Castor Vali
Human Rights Policy

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1 Policy Statement

Castor Vali is committed to respecting and promoting internationally recognised human rights throughout its operations and business relationships. We conduct our activities in accordance with the UN Guiding Principles on Business and Human Rights, the International Code of Conduct for Private Security Service Providers (ICoC), applicable national laws and recognised international standards. We will identify, prevent, mitigate and, where appropriate, remedy adverse human rights impacts arising from our activities, while fostering a culture of dignity, fairness, equality and respect.

1.1 Policy Principles

Castor Vali will:

- Respect internationally recognised human rights in all operations.
- Conduct Human Rights Due Diligence throughout the contract lifecycle.
- Prohibit discrimination, forced labour, child labour, modern slavery and Sexual Exploitation and Abuse (SEA).
- Provide accessible grievance and reporting mechanisms without fear of retaliation.
- Engage with stakeholders to identify and address human rights impacts.
- Provide or cooperate in the remediation of adverse human rights impacts where Castor Vali has caused or contributed to them.
- Promote continual improvement through monitoring, training and management review.
- Where an adverse human-rights impact is directly linked to Castor Vali's operations, products or services through a business relationship, Castor Vali will use its influence to seek prevention, mitigation and appropriate remediation. Where adequate improvement cannot be achieved, Castor Vali will reconsider, suspend or terminate the relevant activity or relationship where legally and contractually possible.

2 Purpose

The purpose of this policy is to establish Castor Vali's commitment to protecting and respecting human rights and to define the principles that govern our operations, employment practices and business relationships.

The policy supports our Human Rights Due Diligence process by providing a framework for identifying, assessing, preventing and mitigating adverse human rights impacts and ensuring compliance with applicable legal, regulatory and international standards.

2.1 Scope

This policy applies to all Castor Vali Group companies, employees, directors, temporary workers, agency personnel, contractors, subcontractors and any other individuals acting on behalf of the organisation.

It applies throughout the entire employment and service delivery lifecycle, including recruitment, onboarding, training, operational planning, deployment, contract delivery and contract close-out. The policy also extends to Castor Vali's business relationships with clients, suppliers, subcontractors and other partners, who are expected to operate in a manner consistent with the principles set out in this policy.

Where Castor Vali operates in complex or high-risk environments, this policy is supported by Human Rights Due Diligence processes, including Human Rights Risk Assessments (HRRAs), the Human Rights Impact Assessment (HRIA) process and the Human Rights Impact Register (HRIR), to identify, prevent, mitigate and monitor actual and potential human rights impacts.

3 Compliance with Local Legislation

Castor Vali operates across multiple jurisdictions, where applicable legislation on human rights, employment, privacy, the use of force, and security operations may vary.

All personnel must comply with the laws and regulations of the country in which they operate. Where this policy establishes a higher standard than local legislation, Castor Vali expects personnel, contractors, and business partners to comply with the higher standard, provided that doing so does not cause personnel to be in breach of applicable law. Where local legislation imposes more stringent requirements, those requirements shall take precedence.

4 Definitions

Term	Definition
Human Rights	The fundamental rights and freedoms recognised under international human rights law and applicable national legislation.
Human Rights Due Diligence (HRDD)	The ongoing process of identifying, assessing, preventing, mitigating and monitoring actual and potential human rights impacts arising from business activities.
Human Rights Impact Assessment (HRIA)	The structured process used to identify, assess, prevent, mitigate and monitor the actual and potential impacts of Castor Vali's activities on affected rights-holders.
Human Rights Impact Register	The operational record of the actual and potential human rights impacts identified through the HRIA process, together with their assessment, existing controls and further mitigation measures.
Human Rights Risk Assessment (HRRA)	A structured assessment used to identify and manage human rights risks to Castor Vali, complementing the HRIA, which focuses on rights-holders.
Rights-holder	Any individual or group whose human rights may be affected by Castor Vali's activities, including employees, contractors, clients, suppliers, local communities and other stakeholders.
Sexual Exploitation and Abuse (SEA)	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another, or any actual or threatened sexual abuse.

5 Roles and Responsibilities

Role	Responsibilities
Senior Management Team	Demonstrate leadership and commitment to this policy. Ensure appropriate resources are available to implement Human Rights Due Diligence. Review human rights performance and drive continual improvement.
Chief Operating Officer	Maintain oversight of Human Rights Risk Assessment, Human Rights Impact Assessment and Human Rights Impact Register processes. Ensure reported human rights concerns are appropriately investigated and managed. Monitor compliance with this policy and associated procedures.
Managers	Implement this policy within their areas of responsibility. Identify and manage human rights risks and impacts. Promote awareness and ensure personnel complete required training. Encourage the reporting of concerns and support effective grievance mechanisms.
Personnel	Comply with this policy and associated procedures. Respect the human rights of all individuals. Promptly report any actual or suspected human rights concerns, through established reporting channels.
Suppliers, Contractors and Business Partners	Operate in a manner consistent with this policy. Cooperate with Castor Vali's Human Rights Due Diligence processes. Promptly report and address any actual or suspected human rights concerns relating to their activities.

6 Risk and Impact Assessments

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.

Castor Vali undertakes Human Rights Due Diligence through both Human Rights Risk Assessments (HRRAs), which assess risks to the organisation, and the Human Rights Impact Assessment (HRIA) process, which assesses actual and potential impacts on rights-holders. The outcomes of the HRIA process are recorded and maintained within the Human Rights Impact Register (HRIR), which is reviewed and updated as operational activities and identified impacts evolve.

7 Staff Training and Awareness

All personnel will complete induction training and regular refresher training which includes information on human rights issues pertinent to their roles and the areas in which they work. Recruitment and pre-engagement screening are conducted in accordance with the Recruitment and Selection Policy. Where lawful, relevant and proportionate to the role, screening may consider criminal history, previous military, police or security service, professional conduct and credible allegations or findings involving human-rights abuse, violence, corruption or other serious misconduct. Personnel will not be appointed or deployed where unresolved concerns create an unacceptable risk.

Human rights training includes the International Code of Conduct (ICoC), Human Rights Policy, Rules for the Use of Force (where applicable), grievance mechanisms, modern slavery, human trafficking, Sexual Exploitation and Abuse (SEA), and the reporting of suspected human rights violations.

8 Equal Opportunities and 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 work in an environment where they are 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 Human Resources Manager or the Chief Operating Officer. Refer to our Equal Opportunities and Harassment Policy and our Recruitment and Selection Policy for further details.

8.1 Sexual Exploitation and Abuse (SEA)

Castor Vali has zero tolerance for Sexual Exploitation and Abuse (SEA) or any form of sexual harassment, exploitation, coercion or abuse committed by or against personnel, contractors, suppliers or other persons affected by our activities. Personnel shall not engage in sexual exploitation, abuse or any sexual activity involving coercion, abuse of power, exploitation of vulnerability or exchange of money, employment, goods or services for sexual activity.

Allegations of SEA shall be reported immediately through established grievance, whistleblowing or anonymous reporting mechanisms, including the QR Code Feedback Portal. All allegations will be investigated promptly, and appropriate disciplinary, contractual, or legal action will be taken where substantiated.

9 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 and Young Workers - Castor Vali prohibits child labour and shall comply with applicable minimum-age legislation in every country in which it operates. No person shall be employed or engaged

below the applicable legal minimum age and, in all circumstances, Castor Vali's minimum age for employment is 15 years. Where applicable legislation establishes a higher minimum age, the higher age shall apply.

A person aged between 15 and 17 may only be employed or engaged in lawful, non-hazardous and non-security work where expressly permitted by applicable legislation. Such work shall not interfere with compulsory education or be harmful to the person's health, safety, wellbeing or development. Appropriate risk assessment, supervision and any legally required restrictions on working hours or activities shall apply.

Regardless of any lower age permitted for ordinary, non-hazardous employment, Castor Vali shall not employ, engage or deploy anyone under 18 years of age in security operations or hazardous work. This prohibition includes armed or unarmed guarding, protective services, journey-management security duties, weapons-related activities, hostile or high-risk deployments, and any other work classified as hazardous under applicable legislation or the relevant risk assessment.

Age and eligibility for employment shall be verified before engagement. Suppliers, subcontractors and other parties providing personnel for Castor Vali activities shall be required to apply equivalent minimum-age controls.

10 Freedom of Association and 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.

11 Suppliers and 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 rigorous due diligence 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 those on human rights.

Supplier due diligence includes consideration of labour rights, modern slavery, human trafficking, Sexual Exploitation and Abuse (SEA), grievance mechanisms and broader human rights performance. Where significant human rights risks are identified, appropriate mitigation measures shall be implemented before engagement continues.

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 its workers to strengthen grievance mechanisms to communicate 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 and ICoCA).
- Wherever possible, ensure any joint venture or sales contracts include provisions to respect human rights.
- Seek advice from 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 and to 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.

12 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. Castor Vali seeks to identify and minimise any adverse human rights impacts on local communities through stakeholder engagement, project planning and, where appropriate, project-specific Human Rights Impact Assessments. Communities may raise concerns through Castor Vali's established grievance mechanisms.

13 Clients

Castor Vali is committed to providing our clients with the best possible guidance and information regarding human rights legislation and industry standards. Castor Vali reserves the right to decline work and withdraw from situations where reported human rights abuses are not being addressed by our clients. Where appropriate, Castor Vali will engage with clients to promote responsible security practices consistent with the International Code of Conduct and internationally recognised human rights standards.

14 Use of Force and Carriage of Weapons

Castor Vali requires any use of force to comply with applicable law, contractual requirements, human-rights principles and approved Rules for the Use of Force (RUF). Force must be avoided wherever reasonably possible through communication, de-escalation or withdrawal. Where unavoidable, it must be lawful, necessary, proportionate and limited to the minimum reasonable force required. Lethal force may only be used as a last resort in self-defence or defence of others against an imminent threat of death or serious injury.

Castor Vali does not own, store, transport or issue firearms or ammunition. Where Privately Contracted Armed Security Personnel (PCASP) are required, they are provided through appropriately licensed and approved specialist subcontractors subject to Castor Vali's due-diligence, competence, contractual and monitoring controls. PCASP are briefed and trained on applicable human-rights requirements, the approved RUF and Castor Vali's Graduated Response. Castor Vali shall verify that PCASP have received appropriate training and briefing on applicable human-rights requirements, the approved RUF and the Graduated Response applicable to the operation.

Host-nation security forces remain under their own lawful authority, rules of engagement and chain of command. Associated legal, security and human-rights risks shall be assessed and monitored proportionately. Their authority, responsibilities, command boundaries, communications and escalation arrangements are addressed through operational planning, and they are briefed on client requirements, human rights, the Voluntary Principles on Security and Human Rights and Castor Vali's use-of-force expectations.

Any use of force must be reported immediately, with medical assistance provided where required. The incident will be documented, reviewed and investigated as appropriate. Castor Vali may suspend or withdraw from any operation where the use of force is unlawful or presents an unacceptable human-rights risk.

15 Human Rights Due Diligence

Castor Vali is committed to ongoing Human Rights Due Diligence. Human rights impacts are identified, assessed, prevented, mitigated and monitored through the Human Rights Impact Assessment (HRIA) process, with identified impacts recorded and maintained within the Human Rights Impact Register. This is supported by operational planning, stakeholder engagement, incident reporting, management review and continual improvement.

16 Governance

Castor Vali encourages employees, subcontractors, suppliers, partners, clients and other stakeholders to report any actual or suspected human rights concerns through the company's Complaints and Escalation Policy, Whistleblowing Policy or Anonymous QR Code Feedback Portal. Reports may be submitted confidentially and, where appropriate, anonymously. All reported concerns are investigated and appropriate corrective action or remedy implemented where required. Individuals raising concerns are encouraged to provide sufficient detail and supporting information to enable an effective assessment, appropriate follow-up and, where necessary, a formal investigation.

17 Monitoring and Enforcement

Compliance with this policy is monitored through the Human Rights Impact Assessment (HRIA) process, the Human Rights Impact Register, risk assessments, audits, management reviews, grievance and whistleblowing mechanisms, incident reporting and supplier due diligence activities.

Alleged breaches of this policy will be investigated promptly and may result in corrective action, disciplinary measures, termination of contracts or referral to the appropriate authorities, depending on the nature and severity of the breach.

Human-rights performance will be evaluated using proportionate information such as completed risk and impact assessments, training completion, reported concerns, complaints and grievances, incidents, supplier findings, overdue mitigation actions and evidence that corrective or remedial measures have been effective.

18 Policy Review and Updates

This policy is reviewed at least annually, or sooner where there are significant changes to legislation, international standards, organisational activities, identified human rights impacts or the company's operating environment. The Chief Operating Officer is responsible for ensuring the policy remains effective and appropriate.

19 References

19.1 Internal References

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

- CVMS039_Human Rights Risk Assessment;
- CVMS059_Human Rights Impact Assessment (HRIA) Procedure;
- CVMS060_Human Rights Impact Register (HRIR);
- CVMP009_Code of Conduct;
- CVM003_Rules for the Use of Force (RUF);
- CVMP008_Anti-Bribery Policy;
- CVMP003_Equal Opportunities and Harassment Policy;
- CVMP013_Corporate Social Responsibility Statement;
- CVMP006_Security Management Policy;
- CVMS022_Statement of Conformance and Applicability;
- CVMP017_Recruitment and Selection Policy;
- CVMP019_Staff Training and Development Policy;
- CVTR034_Group Training and Competence Framework;
- CVMP016_Complaints and Escalation Policy;
- CVMP014_Whistleblowing Policy;
- Standard Operating Procedures (SOPs).

19.2 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);
- ISO 18788:2015.

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

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