

COUNTER SECURITY SERVICES LIMITED

<i>Reference</i>	CSS POL 29
<i>Version</i>	1.0
<i>Issue Date</i>	21/07/2018
<i>Approved</i>	MD

HUMAN RIGHTS POLICY

Executive Summary

Human Rights

COUNTER SECURITY SERVICES LIMITED's Human Rights policy formalizes our long-standing commitment to uphold and respect human rights for all people. COUNTER SECURITY SERVICES LIMITED's leadership team believes this policy reflects the standards for business conduct and human rights, provides a cornerstone for COUNTER SECURITY SERVICES LIMITED to identify and manage its human rights impacts, mitigate risks and maximize opportunities for human rights to flourish, and fosters collaborative and transparent engagement with the global community of stakeholders and investors.

Human rights are the fundamental rights, freedoms, and standards of treatment adhered to by governments, businesses, and individuals around the world. COUNTER SECURITY SERVICES LIMITED upholds and respects human rights as contained in the United Nations Universal Declaration of Human Rights (UDHR), the eight Core Labor Conventions developed by the International Labor Organization (ILO), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights. The Guiding Principles, in particular, clarify the duty of governments' to protect against human rights abuses by third parties, including business enterprises, the corporate responsibility to respect human rights, and a joint responsibility of business and government to remedy adverse human rights impacts if they occur.

Following substantial research, benchmarking of industry best practices, and consultation with leading organizations on the topic of human rights, COUNTER SECURITY SERVICES LIMITED believes that it is critical for all values-based companies to develop a formal approach to human rights. Human rights have long been integrated into how COUNTER SECURITY SERVICES LIMITED works with supply chain partners, develops employee ethics codes and policies, and creates a safe, inclusive, and diverse workplace.

Creating, implementing, and communicating a formal human rights policy, as part of a broader framework and roadmap for protecting human rights, will help to maintain COUNTER SECURITY SERVICES LIMITED's leadership in the IT industry, reduce the potential for negative reputational risks, and present opportunities for engagement and collaboration with human rights stakeholders.

COUNTER SECURITY SERVICES LIMITED's approach to human rights is informed by the documents identified above, and anchored to the approach set forth in the [UN Guiding Principles](#). Many leading companies, including COUNTER SECURITY SERVICES LIMITED, with global operations have committed to adhering to the Guiding Principles which include the development of a human rights policy, a framework to assess and mitigate known risks, and mechanisms to report and remedy grievances where they occur. COUNTER SECURITY SERVICES LIMITED is fully committed to this approach over the long-term.

The UN Guiding Principles state that:

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“[I]n order [for companies] to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including: (a) A policy commitment to meet their responsibility to respect human rights;

(b) A human rights due-diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights;

(c) Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.

Business enterprises need to know and show that they respect human rights. They cannot do so unless they have certain policies and processes in place.”

The Guiding Principles additionally call for companies to integrate human rights assessment processes into regular business practices, and to measure and report on impacts. The Guiding Principles also require proactive stakeholder engagement as a tool for companies help to identify and mitigate potential risks and develop positive opportunities for impacted communities.

Overview

COUNTER SECURITY SERVICES LIMITED supports these organizations and standards, and the positive impact they are having on global human rights:

1. UN Global Compact
2. Universal Declaration of Human Rights
3. International Labour Organisation
4. Global Network Initiative
5. Human Rights Campaign Foundation

Scope

The scope of COUNTER SECURITY SERVICES LIMITED’s human rights policy applies to all employees, partners, suppliers, and contractors, and supports the human rights of all COUNTER SECURITY SERVICES LIMITED stakeholders including internet users.

Compliance Effective Date

This policy is effective 28/05/2018

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Policy Statement

1.1. Human rights

COUNTER SECURITY SERVICES LIMITED and all employees must continue to respect, support and promote the human rights outlined in the [Universal Declaration of Human Rights](#). Employees, partners, suppliers and contractors must:

- 1.1.1 Commit to responsible business practices that do not infringe on human rights including appropriate evaluation of the human rights impacts of activities undertaken by and under the control of COUNTER SECURITY SERVICES LIMITED and a governance structure which will provide appropriate processes and mechanisms to address questions regarding the impact of COUNTER SECURITY SERVICES LIMITED's activities on human rights.
- 1.1.2 Avoid human rights abuses by complying with all applicable laws and regularly assessing human rights risks.
- 1.1.3 Protect privacy and data security for our customers.
- 1.1.4 Promote the benefits of increased connection and communication through the use of technologies that support freedom of expression.
- 1.1.5 Contribute to global communities by supporting diversity and employee engagement.
- 1.1.6 Support impactful social programs including those focused on critical human needs (food, water, shelter and disaster relief), education, and economic empowerment.
- 1.1.7 Report transparently on COUNTER SECURITY SERVICES LIMITED's support of and performance on human rights.
- 1.1.8 Engage openly with stakeholders on issues that impact human rights.
- 1.1.9 Contribute to the development of international standards relevant to the IT sector and consistent with respect for human rights.
- 1.1.10 Work with COUNTER SECURITY SERVICES LIMITED's suppliers and partners to uphold these same values and implement similar policies and practices.

Policy Compliance

2.1 Compliance Measurement

Compliance with COUNTER SECURITY SERVICES LIMITED policies is required. Compliance with this policy is verified through various methods, including but not limited to, reports from available business tools, audits, self-assessment, and/or feedback to the policy owner.

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This corporate human rights policy is governed by a process which demands full compliance. Non-compliance will be managed by COUNTER SECURITY SERVICES LIMITED's QMR. Concerns from employees, suppliers, partners or any other stakeholder can be communicated through the same channels as any other ethical issue.

2.2 Non-Compliance

Compliance with COUNTER SECURITY SERVICES LIMITED policies is required. Deviations or non-compliance with this policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions, up to and including termination, as allowed by local laws.

Non-compliance will be managed by COUNTER SECURITY SERVICES LIMITED's Chief Compliance Officer or his or her designee. Concerns from employees, suppliers, partners or any other stakeholder can be communicated through the same channels as any other ethical issue.

COUNTER SECURITY SERVICES LIMITED employees are required to adhere to the COUNTER SECURITY SERVICES LIMITED Human Rights policy. If an employee is unsure how to implement the Human Rights policy in their day to day responsibilities, they must speak with their manager to ensure compliance with the policy. If an employee observes or is aware of processes or actions that do not conform to COUNTER SECURITY SERVICES LIMITED's Corporate Human Rights policy, they must escalate the issue to the appropriate reporting channel.

Related Policies and Processes

Human rights is a matter which encompasses multiple issues and therefore this corporate human rights policy is supported by other COUNTER SECURITY SERVICES LIMITED policies including but not limited to policies on privacy, bribery and corruption, health and safety, diversity, harassment and other labour related policies.

[Code of Business Conduct](#)

[Focus Area: Supply Chain](#)

[Global Anti-Corruption Policy](#)

[Global Civility Workplace Policy](#)

[Global Human Resources Data Protection Policy](#)

[Privacy Policies](#)

[Reasonable Accommodation Policy](#)

[Workers Personal Information Policy](#)

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Definitions

The following terms and definitions are used in this document:

Human Rights	Human rights are the fundamental rights, freedoms and standards of treatment adhered to by governments, businesses, and individuals around the world and to which all people are entitled. Fundamental human rights are found in the United Nations Declaration on Human Rights, the eight ILO Core Labor Conventions, and various covenants and treaties that implement these principles.
<u>United Nations Global Compact (UNGC)</u>	The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. The Global Compact exists to assist the private sector in the management of increasingly complex risks and opportunities in the environmental, social and governance realms, seeking to embed markets and societies with universal principles and values for the benefit of all.
<u>Universal Declaration of Human Rights (UDHR)</u>	The Universal Declaration of Human Rights was enacted in 1948 by the United Nations, and contains 30 high-level principles that established the modern scope of “human rights.”
Freedom of expression	Freedom of expression is a fundamental human right contained in the UDHR and several additional implementing treaties. As defined in the UDHR, freedom of expression is the right to express one’s individual views and opinion, and the “freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.” UDHR, Article 19.
<u>International Labor Organization (ILO)</u>	The International Labor Organization is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies / programs promoting decent work for all.
<u>Global Network Initiative (GNI)</u>	The Global Network Initiative is a multi-stakeholder organization committed to working with IT businesses to identify, navigate, and mitigate human rights risk and impacts.

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<u>Human Rights Campaign (HRC)</u>	The Human Rights Campaign is America's largest civil rights organization working to achieve lesbian, gay, bisexual and transgender equality. By inspiring and engaging all Americans, HRC strives to end discrimination against LGBT citizens and realize a nation that achieves fundamental fairness and equality for all.
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