign Asset Control (OFAC) of the U.S. Department of the Treasury prohibit any U.S. person, including employees of U.S. companies located outside the U.S., from transferring, paying, receiving, or otherwise dealing in property or an interest in property belonging to or controlled by designated individuals or entities (the OFAC list). Violations of these regulations can result in substantial fines and imprisonment.

To comply with the OFAC regulations, we must review the OFAC list and make certain that none of the entities with which we transact business are designated. You should contact the HR Department for assistance in complying with OFAC screening requirements.

INTERNATIONAL BOYCOTTS

PESSC24 and its employees are prohibited from taking any action to further or support a boycott against a country friendly to the United States and/or a boycott not sanctioned by the U.S. Government. The Anti-Boycott regulations include prohibitions on:

- **Refusing to do business with boycotted countries or companies organized under the laws of boycotted countries.**
- **Performing discriminatory actions or providing information concerning race, religion, gender, national origin, or contributions to charitable organizations that support a boycotted country.**
- **Furnishing information regarding any past, present, or future business relationship with a boycotted country or its nationals or residents or other boycotted persons, even if the information is publicly available.**
- **Conducting business pursuant to a letter of credit that contains provisions related to a prohibited boycott.**

Employees must immediately report any request to engage in an unlawful boycott to the Compliance Group. Employees should also contact the HR Department if they have any questions regarding international boycotts.

HOW WOULD YOU RESPOND?

Question: You have an opportunity to enter into a contract with a private commercial company in Myanmar. One of the terms of the commercial contract directs that PESSC24 will adhere to and obey all laws of the commercial company's host nation. Host nation law mandates a boycott of Bangladeshi goods and services. May PESSC24 agree to this restriction?

Answer: No. Even a deceptively simple agreement to obey all local law presents a problem when local law requires support of a boycott not sanctioned by the United States Government. This is true even in a strictly commercial setting. You must contact the HR Department and before entering into such an agreement. Even if the offending language can be deleted or suitably modified, PESSC24 must report any request to engage in an unlawful boycott.

POLITICAL ACTIVITY INCLUDING LOBBYING

PESSC24 respects the political process, including the limits imposed on corporate involvement in lobbying and contributions. We are committed to full compliance with all laws controlling our ability to participate in this arena.

PESSC24 will not make contributions, directly or indirectly, to any candidate or party or to any organization that might use the contributions for a political candidate or party. This prohibition includes employee work time. Exceptions may be made to this prohibition only if permitted by law and approved by PESSC24 Chairman. PESSC24 does not prohibit employees from participating individually in the political process. Such activities must take place on the employee's own time and at the employee's own expense. Each employee is responsible for complying fully with all laws and regulations relating to political contributions and interactions with government officials. Employees may not engage in political activities that are potentially in conflict with their work duties and responsibilities to the Company, including but not limited to, acting as an advisor to or spokesperson for candidates for public office. No manager, supervisor, employee, agent, or third person who represents the Company in political or governmental matters shall apply any pressure, direct or indirect, to any employee in a way that infringes on an employee's right to decide whether, to whom, and in what amount a personal political contribution is to be made.

Lobbying activity is highly regulated. Lobbying includes attempts to influence Congress, congressional staff, and certain officers and employees of the Executive Branch with respect to legislation, rules, regulations, programs, policies, and other similar actions. Lobbying activity can include phone calls, emails, letters, and in-person meetings. PESSC24 is required to register as federal lobbyists all employees who engage in certain levels of lobbying activities and must file reports related to their efforts. All employees must confer with both the HR Department prior to undertaking any effort to lobby the federal government, any of the States, the District of Columbia, any local jurisdiction, or a foreign country, either directly or through a hired third-party.

HOW WOULD YOU RESPOND?

Question: A neighbor is running for city council. She asks for your help with her campaign. Can you volunteer?

Answer: Yes, as long as you do so exclusively on a personal basis, on your own time, and as long as the campaign work does not create a potential or actual conflict of interest with your work for PESSC24. You cannot use your connection to PESSC24 in any way whatsoever in connection with the campaign and cannot use Company assets such as office supplies, computers, network access, or telephones.

PROCUREMENT INTEGRITY AND ACCURACY

PESSC24 competes fairly for all business. We are committed to the integrity of the procurement process.

You are responsible for dealing fairly with the Company's customers, suppliers, competitors, and employees. If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective customers and suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements and clauses.

You must refuse any offers to provide PESSC24 with any unauthorized contractor bid and proposal information or source selection information and immediately report the offer to the HR Department. You may not use, obtain, accept, or receive any information to which PESSC24 is not clearly and legitimately entitled. If you ever have reason to believe

that the release or receipt of any information is unauthorized, or you are uncertain as to PESSC24's right to use the information, do not copy, distribute, or use it until you have obtained guidance from the HR Department.

PESSC24 employees who participate in proposal or bid preparation or a negotiation process are also responsible for compliance with all Truth in Negotiations Act (TINA) requirements. In accordance with TINA, PESSC24 employees must gather all relevant cost or pricing data, certify that all cost or pricing data is current, accurate, and complete, and make proper disclosure of cost or pricing data to the customer.

HOW WOULD YOU RESPOND?

Question: In the course of your work on a proposal, you receive an email from the contracting officer. When you open it, you realize the message was sent to you erroneously, and that the email appears to contain proprietary competitor information. What should you do?

Answer: From the moment you realize the email contains or may contain proprietary competitor information, you must immediately refrain from reading the message and its contents. Contact the HR Department immediately before communicating with any other employee concerning the message. Close the message, do not send it to any other person, and do not print it without guidance from the HR Department. Steps will be taken to immediately notify the Government of the error, to eradicate the message completely, to comply with any procedures the Government directs, and to disclose what information, if any, was learned from the message and by whom.

Question: You have hired a new employee in your group. She previously worked for a competitor and has current information about both our industry and our competitors. Can you ask her about this competitive data?

Answer: No. You should not ask for any confidential or proprietary information about the employee's former employer. In addition, you should not allow the employee to volunteer such information. Contact the HR Department for guidance.

AVOID IMPROPER GIFTS AND GRATUITIES

PESSC24 avoids the appearance of impropriety that may arise when improper gifts change hands. We compete and succeed on the merits of the services we provide.

GIFTS, ENTERTAINMENT AND GRATUITIES FOR GOVERNMENT EMPLOYEES

Never give or offer any money, gift, gratuity, favor, entertainment, loan, or any other item of value to a government employee. This prohibition applies to all Government employees, as well as to employees of U.S. state and local governments. Pay particular attention to this prohibition when dealing with any Government employee with whom the Company is seeking to obtain, or is actively doing, business. In addition, do not accept gifts or gratuities from Government employees.

U.S. Government regulations generally prohibit U.S. Government employees from receiving gifts and benefits, including entertainment, transportation, meals, and tickets to sporting or other events. When meals are available at a meeting with Government employees, either a fair sharell box must be made available or the responsible manager must confirm that it is appropriate to charge the meal to a contract. Even in those limited circumstances in which U.S. Government regulations permit acceptance of such gifts and benefits, PESSC24 policy is that neither its employees nor members of their immediate families may offer or give anything of value to U.S. Government employees.

GIFTS, ENTERTAINMENT, GRATUITIES, AND DISCOUNTS FROM NON-GOVERNMENT/BUSINESS CONTACTS

Never accept gifts from anyone with a company that does or might do business with PESSC24. Employees may accept advertising gifts, token gifts of appreciation, or meals and tickets from non-U.S. Government business contacts, if they are of reasonable value and if declining to accept them would embarrass the offer or. Accept business meals only if they are of reasonable cost. Do not claim or accept reimbursement for meals provided by others. On accepting a gift, an employee should immediately discuss the matter with his/her supervisor to avoid any impropriety or appearance of impropriety.

NO KICKBACKS

Do not offer, pay, solicit, or accept, directly or indirectly, any fee, commission, compensation, gift, or gratuity to or from any Government agency (federal, state, or Local Township) prime contractor, or subcontractor.

HOW WOULD YOU RESPOND?

Question: A vendor calls repeatedly to sell her company's copying services. You are responsible for the contract, and have rejected her offers because the price is too high. She calls one day and offers you a ticket to a Washington Redskins game. Can you accept this ticket?

Answer: No. This vendor is seeking to do business with PESSC24. Due to the cost of this Ticket and the likelihood of a conflict of interest, you must decline this offer. You should also report the offer to your supervisor.

Question: You are holding a business meeting and have invited several Government officials. Can you provide a meal?

Answer: No. You cannot provide any gifts to Government officials. You should provide a —fair sharell box so that each participant can pay the fair market value of his/her own meal.

AVOID CONFLICTS OF INTEREST

All PESSC24 employees occupy positions of trust. We must be very sensitive to any circumstance, on or off the job that could damage that trust or cause others to question the good faith of our behavior.

A conflict of interest exists when you have divided loyalties – when you have a direct or indirect personal interest in a transaction or matter such that it might reasonably appear to affect the judgment that you exercise on behalf of PESSC24, influence your actions, or lead you to neglect PESSC24 business interests.

PERSONAL CONFLICT OF INTEREST GUIDELINES

You are responsible as an PESSC24 employee to act in a fair and impartial manner in all business dealings, and to place the interests of PESSC24 over personal interests in matters relating to PESSC24 business.

You must avoid financial, business, or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of PESSC24. Such situations may arise from relationships with customers, competitors, and suppliers, present or prospective employees, or from the acquisition or use of company assets for personal gain. An actual conflict of interest does not need to be present to constitute

a violation of this Code; you must also avoid activities that create the appearance of a conflict of interest. A conflict of interest exists when you use your contacts or position in the Company to advance interests other than the Company's, such as your own private business or financial affairs, or those of a friend or relative (whether or not at the expense of the Company). You should never use Company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your position at PESSC24.





EXAMPLES OF HOW A PERSONAL CONFLICT OF INTEREST COULD OCCUR:

- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by PESSC24.
- Acceptance of gifts, payment, or services from those seeking to do business with PESSC24.
- Placement of business with a firm owned or controlled by a PESSC24 employee or his/ her family.
- Ownership of, or substantial interest in, a company that is a customer, competitor or supplier.
- Acting independently as a consultant to a PESSC24 customer or supplier, while employed by PESSC24.
- Having a personal interest or potential for gain in any Company transaction.
- Using Company assets, intellectual property, or proprietary information for personal gain.
- Employing or discussing employment with former Government employees, or using them as consultants or subcontractors in violation of applicable laws or regulations.
- Having a close, personal relationship with a subordinate employee.

ORGANIZATIONAL CONFLICTS OF INTEREST

Generally, an organizational conflict of interest may arise if (1) the Company and/or an employee participate in the development of a statement of work for a procurement that the Company intends to pursue, (2) a statement of work requires the Company or its team partners to evaluate or assess work performed by the Company or its team partners for the Government, or (3) the Company is provided access to third-party proprietary information that may give the Company an unfair competitive advantage in another procurement.

Government procurement regulations generally restrict the ability of a company to participate in a procurement if an organizational conflict of interest exists and cannot be effectively mitigated. To prevent a loss of business, it is important, therefore, to comply strictly with the rules governing such conflicts.

The circumstances related to organizational conflicts of interest can be complicated and difficult to evaluate. If you have any questions or become aware of a situation that could create an organizational conflict of interest, consult the HR Department immediately.

HOW WOULD YOU RESPOND?

Question: Your daughter wants to apply for a position in your department. Can you encourage her to apply and ask your Human Resources to make the hiring decision so it does not appear that you gave your daughter preferential treatment?

Answer: No. Even if the Human Resources representative selected your daughter without any input from you, there would be an appearance of improper conduct.

Disappointed applicants would not know how the hiring process worked and would justifiably believe that the decision was based on inappropriate factors. Asking the Human Resources representative to consider your daughter's application would be inappropriate and would subject you to disciplinary action, up to termination. Moreover, Company policy prohibits your daughter or any other family member from working in your organization or any part of the Company under your control or influence. Thus, even if your daughter were hired through a wholly impartial process, she could not work in any department you supervise.

HIRE OR RETAIN FORMER GOVERNMENT EMPLOYEES PROPERLY

PESSC24 competes fairly for business opportunities. As a result, we do not work with former Government employees in any capacity that could violate their duty to their former agencies or create a conflict of interest.

You are responsible for ensuring that PESSC24 avoids conflicts of interest in connection with employing or acquiring the services of current or former Government employees.

Employees must comply fully with all laws and regulations pertaining to employing or acquiring the services of Government employees. These rules apply to contact or negotiations with current or former Government employees to discuss their potential employment by the Company or their use as consultants or subcontractors. For this reason, all employees must consult with the Human Resources Department or the HR Department before starting discussions with current or former Government employees or military personnel regarding service with PESSC24 as an employee or consultant. Applicable laws and regulations also restrict the roles and responsibilities that former Government employees may perform on our behalf after joining the Company.

The laws and regulations governing the hiring and employment of former Government employees are complex and the penalties for violations can include civil and criminal sanctions. The restrictions are particularly significant for current and former Government —procurement officials. As a result, personnel hiring on behalf of PESSC24 must require the following current or former Government candidates for hire to obtain an ethics advisory opinion from the relevant Government agency's Designated Agency Ethics Official (DAEO): (1) those who are or have been procurement officials; (2) those who have had or currently have personal and substantial involvement in any procurement or program involving PESSC24; or (3) those who have had or currently have any direct or indirect administrative operating responsibility for PESSC24 programs or contracts. These DAEO determinations are made routinely and should clearly outline any prohibitions or restrictions associated with a candidate for hire. No employment discussions or offer of employment may be made to former or current Government employees in these categories, verbally or in writing, prior to receipt, review, and clearance of the DAEO letter by the HR Department.



HOW WOULD YOU RESPOND?

Question: A contracting officer tells you at the end of a meeting that she is interested in a position in the private sector and asks if PESSC24 is hiring. What should you tell her?

Answer: You should tell her that you understand there are numerous federal laws limiting PESSC24 ability to hire or even to discuss employment with Government officials. You should refer her request to your senior Human Resources representative for discussion with the HR Department. No discussions whatsoever regarding possible employment can take place until you receive clearance from the HR Department.

RETAIN CONSULTANTS AND OTHER PARTIES PROPERLY

PESSC24 has established specific procedures to ensure that we engage consultants and other third parties who meet our high ethical standards. These procedures affirm that the engagement complies with all governing laws. We only engage consultants and other third parties after fully satisfying all applicable Company policies and procedures.

You may not retain a consultant, representative, or other third-party to conduct business in a manner that is contrary to PESSC24 policies or procedures, or that would circumvent our values and principles. For example, you must not retain consultants, representatives, or other third parties for the purpose of paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of third parties without authority, or improperly gaining inside information or influence.

Employees are responsible for seeking advice from the HR Department prior to engaging an international or domestic consultant. Consultants and representatives must certify their willingness to comply with this Code, PESSC24 policies and procedures, and all applicable laws and regulations.

HOW WOULD YOU RESPOND?

Question: You plan to enter into a contract to retain an agent to act for PESSC24 in a country in which we plan to pursue several new contracts. We are not currently operating in the country. You have carefully screened candidates and selected a potential agent based on strong recommendations you received from several trusted people operating in the country. Is your due diligence complete?

Answer: No. There is a formal and robust due diligence process that must be followed. In addition, Company policy requires that the potential agent review and agree to comply with the provisions of this Code, the relevant Company policies, and specific contractual provisions. You must follow the Contracts Department's due diligence process and the HR Department's Foreign Corrupt Practices Act (FCPA) due diligence process to ensure that the retention of this agent will not harm PESSC24's reputation or business standing, violate the FCPA, or trigger the anti-bribery provisions of the country in which the agent

will operate. You must contact the HR Department to undertake proper due diligence under the FCPA. Please raise any questions regarding this policy or any other steps necessary to retain a foreign agent with the HR Department prior to engaging any agent.

OBLIGATIONS OF DEPARTING AND FORMER EMPLOYEES

In the course of your employment, you may obtain equipment and information intended to help you perform your job. You cannot use that equipment or information after your employment is concluded. Moreover, your obligation to protect PESSC24 proprietary information remains in effect. For these reasons, at the conclusion of your employment, you must promptly return all Company provided tools, equipment, and data in your possession and continue to preserve the confidentiality of all Company proprietary information you learned during your employment.

Your obligations to comply with this Code and Company policies and procedures remains in effect even after your employment with PESSC24 ends. The following requirements apply to all current, departing, and former PESSC24 employees:

- **When leaving or retiring, you must ensure that you return all Company property in your possession, including all records and equipment.**
- **You may not breach any employment condition or agreement you have entered with PESSC24.**
- **You may not use or disclose PESSC24 non-public information in any subsequent employment.**
- **Current employees may not provide any PESSC24 non-public information to former employees unless authorized. If a former employee solicits non-public information from you, you must immediately notify Security or the HR Department.**

If you are concerned that a former PESSC24 employee is benefiting unfairly from information obtained while employed at PESSC24 or may be inappropriately receiving non-public information, you should immediately contact your supervisor or the HR Department.



PROTECT PROPRIETARY INFORMATION

PESSC24 employees are regularly entrusted with proprietary information and we must treat such information with the appropriate level of care. We do not disclose confidential or proprietary information belonging either to the Company or to others without appropriate authorization. Further, your obligation to protect confidential information survives the conclusion of your employment.

You may not disclose or receive sensitive information, including Company proprietary information, without proper authorization. You must keep sensitive information, including any proprietary documents, protected and secure. You may disclose sensitive information only if you have proper authorization to do so.

In the course of normal business activities, suppliers, customers, and competitors may sometimes divulge to you information that is proprietary to their business. You may accept or use the proprietary information only if such use or acceptance complies with Company policy. If you receive proprietary information from a supplier, customer, or competitor without proper authorization, such as a non-disclosure agreement, you must immediately bring this disclosure to the attention of the HR Department.

If you have any questions regarding the procedures to safeguard information properly, please consult the HR Department, and in the case of classified information, contact the Security Department.

HOW WOULD YOU RESPOND?

Question: You take public transportation each morning to the office and use the time to catch up on business telephone calls and emails. Is that a problem?

Answer: You must make sure that you do not review or discuss confidential business matters in a place or manner where Company proprietary information can be seen or overheard. You should be mindful of your surroundings at all times. You must also charge your time correctly to account for this work.

PROTECT CLASSIFIED AND NATIONAL SECURITY INFORMATION

In our jobs, we are often entrusted with classified and national security information. Such information must be protected and may never be disclosed to unauthorized personnel unless approved by the U.S. Government.

You must take all steps necessary to protect classified and national security information and you must coordinate all activities related to this information with Security and HR Department personnel who have appropriate clearances. It is never appropriate to disclose this information to another person without explicit approval from the U.S. Government.

PROTECT PERSONAL INFORMATION

As part of our jobs, we are often allowed access to colleagues' personal information. We understand that this information can be used only for legitimate business purposes. We will safeguard personal information and protect it from unauthorized disclosure or inappropriate use.

You must not access personal information unless you have a —need to knowll such information for legitimate business purposes and have prior authorization.

If you have access to personal information (including personnel or medical records), you may not disclose such information without proper authorization. You must keep personal information protected and secure in accordance with Company policies, laws, and applicable third-party agreements. No employee may use personal information for any unauthorized purpose.

If you collect or access personal information on behalf of PESSC24, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

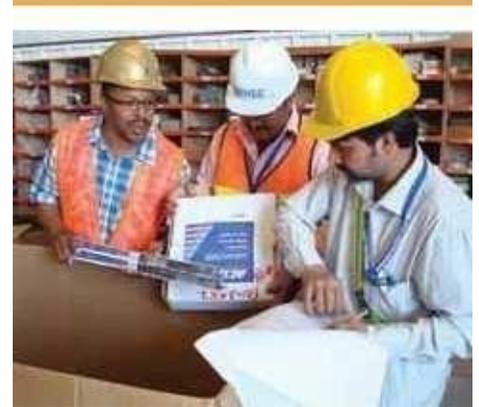
If you believe that personal information has been accessed by an unauthorized person, disclosed inappropriately, used for purposes other than PESSC24 business, or gathered in violation of Company policy or the law, you must immediately bring the relevant facts to the attention of the HR Department.

PROTECT COMPANY AND CUSTOMER PROPERTY

Company and customer resources are made available to help employees perform their jobs. These resources can only be used for authorized business purposes. These resources belong to our shareholders and our customers and we have an absolute duty to protect these assets from damage or improper use.

Each of us owes a special duty to the Company and its customers to use property only for its intended purposes. Use of Company or customer facilities, property, or funds for other than Company business is strictly forbidden unless permitted in published Company policies and procedures or cleared in advance in writing by a corporate officer.

Employees are expected to use Government provided and Company owned property properly. This responsibility requires all employees to use, maintain, account for, and dispose of such property in compliance with Company procedures and supervisory instructions. Failure to satisfy this responsibility may be considered theft.



Property provided by a customer or a supplier must be used by employees only in accordance with and for the purposes set forth in the relevant contract.

In all cases, Company or Government provided equipment, including technology, computers, software, fax machines, telephones, and email accounts, should only be used for authorized business purposes. You may occasionally use business resources for personal use if the purpose is consistent with Company policy. You may not use Company resources to support a personal business or purpose that would embarrass the Company under any circumstances. Abuse or unauthorized use of the internet is prohibited. In all cases, technology cannot be used for purposes that are disruptive, offensive, embarrassing, or in violation of Company policy or procedure. Example of inappropriate uses of the Internet and email include:

- **Pornographic, obscene, offensive, harassing, or discriminatory content;**
- **Chain letters, pyramid schemes, or unauthorized mass distributions;**
- **Communications on behalf of commercial ventures;**
- **Gambling, auction-related materials, or games;**
- **Large personal files containing graphic or audio materials;**
- **Violations of others' intellectual property rights; and**
- **Malicious software or instructions for compromising the Company's security.**

Employees must take necessary steps to protect the security of Company and/or Government provided technology. Employees must keep access information and passwords confidential. Similarly, employees should use only licensed and approved software on Company systems.

Employees do not have any right of privacy concerning any information that is sent, accessed, copied, deleted from, stored on, received by, or transmitted using Company hardware, software, or network systems, including but not limited to, email, computer disks, voicemail, and all other media. PESSC24 reserves the right to inspect, copy, access, intercept, remove, view, listen to, alter, or disclose at any time any information on its hardware, software, or network systems. Employees should understand that NFID hardware, software, and network systems are intended for business use. All information sent, accessed, copied, deleted from, stored on, received by, or transmitted using any Company equipment, software, or systems is considered Company property, and is not private. Employees have no expectation of privacy related to any information on their computers, including any message or data that has been —deletedll from their computer.

Company credit cards and direct purchase (DPC) cards may only be used for approved business purposes. Employees who use these cards for personal use or unauthorized purchases will be subject to discipline, up to termination of employment.

HOW WOULD YOU RESPOND?

Question: An employee in the work group you supervise complains that her co-worker is looking at inappropriate suggestive materials on his computer during working hours. She is able to see his monitor and finds the material offensive and inappropriate for the workplace. What can you do?

Answer: You should work with your Human Resources Representative and the IT Department to investigate these claims. Employees have no right to privacy regarding their use of Company provided technology, including computers and the Company network. If necessary, therefore, you may want to examine the computer and identify the websites that were viewed. If the employee's complaint is substantiated, the Company will impose appropriate discipline, up to and including termination of employment.

Question: You receive a chain letter email from a friend on your Company email address. The email requests that you forward the message to ten people to support a charity. Can you forward the message?

Answer: No. Circulating chain letters through company systems or email is prohibited.



PROTECT THE COMPANY'S PUBLIC IMAGE

As employees, we must safeguard NFID's reputation and public image. We must ensure that all public statements, including filings with Government agencies, are accurate, complete and clear, and communicated only by authorized Company spokespersons.

PESSC24 reputation is one of its most valuable assets. Each of us represents the Company to the public. We must all take steps to protect the Company's public image.

All disclosures made in reports filed with any public agency must be current, accurate, complete, timely, and readily understandable. This responsibility rests with all employees, officers, and directors who have responsibility for preparing, drafting, reviewing, editing, or certifying any public reports.

If you receive a request from the news media, you must immediately report this request to the Corporate Communications Department. Employees are not authorized to communicate with the media, any community relations group, or publish articles or books relating to the work performed by PESSC24 without the prior written approval of the Senior Vice President of Strategy & Corporate Development. Unless you receive prior approval, you may never suggest that you are speaking on behalf of PESSC24 when presenting your personal views at community, professional or cultural functions or on the Internet. You may not use the Company brand, logo, or service mark without prior permission from the HR Department.

CODE OF CONDUCT FOR SECURITY GUARDS

As a professional security Guards he/she will maintain not only his appearance and uniform, but his professional manner as well. Our guards are always respectful to our clients and maintain situational awareness in his/her Area Of Responsibility (AOR).



This **Professional Code Of Conduct** is written to be inculcated in the hearts and minds of all Guards. She/he is a professional by profession. He/she must pledge to protect lives and property of our clients.

All Guards will adhere to the following Code of Conduct:

1. He shall carry with him at all times during his tour of duty his Identification Card and Duty Detail Order (DDO);
2. He shall not use his ID Card for other privileges;
3. He shall not engage in any unnecessary conversation with anybody except in discharge of his duties or sit down unless required by the nature of his work and shall at all times keep himself alert during his tour of duty;
4. He shall refrain from reading newspaper, magazines, book, etc., during actual performance of his duties;
5. He shall not drink any intoxicating liquor immediately before and during his tour of duty;
6. He shall know the location of the alarm box near his post and sound the alarm in case of fire or disorder;
7. He shall know how to operate any fire extinguisher at his post;
8. He shall know the location of the telephone and/or telephone numbers of the police precincts as well as the telephone numbers of the fire stations in the local area;
9. He shall immediately notify the police in case of any sign of disorder, strike, riot or any serious violations of the law;
10. He or his group of guards shall not participate in any disorder, strike, riot, or any serious violations of the law;
11. He shall assist the police in the preservation and maintenance of peace and order and in the protection of life and property having in mind that the nature of his responsibilities is to observe and report;
12. He shall always be in proper uniform and shall always carry with him his basic requirements, and equipment such as writing notebook, pen, night stick (baton) and/ or radio;
13. He shall endeavor at all the times, to merit and be worthy of trust and confidence of the agency he represents and the client he serves.

INTERACTIONS BETWEEN COMPANIES AND PHOENIX ELITE SECURITY SERVICES™ IN RELATION TO HUMAN RIGHTS

When contracted to provide security, Phoenix Elite Security Services™ will coordinate with state forces, (law enforcement, in particular) to carry defensive weapons and to consider the defensive local use of force. Given the risks associated with such activities, we recognize the following voluntary principles to guide our conduct:

1. Phoenix Elite Security Services™ will observe the policies of the contracting Company regarding ethical conduct and human rights; the law and professional standards of Myanmar; emerging best practices developed by industry, civil society, and governments; and promote the observance of international humanitarian law.
2. Phoenix Elite Security Services™ will maintain high levels of technical and professional proficiency, particularly with regard to the local use of force and defensive weapons (batons).
3. Phoenix Elite Security Services™ will always act in a lawful manner. The company will exercise restraint and caution in a manner consistent with applicable international guidelines regarding the local use of force, including the UN Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN Code of Conduct for Law Enforcement Officials, as well as with emerging best practices developed by Companies, civil society, and governments.
4. Phoenix Elite Security Services™ has policies regarding appropriate conduct and the local use of force (e.g., rules of engagement). Practice under these policies will be monitored by the company and, where appropriate, by independent third parties. Such monitoring will always encompass detailed investigations into allegations of abusive or unlawful acts; the availability of disciplinary measures sufficient to prevent and deter; and procedures for reporting allegations to relevant local law enforcement authorities when appropriate.
5. All allegations of human rights abuses by Phoenix Elite Security Services™ should be recorded. Credible allegations should be properly investigated. In those cases where allegations against Phoenix Elite Security Services™ providers are forwarded to the relevant law enforcement authorities, the company will actively monitor the status of investigations and press for their proper resolution.
6. Consistent with their function, Phoenix Elite Security Services™ will provide only preventative and defensive services and will not engage in activities exclusively the responsibility of state military or law enforcement authorities. The company will designate services, technology and equipment capable of offensive and defensive purposes as being for defensive use only.
7. Phoenix Elite Security Services™ will (a) not employ individuals credibly implicated in human rights abuses to provide security services; (b) use force only when strictly necessary and to an extent proportional to the threat; and (c) not violate the rights of individuals while exercising the right to exercise freedom of association and peaceful assembly, to engage in collective bargaining, or other related rights of Company employees as recognized by the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
8. In cases where physical force is used, Phoenix Elite Security Services™ will properly investigate and report the incident to relevant agencies. Phoenix Elite Security Services™ will refer the matter to local authorities and/or take disciplinary action where appropriate. Where force is used, medical aid will always be provided to injured persons, including to offenders.
9. Phoenix Elite Security Services™ will maintain the confidentiality of information obtained as a result of its position as security provider, except where to do so would jeopardize the principles contained herein.

PESSC24 CODE OF ETHICS AND BUSINESS CONDUCT

HOW WOULD YOU RESPOND?

Question: You arrive on post and clock in. You are relieving another guard when you smell beer on his breath. What should you do?

Answer: You should immediately notify your supervising guard or the main office. A guard drinking on post could jeopardize the contract and PESSC24 relationship with the client.



Phoenix Elite Security Services™
VIP/Exec/Diplomatic Protection/Uniformed Guards

COMPLETE MANDATORY TRAINING

The HR Department will establish mandatory training to ensure that all employees, directors, and others have a complete understanding of the requirements that affect their positions. Employees are required to look for training announcements and to complete all training in a timely manner.

PESSC24 expects all employees and members of the Management Team to complete all compliance training applicable to their positions. Completion of assigned training requirements is a condition of continued employment with the Company. Employees who fail to complete assigned training in a timely manner will be subject to discipline, up to and including termination.

HOW WOULD YOU RESPOND?

Question: You receive instructions about a new mandatory compliance training initiative. The employees you supervise are already fully occupied with their contractual obligations. What should you do?

Answer: You must take all steps necessary to ensure that employees complete all mandatory training in a timely manner. You should advise employees that compliance training is an essential part of their job and should adjust schedules to make sure employees have sufficient time to satisfy this requirement. You should also monitor employee completion of this training requirement and remind your workforce that employees who fail to complete training within the time period allotted will be subject to discipline, up to and including termination. Finally, you should ensure that all employees correctly charge the time spent completing this training requirement.

Mandatory Certification

MANDATORY CERTIFICATION

It is PESSC24’s objective to operate according to the highest standards of ethical behavior and professional integrity. By signing this form, I affirm my commitment to this objective.

I acknowledge that I have read the Phoenix Elite Security Services CRISIS24 Co. Ltd. Code of Ethics and Business Conduct (2018 edition) and understand it represents the Company’s standards with which I am expected to comply. I further understand and acknowledge that:

- I am responsible for complying with the Code of Ethics and Business Conduct, which sets out the Company’s guidelines for workplace behavior and ethics;
- I am expected to adhere to the highest moral and ethical standards for business and personal conduct;
- I am personally responsible and accountable for my actions and must avoid any activity or behavior that may conflict with my duties under PESSC24 Code of Ethics and Business Conduct;
- I am required to report any violations or suspected violations of this Code or any Company policy to a supervisor within my chain of command, the Human Resources Department or the Managing Director and can do so anonymously if I so choose;
- I should direct any questions concerning this Code to the HR Department; and
- Violations of this Code may result in disciplinary action, up to and including termination of employment.

Signature

Please Print Your Name

Date

Employee Number

Job Title or Classification

Location

This Certification must be completed and returned to human resources.

Phoenix Elite Security Services CRISIS24 Co. Ltd.

No. 54 (5th Floor) 94TH Street Mingalar Taung Nyunt Township, Yangon, Myanmar

For recruitment, please visit our website www.phoenixelitesec.com to apply and submit a resume.