



Human Rights Policy

Doc# SAM-POL-10	Revision: 00	Issue No: 01	Issue date: 31-12-2024	Page 1 of 3
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Document Introduction

This document is aimed at providing a clear and concise summary of SAM 58's policy on Human Rights and is documented in accordance of the Voluntary Principles on Security and Human Rights; the principles of the UN Global Compact, the UN Human Right's Council's guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the International Code of Conduct for Private Security Providers.

This policy acts in conjunction with the SAM 58 Code of Conduct and Business Ethics Policy and its Anti-Bribery and Corruption Policy, both can be read in full at www.nb-security.com - where you can also submit any grievance through the portal available on that link. Other SAM 58 policies relevant to this Policy include Rules for the Use of Force, Grievance and Complaints, Health and Safety Policy and Whistle Blowing.

Policy

General

Any activity that SAM 58 believes that would result in none conformance of this policy statement and abuse of Human Rights then it will not complete that activity. SAM 58 respects all Human Rights policies mentioned in this document and has a duty to promote this policy and remedy any violation of Human Rights, whilst making this Policy readily available to its personnel and publicly displayed. SAM 58 will not act in any way to neglect the policy or commitment to it.

Employees

Hold the Human Right to work and operate in an environment that promotes fair treatment and condemns discrimination. SAM 58 is committed to providing this environment embedding from top management a culture of respect and trust.

Clients

SAM 58 fully expects its clients to respect and operate in accordance to Human Rights and where it does not believe this to be the case will reserve the right to postpone the activity whilst providing advice and guidance to its clients to avoid such situations.



Human Rights Risk Assessment

SAM 58 has completed a comprehensive Human Rights Risk Assessment to assess any potential impact either directly or indirectly from its activities or planned activities and will communicate this Risk accordingly. This Risk assessment is continual, ongoing and monitored effectively.

Weapons and Equipment

All weapon transfer to and from its personnel, office locations or Moi will be done so under strict management and conformance with Moi regulations.

Rules for the Use of Force

When employees are armed, they will only carry firearms legally under all relevant licensing requirements and exclusively for personal protection, the protection of those in their care. Employees shall take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable laws and regulations. If the use of force is required, it shall be proportionate to the threat, appropriate to the situation, and limited to what is strictly necessary. Lethal force shall only be used in self-defense or the defense of others against imminent threat of death or serious injury, or to prevent the perpetration of a particularly serious crime involving grave threat to life.

Local Communities

SAM 58 clients and contractors will take in to consideration the impact of any activities they are, or are about to take, within the local communities and any activity deemed in violation of Human Rights will result in SAM 58 stopping the activity and advising the client accordingly.

External Complaints

All complaints will be dealt with accordingly, fairly and in a timely manner that is suspected to be a violation of Human Rights.

Company Responsibility

Any contractor, employee, supplier or anyone working on behalf of SAM 58 has a duty to report any Human Rights violations and in any case, there is uncertainty about a situation or how to apply any part of this policy then they should seek guidance from their line manager or SAM 58 point of contact.

Lines of Reporting

Initially the first point of contact should be the line managers, however, if there are cases where someone wishes to remain anonymous (Whistleblowing) then reporting of Human Rights violations can be made by emailing, ethicsenquiry@sam58.com



Top Management Commitment

SAM 58 top management is committed to this policy and have a duty to act on any report received officially or anonymously.



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