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## Human Rights Policy

# Human Rights Policy

Sangfroid Group Ltd (SFG) companies respect and support the dignity, well-being and human rights in all aspects of our operations, including those of our employees, security contractors, the communities in which we operate and those affected directly or indirectly by our operations.

We support the principles set out in the following international standards and codes:

- International Code of Conduct for Private Security Service Providers
- UN Declaration of Human Rights
- Voluntary Principles on Security and Human Rights (VPSHR)
- UN Guiding Principles on Business and Human Rights
- International Labour Organisations Fundamental Conventions
- Modern Slavery Act

We undertake due diligence activities to identify, prevent and mitigate adverse human rights risk and impacts of our security operations. This includes conducting stand-alone HRRAs and control tasks where necessary, as well as integrating human rights into all existing business processes.

## Scope

This policy applies to all personnel including all directors, employees (whether employed on a temporary, fixed term, permanent or part-time basis), and contracted self-employed security contractors. Compliance is also expected that service providers, partners and associates within our supply chain, comply with human rights law and the principles of this policy.

Wherever we operate, we engage with communities to understand the social, cultural, environmental, and economic implications of our activities. We understand potential impact on communities and proactively ensure to capture any concerns or complaints mechanisms and take actions to address complaints. We work to optimise the benefits and reduce the negative impacts of our activities, both for local communities and the countries where we operate.

We strictly oppose any form of slavery, forced or child labour and committed to the prevention of sexual exploitation and gender-based violence.

- We support and implement the International Code of Conduct for Private Security Service Providers and ensure relevant employees and contractors are trained in accordance with these principles. We work with external stakeholders, as well as public and private security forces to promote understanding and implementation of the code and avoid security arrangements at our sites contributing to human rights harm, including through misuse of our equipment and facilities.

## Implementation

Implementation of our commitment is achieved by the following:



- Business Ethics and Code of Conduct Policy
- Mission Statement and strategic objectives
- Standard Operating Procedures
- Rules for the Use of Force
- Project resource planning (site requirements/risk management)
- Ensuring each project and arrangements comply with relevant law and human rights policy
- Working with interested parties and stakeholders
- Proactively identifying & managing business practices, inc. potential breaches
- In country management and community engagement where applicable
- Supplier due diligence
- Company whistleblower and grievance procedures

The business strives to respect human rights in accordance with the International Code of Conduct for Private Security Service Providers.

Within the SFG Group it is the responsibility of all personnel to manage work environments and security operations which maintain and protect human rights free from discrimination, harassment, extortion and any other human right impacts.

If an employee or contractor believes that someone, within the SFG Group companies or within an associated supplier is violating Human Rights within our network which breach internal law and our internal policy and principles, they are requested to report the instance following our Whistleblower Policy and Procedure.

Through appropriate contractual arrangements and procurement principles, we make our consultants, agents, contractors and suppliers aware of and expect their compliance with our human rights commitments. We strive to ensure our joint venture partners and non-controlled companies in which we participate also respect our commitments to uphold human rights.

This policy provides the foundation to our human rights approach. Our policies on Employment; Health, Safety, Environment, Business Ethics and Code of Conduct also contain human rights commitments.

## Training and Awareness

This Policy will be communicated to employees (whether employed on a temporary, fixed term, permanent or part-time basis), and contracted self-employed security contractors within the Employee New Starter Handbook or Contractor training. We commit to providing Human Rights related updates where necessary in both a proactive and reactive approach to ensure transparency.

## Enforcing this policy

This policy is intended to protect the business, our personnel, business partners and interested parties. Given the importance of human rights breaches to the business, any breach of the policy will result in further investigation under the disciplinary and grievance policy and procedure.

# Monitoring & Review of Human Rights Management Effectiveness

We will ensure to measure our performance for the effective management of Human Right Risk through measures including:

- Complaints management and investigation
- Employee and contractor appraisals
- Supplier due diligence
- Whistleblower reporting and investigation
- Management review

## Related Policies:

- P001 - Due Diligence & Ethical Practice Policy
- P002 - Anti-Corruption & Anti-Bribery Policy
- P003 - Quality Management Policy
- P004 - HSSEQ Policy
- P005 - Sustainability Policy
- P010 - Equality & Diversity Policy
- P011 - Corporate & Social Responsibility Policy
- P016 – Whistle-blower Policy