

HUMAN RIGHTS POLICY

Approved By: James Lawrence

Position: Director

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HUMAN RIGHTS POLICY

OVERVIEW

This document sets out Peregrine Risk Management’s policy on human rights. This policy governs and drives how we treat our employees and contractors in the workplace; how we manage our 3rd Party supply chain which drives how we engage with our clients on what we can accept and the scope of that business.

Peregrine respects and is aligned to the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights within the UN Global Compact. If Peregrine believes, for any reason, that by engaging in any activity it would breach any human rights, it will not be undertaken.

Scope

This policy applies to all employees, contractors, and directors within Peregrine Risk Management Ltd.

Supporting Documents

This Human Rights Policy is also supported by the following documents.

- QM PO012/19 Code of Conduct Policy
- HR PO013/19 Whistle Blowing Policy
- HR PO015/20 Grievance Policy
- HR PO021/20 Code of Ethics
- Company Induction
- Pre-Deployment Briefing
- Employment and Contractor Agreements

For any clarification or for guidance on how to apply this policy contact your line manager or Head of Technical Solutions and Compliance for further support.

If at any point you are aware of any breach in ethics that are outlined in this policy, or suspected breach, please follow [HR/PO013/19 Whistle Blowing Policy](#).

DEFINITIONS

Universal Declaration of Human Rights (UDHR)	Fundamental international standard which includes economic, social and political rights.
Voluntary Principles on Security and Human Rights (VPs)	Addresses the human rights problems associated with security provision for oil & gas and mineral projects in conflict-affected areas.

Montreux Document on Private Military and Security Companies	Summary of legal obligations and best practices, including human rights obligations of governments and security companies in conflict zones.
UN Global Compact	Strategic Policy initiative for businesses committed to adopting universally accepted principles including human rights.
International Code of Conduct for Private Security Providers (ICoCA)	This code applies the principles of the Montreux Document to companies
UN Guiding Principles on Business and Human Rights	States the duty to protect human rights, corporate duty to protect human rights (due diligence) and the need for victims to have access to remedy.
UK Modern Slavery Act 2015	UK Legislation to combat modern slavery and human trafficking.
Bill of Rights (US)	US bill on human rights which aligns with UDHR.
Complicity	Indirect involvement in human rights where harm is committed by another party.

POLICY REQUIREMENTS

Introduction

Peregrine Risk Management fully appreciates that the human rights landscape continues to grow in response to international law, policy and practices. This policy aligns with the following laws, legislation, practices and codes of conduct; Universal Declaration of Human Rights (UDHR), Voluntary Principles on Security and Human Rights (VPs), Montreux Document on Private Military and Security Companies, UN Global Compact, International Code of Conduct for Private Security Providers (ICoCA), UN Guiding Principles on Business and Human Rights, UK Modern Slavery Act 2015 and the Bill of Rights (US).

Our People

Peregrine Risk Management's employees and contractors have the 'right' to work in an environment that is built on respect, trust and fair without discrimination.

Working with and Advising Clients

All business activities and consultation will be consistent with the human rights directive of Peregrine Risk Management and of our clients. When delivering business activities for clients, Peregrine reserves the right to turn down new projects or withdraw from existing projects if we feel that continuation would cause the company to be complicit in any abuse of human rights.

Assessing Human Rights Risks Associated with our Business

Prior to accepting a new project or assignment the activity will be assessed by the Peregrine representative tasked with delivering the work. This assessment will look to identify any direct or indirect activities that could contribute to the abuse of human rights or there is a potential for a human rights breach to escalate. This will be assessed in line with the Peregrine Human Rights Impact Assessment (HRIA).

In addition to the Human Rights Impact Assessment, Peregrine adopts a risk-based approach to business activities and human rights also forms an area assessed during our Security Risk Assessment (SRA) process. This is vital when working in environments where there could be conflict, labour laws are lacking and working environments are uncertain.

Working with and Relationships with Government Security Forces

Peregrine Risk Management takes into account past records of relevant government actors and agencies when considering the impact human rights could have when working with or contracted to them.

Vender Engagement

All 3rd Party Venders must adhere to human rights principles that align and are consistent with this policy. If any 3rd Party vender fails to abide by those human rights mentioned within this policy, Peregrines has the right to terminate the contract or relationship. All venders will be vetted prior to contract and they will be required to evidence alignment to human rights, modern slavery and human trafficking legislation and codes of practice.

Weapons and Equipment

Peregrine Risk Management understands that there is a risk of human rights abuse when advising clients on the transfer of weapons and equipment, these risks will form part of our initial risk assessment on engagement with local agencies.

Community and Stakeholder Relationships

When advising clients on their impact of activities on local communities, environments or other stakeholders Peregrine will consider and take into account human rights.

Handling External Complaints

Any reports of human rights abuses or other professional business malpractices will be investigated with fairness and transparency by Peregrine. This procedure is laid out in [HR/ PO022/20 Handling Third-Party Complaints Policy and Procedure](#).

AUTHORITY AND RESPONSIBILITY

All Peregrine Employees and Contractors

- Peregrine requires all employees and contractors to abide and follow this policy, no matter the role, activity or environment.
- When delivering services for or on behalf of Peregrine ensure you are briefed fully on any human rights risks identified during the Human Rights Impact Assessment (HRIA) or identified during the Security Risk Assessment (SRA).
- Report any newly identified breaches to human rights that did not form part of any initial assessment or briefing.
- Record any breaches of human rights to assist Peregrine in the investigation process, this includes contacted 3rd Party Vendors and clients.
- Employees or contractors who fail to abide this policy may face disciplinary action, which includes dismissal or contract end.
- Any breach of this policy, or suspected breach should be reported immediately to their line manager or by following the Peregrine [HR/PO013/19 Whistle Blowing Policy](#).

Security Project Managers and Client Managers

- Assess and complete a Human Rights Impact Assessment (HRIA) prior to accepting new projects and clients.
- Ensure that human rights form part of the Security Risk Assessment (SRA) and are within the company and project risk register.
- Ensure that human rights are monitored throughout the project lifecycle.
- Liaise and brief clients on Peregrine's Human Rights Policy and on specific project sensitive issues.
- Ensure all 3rd Party vendors are vetted in accordance with Peregrine's policies and their human rights obligations.

Head of Technical Solutions and Compliance

- Review and investigate any breaches of human rights abuses with the Ethics Committee, in urgent cases, direct to the Board of Directors.

Ethics Committee

- The Ethics Committee chaired by the Board of Directors will review and take appropriate action when considering breaches of human rights.

Board of Directors

- In accordance with the ICoCA Voluntary Principles the Board of Directors will not only support the Ethics Committee but will decide the appropriate course of action if there is a believed breach on human rights. Peregrine has a duty to report this alleged breach.

Review

This policy is to be reviewed annually or if there is a significant event that affects the integrity and adherence to this policy.

Director: **James Lawrence** SIGNED: _____  _____

This Human Rights Policy is available to all personnel including visitors and contractors. All employees are encouraged to read it and communicate any query to the Directors. A copy of the Human Rights Policy Code can also be obtained on request (to any interested parties) from our Head Office.

Peregrine

Risk Management



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