



Anti-Modern Slavery Policy

Doc#: SAM-POL 18	Revision: 00	Issue No: 01	Issue date: 31-12-2024	Page 1 of 4
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1 Introduction

SAM 58 is committed to upholding the highest ethical standards and ensuring the protection of human rights in all its operations. We recognize the abhorrent nature of modern slavery and human trafficking and are dedicated to preventing and eradicating these crimes from our activities and supply chains. This Anti-Modern Slavery Policy outlines our commitment to combating modern slavery, human trafficking, and related exploitative practices.

(ILO) Declaration on Fundamental Principles and Rights at Work; more specifically these:

- 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)
- The International Labor Organization Declaration on Fundamental Rights at Work (1998)
- Modern Slavery Act (2015)

As a commercial provider of protective security services, SAM 58 recognizes that the rights to life and security of person, the right to own property and the right to freedom of movement are the kernels upon which these services must be designed and delivered.

2 Policy Statement

SAM 58 is resolutely against all forms of modern slavery, including forced labor, human trafficking, debt bondage, and other exploitative practices. We strive to ensure that all individuals, whether employees, contractors, suppliers, or any other stakeholders, are treated with dignity, respect, and fairness.

SAM 58 is a member with the International Code of Conduct for Private Security Providers (ICOCA) and an active member of the ICOC Association (ICOC-A) and its oversight mechanism. SAM 58 recognizes the Montreux Document and its statements related to private security companies' responsibilities to

respect human rights. The Company is to comply with all applicable regulations and laws emanating from the Contracting States, Territorial States and Home States, as they relate to SAM 58's services.

SAM 58 has long recognized and supported the Voluntary Principles on Security and Human Rights, as they relate to the extractive industry, and has applied them in the delivery of its services in support of its clients' operations. SAM 58's commitment to respecting human rights is embedded in its Integrated Management System the Statement of Conformance (Chapter 2) and its Business Ethics (Annex D to Chapter 1).

3 Scope

This policy applies to all employees, contractors, suppliers, and individuals associated with SAM 58. It encompasses all our operations, projects, and business relationships.

4 Objective and Intent

SAM 58 is unwavering in its commitment to combatting modern slavery and human trafficking in all its forms. Our Anti-Modern Slavery Policy is designed with a clear objective: to ensure that our business operations and supply chains remain free from any involvement in such abhorrent practices. With a commitment to ethical sourcing, employee welfare, and responsible business conduct, we aim to identify and mitigate the risks associated with modern slavery. Through robust due diligence, continuous monitoring, and collaboration with stakeholders, we strive to eradicate any instances of modern slavery within our sphere of influence. This policy serves as a testament to our dedication to upholding human rights, fostering a work environment that values dignity and integrity, and contributing to the global effort to eradicate modern slavery.

5 Policy Principles

5.1. Prevention

SAM 58 is committed to taking proactive measures to prevent modern slavery in all aspects of our operations. This includes assessing and mitigating risks within our supply chains and operations that may lead to modern slavery.

5.2. Compliance

SAM 58 is dedicated to adhering to all applicable laws and regulations related to modern slavery, human trafficking, and labor rights in Iraq. We will work to ensure that all our operations are in full compliance with these laws.

5.3. Reporting Violations

Any employee or stakeholder who suspects or witnesses a violation of this policy, including incidents or indicators of modern slavery, is obligated to report it promptly to their supervisor, manager, or through our established reporting channels as outlined in our Human Rights Policy:

Internal: SAM 58 is to communicate to all persons working on its behalf, its commitment to respect human rights. This is achieved through documents (policies and procedures), briefings, notices, and recurrent training of personnel. The training of personnel is to include their responsibilities to report any human rights risk and impacts that they perceive to have been created by SAM 58's activities. Furthermore, SAM 58 has an established Whistleblower Policy which enables anyone employed by the Company to report human rights impacts without fear of retribution.

External: SAM 58 will communicate its commitment to respecting human rights to external stakeholders, including clients, subcontractors, and suppliers. SAM 58 is to conduct effective and recurrent communications with such external stakeholders to understand their perceptions, values, needs and interests. Such understanding will confirm whether there are any human rights impacts which must be considered by the Company within its 'Recognize' stage of this process. If any such impacts are 'Recognized', further communications will have to take place concerning the 'Respond' and 'Improve'. Records of all such communications are to be maintained.

Furthermore, all employees have a responsibility to report to line managers any known, or having reasonable suspicion of, the commission of any of the of the following international crimes:

- a. War crimes,
- b. Crimes against humanity,
- c. Genocide,
- d. Torture,
- e. Enforced disappearance,
- f. Forced or compulsory labor,
- g. Hostage-taking,
- h. Sexual or gender-based violence,
- i. Sexual exploitation and abuse,



j. Human trafficking,

k. Trafficking of weapons or drugs,

l. Child labor, or

m. Extrajudicial, summary, or arbitrary executions.

Managers made aware of reports of any of the international crimes, listed above, should report them to a member of the Human Rights Committee.

5.4. Non-Retaliation

SAM 58 strictly prohibits retaliation against anyone reporting violations of this policy in good faith. We will protect whistleblowers and ensure their confidentiality in line with our Human Rights Policy.

5.5. Investigation and Remediation

Upon receiving a report, SAM 58 will initiate a thorough investigation, taking appropriate action based on the findings. If violations are confirmed, we will take prompt corrective measures, which may include collaboration with law enforcement agencies and affected stakeholders.

5.6. Supplier Due Diligence

We expect our suppliers to share our commitment to combatting modern slavery. Our procurement processes include evaluating supplier compliance with anti-modern slavery principles. Non-compliance may lead to contract termination or corrective action plans.

5.7. Training and Awareness

We will provide ongoing training and awareness programs for our employees, contractors, and stakeholders to ensure a thorough understanding of modern slavery risks, indicators, and reporting mechanisms.

6 Review and Continuous Improvement

This Anti-Modern Slavery Policy will be reviewed regularly to ensure its relevance and effectiveness. SAM 58 is dedicated to continuous improvement in preventing modern slavery within our operations and supply chains.



7 Conclusion

SAM 58 stands united against modern slavery and human trafficking. We are committed to driving positive change and maintaining the highest standards of integrity, ethics, and human rights. This Anti-Modern Slavery Policy reinforces our dedication to eradicating these crimes from our operations and supply chains in Iraq. To ensure compliance with international standards, the version on the company website must be replaced with version changes are made to this document.



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