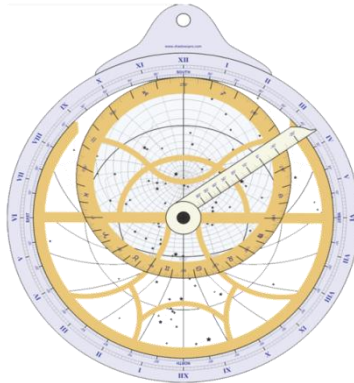


SEAFARER INTERNATIONAL LLC

Seafarer Standards

Corporate Vision, Mission, Core Values and Operating Principles

11/20/2012
Revised 01/01/2018



Seafarer strives to apply the highest ethical and moral standards in the conduct of its business. Our Vision is to be an ethical industry leader in creating value for our clients, customers, employees, partners, communities and countries we serve. We will accomplish this through Seafarer's commitment for providing an exceptional and transparent client and customer experience with a team that is encouraged, recognized and rewarded for delivering on this vision. Our eight Core Values reflect and reinforce our character as a Company and establish expectations of how we as Seafarer treat ourselves and every other.

Seafarer International is an American Registered Risk Management Consulting Company with overseas elements and extended capabilities providing Risk Analysis, Maritime Security, Contingency Logistics, Remote Construction Management, Training and Crisis Response Services to our clients in Africa, Asia and the Middle East.

Governance

Seafarer strives to apply the highest ethical and moral standards in the management of its business. Our principles are shaped by a series of codes and charters which form the ethical backbone of our management practices. The Company complies with the principles and best practice provisions of American corporate governance, and we strictly adhere to all applicable International and Local laws and regulations governing where and how we work.

Code of Ethics

Our code of ethics, reviewed and implemented in 2010, provides guidelines for the conduct of all employees with respect to internal controls, financial disclosures, accountability, business practices and legal principles. With regard to its employment practices, Seafarer does not tolerate any kind of harassment or discrimination against job applicants or employees. Our whistle-blower procedure guides the receipt, retention and treatment of all complaints regarding suspected financial, contractual and confidentiality irregularities.

Transparency

Seafarer's management regards internal control and transparency as a responsibility that is shared by all managers, employees and consultants, and is met by implementing a set of processes and procedures within Seafarer intended to provide reasonable assurance that risks are mitigated, financial reporting is reliable, applicable laws and regulations are complied with, and that the objectives of the partnership can be attained and maintained. We are proud of our open relationship with clients, teaming partners and subcontractors as well as the countries and communities which we serve and in which we operate.

Global Compact

As a business with operations and customers on every continent, we respect and strive to adhere to all applicable provisions of the United Nations Global Compact. This is a strategic policy initiative for those committed to aligning their operations and strategies with ten universal principles in the areas of human rights, labor, environment and anti-corruption. We fully support and endeavor to promote the ten principles of the Global Compact. Please refer to {HYPERLINK "http://www.unglobalcompact.org."}

Vision

Our Vision is to be an ethical industry leader in creating value for our clients, customers, employees, partners, communities and countries we serve. We will accomplish this through Seafarer's commitment for providing an exceptional and transparent client and customer experience with the most highly professional team that is encouraged, recognized and rewarded for delivering on this vision in the most ethical manner possible.

Mission

The Seafarer Mission defines why we are here. Knowing why we exist creates a common purpose that brings everyone, regardless of role or affiliation, together to achieve our mission. We endeavor to accomplish our mission guided by the highest ethical standards.

- To help our Customers and Clients achieve their economic, contractual, security and professional goals by building enduring relationships based on trust and integrity.
- To build multi-cultural and multi-national work forces where all can learn, grow, and prosper as contributing members of a winning team.
- To create long term value for our ownership, teaming partners, customers and clients.
- To improve the quality of life in the communities where we work and serve.

Ethical Operating Principles

All Seafarer ownership, senior management and field representatives have served in positions of the highest trust, authority and responsibility in Western Militaries.

The Seafarer Operating Principles direct our rational decision making. We have clearly defined principles that guide our actions because we understand that our decisions affect clients, customers, employees, partners and the communities we serve. All at Seafarer:

- Value the uniqueness of every client and customer seeking to preserve each one's unique identity with integrity.
- Embrace a culture of teamwork joining to serve our clients and host nations.
- Commit to extraordinary service, accessibility and strive to deliver more than we promise and more than the client expects in the most transparent manner.
- Value lifelong learning and seek to be a learning organization.
- Respect and seek to advance the professionalism of clients and colleagues while celebrating their successes.
- Value partnership, alliances and teamwork.
- Are committed to contributing to the common good through resource sharing, information sharing and community service.
- Seek and support ongoing strategic thinking as an organizational value.
- Operate an autonomous entrepreneurial organization of dedicated professionals.
- Seek authentication of information and apply industry standards to research and assessment methods.
- Strive to promote justice and peace and seek to honor the dignity and uniqueness of every human being while searching for points of unity in our common humanity.
- Value active listening, discernment and reflective dialogue.
- Value inclusion and strive to preserve and build community in all we do.
- Continuously seek improvement by becoming the best among our regional peers.
- Value quality and consistently evaluate our actions and interactions to improve

Core Values

Seafarer Core Values define how we behave. Our eight Core Values reflect and reinforce our character as a Company and establish expectations of how we, as Seafarer, treat each other, our clients, customers, teaming partners and the communities we serve.

We strive to achieve an enduring success with an essential, enduring core ethical ideology:

- **Integrity:** We are straightforward, honest and truthful in all professional and business relationships. We will not be associated with any information that we believe contains a materially false or misleading statement, or which is misleading by omission.
- **Objectivity:** We do not allow bias, conflict of interest or the influence of other people to override our professional judgment and professional responsibility to ourselves or clients.
- **Behavior:** We comply with all relevant laws and regulations. We also avoid any action that could negatively affect our professional reputation or honor. Additionally we respect all local national, regional, cultural, tribal, and social customs and practices wherever we work.
- **Service:** We provide the highest level of personal service and support to all we serve.
- **Teamwork:** Our strength is our ability to work together, combining individuals with diverse, but intrinsically essential skills and experiences for the common goal to succeed.
- **Competence:** We have an ongoing commitment to the highest level of professional knowledge and skill based on current developments in practice, legislation and techniques. All those working under our authority and also along with us must also have the highest level of appropriate training and supervision. We only team with or hire the best.
- **Flexibility:** We develop a plan for success, and we adapt and reinvent in the field.
- **Confidentiality:** We do not disclose professional information without specific authorization or the legal or professional duty to do so. We are transparent in our working relationships, but we absolutely guarantee the privacy of all information pertaining to a specific project.

Ethical Operating Standards

Standards govern how we achieve our vision and realize our goals. Seafarer is committed to transparency and accountability as we labor to best serve our Clients, Customers, Partners, Owners, and the Local Communities we serve. This is the Seafarer ethical approach to reduce risk, manage reputation and embed good practice.

Internal Assessments: We conduct a comprehensive risk selection process for every project we select and an ongoing internal evaluation of these projects in the field in order to maintain our ethics, integrity and professionalism for clients, customers and the communities which we serve. We employ a structured planning method to evaluate the strengths, weaknesses, opportunities and threats involved in a project or business venture. We conduct this analysis for a plan, a product, a place or a person. When evaluating any endeavor we tell each other the truth and we apply continuous improvement concepts in everything we do. By our involvement we look for the opportunity to give back to our community, and we provide an environment where all can learn, achieve and prosper. We are transparent and build trust with this process. The rules of behavior that guide how our

personnel behave also govern how we evaluate our ability to accept new tasks and responsibilities to our best ability.

Confidentiality: Seafarer maintains the highest corporate, client and customer confidentiality. All information, operations and procedures provided from or to our clients is strictly confidential. No information is shared between or about our customers, and all identities and client lists are private, not for release or comment. All information pertaining to a specific operation or contract is absolutely private. This is our guarantee to our clients and we expect the same level of confidentiality from them. Operating overseas entails high-risk and maintaining the highest corporate confidentiality is absolutely essential for all parties to any agreement or discussion. All initial contacts are only continued after signing a binding Non Disclosure Agreement (NDA) and all Documents and Files are stored in a secure, locked container. No material is transmitted or conveyed in any but the most secure manner, and no extraneous or unnecessary copies are circulated or retained. All correspondence and materials not retained in a secure filing system is shredded and properly disposed. All material in the field is incinerated. We maintain the highest level of electronic and internet security necessary for our projects. Our Webmaster is also a corporate communications security specialist who constantly monitors our system with the most current tools available.

Human Rights: We solicit and accept working relationships and contracts globally. We have the utmost respect for human rights, abhor discrimination, and foster a working environment which emphasizes the dignity of each individual. Issues including employment itself, privacy, compensation in accord with comparable worth, collective bargaining are inalienable and only negotiable in a legal context which does not ignore the dignity of the individual. Discrimination by age, gender, race, religion, disability, weight and attractiveness is intolerable. Seafarer endeavors to be a rightful, ethical and moral citizen where we labor.

Hiring Standards: We only employ individuals of the highest honor and moral character. All have proven global special operation, intelligence management and risk analysis experience, and all have served and separated honorably from military, civilian law enforcement, or government positions. Recognizing that all will possess the proven professional skills, possess the requisite experience, and demonstrate ongoing performance at the highest levels, the individual's ethical standard is our primary selection criteria. After a thorough review of all submitted pertinent employment background information and personal contact with the individuals who have recommended the individual, to be hired, all Seafarer Personnel must be personally qualified and approved by the ownership partners. Along with this personal interview, every potential employee must be able to withstand the scrutiny of a personal background investigation and law enforcement records check which is all part of the hiring process before we employ and deploy individuals overseas. Every employee is our public face and window to the world. It is our ethical responsibility to employ the most qualified and it is their duty to represent Seafarer in the most ethical and professional manner.

No Strike Policy: Every officer, employee, teaming partner, subcontractor and consultant is our public face and represents Seafarer. We expect everyone associated with us to maintain the highest ethical, personal and professional standards. The failure of any individual to meet these standards signifies that they are not committed to our highest ethical ideals and this displayed lack of commitment will result in the immediate suspension

of their duties and an investigation and audit conducted by senior management. This may necessitate the immediate cancellation of their employment and forfeiture of any pay. We labor in remote, harsh environments and we cannot meet our commitment to our clients and customers without the highest ethical, personal and professional standards.

Threat Awareness: Security training and threat awareness is an ongoing, ethical company responsibility. We have ongoing employee training programs conducted by our security personnel to recognize the threat posed by terrorists wherever we work. We follow all embassy, local government, institutional, and law enforcement regulations and recommendations. We coordinate all travel and layovers as required by our contract, and we make all personnel aware of company procedures to address a threat posed by terrorists, pirates or abductors and how to report it through proper channels to higher authority. Additional training will include recognizing internal conspiracies and protecting access controls. Personal safety and security is the best incentive for team vigilance. These are all part of an ethical practice to maintain the highest trust and in all endeavors.

Personnel Security: We are ethically committed to the security of all we hire. The personal safety of our personnel is paramount in all we do. We only employ individuals who have a demonstrated history of proven success in remote, foreign, and underdeveloped areas communities. We maintain written and verifiable procedures outlining security methods. We utilize an employee identification system for identification and access control purposes. We review application information, including employment history and references, and we verify data prior to employment. Consistent with government and local regulations we conduct background checks and investigations of prospective staff. Once hired, we perform periodic checks and reinvestigations based upon cause and/or sensitivity of the position. We have procedures in place to remove system access for former staff. These security measures exist to protect the integrity of relevant processes, limit unauthorized access, ensure the safety and security of current personnel, and safeguard clients and customers.

Cyber System Security: We maintain the highest level of computer security and sound communication procedures to serve our clients and customers in the most ethical and professional manner possible. We have ongoing personal training and security updates from the best computer security experts. We maintain written and verifiable procedures to ensure computer systems security. For computer accountability, we identify computer abuse including proper access, tampering, or altering business data. We have assigned computer accounts that require a periodic change of password and we protect our systems from improper intrusion.

Procurement and Products: We only recommend, purchase and supply the best products from the most reputable sources. All our suppliers agree to disclose all factories and subcontractors producing merchandise for us, our clients and customers. We reserve the right to make an unannounced visit to any supplier or any subcontractor for the purpose of verifying the highest standards of their production. It is our intent and desire that a supplier who directly imports merchandise into the United States for export will participate in the C-TPAT Program. Suppliers not eligible for C-TPAT must meet comparable facility security standards.

Import-Export Laws and Standards: We strictly adhere to all US and International Import and Export Laws and Standards including compliance with applicable export controls

and tracking methodologies. Senior company management oversees compliance with the Arms Export Control Act (AECA) and the International Traffic in Arms (ITAR) regulations. We have identified the duties and authority of key individuals for day-to-day export/import operations and compliance oversight. This compliance includes re-export/retransfers, screening procedures for customers, clients, carriers and countries, recordkeeping, internal monitoring, and trading. It is our absolute responsibility to comply with all US, local, and international standards to best serve our clients, customers and the communities we serve in the most ethical and professional manner commensurate the best business practices.

Physical Security Standards: All factories, suppliers, subcontractors and shippers must meet the highest physical security and inventory accountability and control standards necessary to serve our clients, customers, and the communities which we serve. Physical Access Controls must prevent unauthorized entry, maintain control of employees and visitors, and protect facility assets. Adequate fencing, where applicable, must be capable of deterring intruders. While ensuring that no security system endangers site personnel or hampers their ability to exit the premises in an emergency, all external and internal doors, windows, and gates must be secured with locking devices during periods of site inactivity. Management or security personnel must control the issue of all locks and keys. Adequate lighting inside and outside of the facility in areas such as entrances and exits, handling and storage areas, fence lines and laydown areas must be provided and maintained as a deterrent to intruders and pilferers. Where necessary, Alarm Systems and Video Surveillance Cameras to monitor the facility and prevent unauthorized access to storage and handling areas must be provided. All visitors must present the proper photo identification upon arrival, be logged into a proper register, and be escorted while at the facility. All of our remote facilities will have a proper process to identify, challenge, and address unauthorized or unidentified individuals.

Ocean Shipping Containers: We maintain written and verifiable procedures to ensure the highest security and integrity of all shipping containers. We insist on the safe and secure movement of cargo from the factory/supplier to the port, or factory/supplier to the consolidator, or factory/supplier to the air forwarder. Shipments must be protected against the unauthorized introduction of material or persons into the container. At point of stuffing, shipments must properly use and apply a high security seal that meets PAS ISO 17712 standards for high security seals. All shippers must follow procedures that indicate seal control including authorized access to seals, logging seal usage, the date issued and to whom. A process must be in place to recognize and report a compromise to the seal control program. Shippers will ensure a seven-point inspection program to verify the physical integrity of the container prior to stuffing to include the reliability of the locking mechanisms and doors. Containers will always be stored at a secure area to prevent unauthorized access and/or manipulation.

Anti-Fraud Management. Seafarer's anti-fraud control system is administered by our Chief Legal Counsel who coordinates the efforts of our Cyber Security Officer, Senior Officer for Product Research and Procurement, Chief Information Officer, Senior Finance Manager and our Senior Field Managers. This ongoing effort was initiated in 2010, and meets once a quarter to coordinate the various fraud prevention and detection programs. It initiated the anti-fraud policy which was published in 2011 and among its actions it promoted various training sessions on integrity and anti-fraud awareness. Concomitantly, this endeavor has significantly contributed to our reputation and morale, provided an invaluable framework for

operating in communities of other customs and cultures, contributed to quality assurance and control, and has even added to personal security.

Risk assessment In 2009, prior to our reorganization, Seafarer initiated an enterprise risk assessment and subsequently issued a risk map together with action plans to mitigate the key risks. An update of these action plans was presented to our Senior Advisory Board and twice to the Partners in 2010. An ongoing dialogue has been maintained with detailed description which is annually presented to the partners as part of our "Internal risk management and control system". This internal procedure serves as the model for our Risk Assessment Service to our clients, customers, and the communities which we serve. Good corporate governance governed by the highest ethical operating standards and compliance with all US, International and Local Laws and Regulations is absolutely essential.

