

The graphic features a dark teal triangle on the left containing the text 'Human Rights Policy'. The background is a close-up, blue-tinted image of interlocking gears.

Human Rights Policy

PURPOSE

- ▶ This document sets out Control Risks' policy on human rights.
- ▶ It governs how we treat our employees in the work place; how we manage our vendor supply chain; which client engagements we can accept and the scope of that work.
- ▶ Control Risks respects the full range of human rights, and will not neglect or downplay any aspect of the Universal Declaration of Human Rights or the UN Guiding Principles on Business and Human Rights.
- ▶ If Control Risks has reason to believe that in undertaking an activity it would be complicit in human rights abuses committed by others, it will not undertake that activity.

SCOPE

This policy applies to all companies in the Control Risks Group ("Control Risks" or the "Company"). Control Risks Group shall be defined as Control Risks International Limited and its subsidiaries and branches. This policy applies to all engagements whether the service is delivered by Control Risks or by subcontractors acting on our behalf.

SUPPORTING DOCUMENTS AND CONTACTS

This policy should be read in conjunction with the Code of Ethics and Anti-Bribery and Anti-Corruption policy.

Procedures and guidance

The In-house Guide to Human Rights Due Diligence and Risk Management.

Contacts

If you are in any doubt about how to apply this policy please speak to your manager or the Legal, Risk and Compliance team.

If you become aware of any breach of this policy, or potential breach, we hope that you will feel comfortable talking to your manager. However, if that's not the case please use the Control Risks Whistleblower Hotline.

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1. DEFINITIONS

► **Table 1: Definitions**

Universal Declaration of Human Rights (UDHR)	Fundamental international standard. Includes economic, social and political rights.
Voluntary Principles on Security and Human Rights (VPs)	Addresses the human rights problems associated with security provision for oil, gas and mineral projects in conflict-affected areas. Control Risks supports the objectives of the VPs, but is not a formal participant.
Montreux Document on private military and security companies	Summary of legal obligations and best practices, including the human rights obligations of governments and security companies in conflict zones. Directed at governments.
UN Global Compact	Strategic policy initiative for businesses committed to adopting universally accepted principles including human rights. Control Risks is a signatory.
International Code of Conduct for Private Security Providers (ICOC)	Code applying the principles of the Montreux Document to companies. Control Risks is a signatory.
UN Guiding Principles on Business and Human Rights	Emphasises state duty to protect human rights, corporate duty to respect human rights (including the need for due diligence) and the need for victims to have access to remedy.
UK Modern Slavery Act	UK legislation to combat modern slavery and human trafficking.
Complicity	Indirect involvement in human rights abuses where harm is committed by another party, for example another company or the security forces.

2. POLICY REQUIREMENTS

2.1 Introduction

International law, and policy and practice in relation to business and human rights continue to evolve, and this policy takes account of the Universal Declaration of Human Rights; the Voluntary Principles on Security and Human Rights; the Montreux Document; the principles of the UN Global Compact; the International Code of Conduct for Private Security Providers, the UN Guiding Principles on Business and Human Rights and the UK Modern Slavery Act.

2.2 How we treat our employees

Control Risks' employees have the right to work in an environment of mutual trust and respect, where everyone is fairly treated without discrimination.

2.3 Working with clients

Control Risks will give its clients advice that is consistent with the human rights responsibilities of the Company and of its clients. In accordance with the Client and Project Risk Management Policy and paragraph 2.4 below, if the Company judges that its clients are not prepared to act on this advice, Control Risks reserves the right to turn down new

assignments and to withdraw from an existing project if we judge that continuation would cause the company to be complicit in any abuse of human rights.

2.4 Assessing human rights risks linked to our work

Before accepting a new client or assignment, the client or project manager must assess the risk that Control Risks' activities could – directly or indirectly – contribute to human rights abuses or to an escalation of conflict. Risk assessment is especially important for projects that have high social and environmental impacts, are in areas affected by conflict, or employ large numbers of labourers in uncertain working conditions. Risk assessments must take account of the rights of women, ethnic or religious minorities and other vulnerable groups. We have zero tolerance for all forms of sexual exploitation and gender-based violence.

The project manager is responsible for monitoring Control Risks' initial risk assessment and reporting any concerns to senior management. See also Client and Project Risk Management Policy and In-house Guide to Human Rights Due Diligence and Risk Assessment.

2.5 Relationships with government security forces

When advising clients, Control Risks will take into account the past records of relevant government agencies as well as the potential human rights impacts of working with them.

2.6 Working with vendors

All vendors (subcontractors and suppliers) must abide by human rights principles that are consistent with this policy. If they fail to do so, Control Risks has the right to terminate its relationship with them. Prior to working for Control Risks, vendors will be vetted in accordance with Control Risks' policies, including its Subcontractor Management Policy and Supplier Management Policy. The use of vendors must be considered when assessing human rights risks linked to our work (see section 2.4). In particular, Control Risks has zero tolerance for all forms of modern slavery, including child labour and human trafficking: it is committed to implementing effective systems and controls to ensure that none of these practices are occurring anywhere in its supply chains.

2.7 Use of weapons and equipment transfer

When advising clients, Control Risks will consider the risks that transfer of weapons or equipment to local agencies may lead to human rights abuses.

2.8 Relationships with communities and other affected stakeholders

Control Risks will take into account human rights considerations when advising clients on the impact of their activities on local communities and other affected stakeholders.

2.9 How we handle external complaints

Control Risks will investigate any complaints made by external stakeholders concerning suspected human rights abuses or other professional malpractice fairly and transparently, in accordance with its Third Party Grievances Policy.

3. AUTHORITY AND RESPONSIBILITY

3.1 All Control Risks' employees

- ▶ Seek advice from their line manager if they are uncertain about how to apply any aspects of this policy.
- ▶ When carrying out assignments, ensure that they are fully briefed on the human rights risks identified on project risk registers.
- ▶ Report to their line manager if there are new developments that may change the original risk assessment.
- ▶ Record any credible allegations of human rights infringements that are – or could be seen to be - associated with the activities of Control Risks or of a client, or are in the vicinity of a client project. This includes any incidents or credible allegations involving public or private security providers guarding the facilities of Control Risks or of its clients.
- ▶ Report any such incidents or other human rights concerns to their line manager or to the Ethics Committee. Alternatively, they may make an anonymous report (see Whistleblowing Policy) if they do not wish to be identified. When making such reports, they should take care to avoid leaks of sensitive information that could put anyone at risk, for example external whistleblowers.

3.2 Client and project managers

- ▶ Assess risks relating to human rights and ethical issues, before accepting new clients or projects.
- ▶ Ensure that human right risks are included on project risk registers where appropriate.
- ▶ Ensure that human rights risks are monitored in the course of the assignment.
- ▶ Liaise with clients in order to ensure that they are fully briefed on Control Risks' Human Rights Policy and on sensitive human rights issues relating to specific assignments.
- ▶ Ensure that subcontractors are vetted in accordance with Control Risks' policies, and are fully briefed on their human rights obligations.

3.3 Regional CEO

Report any incidents of suspected human rights abuses to the Ethics Committee and, in urgent cases, direct to the Group CEO.

3.4 Ethics Committee

Consider all requests on the subject of human rights abuses referred by CEO and other employees, and take action as appropriate.

3.5 Group CEO

In accordance with the Voluntary Principles and the ICOC, the CEO will consult the Board on the appropriate course of action if he believes that that the Company has a duty to report an allegation of human rights abuses.