

	<b>Fearless Security Services FSS</b>	<b>Human Rights Policy</b>		
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<b>Standard 18788: Planning Respect for Human Rights 8.1.3</b>				

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## Executive Summary

Fearless Security Services (FSS) is an Iraqi provider of security services and solutions to corporate, governments and organisations throughout Iraq. FSS is committed to operating with integrity and the highest ethical standards. Our reputation is built on trust and the confidence of clients. Strong ethics and good business practice are an integral part of our vision to make and maintain FSS as the most respected and successful of Iraqi security companies.

FSS provides risk management and specialist workforce solutions to clients (commercial, governmental, and international organisations) operating in high-risk environments.

Our Code of Ethics seeks to ensure that the Company will not engage in business with clients that it ought not to do, that its personnel will not be asked to do anything that they may feel is unethical, and that customers can be comfortable that the Company will not accrue reputational issues for them. Few issues demand more attention in this respect, than does Human Rights; especially where the Company operates alongside vulnerable communities, in regions lacking effective rule of law.

FSS takes its human rights role seriously and has therefore set out core principles and practices derived from International Codes and instruments to provide clients and other stakeholders with clarity as to how we assess and manage our human rights responsibilities.

There are two facets. The external aspect covers FSS's obligation, in the delivery of a contract, to do no harm in keeping with its human rights policy, local law and international codes. The internal aspect encompasses FSS's responsibility to its Personnel, whether core employees or contracted personnel, principally as regards their labour and employment rights.

FSS carries through its aims through:

- Responsible Contracting
- Human Rights Risk Assessment
- Training in Human Rights and Human Rights Management
- Acting as a Responsible Employer

## Aims

FSS will.

- Conduct a human rights impact assessment in territories in which it operates.
- Comply with international and local human rights laws and applicable provisions of international humanitarian law.
- Operate with full respect for the values, culture, and religions of Iraq.
- Co-operate with law enforcement agencies in the follow-up to allegation of a breach of the law, or its codes of practice.

## Responsible Contracting

FSS is sensitive when considering contracts that might be perceived to impinge on civil liberties, where it operates in support of clients in areas which are environmentally fragile or with vulnerable communities, in weak governance absent the rule of law or where operations may on occasion require the bearing of arms by its personnel or by persons acting under its authority.

FSS will undertake due diligence as to the human rights implications when contracting:

- FSS will determine the human rights record, policies, and commitment of potential clients before accepting a contract.
- FSS will conduct a Human Rights Impact Assessment (HRIA) as to the potential for harm to individuals, communities, the environment, and to civil liberties in planning the delivery of a contract or may alternatively conduct a Security and Human Rights Impact Assessment in a conflict zone or high-risk environment.
- FSS will seek to deliver a contract in full compliance with the human rights policies of its client, the host country and its own undertakings and policies.

## Prevention and Non-Compliance

FSS will not accept contracts for the provision of security services where to do so would conflict with applicable international human rights law or international humanitarian law (IHL), or where it would be contrary to international, national or local law, or where it might prejudice the security and stability of the country or impact adversely on the environment where it operates.

- FSS will not supply or maintain equipment or systems to governments, where there is a strong possibility that such equipment may be used to breach or suppress human rights.
- FSS will initiate disciplinary action if its personnel are suspected of breach of this policy, or of relevant human rights laws, which may result in the dismissal of offenders.
- FSS will co-operate with law enforcement agencies in the follow-up to breach of the law.
- FSS will bring breach of human rights by third parties to the attention of sub-contractors and clients for them to address where they are implicated and the authorities for redress if no other means of addressing the matter is effective.

## Human Rights Risk Assessment

Human rights risk assessment is not just the calculation of probabilities but involves other parties who are the rights-holders, i.e., whose human rights might be affected. As part of its risk assessment strategy, in delivering contracts that might have potential for local impact:

- FSS will conduct a risk assessment as to the potential for any of its actions impinging or being perceived to impinge on the human rights of a local community or individuals.
- FSS will conduct a risk assessment as to the potential for public controversy or media or legal challenge on human rights grounds.

- FSS will develop relationships and maintain a dialog with local community leaders and relevant civil society players, particularly in weak governance societies.
- FSS will seek to ensure that senior executives and key members of the operational team fully understand the potential for harm, or perceived harm through allegations of human rights abuse from the inception of any contract.

## Training and Management

FSS undertakes training in human rights for all its personnel from senior executives to contracted personnel to explain how the Company gives effect to human rights obligations. Training will:

- Explain the international background and how Human Rights obligations cascade down from State to company level.
- Set out the background to relevant international corporate initiatives in particular the International Code of Conduct Association for Private Security Service Providers (2010) and where relevant, the Global Compact and the Voluntary Principles.
- Explain the Human Rights Impact Assessment programme. In particular, personnel will be briefed on the provisions under the International Code of Conduct Association for Private Security Service Providers and the provisions that refer to the need,
  - a. To respect the human rights and culture of the local community.
  - b. In keeping with local law, to respect rights as regards freedom of speech and association, protection of property, freedom from arbitrary treatment.
  - c. To avoid sexual exploitation or abuse (including prostitution) or sexual harassment or violence.
  - d. To avoid people trafficking, child labour or slavery.
  - e. To avoid racist actions or language.
- Alert Personnel to potential for problems or the perception of problems so that managers can take remedial action swiftly.
- Brief Personnel on the whistleblowing and grievance provision as it relates to human rights policy.
- Brief personnel that a breach of any of these provisions would constitute a disciplinary offence, and potentially even a criminal offence.
- Keep a record of any claims or any allegations of human rights problems and review them regularly with the Ethics Committee to ensure that there is no systemic problem or systematic pattern.

## Use of Force

FSS Personnel will receive specific training on the FSS Guidance on the Use of Force (unless those agreed with and applied by a client should supervise), and use and maintenance on weapons, which are covered in separate policy the Firearms Policy.

## Responsible Employer

As a responsible employer, FSS values its relationship with its Personnel, whether employees or contracted personnel. FSS is committed to reflecting human rights with fair and open employment policies and practices. Specifically, FSS will:

- Not allow discrimination based on race, colour, sex, language, religion, or other aspects unless justified by reasons intrinsic to specific work requirements in a particular environment or country.
- Recruit Personnel appropriate to the task in keeping with the laws in the country of recruitment and the country of delivery of a contract and screen all personnel for any criminal record.
- Screen Personnel when recruiting nationals in countries where there has been a record of human rights abuse by State entities or other organizations to ensure that operatives do not have a record of human rights abuse, racist acts or sexual harassment unless there is an internationally recognized reintegration programme encouraging past parties to conflict to live and work together again;
- Provide training or refresher training appropriate to the task.
- Provide a work environment free from any form of harassment, intimidation or bullying.
- Provide clarity in writing as to job duties, payment, and hours of work.
- Make clear in writing what special provision there may be for difficult environments (e.g., as regards medical and travel insurance, work clothing, or leave provision, personal use of office provided mobile phones and laptops etc.).
- Ensure that its employment policies for Personnel are compliant with international standards as reflected in the International Labour Organisation (ILO) Codes and British and third country employment rules and regulations.

## Compliance and the Ethics Committee

The Executive Committee of FSS is responsible for ensuring compliance with this policy paper, which incorporates the relevant provisions of the ICoCA. They are also responsible for ensuring that the key elements are fully understood by senior executives and reflected in company training courses. The Ethics Committee will function as a source of independent advice to the Executive Committee on business ethics or international matters affecting Company activities in respect of human rights and is responsible for updating and maintaining this, Policy.

FSS has established a procedure for any case where an individual or group might feel their human rights have been affected by the company's action which allows for dialogue and practical solutions. The Company's policy on Whistleblowing and Grievance Mechanism are covered in a separate policy paper *HR-POL-12 Grievance Policy*.

Employees and contractors serving the Company may register any issue they may have in respect to the

Company's human rights performance as **Whistle-blowing**, while third parties (external to the Company) wishing to bring issues to FSS's attention as a **Third Party Grievance** should report the substance of their concern found on the website [www.fearless144.com](http://www.fearless144.com) or email: [info@fearless144.com](mailto:info@fearless144.com)

## Whistleblowing

FSS makes provision whereby its Personnel can report unethical or illegal activity in the context of human rights without fear of retribution. The Company maintains a confidential line of communication to its Ethics Committee to which Personnel may report their concerns in confidence and receive impartial advice. Allegations of wrongdoing, or breach of human rights will be investigated, and disciplinary action taken and/or reports submitted to the authorities if necessary. The whistle-blowing confidential e-mail address is: [info@fealess144.com](mailto:info@fealess144.com).

Third parties (external to the Company) wishing to bring issues to FSS's attention as a Third-Party Grievance should report the substance of their concern to [info@fearless144.com](mailto:info@fearless144.com)

## Standards

FSS bases its position on human rights through the following source documents:

### Applying to Corporations

- UN Global Compact, 2000
- Voluntary Principles on Security and Human Rights, 2000
- The International Code of Conduct Association for Private Security Service Providers, 2010

### Applying to States:

- The Universal Declaration of Human Rights, 1948
- ILO Declaration on Fundamental Principles and Rights at Work (1998)
- The Montreux Document (2008)