

Human Rights Policy

Reviewed: 20/01/2020

Our Commitment

Wilson Security is firmly committed to the international principles that underpin human rights, particularly in the areas of Employment, Industrial Relations, Anti-Corruption and Environment.

Our Human Rights Policy explains what we mean by that commitment and aims to provide clear expectations for everyone who works for us and with us.

- In developing this policy, we have taken into consideration Human Rights principles described in:
 - The United Nations Declaration of Human Rights;
 - The United Nations Guiding Principles on Business and Human Rights, founded on the UN's 'Protect, Respect and Remedy' framework;
 - The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, as these conventions are underpinned by the four United Nations Global Compact Labour Principles; and
 - The OECD Guidelines for Multinational Enterprises.

Guiding Principles

At Wilson Security we recognise that every person has the right to live a life free from fear, harassment and discrimination and is entitled to enjoy a universal set of Human Rights. In line with founding principles enshrined within the UN Declaration of Human Rights we aim to respect every individual's Human Rights, including in the following areas:

- Protection of all internationally proclaimed Human Rights including the right to life and dignity.
- Right to liberty and security of person
- Right to the enjoyment of physical and mental health
- Right to privacy
- Right to freedom of thought, conscience and religion
- Right to freedom of opinion and expression
- Right to participate in cultural life
- Right to freedom from discrimination and harassment (including sexual harassment and abuse)
- Right to work (including training and education)
- Right to just and favourable working conditions
- Right to freedom from forced or compulsory labour and the worst forms of child labour (as outlined in the Australian *Modern Slavery Act 2018*)
- Right to freedom of movement
- Right to freedom of association & collective bargaining
- Right to rest and leisure
- Freedom from torture and other cruel, inhuman or degrading treatment or punishment



Objectives

We aim to develop our business and our people management practices based on these internationally recognised Human Rights principles.

Therefore, while our Human Rights Policy describes our commitment and approach, it is through many of the policies and processes across our business operations that we ensure human rights principles are upheld, particularly through our human resource and occupational health and safety policies. Appendix A refers to the main policies that underpin our approach to Human Rights

Through implementation of this Policy we aim to:

1. Develop, review and continuously improve our approach to protecting the Human Rights of our employees, contractors, customers, and workers in our extended supply chain;
2. Monitor our practices, policies and procedures to ensure we do not cause Human Rights impacts either internally or externally, knowingly or unknowingly and responding rapidly when we do;
3. Take all reasonable steps to ensure we do not support or associate with businesses, customers, suppliers or contractors that do not share our commitments outlined under this policy;
4. Ensure we are legally compliant with relevant local, national and international laws protecting recognised Human Rights;
5. Guard against corruption in all its forms including extortion, bribery and tax fraud;
6. Provide a healthy and safe work environment for our employees and contractors including the development of robust management systems to regulate, control and develop safe work practices;
7. Support the right for every employee, contractor and workers in our extended supply chain to freedom of association, collective bargaining and constructive negotiations;
8. Ensure there are no forms of compulsory or forced labour or the worst forms of child labour in our operations, business partnerships or extended supply chains;
9. Maintain a zero tolerance for harassment and discrimination at any phase of the recruitment cycle including recruitment and selection, promotion and transfer, day-to-day management, performance and remuneration reviews, training and development opportunities;
10. Promote gender equity, diversity and inclusion within Wilson Security;
11. Encourage open and honest dialogue on Human Rights with our stakeholders and particularly those in the communities in which we operate and all vulnerable groups; and
12. Transparently disclose our approach to Human Rights including our policies and processes

How we work

At Wilson Security, we believe that for a Human Rights policy to be effective, the way we work and the culture we create must have Human Rights principles at the heart. Therefore, we have adopted a 3-step approach for how Wilson Security incorporates Human Rights into our business practices:

1. By setting and communicating expectations through our policies and training;
2. By providing a respectful and considerate workplace; and
3. Encouraging a culture of reporting and transparency, and act promptly to remedy any adverse Human Rights impacts.



Maintaining a Human Rights Focus

We recognise that organisational structures, processes and requirements evolve over time due to innovation, market pressures and business growth. Wilson Security understands that it is important to monitor, correct and improve our policies and practices to ensure they remain relevant. Our Human Rights approach is no different. We recognise that upholding Human Rights throughout our own operations, business partnerships and supply chain requires a formal, consistent and risk-based approach to identify, manage and mitigate actual and potential Human Rights impacts.

We maintain our ongoing commitment to Human Rights through the development of measures and reporting mechanisms to assess Human Rights issues, inform the development of relevant training, and integrate the results into our policies and internal systems.

We will act to escalate Human Rights impact if and as they arise.

Accountabilities

The following table describes our accountability framework, which has been developed collaboratively to ensure our Human Rights commitment remains a guiding force at Wilson Security:

Human Rights Accountability		
<p>Wilson Security CEO</p> <p>Approves the Wilson Security Human Rights Policy and any future revisions to the Policy. The CEO also appoints a member of the Executive to act as lead sponsor(s) for the implementation of Human Rights initiatives and monitoring.</p>	<p>Lead Human Rights Sponsor</p> <p>Appointed by the CEO, the role of the Lead is to help steer the policy throughout the business. They are also responsible for matters such as training and reporting needs in this area.</p>	<p>All Wilson Security People:</p> <p>All employees, from our casual staff to our managers and contractors are expected to work within the spirit and intent of our Values and to abide by our Code of Conduct to ensure a tolerant and thoughtful workplace.</p> <p>All employees and contractors also have a responsibility toward each other to report any Human Rights issues or concerns.</p>
Human Rights Steering Committee		
<p>The Sponsor leads the formation and maintenance of a cross-functional Human Rights Steering Committee. The Steering Committee focuses on identifying any areas of priority for the business, planning for the introduction of any changes and communicating the Human Rights Policy and initiatives across the organisation.</p> <p>Where new or revised initiatives need to be implemented, the Steering Committee may select people to form working groups to assist in developing new systems while also capturing important in-house knowledge. They may also consult or call on external expertise from time to time.</p> <p>The Steering Committee will meet at least twice a year and may act to review Human Rights performance measures to ensure effective remediation and to inform continuous improvement.</p>		
Human Resources		
<p>The Human Resources team will work to support the Sponsor and the Human Rights Steering Committee by managing training and development strategies and implementing policies relating to the employment relationship to ensure Human Rights principles are maintained, in practice, throughout all major stages of the employment cycle.</p>		



Reporting: Internal

We encourage employees and contractors to report any circumstance or action that violates, or appears to violate, our Human Rights Policy. Even if unsure, it is best to speak to someone immediately to raise your questions or concerns. There is no formal reporting hierarchy because we do not want to discourage reporting with unnecessary complexity.

If you wish to raise a Human Rights issue, or a potential issue or concern, you are encouraged to report it to any of the following people:

- Your manager
- Any senior manager of Wilson Security you feel comfortable with
- Any member of the Human Resources Team.

You can speak to any of these people directly, face-to-face or by phone, or you may email them if you prefer.

Reporting: External

A key component of the Wilson Security Human Rights Policy is the confidential reporting framework established to allow external parties (contractors, suppliers, customers and members of the public) to provide information, make a complaint or seek assistance in relation to action that violate or appear to violate our Human Rights Policy.

To report an issue to Wilson Security the following secure link should be used

<https://wnet.wilsonsecurity.com.au/my-workspace/consumer-feedback.jsp>

All suspected occurrences of improper conduct will be taken seriously and thoroughly investigated in line with our Wilson Group Speak Up Policy. All complaints or concerns raised will be treated in confidence to the maximum extent possible. If the informant advises that he/she does not wish to reveal his/her identity, Wilson will not disclose the identity of the informant without consent unless it is absolutely necessary in order to investigate serious allegations (or it is required by law). Our Consumer Feedback Handling process outlines the persons to whom the allegations (as opposed to the identity of the informant) are to be reported to and how the complaint will be handled.

Document review

This policy has the total commitment of the Senior Leadership Team and has been developed in consultation with the Wilson Security Human Rights Steering Committee. This Policy will be reviewed at least every 2 years to ensure it remains appropriate and effective.

Nick Frangoulis
CEO Wilson Security Pty Ltd
Date: 20/01/2020

Chris Goodall
CSO Wilson Security Pty Ltd
Date: 20/01/2020



Appendix A

- Wilson Group Code of Conduct
- Wilson Group Speak Up Policy
- Wilson Group Discrimination, Harassment & Bullying Policy
- Wilson Group Grievance Policy & Procedural Guidelines
- Wilson Group Fraud, Bribery & Corruption Policy
- Wilson Security Competition & Consumer Law Compliance Policy
- Wilson Security Consumer Feedback Handling Policy
- Wilson Group Privacy Policy
- Wilson Security Environment Policy
- Wilson Group Reconciliation Action Plan