

NON-DISCRIMINATION and ANTI-HARASSMENT POLICY

Command Security Corporation (“CSC” or the “Company”) is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that prohibits discriminatory practices, including harassment. Therefore, the CSC expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.

A copy of this Policy may be located on the Company’s website on the Corporate Governance page, as well as EHub.

Equal Employment Opportunity

It is the policy of the CSC to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, age, national origin, marital status, sexual orientation, gender identity, the status of being transgender, disability, veteran status or any other characteristic protected by law. CSC prohibits and will not tolerate any such discrimination or harassment.

Definition of Harassment

For the purposes of this Policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, age, national origin, marital status, sexual orientation, gender identity, the status of being transgender, disability or any other characteristic protected by law or that of his/her relatives, friends or associates, and that:

- (1) has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- (2) has the purpose or effect of unreasonably interfering with an individual’s work performance; or
- (3) otherwise adversely affects an individual’s employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail), even if the complaining individual is not the intended target of the harassment

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this Policy, sexual harassment, pursuant to the Equal Employment Opportunity Commission Guidelines, is defined as unwelcome sexual

advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or continued employment (called "quid pro quo" harassment);
- (2) submission to or rejection of such conduct by an individual is used for employment decisions affecting such individual; and
- (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: touching, pinching, brushing against, grabbing; unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; catcalls or touching; insulting or obscene comments or gestures; noises; remarks; name-calling; demeaning or pornographic material; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail or text message); and other physical, verbal or visual conduct of a sexual nature. Sexual harassment may also include sex stereotyping, sexually orientated gestures, displays, publications, or taking actions against an individual because of their sexual orientation, gender identity or status of being transgender, or when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals should look or act.

Individuals and Conduct Covered

This Policy applies to all applicants and employees, and prohibits harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected with the Company (e.g. an outside vendor, consultant, customer).

Conduct prohibited by this Policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Reporting an Incident of Harassment, Discrimination or Retaliation

The Company requires timely the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to our policy or who have concerns about such matters should file a complaint, orally or in writing, with their immediate Supervisor or any Manager, Corporate Director, Vice President, or the In-House Counsel (via the Employee Hotline 855-757-6272). Employees may also send the

Complaint Form below to Corporate Human Resources at HRCorp@commandsecurity.com. Individuals should not feel obligated to file a complaint with their immediate Supervisor first before bringing the matter to the attention of one of the other Company designated representatives identified above. Any of the designated individuals receiving such a Complaint must make a record of the complaint, in writing, including names, details, dates and times.

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, *are required* to report such suspected sexual harassment immediately to Human Resources. In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Retaliation Is Prohibited

CSC prohibits retaliation against any individual who reports discrimination or harassment in good faith and with a reasonable belief that discrimination or harassment has in fact occurred, or participates in an investigation or participates in such reporting and/or in an investigation of a claim of harassment or discrimination. Unlawful retaliation can be any action that would keep a worker from coming forward to make or support a sexual harassment claim. Retaliation is a serious violation of this policy and, like harassment and discrimination itself, will be subject to disciplinary action up to and including termination. Harassers may be subject to individual liability as well.

Important Notice to all Employees

Employees who have experienced conduct they believe is contrary to this Policy have an obligation to take advantage of this complaint procedure. An employee's failure to fulfill this obligation in a timely manner could affect his or her rights in pursuing legal action.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, the Company mandates immediate reporting of complaints or concerns, so that rapid and constructive action can be taken. For reporting purposes, a sample Complaint Form is attached.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued, and such behavior is strongly encouraged. If this does not cause the harassment to stop, the individual must follow the complaint procedure outlined above.

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. If documents, emails, phone calls or text messages are involved, management will take steps to preserve them.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation, appropriate action and the law. All persons involved, including complainants, witnesses and alleged perpetrators will be accorded due process to protect their rights and a fair and impartial investigation.

Responsive Action

The complainant will receive a final determination following management's investigation. Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as the Company believes appropriate under the circumstances. Individuals who have questions or concerns about this Policy should contact the Vice President of Human Resources.

This Policy should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of the Company prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and prerequisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.

NEW YORK STATE EMPLOYEES ONLY

In addition to the internal reporting remedies outlined above, a New York State employee may file a complaint with the New York Division of Human Rights (DHR) within one year of the harassment or three years in state court, pursuant to the New York Human Rights Law. Complaining internally to the Company, however, does not extend the time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

The employee does not need an attorney to file a complaint with DHR, and there is no cost to file with DHR. DHR will investigate the complaint and determine whether there is probable cause to believe that discrimination has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If discrimination is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying monetary damages, attorney's fees and civil fines. DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400 or (888) 392-3644. The employee may also visit www.dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

The EEOC enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred.

If an employee believes that he/she has been discriminated against at work, he/she can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (1-800-669-6820 (TTY)), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Finally, many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live



to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml

