

## Group Standard

# Human Rights



Serco is committed to respecting the human rights of individuals in all aspects of our operations wherever we operate

## Document Details

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<b>Reference</b> SMS GS-BC5: Human Rights	<b>Version</b> 1.0
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<b>Applicability</b> Serco Group covering all business regions, operating companies and business units throughout the world <sup>1</sup> covering: <ul style="list-style-type: none"> <li>- employees, officers, directors and individuals working as consultants and contractors and any other parties acting as representatives or agents of Serco (Employees)</li> <li>- wholly owned subsidiaries and majority-owned operations.</li> </ul> Where a minority interest and in regard to its subcontractors and suppliers Serco encourages alignment with this Standard	
<b>Authority</b> Chief Executive, Serco Group plc	
<b>Accountable Policy Owner (Group)</b> Group Company Secretary	
<b>Additional Information</b> Supporting standards, standard operating procedures and guidance relating to this Group Standard are available on 'Our World' under Serco Management System	
<b>Governance</b> Our policies and standards, together with any regional or market requirements and enhancements to them, are authorised through a robust governance process.	
<b>Consequence Management</b> As a Group Standard the requirements detailed in this document are mandated and must be adhered to. Non-compliance will have consequences which may include disciplinary action. The Consequence Management Group Standard (SMS-GS-G1) details how instances of non-compliance will be dealt with	
<sup>1</sup> As used herein, Serco Group and its affiliates, subsidiaries and operating companies are referred to as 'Serco', the 'Company' or 'company', or 'we', 'us' or 'our'.	

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# 1 Objectives

**Serco is committed to respecting the human rights of individuals in all aspects of our operations wherever we operate.**

This Group Standard demonstrates this commitment and the significance of human rights for a diverse global organisation. It also sets out expectations for the conduct of Serco, our employees, those who are in the facilities we manage or benefit from the services we provide, those of the communities in which we work and those with whom we do business.

Human rights are fundamental rights, freedoms and standards of treatment to which people are entitled. Whilst sovereign states have the primary duty to protect and uphold human rights, where Serco is involved in potential adverse human rights impacts, we will strive to respect human rights by understanding and managing the human rights impacts arising from the conduct of our business activities.

Serco's Human Rights Assessment and Decision Tree Group Standard Operating Procedure (GSOP)<sup>1</sup> provides guidance on the implementation of these standards. Together this Standard and supporting GSOP define the policy and principles by which Serco will hold its employees, business partners and related third parties accountable for respecting human rights.

This Group Standard should be read in conjunction with and is applicable to the full set of Serco's Policies and Standards along with Serco's Code of Conduct ('the Code').

# 2 Policy Standards

## 2.1 General requirements

- S1. Serco will not take part in, or benefit from, any activity that breaks any law relating to human rights
- S2. Serco will strive to respect human rights in our operations and will use international human rights standards such as the United Nations Guiding Principles on Business and Human Rights (2011) (UN Guiding Principles<sup>2</sup>):
  - a. to guide our decision making and constructive engagement
  - b. to identify, assess, and manage adverse human rights impacts
  - c. to integrate and act on findings, track responses, monitor effectiveness and communicate how impacts are addressed
  - d. to establish processes prevent potential adverse impacts from occurring and to address impacts should they occur
- S3. Serco recognises we can contribute positively to the realisation of human rights through the range of services we offer. However we also recognise our own limitations and ability to influence change when it comes to government policy and other matters outside our control
- S4. Serco is committed to encouraging a workplace culture that respects human rights through proactive engagement, monitoring and appropriate arrangements with our business partners and related third parties
- S5. Serco will endeavour to apply the same standards of respect for human rights in each of the markets and geographies we operate in. We will comply with the applicable laws that aim to protect human rights. We will assess and seek to manage human rights risks where appropriate

<sup>1</sup> See Human Rights Assessment and Decision Tree GSOP (Ref: SMS-GSOP-BC5-1)

<sup>2</sup> The UN Guiding Principles use the following international human rights conventions as a baseline for the rights and obligations that business should respect: The Universal Declaration of Human

Rights (1947); The International Covenant on Civil and Political Rights (1966); The International Convention on Economic, Social and Cultural Rights (1966); and The International Labour Organisation Declaration on Fundamental Rights at Work (1998)

- S6. Where appropriate employees will seek appropriate guidance regarding human rights laws and regulations relevant to their work and comply with legal requirements applicable to them and their work. For guidance, employees are to approach their line manager, Ethics Lead or Divisional Legal Representative to support their understanding
- S7. Serco encourages its employees, business partners and related third parties to report suspected Adverse Human Rights Impacts (AHRIs). Where suspected AHRIs are discovered they should be reported to line management, Ethics Lead or divisional legal representatives or alternatively through the Speak-Up<sup>3</sup> process. Any suspected AHRIs will be taken seriously, properly reviewed and/or investigated with rectifying actions taken. Where appropriate grievance mechanisms will be applied<sup>4</sup>
- S8. Policies, standards and procedures defining Serco's position and management of human rights will be documented, implemented and periodically reviewed. Policy reviews will consider the outcome of human rights assessments and actions taken to identify, prevent, mitigate or remediate AHRIs
- S9. Procedures will be appropriate and proportionate to the nature of human rights risks and the risks to Serco's business

### 2.1.1 Training awareness and competence

- S10. The needs of employees will be assessed against identified human rights risks and their potential involvement in AHRIs. Where appropriate, training will be given to help them understand, prevent and mitigate potential involvement in AHRIs
- S11. New employees will be advised, and existing employees regularly reminded, of the Company's policies, standards and procedures and will be provided with updates to those policies or changes in local requirements
- S12. Our customers, business partners and appropriate related third parties will be made aware of Serco's position in relation to human rights. This will principally be done through our Code of Conduct. Serco reserves the right to terminate business relations with those who it believes are

unwilling or unable to operate in a manner consistent with our policies in respect of Human Rights

- S13. As part of ongoing training and awareness, employees, business partners and related third parties will be advised of how they can alert the Company to potential human rights abuses through the use of the Speak Up process<sup>5</sup>

### 2.1.2 Compliance assessment and audit

- S14. Human Rights procedures, processes and controls will be periodically assessed to provide a planned, independent and documented assessment of compliance
- S15. Human Rights compliance reviews and audits will be periodically completed in accordance with Compliance and Internal Audit requirements<sup>6</sup>

### 2.1.3 Management review

- S16. Human Rights procedures, processes and controls will be periodically reviewed to ensure their continuing suitability, adequacy and effectiveness in reducing AHRIs and in order to meet applicable legal, Group and customer requirements
- S17. The reviews (carried out by Group) will consider any need for changes to policies and related management systems in light of issues raised through Speak Up, Serco's responses to actual or potential AHRIs, management and compliance reviews, internal audit, changing circumstances and our commitment to continual improvement. Where appropriate such reviews may consider input from external third parties including affected stakeholders or independent experts
- S18. The outcome of reviews will be discussed by Divisional executive management teams, the Executive Committee and Corporate Responsibility Committee with appropriate rectifying actions taken

<sup>3</sup> See Speaking Up Group Standard Ref: SMS-GS-BC3

<sup>4</sup> See Employee Wellbeing Group Standard Ref: SMS-GS-P2

<sup>5</sup> See Speaking Up Group Standard Ref: SMS-GS-BC3

<sup>6</sup> See Compliance Group Standard Ref: SMS-GS-G2 and Internal Audit Group Standard Ref: SMS-GS-G3

## 2.2 Risk management and controls

- S19. Serco will take reasonable steps to identify, prevent or mitigate any AHRIs caused or contributed to by Serco's operations or directly linked to Serco through our customers, business partners or related third parties
- S20. Human Rights risks<sup>7</sup> will be identified and assessed by carrying out appropriate periodic due diligence (Risk Assessment) on:
  - a. existing operations and markets
  - b. new markets, geographies, acquisitions, bids and rebid opportunities<sup>8,9</sup>
  - c. customers, business partners and related third parties prior to entering into working arrangements with them<sup>10,11</sup>
- S21. The Risk Assessment will consider how Serco could cause or contribute to AHRIs directly or indirectly through business relationships by reference to local and international laws, Serco's values and international standards such as the UN Guiding Principles
- S22. Serco considers risks to people as being risks to its business. This enables Serco to understand its responsibilities, respond to situations where rights are impacted and respond to opportunities. When identifying potential adverse impacts, consideration will be given to engaging relevant stakeholders to identify how business activities can cause, contribute to or be directly linked with adverse impacts, and in developing mitigation plans
- S23. Where potential AHRIs are identified the assessment will consider their likelihood and severity including any potential harm based on the number of individuals that could be affected, the gravity of the impact and any limits on the ability to restore affected individuals to a situation equivalent to that existing prior to the AHRI
- S24. Where Serco finds that it does, or could potentially, cause contribute or be linked to AHRIs we will seek to prevent or mitigate where possible

the risk of those impacts occurring and may seek to use influence with other contributing parties to prevent or mitigate any impacts

- S25. Mitigation plans will be focused on reducing the impact on individuals and facilitating their ability to raise concerns. Mitigation planning will include outlining any influence Serco can bring to bear on customers, business partners or related third parties
- S26. Where Serco chooses to operate with a customer who operates in a high risk area for human rights impacts or where adverse impacts are potentially likely to occur, Serco will consider a range of factors when making decisions, including its potential involvement in AHRIs, its values, policy commitments and effective risk management
- S27. If a significant human rights risk or issue is raised, it will be reviewed by Divisional executive management and direction agreed with the Divisional CEO. Agreed direction will be reported to the Group CEO and Chief Operating Officer (COO), recorded and, subject to any limitations and appropriate preservation of company legal or other privileges, communicated to management and reported to the Executive Committee
- S28. If the Divisional CEO and the Divisional Executive Management Team requires further guidance, the issue will be raised with the Executive Committee for a final decision
- S29. All Salient Human Rights risks that Serco identifies will be recorded within risk registers, with appropriate controls implemented to manage, mitigate or remediate the risk, in accordance with the Risk Management Group Standard<sup>12</sup>
- S30. Where mitigation/remediation plans are put in place they will be actioned, communicated and tracked for effectiveness
- S31. Standards defined for risk management will be applied with human rights risks being reviewed as part of the regular review of business risks<sup>13</sup>

<sup>7</sup> See Human Rights Assessment and Decision Tree GSOP Ref: SMS GSOP BC5-1

<sup>8</sup> See Bidding Group Standard Ref: SMS-GS-BD1

<sup>9</sup> See Third Party Legal and Ethical Compliance Due Diligence GSOP Ref: SMS-GSOP-BC2-3

<sup>10</sup> See Procurement and Supply Chain Group Standard Ref: SMS-GS-PSC1

<sup>11</sup> See Third Party Legal and Ethical Compliance Due Diligence GSOP Ref: SMS-GSOP-BC2-3

<sup>12</sup> See Risk Management Group Standard Ref: SMS-GS-RM1

<sup>13</sup> See Risk Management Group Standard Ref: SMS-GS-RM1



## 2.3 Salient human rights issues

S32. Salient Human Rights are defined in this section. All employees, business partners and related third parties will remain vigilant for all instances of AHRIs in respect of Salient Human Rights with appropriate reporting and mitigation actions taken where discovered

### 2.3.1 Employee lifecycle and wellbeing

- S33. Serco is committed to providing a working environment that respects human rights and diversity and promotes well-being through its employee lifecycle. Our Group Standards on Employee Lifecycle<sup>14</sup> and Employee Wellbeing<sup>15</sup> include our commitment to equality of opportunity; anti-discrimination, victimisation, bullying and harassment; fair remuneration; training and development; freedom of association; and grievance procedures
- S34. During the recruitment of employees and offering of employment with Serco including recruitment conducted through recruitment agencies, agents and third parties, misleading or fraudulent recruitment practices will not be used. Any recruitment fees will be transparent and agreed with Serco prior to commencement of any recruitment
- S35. Serco will provide all employees with an employment contract, recruitment agreement, or similar work document, written in a language the employee understands
- S36. Where applicable, any housing provided will be in line with locally agreed Serco standards which will consider host country housing and safety standards and international standards
- S37. Serco will comply with any agreement to provide return transportation or pay the cost of return transportation upon the end of employment

### 2.3.2 Prohibition of slavery and forced labour

S38. All labour will be voluntarily given and adhere to minimum ages stated in applicable labour laws or international standards. Employees will be free to leave in accordance with established laws, regulations, and other rules. Should conflict arise between these laws, regulations and

established rules, we will uphold our values and policy commitments, which are based on international human rights standards

- S39. Serco will not use, or be complicit in, forced or compulsory labour. No employees should be forced into involuntary labour and coercion at work is not acceptable
- S40. Fining employees as a disciplinary sanction is prohibited
- S41. Serco will respect employment relationships and the obligations from such. The employment models deployed will be in line with territory specific law and practices whilst seeking to uphold our values and policy commitments
- S42. An employee's identity or immigration documents will not be destroyed, concealed, confiscated or otherwise retained so that the employee is denied access to them

### 2.3.3 Children's rights and child labour

- S43. Serco is committed to respecting children's rights, understood in line with international standards, in its operations and through business partners and related third parties when acting in connection with Serco's own operations
- S44. Serco respects the rights of children and young workers to be protected from work that deprives them of their childhood, their potential and their dignity, and that is harmful to their physical and mental development. Serco is committed to ensuring that children and young workers are protected from child labour, including hazardous work, and this is understood in line with international standards
- S45. Where child labour is discovered Serco is committed to eliminating it in a manner consistent with the best interests of the children concerned. Where relevant, we will participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child

### 2.3.4 Human trafficking

- S46. Serco will not engage in trafficking of persons including the recruitment, harbouring, transportation, provision or obtaining of a person for labour

<sup>14</sup> See Employee Lifecycle Group Standard Ref: SMS-GS-P1

<sup>15</sup> See Employee Wellbeing Group Standard Ref: SMS-GS-P2

or services through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage, or slavery

### 2.3.5 Sexual exploitation and abuse or gender-based violence

- S47. Serco will not engage in, benefit from or be complicit in sexual exploitation (including, for these purposes, prostitution) and abuse or gender-based violence or crimes, either within the Company or externally, including rape, sexual harassment or any other form of sexual abuse or violence

### 2.3.6 Torture and other cruel, inhuman or degrading treatment or punishment

- S48. Serco respects the security of the individual
- S49. Serco will not cause or contribute to torture and other cruel, inhuman or degrading treatment or punishment through its operations or be linked to such activities through our business partners and related third parties when acting in connection with Serco's own operations
- S50. Serco will seek to prevent incidents of torture and other cruel, inhuman or degrading treatment or punishment in our operations and we will not seek to pursue business activities where torture and other cruel, inhuman or degrading treatment or punishment have been uncovered unless we can implement or influence changes that will remove the risk of torture and other cruel, inhuman or degrading treatment or punishment occurring

### 2.3.7 Safe and healthy environment

- S51. Serco is committed to providing a safe and healthy environment for our people, our customers, our partners and contractors, those who are in the facilities we manage or benefit from the services we provide and the public. Our policies regarding this can be found in our Health Safety and Environment Group Standard<sup>16</sup>

<sup>16</sup> See Health Safety and Environment Group Standard SMS-GS-HSE1

<sup>17</sup> In the following standards the term 'weapon' should be read to cover firearms and other prohibited weapons

### 2.3.8 Use of force

- S52. Employees and related third parties shall take all reasonable steps to avoid the use of force both in relation to those who are in the facilities we manage or benefit from the services we provide and other stakeholders that might be impacted by our operations
- S53. Conflict resolution through negotiation and de-escalation is, where practicable, to be considered before the use of force. If force is used, it shall be in a manner consistent with applicable laws and regulations, proportionate to the threat, appropriate to the situation, and limited to what is strictly necessary
- S54. Force should only be used as a last resort for the minimum period where other means have proved unsuccessful and where not to act would threaten the safety or security of employees, those in our care or the innocent
- S55. The use of force must not include cruel, inhumane or degrading treatments
- S56. The use of force must not be used for the purposes of punishment
- S57. Where there is a risk that the use of force might be applied, procedures will be implemented to define the rules applicable to the use of force (rules of engagement) including the importance of conflict resolution, restraint, proportionate response and issue of warnings. Employees and related third parties who may potentially be in situations where force might be used will receive training in the procedures

### 2.3.9 Management of firearms, ammunitions and other prohibited weapons<sup>17</sup>

- S58. Unless required by the contract, no Serco employee will enter the workplace<sup>18</sup> carrying a handgun, firearm or prohibited weapon of any kind, regardless of whether the person is licensed to carry the weapon
- S59. Some of the contracted services that Serco provides may necessitate the handling, carriage and use of firearms and other prohibited weapons (weapons). This includes operating in high risk environments which on

<sup>18</sup> 'Workplace' refers to any property that Serco controls (owned or leased) and the customer's workplace (for Serco employees who work on customer site), this may include a parking lot where this Standard will apply unless local laws recognise an individual's right to share an otherwise lawfully possessed weapon in their locked personal vehicle when it is parked on the property

occasions necessitates the carriage and use of weapons for personal protection, the protection of those in their care, or the protection of the innocent

- S60. On those occasions when a contract requires employees to carry weapons in defined circumstances, the Company will ensure all necessary authorisations and licences are acquired and maintained in accordance with applicable law for the possession and use of any weapons and ammunition. Employees will only ever carry weapons legally and under all relevant licensing requirements
- S61. No weapons or ammunition obtained or acquired by any means other than official issue by Serco or its customers may be used in the performance of Serco operations. Weapons or ammunition that are illegal will not be used
- S62. Employees and related third parties shall not engage in any illegal weapon transfers. Any weapon transactions will comply with applicable laws and United Nations Security Council requirements, including sanctions
- S63. Weapons and ammunition will not be altered in any way that contravenes applicable laws
- S64. Where there is a contractual requirement for the handling of weapons, procedures will be in place governing the use of force and weapons and the management of weapons and ammunitions including:
  - a. the circumstances under which an employee is authorised to carry weapons and the types of weapons and ammunitions permitted
  - b. the rules of engagement applicable to the use of force including the importance of restraint, proportionate response and issue of warnings
  - c. employee checks and references
  - d. employee initial and refresher training
  - e. secure storage
  - f. controls over their issue including individual accountability for weapons and ammunitions issued to them
  - g. records regarding to whom and when weapons are issued
  - h. identification and accounting of all ammunitions

- i. verifiable and proper disposal

Such procedures will comply with any national and international laws and regulations. Employees and related third parties shall adhere to these procedures

- S65. Due diligence will be completed on all applicants and employees that are required to carry weapons as part of their duties to determine their suitability. This will also apply to the appointment of related third party employees. At a minimum, this will include checks that applicants or employees have not:
  - a. been convicted of a crime that would indicate that the individual lacks the character and fitness to perform the required services
  - b. been dishonourably discharged from the Armed Forces
  - c. had other employment or engagement contracts terminated for documented violations of ethical conduct or applicable laws and regulations
  - d. had a history of other conduct that, according to an objectively reasonable standard, brings into question their fitness to carry a firearm
- S66. All employees and related third parties who are to carry weapons will:
  - a. only be permitted to do so upon completion or verification of appropriate training with regard to the type and model of weapon they may be required to use and the rules for the use of force
  - b. receive regular, verifiable refresher training specific to the type and model of weapon they may be required to use and the rules for the use of force
- S67. No employee or related third party will operate with a weapon until they have successfully completed weapon-specific training
- S68. While carrying a weapon the employee or related third party must:
  - a. at all times be alert
  - b. maintain the weapon and its ammunition in the condition, and with the safety precautions regarding its carriage, use and readiness to fire, as are approved
  - c. not deface the weapon or any of its accessories or ammunition



- d. not make modifications to the weapon or to its ammunition

S69. Weapons shall only be used in self-defence or the defence of others against imminent threat of death or serious injury, or to prevent the perpetration of a particularly serious crime involving grave threat to life

### 3 Responsibilities & Accountabilities

S70. The following responsibilities will apply to the delivery of the defined standards. If these are not completed effectively, the person responsible will be accountable for any consequences<sup>19</sup>

#### Group

- S71. The Group CEO will appoint a Group Human Rights Lead responsible for:
- a. developing and maintaining Group Human Rights policy
  - b. ensuring standards and associated programmes, procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage Human Rights risks and AHRIs
  - c. providing oversight and reporting performance in regard to Human Rights to the Executive Committee
- S72. The Serco Group plc Board will determine Serco's position in relation to AHRIs where:
- a. they are considered to be gross human rights abuses which we may cause or contribute to either directly or indirectly
  - b. they involve responsibility for children or pregnant women
  - c. they involve the handling of arms or landmines
- S73. The Executive Committee is responsible for:
- a. determining Serco's position in relation to AHRIs that present a severe risk to the business<sup>20</sup>
  - b. assuring Human Rights risks are understood and managed through the application of policy, procedures, training and review

- c. monitoring the implementation of mitigation or remediation actions related to key Human Rights risks

#### Division

- S74. The Divisional CEO will appoint an Ethics Lead responsible for:
- a. implementing human rights policy, standards, associated programmes, procedures and key controls across the Division which may include the development of country/region/Divisional procedures and management systems
  - b. ensuring procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage ethical risks
  - c. providing oversight and reporting on human rights risks and impacts and related management, mitigation and remediation plans to the Divisional Executive Management Team
  - d. implementing a management structure to manage human rights and the delivery of this Standard
- S75. The Divisional Executive Management Team is responsible for
- a. Having appropriate policy systems and procedures to meet the requirements of this Standard
  - b. assuring human rights risks are understood and managed through the application of policy, procedures, training and review
  - c. monitoring the implementation of mitigation or remediation actions related to key Divisional human rights risks
  - d. determining the Division's position in regard to human rights issues and impacts that may present a human rights risk

#### Contract/Function

- S76. Contract management will:
- a. assess their exposure to human rights risks and, where identified, ensure they are managed and mitigated or remediation plans are in place and implemented
  - b. ensure specific actions, including training, relating to identified human rights risks and impacts are delivered

<sup>19</sup> See Consequence Management Group Standard Ref: SMS-GS-G1

<sup>20</sup> See Risk Management Group Standard Ref: SMS-GS-RM1

## 4 Processes and Controls

### 4.1 Governance processes and controls

Process		Controls		Responsibility				
A set of related activities that must be carried out to achieve policy outcomes		The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference		for ensuring controls are in place and operating effectively				
Ref	Description	Ref	Description	Group (S71 – S73)	Division (S74 & S75)	Business Unit	Contract (S76)	All Employees
P1	Human rights responsibilities are defined and understood	➡ C1	<p>The Group CEO will appoint a Group Human Rights Lead responsible for:</p> <ul style="list-style-type: none"> <li>developing and maintaining Group human rights policy</li> <li>ensuring standards and associated programmes, procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage human rights risks and impacts</li> <li>providing oversight and reporting performance in regard to human rights to the Executive Committee</li> </ul>	●	○	○	○	○
		➡ C2	<p>The Serco Group plc Board will determine Serco's position in relation to human rights impacts that might lead to gross human rights abuses which we may cause or contribute to either directly or indirectly; involves a responsibility for children or pregnant women; involves the handling and or carrying of arms or landmines</p>	●	○	○	○	○

## Process

A set of related activities that must be carried out to achieve policy outcomes

## Controls

The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference

## Responsibility

for ensuring controls are in place and operating effectively

Ref	Description	Ref	Description	Group (S71 – S73)	Division (S74 & S75)	Business Unit	Contract (S76)	All Employees
		➡ C3	<p>The Executive Committee is responsible for:</p> <ul style="list-style-type: none"> <li>determining Serco's position in relation to human rights impacts that present a severe risk to the business;</li> <li>assuring human rights risks are understood and managed through the application of policy, procedures, training and review</li> <li>monitoring the implementation of mitigation or remediation actions related to key human rights risks</li> </ul>	●	○	○	○	○
		➡ C4	<p>A Divisional Ethics Lead is appointed by the Divisional CEO with responsibility for:</p> <ul style="list-style-type: none"> <li>implementing human rights policy, standards, associated programmes, procedures and key controls</li> <li>ensuring procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage human rights risks</li> <li>providing oversight and reporting on human rights risks and impacts and related management, mitigation and remediation plans</li> <li>implementing a management structure to manage human rights and the delivery of this Standard</li> </ul>	○	●	○	○	○

## Process

A set of related activities that must be carried out to achieve policy outcomes

## Controls

The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference

## Responsibility

for ensuring controls are in place and operating effectively

Ref	Description	Ref	Description	Group (S71 – S73)	Division (S74 & S75)	Business Unit	Contract (S76)	All Employees
P2	Establish policy	➔ C5	<p>The Divisional Executive Management Team is responsible for</p> <ul style="list-style-type: none"> <li>• Having appropriate policy systems and procedures to meet the requirements of this standard</li> <li>• assuring human rights risks are understood and managed through the application of policy, procedures, training and review</li> <li>• monitor the implementation of mitigation or remediation actions related to key divisional human rights risks</li> <li>• determine the Divisions' position in regard to human rights issues and impacts that may present a human rights risk</li> </ul>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
		➔ C6	<p>Contract management will:</p> <ul style="list-style-type: none"> <li>• assess human rights risks and where identified ensure they are managed, mitigated or remediation plans are in place and implemented</li> <li>• ensure specific actions, including training, relating to identified human rights risks and impacts are delivered</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
		➔ C7	<p>Policy, standards and group procedures are defined and published</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<b>Process</b> A set of related activities that must be carried out to achieve policy outcomes		<b>Controls</b> The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference		<b>Responsibility</b> for ensuring controls are in place and operating effectively				
Ref	Description	Ref	Description	Group (S71 – S73)	Division (S74 & S75)	Business Unit	Contract (S76)	All Employees
P3	Establish systems and process	➔ C8	Policy requirements, defined in the Serco Management System, are communicated and implemented	●	●	●	●	○
		➔ C9	Appropriate systems and procedures are in place to meet the Serco Management System, legal requirements and manage identified human rights risks and impacts	○	●	●	●	○
P4	Compliance assessment and audit	➔ C10	A compliance plan is in place which includes assessment of human rights systems and procedures	○	●	●	○	○
		➔ C11	Compliance and audit reports have action plans to address non-conformities	○	●	●	○	○
		➔ C12	Agreed actions are closed out	○	●	●	○	○
P5	Management review	➔ C13	Systems and procedures are periodically reviewed and updated	○	●	●	●	○
		➔ C14	The outcome of reviews will be recorded along with how Adverse Human Rights Impacts are being addressed and reported through the ethics and speak up reporting process for review by Divisional executive management teams, the Executive Committee and Corporate Responsibility Committee	●	●	●	●	○



## 4.2 Key processes and controls

### Process

A set of related activities that must be carried out to achieve policy outcomes

### Controls

The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference

### Responsibility

for ensuring controls are in place and operating effectively

Ref	Description		Ref	Description	Group	Division	Business Unit	Contract	All Employees
P6	Assess and manage human rights risks	➔	C15	<p>Human rights risks will be identified and assessed for existing business operations and markets; identified and assessed, along with appropriate due diligence, for new markets, geographies, acquisitions, bids and rebid opportunities; identified and assessed for business partners and related third parties when acting in connection with Serco's own operations, along with appropriate due diligence as part of the procurement process and prior to entering into working arrangements with them</p> <p>All material human rights risks will be recorded within risk registers, with appropriate controls implemented to manage, mitigate or remediate the risk, in accordance with the Risk Management Group Standard</p> <p>Where mitigation/remediation plans are put in place they will be actioned, communicated and tracked for effectiveness</p> <p>Standards defined for risk management will be applied with human rights risks being reviewed as part of the regular review of business risks</p>	●	●	●	●	○

## Process

A set of related activities that must be carried out to achieve policy outcomes

## Controls

The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference

## Responsibility

for ensuring controls are in place and operating effectively

Ref	Description	Ref	Description	Group	Division	Business Unit	Contract	All Employees
		➔ C16	There is evidence of periodic review of human rights risks by management and the relevant Executive Committee/Meeting	●	●	●	●	○
P7	Raise awareness on policy requirements, standards of conduct expected and ethical risks	➔ C17	Human rights training requirements are defined, assessed, planned and implemented	●	●	●	●	○
P8	Reporting of issues	➔ C18	Serco will maintain a process to support employees, business partners and related third parties to report any suspected human rights violations in an environment which is safe and supportive	●	●	○	○	○
		➔ C19	Any credible allegation of human rights issues or abuses raised will be reported, recorded, investigated and actions taken through Speak-Up. Where appropriate grievance mechanisms will be applied	●	●	●	○	○
P9	Management of use of force	➔ C20	Where there is a risk that the use of force might be applied, procedures will be implemented to define the rules applicable to the use of force (rules of engagement)	○	●	●	●	○

## Process

A set of related activities that must be carried out to achieve policy outcomes

## Controls

The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference

## Responsibility

for ensuring controls are in place and operating effectively

Ref	Description		Ref	Description	Group	Division	Business Unit	Contract	All Employees
P10	Management of firearms, ammunition and other prohibited weapons	➔	C21	Where there is a contractual requirement for the handling of weapons, procedures will be in place governing the use of force and weapons and the management of weapons and ammunitions	○	●	●	●	○

## 5 Supporting documentation and guidance

The following should be read in conjunction with this standard:

Ref	Document
SMS-GS-G1	Consequence Management Group Standard
SMS GSOP-BC5-1	Human Rights assessment and Decision Tree GSOP
SMS GS-BC2	Business Conduct and Ethics Group Standard
SMS-GS-BD1	Bidding Group Standard
SMS-GS-RM1	Risk Management Group Standard
SMS-GS-G5-PSC1	Procurement and Supply Chain Group Standard
SMS-GSOP-BC2-3	Third Party Legal and Ethical Compliance Due Diligence GSOP
SMS-GS-BC3	Speaking up Group Standard
SMS GSOP-BC3-1	Speak Up GSOP
SMS-GS-P1	Compliance Group Standard
SMS-GS-P2	Employee Lifecycle Group Standard
SMS GSOP-BC2-2	Employee Wellbeing Group Standard
Our World>The Way We Work>Finance & Commercial>Finance> Group Financial Controls>Delegated Approvals – Delegated Approval Authorities	

## 6 Definitions

Term	Definition
<b>Accountability</b>	Being accountable means being not only responsible for something but also answerable for your actions.
<b>Responsibility</b>	<p>A responsible person is the individual who completes the task required. Responsibility can be shared and delegated.</p> <p>All responsible persons will also be accountable for completing tasks effectively. Non-compliance will have consequences which may include disciplinary action as defined within the Consequence Management Group Standard.</p>
<b>Group</b>	Serco Group plc is the administrative centre of the organisation, responsible for setting corporate strategy, defining governance requirements and supporting the business in its day to day operations
<b>Division</b>	The Group will define a set of business divisions which will be responsible for business delivery within a defined set of markets or geographies.
<b>Business Unit</b>	<p>A Business Unit is a cluster of contracts which provide a similar service e.g. Health, Defence, Transport etc.</p> <p>Where appropriate, a separate legal entity wholly owned or where Serco has a controlling share may also be referred to as a Business Unit, where appropriate.</p> <p>This may also refer to Counties/Territories</p>

Term	Definition
<b>Contract</b>	<p>A Contract provides specified requirements to a customer (either directly with Serco or to a consortium/Joint Venture in which Serco is a party)</p> <p>A Contract will also refer to a corporate/functional area.</p> <p>Corporate/functional areas are functions which support the business and they include finance, HR, procurement etc.</p>
<b>Employee</b>	Covers employees, officers, directors and individuals working as consultants and contractors and any other parties acting as representatives or agents of Serco
<b>Third Party</b>	This includes all natural persons or businesses in all forms (including corporations, joint ventures, partnerships and sole proprietorships) which pays Serco, or is paid by Serco to perform or arrange the performance of any activities, supply or arrange the supply of any goods or services or to act on its behalf. This includes customers, vendors, suppliers, subcontractors, volunteers, charities, advisors and business partners.
<b>Business Partner</b>	<p>Covers where the party</p> <ol style="list-style-type: none"> <li>1. is targeted by Serco for merger or acquisition</li> <li>2. shares profits from the business of a joint venture, consortium or other form of partnership in which Serco is a part</li> <li>3. has an equity interest in an entity owned by Serco;</li> <li>4. is granted exclusive or special distribution rights over Serco's products or services;</li> <li>5. is a major subcontractor without which it would be impossible for Serco to carry out its contract with its client. These may</li> </ol>

Term	Definition
	<p>be nominated subcontractors imposed by the client or preferred sub-contractors in a pre-bid agreement with Serco and may include construction contractors leading on delivery of essential facilities required under Serco's contract with its client or a supplier of labour where Serco is unable to recruit directly in a region or market; or</p> <ol style="list-style-type: none"> <li>6. is paid compensation (whether in fixed or lump sum fees, as a percentage of contract award, as a bonus, or in other non-monetary forms) to assist Serco (including as a sales agent, marketing agent, country sponsor, or consultant) with:             <ol style="list-style-type: none"> <li>a. the process of bidding for, obtaining or maintaining projects, contracts or other business or services;</li> <li>b. developing business or the provision of services in a particular country or region;</li> <li>c. forming a local office or establishing a business presence in a particular country or region (including by sponsoring Serco);</li> <li>d. promoting the company's products, services or technologies;</li> <li>e. interacting with government officials (including in connection with obtaining permits, licenses or approvals) on Serco's behalf.</li> </ol> </li> </ol>



Term	Definition
<b>Child labour</b>	Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work
<b>Young worker</b>	An individual above the legal minimum age but under the age of 18
<b>Ethics</b>	The term ethics refers to Business ethics meaning the application of ethical values, such as integrity, fairness, respect and openness, to business behaviour. Business ethics is about how an organisation does its business and how individuals carry out their roles
<b>Force</b>	Force is defined as an action, or the perception of action taken to limit or control the movement or freedom of an individual. Force is also action applied against an object to search or gain entry of a property
<b>Reasonable force</b>	Reasonable force is the minimum amount of force, and no more, necessary to achieve legislative outcomes and/or ensure the safety of all individuals and property. The use of force is considered to be reasonable if it is objectively justifiable and proportionate to the risk faced
<b>Excessive force</b>	Excessive force is force beyond that which is reasonably necessary in the circumstances

Term	Definition
<b>Human Rights</b>	Human Rights are the equal and inalienable rights and freedoms that belong to every person in the world in recognition of their inherent dignity. They include, for example, the right to life, the right to respect for private and family life and freedom of thought, religion and expression
<b>Human Rights Risks</b>	Human rights risks are any risks where Serco's operations and business relationships may lead to adverse human rights impacts. This should be understood as being separate from any risk that Serco's involvement in adverse human rights impacts may pose to its business, although the two are related, and might include significant adverse media attention, NGO interest and transactional advocacy, creating knock on risks to Serco's reputation, operations, shareholder and investor relations and litigation
<b>Adverse Human Rights Impacts (AHRI)</b>	Adverse human rights impacts occur when an action removes or reduces the ability of an individual to enjoy his or her human rights.  Note: such actions constitute Human Rights abuses. Serco's involvement in Adverse Human Rights Impacts can occur where Serco causes adverse impacts through its own operations and activities or contributes to adverse impacts both directly, that is, through its own operations and activities, or indirectly, through or with another entity. Where Serco doesn't cause or contribute to Adverse Human Rights Impacts it might still be directly linked to those impacts by an entity with which it has a business relationship

Term	Definition
<b>Involuntary Servitude</b>	Includes a condition of servitude induced by means of (1) any scheme, plan or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or (2) the abuse or threatened abuse of the legal process. This might include Debt Bondage, Forced Labour or Slavery
<b>Debt Bondage</b>	The status or condition of a debtor arising from a pledge by the debtor of his/her personal services or of those of a person under his/her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined
<b>Forced Labour</b>	Knowingly providing or obtaining the labour or services of a person (1) by threats of serious harm to, or physical restraint against, that person or another person; (2) by means of any scheme, plan or pattern intended to cause the person to believe that, if the person did not perform such labour or services, that person or another person would suffer serious harm or physical restraint; or (3) by means of the abuse or threatened abuse of law or the legal process
<b>Slavery</b>	The state or condition of being a slave; a civil relationship whereby one person has absolute power over another and controls his life, liberty, and fortune; the subjection of a person to another person, especially in being forced into work; the condition of being subject to some influence or habit; work done in harsh conditions for low pay

Term	Definition
<b>Human trafficking</b>	Means (1) Sex Trafficking in which a Commercial Sex Act is induced by force, fraud or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (2) the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to Involuntary Servitude, peonage, Debt Bondage, or slavery
<b>Sex Trafficking</b>	The recruitment, harbouring, transportation, provision or obtaining of a person for the purpose of a Commercial Sex Act
<b>Commercial Sex Act</b>	Any sex act for which anything of value is given to or received by any person
<b>Torture</b>	An act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as: obtaining from that person or a third person information or a confession; punishing that person for an act he/she or a third person has committed or is suspected of having committed; intimidating or coercing that person or a third person; or any reason based on discrimination of any kind
<b>Cruel, inhuman or degrading (CID) treatment or punishment</b>	Cruel, inhuman or degrading (CID) treatment or punishment is a "lesser" form or act of torture and refers to: <ul style="list-style-type: none"> <li>any harsh or neglectful treatment that could damage a detainee's physical or mental health</li> <li>any punishment intended to cause physical or mental pain or suffering, or to humiliate or degrade the person concerned</li> </ul>

Term	Definition
<b>Prohibited Weapons</b>	<p>Different countries will have different lists of prohibited weapons. They are typically viewed as weapons which are a risk to public safety. Individuals cannot possess a prohibited weapon without an exemption. Exemptions are issued for specific purposes only and conditions apply for each weapon.</p> <p>Examples of weapons which are typically included on prohibited weapons lists include:</p> <ul style="list-style-type: none"> <li>• side-handled baton;</li> <li>• extendable or telescopic baton;</li> <li>• any hand-held defence or anti-personnel device that is designed to administer an electric shock on contact;</li> <li>• a Taser gun or other similar anti-personnel conducted energy device;</li> <li>• any device designed or intended as a defence or anti-personnel spray and that is capable of discharging by any means any irritant matter comprising or containing specified substances</li> </ul>

## 7 Further information and support

If you require any further information or support regarding this Group Standard, or if you have any suggestions for improvement, please contact the Accountable Policy Owner (Group) or email [sms@serco.com](mailto:sms@serco.com)