

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.

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, 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, 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).

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;

- (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: 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; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature.

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

CSC 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 CSC 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). 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.

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. Retaliation is a serious violation

of this policy and, like harassment and discrimination itself, will be subject to disciplinary action.

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.

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.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation, appropriate action and the law.

Responsive Action

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.

Finally, 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.