

# Human Rights Policy

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## QA 143 Human Rights Context

QA 143 is committed to fulfilling its responsibilities on human rights in all of its companies around the world by applying the United Nations Guiding Principles on Business and Human Rights (2011) across all of our businesses.

The Guiding Principles affirm four international standards that have achieved broad international consensus as a human rights baseline for all businesses:

- The Universal Declaration of Human Rights (1947)
- The International Covenant on Civil and Political Rights (1966)
- The International Convention on Economic, Social and Cultural Rights (1966)
- The International Labor Organization Declaration on Fundamental Rights at Work (1998)

This QA 143 Human Rights Policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance for a global security company of our scale and diversity. It also sets our expectations for the conduct of all companies in the group, our employees and those with whom we do business.

Detailed guidelines for our staff on how to implement the policy across our businesses can be found in our management guidance document: QA 143 Human Rights Guidelines. Together our Human Rights Policy and Guidelines make up the policies and principles by which QA 143 will hold its employees accountable for respecting human rights.

## A Strategic Approach to Human Rights

We take a strategic approach to respecting human rights. This recognizes the potentially positive and negative impacts of our operations, the particular nature of our business as a security company, the UN framework and the different geographies in which we operate.

## Assessing Risk and Realization

We recognize that QA 143 can play a positive and negative role in respecting human rights around the world. Our businesses can contribute positively to the realization of human rights by the range of services we offer to protect people and enable them to enjoy their rights. We also recognize that we have a duty to ensure that we are not at risk of violating human rights through the services we provide, the customers we work with, the suppliers that we use and through the fair and appropriate treatment of our own employees and others who are in our care.

We will actively assess the impact of our business on human rights. We will encourage our people to develop businesses that consciously and actively enable people to realize their rights and we will take special care to monitor the risks that aspects of our businesses could directly or indirectly contribute to the violation of human rights, or how we could become complicit in violations by our partners suppliers or customers.

## Emphasizing QA 143 Core Rights

As a global security company, we recognize that there are some human rights that are especially salient in the sector in which we operate.

In a rights sensitivity analysis of our business, we have identified some core areas of human rights as particularly significant to the nature of our business and its impact on human rights.

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.

The International Code of Conduct for Private Security Providers and the Voluntary Principles on Security and Human Rights are already important standards for QA 143, which have been embedded into the relevant parts of our businesses.

As a global employer, labor rights (including freedom of association and the right to engage in collective bargaining) and the right to an adequate standard of living are also central.

While we work to respect all human rights, our work in care and justice services, security systems, data management, cash management, facilities management and security services mean that we need to be especially focused on human rights that are related to security.

## Adopting the 2008 UN Framework – “Protect, Respect & Remedy”

We are committed to operate by the guiding principles of the UN framework for business and human rights with its particular emphasis on the state’s duty to protect human rights, the corporate responsibility to respect human rights, and joint state and corporate responsibility to ensure access to effective remedy for people who have experienced business-related human rights abuse.

## Integrating Human Rights Due Diligence

In line with the UN Guiding Principles, we will make human rights due diligence an essential and integrated part of our business processes to assess actual and potential human rights risks. We will act upon the findings of this due diligence to ensure that we prevent human rights violations wherever possible, and deliver appropriate and effective remedy if we fail to prevent abuses.

## Being Consistent in Different Operational Contexts

We work in a very diverse range of states and operational contexts. In every context, we will make every effort to apply the same high standards of respect for human rights. In each context, we will develop a distinct understanding of particular human rights risks and comply with all applicable laws that protect human rights. When a state’s own capacity to protect human rights is weak, or when a state and other parties are actively abusing human rights, we will be careful not to exacerbate the situation and wherever possible and whenever this does not put our staff at immediate risk or bring us into dangerous conflict with local legislation, we will comply with international standards.

## Management and Responsibility for Human Rights in QA 143

Immediate responsibility for ensuring the group respects human rights lies with all of our management and employees. They need to be familiar with the QA 143 Human Rights Policy and Guidelines. They need to be able to demonstrate how they are actively preventing or responding to human rights risks and abuses, and how they are deliberately managing operations that respect people’s human rights and contribute to their realization.

Ultimate responsibility for QA 143’s human rights performance lies with the Board and Management of QA 143 who will actively ensure corporate accountability to this Policy and its related Guidelines.