

TACTICAL EDGE

Corporate Responsibility and Environmental Management Policy

1 Company Commitment

Tactical Edge, Inc. is committed to the following:

- providing safe working conditions for its employees
- treating workers with respect and dignity
- conducting business operations in an environmentally responsible and ethical manner

Tactical Edge, Inc. will not only comply with the laws, rules, and regulations of the countries in which it operates, but will go beyond legal compliance in order to advance environmental responsibility and business ethics. In order to ensure conformance to the above standards, Tactical Edge, Inc. will implement the principles outlined in paragraph 3, below.

2 Management Accountability and Responsibility

The Chief Financial Officer is responsible for ensuring implementation of this policy and maintenance of its associated principles.

The Chief Financial Officer will provide a status of this policy and adherence to its principles on a quarterly basis to the Executive Team.

3 Principles

3.1 Forced Labor

Tactical Edge, Inc. will not use forced or involuntary labor of any type and employment is voluntary.

Assessment Areas

- Review hiring practices to ensure they prohibit forced or bonded labor.
- Determine if workers are free to leave the supplier location in off-hours.
- Verify that identification papers are not withheld from employees.

3.2 Child Labor

Tactical Edge, Inc. will not hire anyone under the age of 14. For Minors aged 14 to 18, all required State and local permits will be obtained prior to any employment.

Assessment Areas

- Check for reliable proof of age and retain a copy of the relevant document proofing age on file.

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- If applicable, verify that workers under age 18 are not performing work that is hazardous in nature.
- Determine if workers under age 18 are working only the legally specified number of hours.
- Determine if workers are kept on trainee wages beyond legally specified durations.

3.3 Wages and Benefits

Tactical Edge, Inc. will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates, and benefits.

Assessment Areas

- Determine how workers' time on the job is recorded, and that it is recorded accurately.
- Review timesheets or other records to determine if workers' wages are being calculated accurately.
- Review payroll records and determine that all mandated pay and benefits are provided.
- Review evidence that workers are given information relating to wages in an understandable form.
- Determine if workers are provided with required insurance(s).
- Determine if social security and other contributions have been made

3.4 Working Hours

Tactical Edge, Inc. will not exceed prevailing local work hours and will appropriately compensate overtime.

Assessment Areas

- Review system for recording time worked to determine that time is recorded accurately and completely.
- Review if employees are taking company holidays and vacation days.
- Review to verify that employees are provided payroll receipts and identification of accumulated vacation days.

3.5 Nondiscrimination

Tactical Edge, Inc. will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability.

Assessment Areas

- Legally required posters regarding nondiscrimination are posted in working areas.
- Management communicates written policies on nondiscrimination to employees.
- Review hiring practices to determine whether classes of people are barred from employment.
- Determine whether people with certain characteristics are either channeled into certain jobs or barred from certain jobs.

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- Review procedures for employees to bring concerns of discrimination to the attention of management for resolution. This applies as well to situations where employees are working off-location.

3.6 Respect and Dignity

Tactical Edge, Inc. will treat all their employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

Assessment Areas

- Written policies and practices are in place prohibiting harassment and abuse.
- Review personnel files for any records of disciplinary actions. Determine if discipline has been appropriate, based on the infraction.
- Determine that no cases of monetary fines are present.
- Review procedures for employees to bring concerns of abuse to the attention of management for resolution. This applies as well to situations where employees are working off-location.

3.7 Freedom of Association

Tactical Edge, Inc. shall respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions.

Assessment Areas

- Determine if open feedback channels exist for employees to bring issues to the attention of management for resolution.
- Determine whether workers affiliated with organizations are subjected to discriminatory treatment.

3.8 Health and Safety

Tactical Edge, Inc. will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

Assessment Areas

- Perform a “walk-through” of the facility looking for potential health and safety hazards and controls including clear emergency egress (aisles, exit doors, exit signage, etc.); use of protective equipment; machine guarding; isolation of energized electrical wiring and equipment; chemical labeling and storage; sanitation; lifting devices and use of proper lifting techniques; lighting; proper use of powered vehicles, etc.
- A health and safety manager has been appointed to oversee compliance.
- Workplace incidents are reported and investigated and action taken to minimize the potential for future occurrence.

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3.9 Protection of the Environment

Tactical Edge, Inc. will operate in a manner that is protective of the environment.

Assessment Areas

- Determine compliance with all applicable environmental laws, regulations and standards such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.
- Check the process or procedure by which the facility identifies applicable environmental laws, regulations, and standards.
- With knowledge of applicable international, country and local environmental laws, regulations, and standards, review records for required permits, certifications, compliance to law, required environmental reporting, and compliance design and product specifications, and contract documents.
- Look for signs or evidence of current activities or processes that would be in violation of the applicable environmental laws, regulations, and standards.
- Develop programs for the efficient use and conservation of energy.
- Develop programs for the efficient use and conservation of water.
- Develop programs for the efficient use of materials, including waste reduction, material reuse, and recycling.

3.10 Laws, Including Regulations and Other Legal Requirements

Tactical Edge, Inc. will comply with all applicable laws and regulations in all locations where it conducts business

Assessment Areas

- Determine if management has a good knowledge of all local laws including employment, health and safety, and environmental practices.
- Determine if supplier has committed sufficient company resources to compliance.
- Review processes and procedures for compliance.
- Senior management supports compliance objectives and practices and enforces them.
- Management representatives have been named who are responsible for monitoring compliance.
- Company periodically monitors compliance.
- Encourage all employees to report suspected noncompliance to management.

3.11 Ethical Dealings

Tactical Edge, Inc. will conduct its business in accordance with the highest ethical standards. Suppliers must strictly comply with all laws and regulations on bribery, corruption and prohibited business practices.

Assessment Areas

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- Company follows written policies and guidelines on conflicts of interest, giving and receiving of gifts, business trips, hospitality, entertainment, use of agents, and facilitation payments that are in accordance with law.
- Company has good accounting policies, procedures, and record keeping.
- Company conducts periodic financial audits to confirm that accounts are in order.
- Clear communications channels exist for employees to report violations or issues of concern.
- Have and follow policies that prohibit retaliation for employee reporting.

3.12 Communications

Tactical Edge, Inc. will make these principles and other relevant information available to employees in the native language(s) of its employees and supervisors.

Assessment Areas

- Provide employees with access to IBM Supplier Conduct Principles in the local languages.
- Company provides employees access to written hiring and employment policies as well as critical health and safety information.
- Company has open channels of communication between employees and management to foster resolution of problems and improve overall working conditions and competitiveness.

3.13 Monitoring / Record Keeping

Tactical Edge, Inc. intends to monitor its compliance, and its Suppliers' compliance with these Supplier Conduct Principles. Such measures may include prescreening Suppliers, or announced and unannounced on-site inspections of Supplier locations by Tactical Edge representatives. Supplier must maintain documentation necessary to demonstrate compliance with these principles and must provide Tactical Edge with access to that documentation upon request.

Assessment Areas

- Develop and maintain all necessary documentation to support compliance, such documentation must be accurate and complete.
- Provide Prime Contractors with access to relevant records, upon Prime's request.
- Allow Prime Contractor representatives to conduct confidential interviews with employees and with management separately.