

Pilgrims Human Rights Policy

1. Introduction

PILGRIMS is committed to upholding and promoting human rights within our operations and throughout our supply chains. We recognise that respecting and protecting human rights is fundamental to our business practices and the well-being of our employees, stakeholders, and communities. 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.

PILGRIMS 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 Organisation 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 PILGRIMS staff, its facilities and our operations and services, wherever we operate. PILGRIMS 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. PILGRIMS Commitment

PILGRIMS 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.

PILGRIMS recognises that Human Rights are:

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

4. Policy

4.1. Human Rights Impact Assessment

PILGRIMS 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 level and respects human rights and pays particular attention to the key principles of:

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

4.2. Commitment to Diversity

PILGRIMS 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, national or social origin, religion or belief, age, disability, sexual orientation, pregnancy or maternity, marriage or civil partnership, gender reassignment, 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 behaviour, 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 and Healthy Workplace

PILGRIMS 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 UK 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

PILGRIMS compensates employees competitively relative to the industry and local labour market in the UK. We operate in full compliance with applicable wage, work hours, overtime and benefits laws and will always pay a National Living Wage.

4.5. Workplace Security

PILGRIMS is committed to maintaining a workplace that prohibits threats of violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. We maintain a zero-tolerance policy towards and take appropriate measures to prevent, investigate, and address any reported incidents promptly and effectively. 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

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

4.8. Freedom of Association and Collective Bargaining

PILGRIMS respects our employees' right to join, form or not to join a workplace union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised 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. Freedom of Movement

PILGRIMS uphold the freedom of movement for our employees, both within the workplace and outside. We do not restrict workers' movements unreasonably and ensure that any restrictions imposed are lawful, necessary, and proportionate to protect legitimate business interests.

4.10. Community and Stakeholder Awareness

PILGRIMS recognises 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 nationalisation and local employment where appropriate.

4.11. Maternity Protection

PILGRIMS does not discriminate against women who are pregnant. Our Human Resources policy is in line with UK Labour Law.

4.12. Inter-action with Government Security Forces

PILGRIMS 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.

4.13. Use of Force

PILGRIMS 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 PILGRIMS disciplinary process. Any use of lethal force by Government agencies working with PILGRIMS must be documented and reported to the PILGRIMS Managing Director for investigation.

4.14. Child Labour

PILGRIMS 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 or supply chains through contractual requirements, audit and observations in the case of our clients. We undertake robust due diligence measures to identify and address any risks related to child labour.

4.15. Forced Labour and Human Trafficking

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

4.16. Access to Remedy, Compensation, and Justice for Victims of Modern Slavery

We are committed to providing access to remedy, compensation, and justice for victims of modern slavery, including forced labour and human trafficking. We have established procedures for reporting and addressing any concerns related to modern slavery, and we support victims in their journey towards recovery and justice.

4.17. Prohibition of Compulsory Overtime

PILGRIMS respect the well-being of our employees and prohibit the imposition of compulsory overtime. We adhere to legal requirements regarding working hours and ensure that employees' right to rest, work-life balance, and health and safety are safeguarded.

4.18. Prohibition of Worker-Paid Recruitment Fees

PILGRIMS are committed to ensuring that our employees are not subjected to worker-paid recruitment fees. We work with our suppliers and recruitment agencies to eliminate any practices that could lead to workers incurring such fees, as they can lead to debt bondage and other forms of exploitation.

4.19. Prohibition of Confiscation of Workers' Original Identification Documents

PILGRIMS do not confiscate or retain workers' original identification documents, such as passports or work permits, as a condition of employment. We ensure that employees have control over their personal identification documents and have access to them whenever required by law or personal need.

4.20. Whistle-Blowing

PILGRIMS operates a Whistle-blowing policy for grievances and observations of potentially illegal or unethical behaviour.

PILGRIMS operates a Whistle blowing policy for grievances and observations of potentially illegal or unethical behaviour. Any breach of Human Rights can and should be reported through this medium where an individual does not wish to report it 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.

4.21. Right to Freely Terminate Employment

PILGRIMS respect the rights of workers to freely terminate their employment without fear of reprisal or undue obstacles. We ensure that employees have the freedom to resign or end their employment contracts in accordance with applicable laws and regulations.

4.22. 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 PILGRIMS whistle-blowing scheme. All complaints of non-compliance will be investigated by a member of the executive management.

4.23. 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.

We are dedicated to implementing and continually improving our human rights practices. Our employees, suppliers, and stakeholders are encouraged to uphold these principles, and we provide appropriate training, communication, and resources to promote awareness and understanding of our Human Rights Policy.

This Human Rights Policy is regularly reviewed to ensure its alignment with evolving international standards and best practices. We welcome feedback and collaboration with our employees, stakeholders, and partners to strengthen our commitment to human rights.