

## HUMAN RIGHTS POLICY

This document summarises **First Call Safety and Security Ltd** (hereafter the “Company”) policy on Human Rights, International law, and policy and practice in relation to business and human rights as they continue to evolve. 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 and the UN Human Rights Council’s Guiding Principles on Business and Human Rights.

This Human Rights Policy should be read in conjunction with the following documents:

- Code of Ethics
- Grievance Procedure
- Anti-Bribery Policy
- Rules for the Use of Force
- Whistleblowing Policy

### SCOPE

This policy applies to all company employees, contractors, or persons providing services on its behalf.

#### 1. POLICY

##### 1.1 Overall

The Company respects the full range of Human Rights and will not neglect or downplay any aspect of the Universal Declaration of Human Rights. If the Company has reason to believe that in undertaking an activity it would be complicit in human rights abuses committed by others, it will avoid that activity.

##### 1.2 Employees

The Company’s employees have the right to work in an environment of mutual trust and respect, where everyone is fairly treated without discrimination.

### 1.3 Working with clients

The Company will give its clients the best possible advice that is consistent with the human rights responsibilities of the Company and of its clients. If the Company judges that its clients are not prepared to act on this advice, the Company reserves the right to turn down new assignments and to reconsider its role in existing projects.

### 1.4 Prohibited Actions

All personnel adhering to FC Code of Conduct will accept the prohibition of the following actions in compliance with international law. The following prohibitions must be strictly adhered to and include (but are not limited to): Personnel will not:

- Engage in torture, punishment, cruel or degrading treatment of persons. Nor will these actions be enabled or supported by personnel, even in the event of imminent armed conflict, threats to national or international security, or any other extraordinary circumstance. The torture or inhumane treatment of persons by another person will be reported to the company immediately.
- Engage in or benefit from the sexual exploitation of persons. Violent sexual crime, prostitution, rape and sexual harassment within the company or externally are strictly prohibited. Incidents of this nature must be reported immediately to the relevant authorities.
- Engage or benefit from the use of labour provided by force, slaves or children. Personnel will not allow associated contractors, groups or employees whether paid or voluntary to engage in these kinds of labour.
- Engage or benefit from human trafficking of adults or children. Personnel will not support or enable the trafficking of humans for labour, prostitution or any other cause.
- Discriminate against any persons on grounds of race, colour, sex, religion, disability or sexual orientation. The company will also adhere to this principle when recruiting personnel, within the requirements of the position available.
- The above actions are strict prohibitions and contravention of any of these may result in the termination of employment and further legal repercussions. Personnel are expected to report immediately any suspicions of incidents involving the above actions.

## 1.5 Risk Assessment

Risk assessment is a fundamental requirement and must include an assessment of the risk that the Company's activities could, directly or indirectly contribute to human rights abuses or to an escalation of conflict. Risk assessments are especially important for high-impact projects and those in areas affected by conflict. The Company's initial risk assessment will be subject to regular monitoring and regular review.

## 1.6 Working with subcontractors

All subcontractors must abide by human rights principles that are consistent with this policy. If they fail to do so, the Company has the right to terminate its relationship with them. Prior to working for the Company, subcontractors will be vetted and in particular, all third party providers of services on its behalf (for example, deployed personnel) will be vetted in accordance with the Company's Recruitment procedures including suitability review prior to interview.

## 1.7 Use of weapons and equipment transfer

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

## 1.8 Relationships with communities

The Company will take into account human rights considerations when advising clients on the impact of their activities on local communities.

## 1.9 External complaints

The Company will investigate any complaints made by external stakeholders concerning suspected human rights abuses or other professional malpractice fairly and transparently, in accordance with its Complaints Policy and Grievance Policy.

## 2. AUTHORITY AND RESPONSIBILITY

### 2.1 All The Company's employees

1. Seek advice from their line manager/team leader/designated operations manager (as appropriate) in cases of uncertainty about how to apply any aspects of this policy.
2. Record any credible allegations of human rights infringements that are, or could be seen to be associated with the activities of the Company or of a client, as well as any advice given to the client. This includes any credible allegations involving public or private security providers guarding the facilities of the Company or of its clients. Care should be taken to avoid any leaks of sensitive information that could put anyone at risk.

If they encounter any credible allegations of human rights infringements that are, or could be seen to be associated with the activities of the Company or of a client, as well as any advice given to the client, employees can:

- Consult their line manager/team leader/designated operations manager (as appropriate).
- Consult a representative of the Ethics Committee in confidence if they are unable to speak to their manager/team leader/designated operations manager.
- Make an anonymous report (see Whistleblowing Policy) if they do not want to be identified.

### 2.2 Directors

Report any incidents of suspected human rights abuses to the Ethics Committee.

### 2.3 Ethics Committee

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

## 2.4 Managing Director

In accordance with the Voluntary Principles, if the **Operations Director of First Call Safety and Security Ltd** believes that that the Company has a duty to report an allegation of human rights abuses, he will consult the Board on the appropriate course of action.

Operations Director  
First Call Safety and Security Ltd

Date: 20/10/2022

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