



# HART

WHEN YOU FACE RISK, YOU NEED HART

# HART HUMAN RIGHTS POLICY

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## **1. Commitments on Human Rights**

Hart is committed to fulfilling its responsibilities on human rights in all of its operations and activities by applying the United Nations Guiding Principles on Business and Human Rights. Hart understands human rights to refer to internationally recognised human rights –as those expressed in the International Bill of Human Rights, International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work; more specifically these:

- a. The Universal Declaration of Human Rights (1947)
- b. The International Covenant on Civil and Political Rights (1966)
- c. The International Convention on Economic, Social and Cultural Rights (1966)
- d. The International Labour Organisation Declaration on Fundamental Rights at Work (1998)

1.1 As a commercial provider of protective security services, Hart recognises that the rights to life and security of person, the right to own property and the right to freedom of movement are the kernels upon which these services must be designed and delivered.

## **2. Framework**

Hart recognises the UN Guiding Principles on Business and Human Rights provide a sound framework for realising its commitment to respect human rights. Managers at every level are to adhere to the guidance within this framework, and must seek to continually improve on its application. Hart is to achieve these commitments through the application of industry specific codes, standards and best practices related to the provision of security and human rights.

2.1 Hart is an original signatory to the International Code of Conduct for Private Security Providers (ICoC) and an active member of the ICoC Association (ICOC-A) and its oversight mechanism. Hart recognises the Montreux Document and its statements related to private security companies’ responsibilities to respect human rights. The Company is to comply with all applicable regulations and laws emanating from the Contracting States, Territorial States and Home States, as they relate to Hart’s services.

2.2 Hart has long recognised and supported the Voluntary Principles on Security and Human Rights, as they relate to the extractive industry, and has applied them in the delivery of its services in support of its clients’ operations.

2.3 Hart’s commitment to respecting human rights is embedded in its Integrated Management System, in particular, the Statement of Conformance (Annex B to its Business Plan 2018/19) and its Business Ethics.

2.4 Hart has been a participant in the UN Global Compact since 2015 and conducts its business activities with a view to supporting its 10 principles.

### 3. Common Understanding

In order to support the company-wide commitment to respect human rights, Hart is to adopt common terminology to facilitate communication and understanding. Synthesising the various terminology used within the framework, standards and codes, Hart understands:

- a. Potential adverse impacts on human rights as RISKS, to the enjoyment of human rights created by delivering services within a context: **human rights risk**.
- b. Actual adverse impacts on human rights as the realisation of the identified RISK, when activities related to Hart's services impact the enjoyment of human rights: **human rights impact**.
- c. **Human rights due diligence** as the combined application of: Hart's Human Rights Policy; and the identified codes and standards through the Integrated Management System (IMS).
- d. **Remedy** as the process of preventing the continued, or reoccurrence of a human rights impact; with the objective of returning the impacted individual(s) to a situation equivalent to that enjoyed prior to the human rights impact.

### 4. Hart's Approach

Hart's approaches to respecting human rights can be summarized as **recognise, respond, improve and communicate**. This approach incorporates the commitments and processes contained in the framework, the IMS and its various standards.

#### a. Recognise

Hart is to implement an iterative process that seeks to understand the contexts in which it delivers services – for example, the location, local culture and communities, the nature of its services, its customers' requirements and modus operandi, its suppliers and subcontractors - in order to identify human rights risks. Understanding these factors will enable Hart to conduct risk assessments and risk management effectively by identifying human rights risks that may be created through service delivery, customer requirements and supplier/subcontractors' modus operandi. Hart will periodically assess the human rights impacts of its services in particular complex environments.

#### b. Respond

Hart's response to the identified human rights risks is to enact mitigation measures that eliminate, avoid or reduce them to the maximum practicable extent. The mitigation measures are to be monitored and evaluated to assess their effectiveness; records of the results are to be maintained. In short, Hart's response to any human rights impact as a result of its business activities is to remedy them.

c. **Improve**

Through the development and application of its human rights due diligence and IMS, Hart will continually enhance its institutional capacity for respecting human rights. Managers at every level are responsible for achieving this within their particular domain; particularly in the capacity to identify human rights impacts and remedying them. At corporate level Hart is to establish a Human Rights Committee which will review the records of human rights impacts across the Company, assess the effectiveness of corrective action, and promote preventative action with a view to promoting continual improvement. The Committee will do so as an adjunct of the Management Review.

d. **Communicate**

Communications concerning this policy are to be conducted internally and externally. Hart has an established Grievance Policy which can be utilised by any employee or external stakeholders/third parties that may have a complaint/grievance concerning the Company or its staff members. This encapsulates the Recognise – Respond – Improve methodology.

(1) **Internal**

Hart is to communicate to all persons working on its behalf, its commitment to respect human rights. This is achieved through documents (policies and procedures), briefings, notices and recurrent training of personnel. The training of personnel is to include their responsibilities to report any human rights risk and impacts that they perceive to have been created by Hart's activities. Furthermore, Hart has an established Whistleblower Policy which enables anyone employed by the Company to report human rights impacts without fear of retribution.

(2) **External**

Hart will communicate its commitment to respecting human rights to external stakeholders, including clients, subcontractors and suppliers. Hart is to conduct effective and recurrent communications with such external stakeholders in order to understand their perceptions, values, needs and interests. Such understanding will confirm whether there are any human rights impacts which have to be taken into account by the Company within its 'Recognise' stage of this process. If any such impacts are 'Recognised', further communications will have to take place concerning the 'Respond' and 'Improve'. Records of all such communications are to be maintained.

## 5. Responsibilities

Hart's commitment to respect human rights requires vigilance on the part of all personnel. This includes recording and reporting any knowledge of human rights impacts. All personnel should therefore:

- a. Seek advice from their line manager in cases of uncertainty about how to apply any aspects of this policy.
- b. Record and report to their line manager any allegations of human rights impacts that are, or could be seen to be, associated with the activities of Hart or a client.
- c. Record and report to their line manager their understanding that a human rights impact has occurred, or is occurring, that could be seen to be associated with the activities of Hart or a client.
- d. Report in confidence, utilising the Whistleblowing procedure, their understanding that a human rights impact has occurred, or is occurring, that could be seen to be associated with the activities of Hart or a client.

5.1 Furthermore, all employees have a responsibility to report to line managers any known, or having reasonable suspicion of, the commission of any of the of the following international crimes:

- a. War crimes,
- b. Crimes against humanity,
- c. Genocide,
- d. Torture,
- e. Enforced disappearance,
- f. Forced or compulsory labour,
- g. Hostage-taking,
- h. Sexual or gender-based violence,
- i. Human trafficking,
- j. Trafficking of weapons or drugs,
- k. Child labour, or
- l. Extrajudicial, summary or arbitrary executions.

Managers made aware of reports of any of the international crimes, listed above, should report them to a member of the Human Rights Committee.

## **6. Human Rights Committee**

The Human Rights Committee is the corporate body responsible for ensuring that Hart achieves its human rights commitments, through the application the Human Rights Policy.

### **a. Composition and Meeting**

The Human Rights Committee will comprise a minimum of the COO, CAO, and Business Unit Directors (as appropriate). It will meet as part of the Management Review and conduct its business as an adjunct of it.

### **b. Role and Responsibilities**

- (1) Implementing the Human Rights Policy.
- (2) Identifying contexts and services that may be relevant to the application of International Humanitarian Law (Laws of War).
- (3) Communicating with Competent Authorities known or reasonable suspicion of the commission of international crimes.
- (4) Defining Hart's objectives and targets, within the IMS, related to human rights.
- (5) Defining the human rights aspects of the risk criteria.
- (6) Maintaining an overview of the human rights risks identified in Hart's risk assessment process.
- (7) Maintaining an overview of all human rights impacts identified through Hart's human rights due diligence process.
- (8) Authorising remediation of human rights impacts recommended by the managers.
- (9) Considering and approving appropriate actions related to human rights impacts in which Hart may be considered complicit, through its relationships with external stakeholders.
- (10) Establishing a repository of best practice and lessons learned on Hart's achievement of its human rights commitments.
- (11) Reviewing Hart's Human Rights Policy and performance at planned intervals, to ensure continuing suitability, adequacy, and effectiveness.



c. **Communicating with Competent Authorities**

When considering the notification to competent authorities of reports alleging human rights violations, the Human Rights Committee will remain cognizant of the right to life, liberty and security of person, non-discrimination, and the rights to be free from arbitrary arrest and detention, torture, or cruel inhuman or degrading treatment or punishment, and the right to a fair trial, of all Hart personnel and third parties. When identifying and reporting to Competent Authorities, Hart will not engage in activities that would allow it to be complicit in these severe human rights impacts.