

CODE OF CONDUCT

&

ETHICS

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Revision

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Company Culture & Integrity of Conduct

LARSA Security Services (herein known as “the Company”) is dedicated to conducting business with integrity, following ethical principles, and complying with the laws and regulations of the United States, as well as those of other countries where we operate. We uphold the highest ethical standards, expecting all employees and relevant third parties to strictly follow our Code of Conduct and Ethics. This Code is applicable to all affiliates, employees, members of the Senior Management Team, and "third parties," which include independent contractors, subcontractors, consultants, and anyone acting on behalf of the Company (collectively referred to as "Personnel").

Adherence to this Code is the responsibility of all Personnel. If there are any uncertainties, they should seek guidance to prevent unethical or unlawful conduct. Compliance with all applicable laws, regulations, this Code, Company policies, and sound ethical practices will be considered when assessing the performance of Personnel. Violations of these laws, regulations, the Code, or Company policies may lead to disciplinary action, including termination. Finally, this Code is not an exhaustive guide to all legal requirements, nor does it cover every possible situation Personnel may encounter. It is the duty of all Personnel to actively seek clarification on any ethical responsibilities they may be unsure about.

Ethical Decision Making

Although LARSA believes that Personnel will be guided to the right decisions by their own personal values, discretion, and good judgment, there are times when a situation may not be clear. It is not always easy to determine the ethical thing to do in a business situation. Personnel must always consider how his or her behavior and actions affect the integrity, credibility, and reputation of the Company as a whole. If you encounter a situation and are not sure of the appropriate course of action, you should always discuss the issue with your supervisor, consult senior management, or contact legal counsel.

Accountability For Upholding This Code, Policies & Procedures

Accordingly, all employees of the Company are expected to adhere to the standards of conduct contained in this Code and to comply with all LARSA Policies and Procedures that apply to their employment. More importantly, they are dutybound to alert and raise appropriate questions and concerns if they think that standards established in this Code or other Company Policies and Procedures are not being followed. Given the power relationship, supervisors and managers assume an added responsibility to be sensitive with their words and actions so as not to indirectly coerce subordinates into taking actions inconsistent with this Code and the Company Policies.

The Company expects all employees to follow these principles and that any failure to comply with this Code or Company Policies may be subject to disciplinary proceedings, which may include the possibility of termination. Employees should read all Company Policies, not all of which are listed in this Code. All policies are available through line management and through senior management.



Violations Of the Code

If you believe, or have a reason to believe, that any of the provisions of this Code, or any law or regulation governing our business, has been violated, or if you are ordered to act in a way that would be a violation of this Code or any applicable law or regulation, it is important that you do not stay silent. Examples of suspected violations include but are not limited to: suspected accounting or auditing improprieties; suspected illegal activity or dangerous situations; unethical conduct or suspected violation of the Code or other Company policies; violation of applicable law or regulation; violation of the PSC.1 (18788) Standard; and fraud against clients, vendors, Personnel, or the Company.

Personnel who learn of any violation or suspected violation must promptly report the matter to their manager, the Human Resources Department, Senior Management, Legal Counsel, or designee as may be appointed. Supervisors or members of Company management who learn of any violation or suspected breach shall report it to higher management for proper and prompt action. In some cases, failing to promptly report a suspected violation can constitute a violation of this Code in and of itself. Remember that no unlawful or unethical conduct ever can be justified as being in the interest of the Company or authorized by a supervisor.

Whistleblowing & Reporting Suspected Violations

Personnel and third parties can report and/or whistle blow any suspected or known violations to their manager, the Human Resources Department, or Legal Counsel or his or her designee. Personnel can also make a report to the Company through its Ethics email account, available 24 hours per day and seven days per week. The Ethics email account is available so Personnel can make reports on a confidential and anonymous basis if desired. Ethics email reports can be made via larsa.ethics@larsa.com

Non-Retaliation

Enforcing this Code is impossible without the participation and support of all Personnel at all levels. LARSA may not be aware of a serious breach of the Code or other policy or legal violations unless Personnel fulfill their duty to bring such matters to the attention of management. Retaliation by any employee against another individual who reports a violation of law or Company policy is strictly prohibited. No hardship, loss of benefit, or penalty may be imposed on an employee as punishment for filing or responding to a good faith complaint or cooperating in an investigation. For additional information on the Company's anti-retaliation mandate, please review the Anti-Retaliation and Whistleblower Policy.

Response To Investigations

When the Company learns of possible violations or complaints under this Code or any Company policy, the Company will initiate a prompt investigation. Personnel are required to cooperate with internal investigations whether they are conducted by Company legal counsel, Company personnel investigating



under delegation of authority from the Owner & General Manager, or external counsel acting on behalf of the Company. Personnel must never alter any documents or electronic records, lie to or mislead an investigator, or obstruct or in any way inhibit the collection of information relating to an investigation or any legal action brought against or on behalf of the Company. Similarly, nothing in the Code limits any individual's ability to communicate with any government agency or otherwise participate in any investigation or proceeding that may be conducted by any government agency. All information collected or learned during any Company investigation will be kept confidential and used only for the purpose of the investigation.

Creating A Safe and Secure Workplace

It is the policy of LARSA; that it is committed to a workplace free from discrimination, harassment, threats, and violence, which is respectful, approachable, and safe. This commitment extends to all colleagues, independent contractors, consultants, suppliers, and customers alike. We incorporate respect and excellence to allow avenues for success in the workplace. LARSA empowers a Speak-Up Culture in which all Personnel are free to raise concerns or ask questions about their work with absolutely no fear of retribution. It is our goal to foster an environment in which the Company's values are preserved and sound judgments are made during the execution of job responsibilities. In addition, it is vital to recognize that different locations have their own set of customs and practices, and what may be acceptable in certain areas that may be considered as offensive or even illegal in other areas.

Equal Employment Opportunity and Anti-Discrimination

LARSA is committed to providing equal employment opportunities for all applicants and employees. This is in line with the prevailing laws and principles that are deemed to be in good faith and in relation to employee relations. Our Equal Employment Opportunity Policy demands that each applicant or employee be judged based on individual merit, with the view that no applicant or employee shall be victimized based on protected categories, including but not limited to, race, sex, gender identity, age, national origin, religion, disability, sexual orientation, marital status, or veteran status.

Anti-Harassment

LARSA is committed to providing a work environment that is free from harassment, where everyone is treated with dignity, decency and respect. The Company absolutely prohibits harassment in any form and will take prompt and appropriate action in response to reports of prohibited conduct. This policy applies to all Personnel, regardless of position, and also includes conduct perpetrated through Company equipment, including but not limited to: networks, software, computers, e-mail, and telephones. The following are some examples of harassment:



Verbal: Remarks about national origin, race, color, religion, age, gender, sexual orientation, or disability or other protected status that are demeaning, degrading, threatening, or hostile; slurs, epithets and similar words. Though usually thought of in the context of sexual harassment, slurs can apply equally to these other protected classes.

Non-Verbal: Written or graphic materials distributed or displayed that insult, degrade, or show hostility toward individuals or groups based on protected status.

Unprofessional Conduct

Employees of LARSA interact with individuals in the public and private sectors. It is critical that we continue to nurture this culture of respect and dignity in these interactions. Each employee plays an important role in maintaining an atmosphere that fosters this type of interaction-respectful and rewarding dialogue. Unprofessional conduct, including but not limited to any actions or behavior tending to injure the interest or reputation of the Company, may lead to disciplinary action, up to and including termination. This code applies to all types of communication, whether it be verbal, non-verbal, physical, in writing or through electronic media. The unacceptable behaviors include threats, intimidation, belittling remarks, lascivious jokes and teasing, and displaced aggression, opportunities to bait, playful teasing and unwarranted physical contact.

Bullying

Bullying is defined as repeated behavior that a reasonable person would find hostile or offensive. Bullying will not be tolerated within LARSA. It can take many forms including physical, verbal and written actions. It usually involves a misuse of power. All forms of workplace bullying go against LARSA's culture and will be responded to promptly.

Workplace Violence

Any acts of violence or threats of violence, including but not limited to physical fights or aggressive behavior, are strictly forbidden and will be subject to disciplinary action, including, and up to termination. The policy covers actions committed during one's own time if the actions deemed to be connected with work.

Favoritism

All personnel actions, including hiring, evaluation, and promotion, are to be carried out based on sound business practices without nepotism or special favor. Romantic or sexual relationships where one party has authority over the other's employment will not be tolerated because such relationships inherently create conflicts and interference with the effective operation of the workplace. Favoritism is antithetical to trust and integrity and is not tolerated.



Safety

LARSA is committed to prioritizing the safety, health, and well-being of our communities, families, and Personnel. It is everyone's responsibility to adhere to the applicable health and safety regulations that guarantee a safe working environment. All accidents, incidents, or injuries must be immediately reported to the appropriate levels of management.

Environment

LARSA is committed to being environmentally responsible by adhering to all the applicable regulations of pollution and sustainability. The Company periodically assesses workplace practices involving waste management, recycling, procurement considering sustainability impact, and energy conservation. All claims of environmental violation are subjected to investigation, and LARSA will further continue to measure performance with ESG metrics.

Alcohol and Controlled Substances

LARSA aims at a drug-free workplace and encourages zero-tolerance of alcohol consumption. No employee shall consume alcohol or drugs while on Company business. Alcohol consumption on Company premises or during an event is strictly prohibited.

Use of Social Media

LARSA prohibits social media activities that would, among other things, violate this Code or other Company policies, or that are directed by customers to be in violation. This includes statements that harass, discriminate against, or encourage violence or unlawful activities toward others. Employees may not disclose confidential or proprietary information. This policy does not limit employees from exercising rights under federal or state labor laws, including the right to engage in protected concerted activities or whistleblower protection.

By adhering to these standards, LARSA seeks to provide an environment that is conducive, positive, and productive to work in-a reflection of our core values and support of the well-being of all Personnel.

Ethical Business Conduct

It is imperative that LARSA Personnel understand and abide by the applicable laws of the countries in which we conduct business as well as any contract/project-specific directives or procedures that govern his or her work. Compliance with applicable laws and contractual requirements reflect the Company's commitment to conduct business with the highest level of integrity and is critical to building and maintaining its reputation for excellence.



Use of Force

At times, the use of force by protective or security Personnel may become necessary in carrying out their duties on behalf of our customers and clients. The Company is committed to the highest ethical standards, and all Personnel are required to adhere strictly to the Company's Code of Conduct & Ethics and applicable laws, policies, and project requirements when using any level of force. To this end, the Company: (1) requires that all Personnel de-escalate situations, where possible, by engaging in actions reasonable under the specific circumstances, to include giving a verbal warning, maintaining distance and otherwise eliminating the need to use force; (2) requires force only be used when reasonably necessary and that any such use of force is proportionate to the threat; (3) precludes the use of all lateral vascular restraints, including choke holds; (4) requires Personnel to intervene and stop excessive force by peers in a manner that is safe and reasonable to do under the circumstances; (5) bans the shooting at moving vehicles except in exigent and articulable circumstances; (6) trains all Personnel on the different types of force available and permitted on a specific program and the circumstances when each should be deployed; and (7) collects information on all use of force incidents to ensure actions were in compliance with Company policy and procedure.

While no universal set of rules can encapsulate all circumstances when Personnel may be required to use force and the level of force that may be used, Personnel may only use the amount of force reasonably necessary to mitigate an incident, detain (if permitted under his or her contract/project), and/or protect themselves or others from harm. The type of force Personnel can use ranges from verbal commands to lethal force and is dictated by: (1) the scope of authority permitted under the contract/project they are working, and (2) the specific situation requiring the use of force.

Importantly, unless expressly granted the authority to detain or otherwise apprehend individuals by virtue of their work on a particular contract, LARSA Personnel shall not take, hold, detain, or apprehend any persons except as a necessary use of force to defend themselves or others against an imminent threat of violence or following an attack or crime committed by such persons against Company Personnel, clients, or property under the Company's protection. Any power to apprehend/detain granted to any Personnel must comply with all contract/project requirements. All apprehended persons shall be treated humanely, consistent with their status and protections under applicable human rights law and international humanitarian law.

Personnel Screening, Training & Firearms Management

The Company exercises due diligence to determine the suitability of applicants and Personnel to carry firearms as part of their duties. At a minimum, this will include complying with all personnel screening requirements dictated by the contract/project and a background screening search. Personnel who are to carry firearms will be granted authorization to do so only on completion or verification of appropriate training on the type and model of firearm to be carried. The Company will ensure that all Personnel possess



the required authorizations dictated by applicable law for the possession and use of any firearms and ammunition.

Personnel carrying firearms must receive regular, verifiable, and recurrent training specific to the firearms that they carry and the rules of force governing their work for the Company. This training may be based on a variety of relevant standards, but should be based, at a minimum, on the principles applicable to the operational environment, such as the National Consensus Policy on Use of Force (2017), International Code of Conduct for Private Security Service Providers (2010), the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990), and national laws or regulations in effect in the area where duties will be performed.

LARSA Personnel shall not engage in any illegal firearms transfers and will conduct any firearms transactions in accordance with applicable laws and United Nations Security Council requirements, including sanctions. No firearms, munitions, or military equipment may be retained for personal use or shipped out of the area of operation for personal retention or control. Firearms and ammunition may not be altered in any way that violates contractual requirements or contravenes applicable national or international law.

Anti-Corruption & Anti-Bribery

LARSA is committed to conducting business ethically. It is strictly against Company policy to engage in or tolerate bribery or any other form of corruption. A bribe or kick-back is giving or offering to give anything of value, such as a “facilitation payment,” to a foreign government official (including but not limited to Personnel of government-owned or controlled businesses, Personnel of public international organizations such as the World Health Organization, and candidates for political office) in order to obtain or retain business or to secure an improper business advantage. Broadly speaking, the Company prohibits any payment or offer or promise of payment that would violate the UK Bribery Act (“Bribery Act”), or any anti-bribery or corruption law of a country where the Company operates. Compliance with anti-corruption laws is an important element in the Company’s mission. It is Company policy to compete on the merits of our performance, reputation, and value that we offer.

In furtherance of its compliance efforts, the Company has developed a rigorous due diligence process applicable to prospective third parties. In addition, appropriate anti-corruption compliance and/or certification provisions are included in the Company’s written agreements with third parties. Each employee has the responsibility to report violations, potential future violations, or suspected violations of anti-corruption laws through their chain of command, to LARSA legal counsel or his or her designee, or through the Ethics email. As noted above, the Company has a “Zero Tolerance” policy for violations.

Refer to the Company’s Anti-Corruption & Bribery Policy for specific guidance about payments to government officials, exceptions to relevant anti-corruption laws, and engaging third parties.



Human Rights Awareness and Compliance

LARSA respects the dignity of all human beings and requires compliance with all international and domestic laws and other obligations regarding human rights. Personnel that act on behalf of LARSA must follow and comply with applicable laws and Company policies, procedures, and controls at all times. The Company shall take firm and definitive action, as called for by existing protocols, laws, and regulations, if Personnel engage in unlawful activities. Failure to follow these laws and obligations can result in termination of employment, criminal prosecution, fines, and imprisonment. All Personnel who perform work on behalf of the Company are required to adhere to LARSA's commitment to the protection of human rights, including the mandates contained in the Company's Human Rights Policy.

Commitment to End Human Trafficking

LARSA is committed to the eradication of human trafficking. Human trafficking has a broad definition but generally is slavery that forces individuals into labor or sexual servitude. Human trafficking is different from human smuggling: individuals do not need to be transported across borders to be trafficked. Accordingly, LARSA has adopted a "zero tolerance" policy for trafficking in humans and will not tolerate the practice in any form, as prohibited by international laws and regulations. Any employee or third party acting on behalf of the Company who directly or indirectly engages in human trafficking will be immediately terminated, and their actions will be reported to the appropriate authorities for prosecution. Additionally, any employee who becomes aware of actions of other employees or subcontractors that appear to violate this policy must report that behavior immediately to contract/project management, the Legal Department, or the Ethics email. When related to a government contract, LARSA is obligated to notify the Government Contracting Officer of any violations and corrective actions taken.

Sexual Exploitation and Abuse and Gender-Based Violence

LARSA will not tolerate sexual exploitation, sexual abuse, or gender-based violence in any form. Company Personnel shall not engage in or tolerate sexual exploitation and abuse or gender-based violence or crimes, including rape, sexual harassment, or any other form of sexual abuse or violence, either within the Company or externally. Company Personnel must remain vigilant against all instances of sexual or gender-based exploitation or violence and, where discovered, report such instances to the Company and the appropriate authorities.

Commitment to Compliance & Quality

LARSA is committed to delivering services that meet or exceed compliance requirements related to integrity, safety, reliability, quality, and performance. All LARSA Personnel are expected to perform their job duties at the highest level of quality and in adherence to contract standards. Moreover, Personnel are responsible for ensuring that services and products provided by consultants, subcontractors, suppliers,



and other business partners align with the Company's stringent quality expectations. Compliance and quality are key standards across the Company's entire supply chain. Any concerns about non-compliance should be reported to your manager or the Legal Department.

Statement of Conformance

As a leader in security services, LARSA is committed to high-quality service delivery that complies with national and international laws, safeguarding the safety, security, human rights, and freedoms of all stakeholders. This includes LARSA Personnel, clients, suppliers, third-party partners, and local communities in operational areas. LARSA has established policies, procedures, and controls to ensure compliance with applicable international humanitarian, human rights, and customary international laws, as well as standards under the ANSI/ASIS PSC.1 Management System and ISO 18788. This system supports objectives outlined in the Montreux Document, the International Code of Conduct for Private Security Service Providers (ICOC) and aligns with the UN Guiding Principles on Business and Human Rights, as well as the Voluntary Principles on Security and Human Rights.

With full backing from senior management, LARSA implements policies and controls that demonstrate its dedication to legal compliance and respect for human rights. These measures address risks, especially in challenging environments, and Personnel receive training on these protocols. LARSA regularly reviews and improves its Quality Management System to adapt to evolving risks and ensure the safety and security of all stakeholders.

Proper Exercise of Authority

Personnel must be mindful of their authority limitations when approving business transactions, including purchasing materials, entering agreements, and authorizing expenditures. The LARSA Delegation of Authority provides specific guidance, detailed through an Authority Matrix, which must be followed to ensure proper review and approval of transactions.

Conflicts of Interest

LARSA understands that Personnel may engage in external business opportunities, but any outside employment must be pre-approved by the General Manager or a designated representative. Activities that create a conflict of interest, reduce the ability to perform job duties, or misuse the Company's assets, name, or image are prohibited, even if there is just an appearance of a conflict. Employees or their family members must disclose and seek approval for any activities that might raise concerns of a conflict of interest. Personnel are encouraged to consult LARSA legal counsel for guidance.

Offering or Receiving Business Gifts

Offering or accepting business courtesies, such as gifts, entertainment, services, or favours, should be rare, modest, appropriate, and legal. Such gestures should not create any appearance of impropriety.



Employees must not offer gifts to influence actions in favour of LARSA or accept gifts in exchange for favourable treatment.

Personnel must report all business gifts, except for promotional items of nominal value (less than \$30, such as mugs, calendars, or pens), to LARSA legal counsel for proper handling. Exceptions include attendance at business dinners or widely attended events where the value exceeds \$30.

Employees who do not have purchasing roles may accept reasonable meals, hospitality, and entertainment if they serve legitimate business purposes, such as fostering relationships with partners, and if they meet the following criteria:

- Acceptance promotes goodwill and successful business relations.
- Courtesies are not lavish or extravagant.
- Courtesies are not frequent and do not establish a pattern of regular acceptance from the same source.
- The recipient would feel comfortable discussing the courtesies with a manager or disclosing them publicly.

For any uncertainties regarding the acceptance of gifts or courtesies, employees should seek guidance from their supervisor, senior management or LARSA legal counsel.

Integrity in the Handling of Company Resources

LARSA is committed to the responsible and ethical use of Company resources, which include time, materials, facilities, equipment, information, and services. These resources must be utilized solely for authorized business purposes, unless a specific exception has been granted by management. Under no circumstances should Company assets be used for illegal activities or in a manner that contradicts any provisions of this Code. The integrity of our operations relies on responsible management and use of these resources at all times.

Responsible Use of Company Property

Company-owned equipment, such as telephones, printers, and computers, are designated primarily for business-related purposes. While limited personal use of communication systems is permitted, employees should be aware that such communications are not private and may be subject to monitoring. Personnel are strictly prohibited from using Company equipment, communication channels, or internet access for the creation, transmission, or distribution of content that is false, obscene, threatening, or illegal. This includes any activities that might promote or encourage illegal behaviour. Unauthorized use or removal of Company property can be regarded as theft and will be dealt with accordingly.



Maintaining Accurate Records

LARSA upholds a strict policy of compliance with all record-keeping and retention standards, laws and regulations. Personnel must ensure that all Company documents and records are accurate, truthful, and properly maintained. It is strictly forbidden to falsify, alter, or intentionally omit information in Company records. This applies equally to internal documentation and information shared with external parties, including government and regulatory bodies. Any misrepresentation or inaccuracies in submissions to authorities can lead to severe legal and financial repercussions for the Company, so extra diligence is required when preparing statements, certifications, or other official communications.

Safeguarding Company Proprietary Information

The Company's intellectual property, which encompasses knowledge, technical designs, strategic plans, literature, employee records, and other sensitive data, represents a significant competitive asset. This proprietary information must be used solely for authorized Company business purposes. Personnel are responsible for safeguarding confidential information, ensuring that it is not disclosed to external entities without proper authorization. Special care should be taken when sharing information with third parties, and measures should be in place to ensure recipients protect LARSA's proprietary data. Intellectual property, including client data, trade secrets, and literature, must remain with the Company even when an employee departs. Unauthorized use of LARSA's intellectual property by former employees may lead to legal action.

Commitment to Information Integrity and Security

LARSA recognizes the critical importance of information integrity and security. Protecting information is not just about compliance; it is about trust and responsibility. Personnel must be vigilant in ensuring that all information handling follows the highest standards of security and accuracy. Any breaches, unauthorized access, or information manipulation must be immediately reported to the appropriate departments to enable swift action. By maintaining rigorous information management practices, LARSA ensures that its operations are not only compliant but also built on a foundation of transparency, reliability, and trustworthiness.

LARSA's continued success depends on the conscientious and ethical use of its resources. By following these guidelines, Personnel help maintain the Company's reputation for integrity and excellence in all its operations.

Distribution & Review of the Code

Each individual or entity receiving this Code is responsible for reading and understanding its contents; any questions or clarifications should be addressed to managers, supervisors, or LARSA legal counsel or his



or her designee. Each individual or entity is also responsible for affirming compliance with the Code by signing the Attestation or Certification of Compliance with the Code.

While the Code is meant to foster a fair and consistent administration and concern for all Personnel, it does not create an employment contract between any employee and LARSA.

Training & Awareness

LARSA requires all Personnel to participate in and complete regular ethics and compliance training as assigned. Completion of this training is a condition of continued employment with LARSA. Personnel who fail to complete assigned training in a timely manner will be subject to discipline, up to and including termination of employment.

As discussed throughout this Code, LARSA has Policies and Procedures that govern employment and our business with all of our clients. While this Code provides an overarching doctrine by which all LARSA Personnel must abide, employees are responsible for abiding by requirements even if not specifically referenced in this Code. Through the Company's various training and awareness programs, including regular electronic trainings, in-person trainings, newsletters, emails, the LARSA Policy Portal and the Compliance Corner SharePoint Page, all employees are expected to understand and abide by all the Company Policies and Procedures that govern their employment. These include but are not limited to Policies and Procedures that cover the following areas

- Anti-Corruption & Bribery
- Anti-Retaliation & Whistleblowing
- Anti-Trafficking in Persons
- Delegation of Authority
- Conflicts of Interest
- Data Protection
- Drug, Alcohol, & Substance Abuse
- Employee Discipline
- Export Controls
- Firearms
- Harassment Prevention
- Human Rights
- Incident Reporting
- Political Activities & Lobbying
- Prevention of False Claims
- Records Retention & Management
- Risk Management
- Safety
- Third Party Due Diligence
- Use of Force



Annex A – Employee’s Attestation

EMPLOYEE’S (AND PROSPECTIVE EMPLOYEE’S) ATTESTATION OF COMPLIANCE WITH THE CODE OF CONDUCT AND ETHICS

As set forth in its Code of Conduct & Ethics, LARSA is committed to the highest standards of integrity, ethical behavior, and compliance with all applicable laws. As an employee (or prospective employee) of LARSA, I support these objectives and affirm the following:

I have read and understand the Code of Conduct & Ethics, including the Statement of Conformance to international standards, including but not limited to the PSC.1 Standard and ISO 18788. I understand that the Code sets forth the minimum standards of conduct with which I must comply.

I am personally responsible for complying with all sections of the Code of Conduct & Ethics and acting ethically and with integrity at all times.

I will be held accountable for my actions, and any violations of the Code of Conduct & Ethics may result in disciplinary action, up to and including termination.

It is my duty and responsibility to report any known or reasonably suspected violations of the Code of Conduct & Ethics or LARSA policies. I may report such violations to my manager, Human Resources, Security, LARSA legal counsel or his or her designee, or the Ethics email, and I may do so anonymously.

It is my responsibility to understand the Code of Conduct & Ethics, and I should direct any questions to my manager or LARSA legal counsel or his or her designee.

I also attest that nothing in my past or present conduct contradicts the Code of Conduct & Ethics, Statement of Conformance, or adherence to the clauses of the PSC.1 Standard and all other standards and guidelines included in this Code.

Signature

Date

Print Name

Title

This attestation must be completed and returned to your manager, Human Resources Dept, or LARSA Legal Counsel or his or her designee for retention with your Personnel records. Failure to do so may result in disciplinary action, up to and including termination, or failure to receive an offer of employment.



Annex B – Subcontractors Certification Of Compliance

SUBCONTRACTOR'S CERTIFICATION OF COMPLIANCE WITH THE CODE OF CONDUCT AND ETHICS

As set forth in its Code of Conduct & Ethics, LARSA is committed to the highest standards of integrity, ethical behavior, and compliance with all applicable laws. As a subcontractor of LARSA, my company/I support these objectives and affirm the following:

I have read and understand the Code of Conduct & Ethics, including the Statement of Conformance to international standards, including but not limited to the PSC.1 Standard and ISO 18788. My company/I understand that the Code sets forth the minimum standards of conduct with which my company/I must comply.

My company is/I am responsible for complying with all sections of the Code of Conduct & Ethics and acting ethically and with integrity at all times.

It is my company's/my duty and responsibility to report any known or reasonably suspected violations of the Code of Conduct & Ethics or LARSA policies. My company/I may report such violations to its/my LARSA point of contact, LARSA legal counsel, or the Ethics email, and my company/I may do so anonymously.

It is my company's/my responsibility to understand the Code of Conduct & Ethics, and my company/I should direct any questions to its/my LARSA point of contact or LARSA legal counsel.

I also attest that nothing in my company's/my past or present conduct contradicts the Code of Conduct & Ethics, Statement of Conformance, or adherence to the clauses of the PSC.1 Standard.

Signature

Date

Print Name

Title and Company

This certification must be completed and returned to your LARSA point of contact.