

## **Human Rights, Modern Slavery and Human Trafficking Policy**

### **Introduction**

Tutare Management Group success is tied in part to the trust that people place in us to deliver our services in the right way – so for us, acting ethically and responsibly is not only the right thing to do, but also the right way to do business. We have a Code of Conduct that reflects these core values and serves as an important guide for our choices and actions. We are committed to fulfilling our 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 Tutare Management Group 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
- Modern Slavery Act 2015 This Tutare Management Group Human Rights Policy demonstrates our commitment to respect human rights and embodies our 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 Tutare Management Group, our employees, consultants, third parties and our clients and any other stakeholders who we conduct business with.

### **Approach to Human Rights**

Tutare Management Group employment policies comply with relevant labour laws. In addition, we provide equal opportunities in employment and employees are treated regardless of any non-vocational distinction such as age, gender (including gender reassignment), marital status, civil partnership status, sexual preference, disability, colour, nationality, race or ethnic origin or religion or belief.

### **Scope**

For the purposes of this Policy it applies to all persons employed by Tutare Management Group or who conduct work for or on behalf of Tutare Management Group, 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.

### **Vision and Values**

Tutare Management Group'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.

Tutare Management Group 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.

Tutare Management Group 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, Tutare Management Group 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.

### **Tutare's Core Human Rights**

Tutare Management Group acknowledges the human rights of its employees, consultants, suppliers, clients and throughout its supply chains. Tutare Management Group endeavours to provide a safe and healthy working environment for all of its employees & Consultants.

Tutare Management Group 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 Tutare Management Group, which have been embedded into our operations.

Tutare Management Group 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. Tutare Management Group 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.

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

## **Embracing Principles and Regulations**

Tutare Management Group 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.

## **Due Diligence and Risk Assessments**

In line with the UN Guiding Principles, Tutare Management Group 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.

## **Respecting Legal Laws and Country Requirements**

Tutare Management Group work in a very 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 careful not to aggravate 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.

## **Responsibility for the Policy**

This policy is adopted by the Tutare Management Group Board of Directors who have overall responsibility for ensuring Tutare Management Group complies with its legal and ethical obligations. Tutare Management Group compliance & legal 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.

## **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 [feedback@tutaregroup.com](mailto:feedback@tutaregroup.com) 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 [feedback@tutaregroup.com](mailto:feedback@tutaregroup.com) 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 at [feedback@tutaregroup.com](mailto:feedback@tutaregroup.com)

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 whistle-blower policy which can be found in the TMG 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.

### **Communication and Awareness of the Policy**

Training on this policy, and on the risk Tutare Management Group 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.

Tutare Management Group 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.

### **Breaches of this Policy**

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

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