

Pilgrims Africa Limited Human Rights Policy

1. Introduction

Human rights refer to basic standards of treatment to which all people are entitled. It is a broad concept, with economic, social, cultural, political and civil dimensions. For Pilgrims Africa Limited (PAL), this means ensuring our service delivery, no matter where we operate, is delivered in such a manner that demonstrates respect for our staff, our clients and the communities in which we operate. It also means respecting the rights of the people living in the communities around the facilities in which we deliver our services and those of our suppliers who may be affected or contribute to our services.

PAL is committed to developing a culture that embraces and implements a Human Rights' policy that supports and complies with the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles, the International Code of Conduct for Private Security Companies and Right to Work and the Voluntary Principles on Security and Human Rights.

2. Scope of this policy

This policy is applicable to all PAL staff, its facilities and our operations and services, wherever we operate. PAL is committed to working with and encouraging our sub-contractors and service providers to uphold the principles of this policy and to adopt a similar process within their businesses.

3. PAL Commitment

PAL respects Human Rights. It is committed to identify, prevent and mitigate adverse human rights impacts resulting from or caused by our business activities before they occur or if they do occur through appropriate mitigation processes. This policy sets out our commitment to Human Rights.

PAL recognizes that Human Rights are:

- Universal and inalienable.
- Interdependent and indivisible.
- Equal and non-discriminatory.

4. Policy

4.1. Human Rights impact Assessment

PAL will conduct a Human Rights Impact Assessment at regular intervals (every 3 years) and whenever a new major project is being planned. The assessment is to be conducted at a country (Nigeria) level and respects human rights and pays particular attention to the key principles of:

- Non-discrimination.
- Stakeholder participation.
- Empowerment.
- Transparency.
- Accountability.

4.2. Commitment to Diversity

PAL values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation and advancement at the Company is qualifications, performance, skills and experience. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

These principles apply not only to Company employees but also to the business partners with whom we work.

4.3. Safe Healthy Workplace

PAL believe that all injuries and occupational illnesses, as well as safety and environmental incidents are preventable, and our goal for all of them is zero. We will provide a safe and healthy workplace and will comply with applicable Nigerian and international safety and health laws, regulations and internal requirements.

We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks and are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

4.4. Work Hours, Wages and Benefits

PAL compensates employees competitively relative to the industry and local labour market in Nigeria. We operate in full compliance with applicable wage, work hours, overtime and benefits laws and will always pay a living wage.

4.5. Workforce Security

PAL is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

4.6. Workplace Bullying and Harassment

All staff have a right to a safe working environment and we will not tolerate any form of bullying or harassment in our workplace or that of the client for whom we operate. All incidents of bullying and or harassment are to be reported, using the incident report system or whistleblowing process, and will be investigated by senior management.

4.7. Disciplinary Process

PAL's disciplinary process recognizes individuals Human Rights and recognizes the individual right to a fair, non-discriminatory, transparent process that complies with the rule of law, including the Nigerian Labour Law, and individual freedom of expression.

4.8. Freedom of Association and Collective Bargaining

PAL respects our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives.

4.9. Community and Stakeholder Awareness

PAL recognizes its impact on the communities in which it operates. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business and believe that local issues are most appropriately addressed at the local level and will seek to engage with local community's leaders to resolve potential issues. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives and a policy of nationalization and local employment where appropriate.

4.10. Maternity Protection

PAL does not discriminate against women who are pregnant. Our Human Resources policy requires female staff to take maternity leave 3 weeks prior to the due birth date of their child and provides for 4 months paid maternity leave with guaranteed employment at the end of this period. In line with Nigerian Labour Law the entitlement of paid maternity leave does not apply to pregnancies in the first 2 years of employment when unpaid leave would be given with guaranteed employment on return from maternity leave.

4.11. Inter-action with Government Security Forces

PAL subscribes to the Voluntary Principles on Security and Human Rights and will monitor and report on any violations to the Principles by any of the Government agencies we interact with. We will endeavor to act to prevent any violations and where unable to do so endeavor to put in place appropriate mitigation measures while documenting and reporting any abuse of Human Rights.

4.12. Use of Force

PAL does not carry or use weapons. We will train our personnel to apply the principle of “Use of Minimum Force” when interacting with potential offenders and criminals. Force must not be used unless no other option exists; including withdrawing from the conflict or confrontation. Where the use of force is considered necessary then it must be the minimum necessary to protect life. Excessive use of force will not be tolerated and will be managed through the PAL disciplinary process. Any use of lethal force by Government agencies working with PAL must be documented and reported to the PAL Managing Director for investigation

4.13. Forced Labour and Human Trafficking

PAL prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labour, slave labour and any form of human trafficking.

4.14. Child Labour

PAL prohibits the hiring of individuals that are under 18 years of age for any positions and will actively work to ensure child labour is not used by our contractors or clients through contractual requirements, audit and observations in the case of our clients.

4.15. Whistleblowing

PAL operates a Whistle blowing policy for staff grievances and observations of potentially illegal or unethical behavior. Any breach of Human Rights can and should be reported through this medium where an individual does not wish to report it in openly. The policy sets out the way in which individuals may raise any such concerns that they have and how those concerns will be dealt with.

4.16. Non-Compliance Reporting

Any instance of non-compliance to this policy will be investigated and appropriate action taken. Non-compliance may be reported through the normal line management channels or the PAL whistle blowing scheme. All complaints of non-compliance will be investigated by a member of the executive management.

4.17. Policy Awareness and Training

This policy is to be briefed to all staff by line management on an annual basis and 100% of staff are to sign to state that they are aware of, understand and will comply with this policy annually. The HR department are responsible for the briefings and recording results.



Daniel Lemmer Commercial Director