

Description

This document summarises the Company's policy on human rights. 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* 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 Code of Ethics and Anti-Bribery and Anti-Corruption policy. Other relevant policies include: Client Acceptance and Engagement Management; Use of Weapons; Human Resources and Dignity at Work; Subcontractor Management; Whistleblowing and Third Party Complaints.

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 Group Holdings Limited and its subsidiaries and branches.

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

Code applying the principles of the Montreux Document to companies. Control Risks is a signatory

UN Human Rights Council's *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.

Complicity

Indirect involvement in human rights abuses where harm is committed by another party – for example, another company or the security forces.

2. Policy

2.1 Overall

Control Risks respects the full range of human rights, and will not neglect or downplay any aspect of the *Universal Declaration of 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 avoid that activity.

2.2 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 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, Control Risks reserves the right to turn down new assignments and to reconsider its role in existing projects.

2.4 Risk assessment

Risk assessment is a fundamental requirement and must include an assessment of 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 high-impact projects and those in areas affected by conflict. Control Risks' initial risk assessment will be subject to constant regular monitoring and regular review.

2.5 Relationships with government security forces

Control Risks' advice will take full account of the record of, and potential for, human rights infringements that could be incurred by working with government agencies.

2.6 Working with subcontractors

All subcontractors 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, subcontractors will be vetted in accordance with Control Risks' Subcontractor Management Policy.

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

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

2.9 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 Complaints Policy.

3. Authority and Responsibility

3.1 All Control Risks' employees

- Seek advice from their line manager in cases of uncertainty about how to apply any aspects of this policy.
- 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, as well as any advice given to the client. This includes any credible allegations involving public or private security providers guarding the facilities of Control Risks or of its clients. Care should be taken to avoid any leaks of sensitive information that could put anyone at risk.
- Consult their line manager if they:
 - encounter 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, as well as any advice given to the client
- Consult a representative of the Ethics Committee in confidence if they are unable to speak to their manager, and if they:
 - encounter 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, as well as any advice given to the client
- Make an anonymous report (see Whistleblowing Policy) if they do not want to be identified, and:
 - encounter 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, as well as any advice given to the client.

3.2 Regional Director

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

3.3 Ethics Committee

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

3.4 CEO

In accordance with the *Voluntary Principles*, if the CEO 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.