

## 1 Scope

The Castor Vali Group is committed to the protection of human rights and promoting the UN 'Protect, Respect and Remedy' framework. Every employee, subcontractor, partner and supplier that works with Castor Vali is expected to adhere to this policy and work with Castor Vali in the protection and promotion of human rights best practice.

## 2 Internal References

This policy should be read in conjunction with the following Castor Vali documents:

- Code of Conduct;
- Anti-Bribery Policy;
- Equal Opportunities and Harassment Policy;
- Recruitment and Selection Policy;
- Corporate Social Responsibility Statement;
- Standard Operating Procedures (SOPs).

## 3 External References

- European Convention on Human Rights;
- International Code of Conduct for Private Security Service Providers (ICoC);
- International Labour Organisation Fundamental Conventions;
- Montreux Document;
- UN Global Compact;
- UN Guiding Principles on Business and Human Rights;
- UN Universal Declaration of Human Rights;
- UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials;
- Voluntary Principles on Security and Human Rights (VPSHR).

## 4 Risk Assessment

Human rights risk assessments form an integral element of the Castor Vali Management System and are included on both the company level strategic and operational risk registers, as well as the risk matrix for individual projects or tasks.

The human rights risk assessment process includes the identification of any activities carried out by Castor Vali, our subcontractors, suppliers or partners, which can have an impact either directly or indirectly on human rights, and the controls that must be put in place to eliminate this.

## 5 Staff Training & Awareness

All personnel will conduct induction training and regular refresher training which includes information on human rights issues pertinent to their roles and the areas in which they work. As part of the recruitment process, Castor Vali conducts vetting and background screening of individuals to ensure that there are no previous convictions that may compromise Castor Vali's human rights policies.

## 6 Equal Opportunities & Harassment

Castor Vali is committed to the elimination of unlawful or unfair discrimination on the grounds of gender, sexual orientation, race, disabilities, religion, ethnic origin and age or any other status recognised by international law.

Castor Vali employees have the right to be working in an environment where they treated fairly and with respect, in compliance with national employment laws. Castor Vali will not tolerate abuse or discrimination of any kind. Any complaints or issues should be reported immediately to the Chief Operating Officer. Refer to our Equal Opportunities & Harassment Policy and our Recruitment and Selection Policy for further details.

## 7 Forms of Labour

**Voluntary Labour** – Castor Vali will not use or benefit from forced or involuntary labour in any form. All employees shall enjoy freedom of movement during their employment. All employees will be provided with a written contract of employment that states their terms and conditions of employment including legal, fair and equal working hours and compensation. Overtime is voluntary, clearly communicated and appropriately compensated in accordance with local and international regulations.

**Child Labour** - Castor Vali will not employ anyone under the basic minimum age of 15 years. If permitted by national law, children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety, or hinder their education. Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18. Personnel are trained to identify and report the worst forms of child labour as defined by ILO Convention No. 182.

## 8 Freedom of Association & Collective Bargaining

Castor Vali respects the rights of our employees to associate freely, join or not join trade unions and/or workers councils, or engage in collective bargaining, in accordance with national law and international conventions without fear of reprisal, intimidation or harassment. We also recognise our employees' right to refrain from collective representation. Castor Vali is committed to constructive engagement and collective bargaining in good faith, with freely chosen employee representatives of a legally recognised union. In accordance with our Equal Opportunities Policy, Castor Vali will not discriminate or take adverse actions against employees, in retaliation for exercising employee rights or participating in union activities.

## 9 Suppliers & Partners (S&P)

Castor Vali often conducts operations in complex environments, where local providers may not always be aware of or adhere to internationally recognised standards. To ensure consistently high standards across service delivery, Castor Vali conducts a rigorous due diligence process before awarding contracts to local S&P. All Castor Vali S&P are required to read, acknowledge and agree to adhere to Castor Vali policies and procedures including human rights.

Castor Vali also recognises the likelihood and impact of Human Rights and Labour Standards issues within our operating environments. Therefore these concerns are covered within our training, risk assessments and relevant areas of service delivery. We also see it as an opportunity to improve Human Rights and Labour Standards amongst our S&P, if opportunities for improvement are identified. As such we view it as our responsibility to offer the following areas of support if deemed appropriate:

- Offer information on Human Rights Policy and best practice to S&P as well as awareness of project risks which may be caused by inadequate management of Human Rights and Labour Standards.
- Educate vulnerable workers and local communities about the laws limiting their Human Rights so they can better protect themselves.
- Work with S&P and their workers to strengthen grievance mechanisms as a way of communicating supply chain workers' concerns to management.
- Work with S&P to promote and strengthen freedom of association and the right to collective bargaining.
- Where possible, work with other companies, trade unions, civil society groups and governments to increase protections for workers in countries from which goods or services are sourced.
- Where possible, work with other companies sourcing from the same suppliers to find ways of reducing the risks (especially via common interest groups e.g. SCEG (Security in Complex Environments Group)).
- Where ever possible, ensure any joint venture or sales contracts include provisions to respect human rights.
- Seek advice from UK embassies about human rights risks related to local corruption or conflict.
- Implement the Voluntary Principles on Security and Human Rights, where appropriate.

It is the duty of Castor Vali senior project personnel to establish and develop close working relationships with all project personnel (including those of our clients and suppliers if applicable). Where possible and appropriate, Castor Vali will establish communication channels with these personnel to build awareness of Human Rights and Labour Standards as well as provide a conduit for feedback. This feedback can be submitted directly through our personnel or via our established reporting channels including the Castor Vali Whistleblowing process.

## 10 Relationships with Communities

Castor Vali will consider the human rights of any local population when conducting risk assessments and identify the impact of our activities within the communities in which we work. Where appropriate we will also offer information and support to local communities on Human Rights and Labour Standards as highlighted above. Refer to our Corporate Social Responsibility Statement for more information.

## 11 Clients

Castor Vali is committed to providing our clients with the best possible guidance and information in relation to human rights legislation and industry standards. Castor Vali reserves the right to turn down offers of work and remove itself from situations where there are reported human rights abuses that are not being addressed by our clients.

## 12 Relationships with Government Security Forces

Castor Vali's Standard Operating Procedures (SOPs) and training for subcontractors will take into account the history and potential for human rights abuses that could be incurred through working with local government agencies.

## 13 Use and Carriage of Weapons

Castor Vali will ensure that all Standard Operating Procedures (SOPs) concerning the use and carriage of weapons are drafted in accordance with national and international human rights legislation and industry standards for best practice. Privately Contracted Armed Security Personnel (PCASP) are recruited and selected in accordance with Castor Vali's recruitment policy and procedures which consider the qualifications, competency and experience of these personnel. PCASP undergo comprehensive training on relevant Human Rights legislation and Castor Vali's Rules on the Use of Force (RUF). Our SOPs also clearly set out our use of force in our Graduated Response Diagram which explains security response states in relation to any potential threat. Lethal Force will only be used as a last resort in self-defence or defence of others against the imminent threat of death or serious injury.

## 14 Governance

Castor Vali encourages all employees, subcontractors, suppliers, partners and clients to report any complaints or issues relating to human rights directly to the Chief Operating Officer in accordance with the whistleblowing procedures laid out in the Castor Vali Code of Conduct.

**Policy approved by: Steve Grant**  
**CEO**  
**Castor Vali Group**

This policy is reviewed by the Castor Vali Senior Management Team in accordance with the company's Management Review Schedule.