



**SF Group**

**Human Rights, Modern Slavery &  
Human Trafficking Policy**

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# 1. Introduction

SF is committed to fulfilling its responsibilities on human rights in all of its operational locations by applying the United Nations Guiding Principles on Business and Human Rights (2011) across all of our operations.

The Guiding Principles affirm four main international standards that have achieved broad international consensus as a human rights baseline for all businesses: As well as the UN Guiding principles SF is also committed to the principles of the Modern Slavery Act and the international code of conduct.

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights; and The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.<sup>23</sup>;
- Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies during Armed Conflicts;
- International Code of Conduct for Private Security Service Providers;
- Voluntary Principles of Human Rights and Security;
- Modern Slavery Act 2015.

This Human Rights Policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance for a risk management company operating in Africa and globally with a mixed diversity of employees & consultants. It also sets our expectations for the conduct of all offices in the Salama Fikira group, our employees, consultants, third parties and our clients and any other stakeholders who we conduct business with.

# 2. Approach to Human Rights

SF takes a strategic risk assessment approach to respecting human rights. This recognises the potentially positive and negative impacts of our operations, and the particular nature of our business as a risk management company, the UN framework and the different locations in which we operate.

# 3. Scope

For the purposes of this Policy it applies to all persons employed by SF or who conduct work for or on behalf of SF, including employees, consultants, and temporary employees, any third party representatives, agency workers, volunteers, interns, agents and sponsors engaged with the organisation.

The policy also applies to any other person associated with the organisation, who performs services for and on behalf of the organisation anywhere in the world. This includes the organisations partners, agents, brokers, sub-contractors, representatives, distributors, consultants and other service providers. The organisation expects those persons to abide by this policy or have in place equivalent policies and procedures.

This policy does not form part of any employee's contract of employment and as we may amend it at any time.

## 4. Vision and Values

SF's core values are to act in a manner which is ethical, respectful, transparent, inclusive and fair, challenging, confident, collaborative and professional. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

SF has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

SF is also committed to ensuring there is transparency in our own business and in our approach to tackling human rights, human trafficking and modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from all of our contractors, suppliers and other business partners. Wherever practicable, SF will seek to include in our contracts with business partners specific prohibitions against the use of bonded, forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that all suppliers will hold their own suppliers to the same high standards.

## 5. Core Human Rights

SF acknowledges the human rights of its employees, consultants, suppliers, clients and throughout its supply chains. Salama Fikira endeavours to provide a safe and healthy working environment for all of its employees & consultants. SF supports the elimination of all forms of forced, bonded or compulsory labour, the freedom of association 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 SF, which have been embedded into our operations.

SF further supports and upholds the elimination of discriminatory practices with respect to employment and occupation, and promotes and embraces diversity in all aspects of its business operations. SF is an equal opportunity employer and does not discriminate either directly or indirectly against employees or prospective employees on the basis of race, colour, religion, sex, sexual preference/orientation, citizenship, marital status, national origin, age or disability, or against any other protection established by applicable law or regulation.

SF is dedicated to creating a workplace that values and respects people from diverse backgrounds and enables its employees & Consultants to do their best work.

## 6. Embracing Principles and Regulations

SF 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.

## 7. Due Diligence and Risk Assessments

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

## 8. Respecting Legal Laws and Country Requirements

SF work in a diverse range of countries and operational environments. In every environment, we will make every effort to apply the same high standards of respect for human rights. In each environment, we will develop a distinct understanding of particular human rights risks and comply with all applicable laws that protect human rights. When a country's own capacity to protect human rights is weak, or when a country and other parties are actively abusing human rights, we will be mindful not to exacerbate the situation. We will ensure our employees, consultants and clients are not in an immediate risk or will be in a situation to bring us into dangerous conflict with local legislation. We will do this by complying with international standards.

## 9. Responsibility for the Policy

This policy is adopted by the SF Board of Directors who have overall responsibility for ensuring SF complies with its legal and ethical obligations. SF compliance department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering human rights abuses, human trafficking and modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## 10. Compliance with the Policy

All employees, consultants and relevant stakeholders must ensure that they read, accept and comply with this policy.

The prevention, detection and reporting of human rights, human trafficking and modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You should notify the Company as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of human rights, human trafficking and modern slavery in any parts of our business or supply chains at any level of supply at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you should notify the company by completing the general feedback form on the company website (under the (FEEDBACK tab) or by completing this Feedback Form as soon as possible.

If you are unsure about whether a particular act is a human rights abuse, the treatment of workers, or their working conditions within any tier of our supply chains constitutes any of the various forms of human rights abuse, human trafficking or modern slavery, raise it with your manager or by completing this Feedback Form as soon as possible

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that human rights, human trafficking and modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our whistleblower policy which can be found in the SF employee handbook and code of ethics and business conduct policy.

You can also raise your concerns with any of the following; Amnesty international, Human Rights Action Centre, Human Rights Watch, Modern slavery Helpline and the National Human Trafficking Hotline.

## 11. Communication and Awareness of the Policy

Training on this policy, and on the risk SF faces from human rights and modern slavery in its supply chains, will be provided as necessary on a periodic basis across the organisation through relevant senior management.

SF have a zero-tolerance approach to human rights, modern slavery and human trafficking this must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 12. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

SF may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



**Crispin Kennedy**  
Chief Operating Officer  
SF Group  
12 January, 2022