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Human Rights Policy

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1 Audience

This document is to be read by all employees, including permanent, contract, temporary personnel and contractors or subcontractors.

This document can be provided to third parties without approval from SRM Senior Management and Group HR.

2 Requirement

2.1 Introduction

SRM is committed to respecting the human rights of individuals in all aspects of its operations in Somalia and internationally. We also recognise that we have an opportunity to ensure that human rights are understood and observed in the areas that we work in.

We are dedicated to providing a safe working environment in which we meet our obligations regarding health and safety, security, equality & diversity and to ensuring that the respect and dignity of all our employees is adhered to at all times.

This policy applies to all SRM's businesses, employees, contractors and subcontractors.

3 Our commitment

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

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organisation
- Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict
- Montreux Document On Pertinent International Legal Obligations
- The ICoC - International Code of Conduct for Private Security Service Providers

Within our remit, we encourage others to support these standards and ask our suppliers, contractors and subcontractor to confirm compliance in their operations.

4 Policy

We understand our responsibility to respect the human rights of our employees and those of the communities in which we operate. These include:

- *Rights to life, liberty, security, due process, privacy, property, freedom of movement, freedom of expression, and asylum; as well as international standards around the use of force and international humanitarian law.*

- *Zero tolerance to:*
 - *Torture and any kind of inhuman treatment*
 - *Discrimination*
 - *Harassment, including sexual harassment*
 - *Sexual Exploitation and abuse or gender-based violence*
 - *Corruption and bribery*
- Labour and workplace rights including fair working conditions
- Freedom of association
- Development of local communities where we work through our community programmes

5 Labour And Workplace Rights

We provide fair working conditions for our employees, including terms and conditions of employment, remuneration, working hours, health & safety, resting time, holiday entitlements and benefits. These are applied according to territory specific statutory requirements. In addition, our Responsible Sourcing Policy outlines the standards that we expect from our suppliers.

6 Child labour

We will eliminate child labour, where it exists, with a manner consistent with the best interests of the children concerned. Where relevant we will develop and participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. We will not employ children and young persons under 18, at night or in hazardous conditions. In any event, the course of action we take shall be in the best interests of the child, conform to the provisions of ILO Conventions 138 and be consistent with the United Nations Conventions on the Rights of the Child.

7 Wages and hours

Pay will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry. Hours of work will be in line with local law or, in the absence of a law, the norm within that industry and shall not be excessive, employees shall not be contractually required to work more than a maximum of 84 hours per week.

8 Diversity

While being sensitive to cultural differences, we expect the development of equal opportunities in employment without discrimination on the grounds of race, religion, and gender or any other arbitrary means.

9 Employment

Forced or compulsory labour is prohibited. Employees should not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited. Permanent employment relationships and the obligations from such will not be unreasonably avoided. The employment models deployed will be in line with country-specific law and practices. Under these practices, there will not be excessive use of alternative models such as sub-contracting or labour-only contracting.

10 Working conditions

Policies and procedures for health and safety, as a minimum, meet legal requirements and where these do not exist, are sufficient to protect the well-being of employees.

11 Freedom of Association

We respect the right of our employees' to join or not to join a trade union and as such, they are free to join an organisation of their choice to represent them in line with local legislation. Where local rights to Collective Bargaining exist it will be allowed.

We also ensure that suppliers respect their employees' right to freedom of association.

12 Development of local communities

Through our community investment programmes, we strive to make a positive contribution and leave a lasting impact in the communities where our employees live and work. Our programmes vary between geographical location and look to address local need.

13 Communication and training

This Human Rights policy should be read and operates in conjunction with our:

- SRM's Company Policy
- SRM's Statement of Conformance
- SRM's Whistle-blower Protection
- SRM's Complains and Grievance Policy
- SRM's Statement of Applicability

Our internet ensures all our employees have access to the same policies. This is supported by providing territory-specific information which ensures that all of our businesses are comfortable with the standards and resulting action plans, in Somalia and internationally.

In addition, we have dedicated online mandatory training modules for Information Security, Equality & Diversity, Health & Safety, Data Protection, Information Security, Fraud Awareness and Anti-Bribery which highlight these policies for our employees.

These are further embedded by local business units through comprehensive role-specific induction and training which include a range of tailored tools for managers and directors.

14 Monitoring

Adherence with this and associated Group policies is the responsibility of business management and overseen through our Group-wide risk governance processes. Group Risk & Compliance provide further second line oversight on key Group policies, reporting back through Group governance with any issues arising. Group Internal Audit also check adherence to key Group policies through their audit activities.

15 Review

The policy will continue to be monitored and reviewed by the Corporate Responsibility Steering Group in respect of its suitability and effectiveness.

We also work in consultation with our stakeholders, particularly our clients, to make sure we are meeting their expectations.

16 Contact

For further information or should you have any questions, please contact the corporate responsibility team by emailing:

whistleblower@ska-arabia.com

info@somali-risk.com

info@ska-arabia.com

17 Non-Compliance

Non-compliance with this policy may result in disciplinary and or criminal proceedings against the employee, contractor and/or sub-contractor which may include their managers.