

01 MAR 2025

Red Castle – Human Rights Statement

Introduction

At Red Castle, our commitment to human rights is unwavering and integral to our core values and business practices. This Statement, aligned with our Human Rights Policy, reaffirms our dedication to upholding the highest international human rights standards in every aspect of our operations and across our global network. We recognise our responsibility not only to comply with international law but to proactively promote respect, dignity, and accountability in all contexts where we operate.

Our Commitments

1. **Respect for International Standards**

We uphold the principles of the **United Nations Universal Declaration of Human Rights**, the **International Labour Organization (ILO) Core Conventions**, the **UN Guiding Principles on Business and Human Rights**, and the **International Code of Conduct Association (ICoCA)**. These standards guide our decisions, shape our risk assessments, and set clear expectations for all personnel, partners, and subcontractors.

2. **Non-Discrimination and Equal Opportunity**

We are committed to providing equal opportunities to all, regardless of race, gender, religion, age, disability, sexual orientation, or other protected status. Discrimination, harassment, and abuse of authority are not tolerated. We foster workplaces built on dignity and mutual respect, backed by training and confidential reporting mechanisms.

3. **Freedom of Association and Collective Bargaining**

We respect the right of all employees to join organisations of their choosing, to collectively bargain, and to engage in dialogue with management. Where these rights are restricted by law, we seek alternative means of ensuring workers' voices are heard.

4. **Prohibition of Forced Labour, Modern Slavery, and Human Trafficking**

We strictly prohibit forced labour, bonded labour, and all forms of human trafficking. Recruitment is conducted transparently without charging workers any fees, and employees are always free to leave upon providing agreed notice. Any suspected cases of trafficking are reported to the authorities and addressed immediately.

5. **Prevention of Child Labour**

We enforce a zero-tolerance approach to child labour. Minimum age standards are aligned with ILO Conventions 138 and 182. Age verification processes are in place to ensure no one under legal working age is employed or subcontracted in our operations.

6. **Health and Safety**

We are committed to protecting the health, safety, and wellbeing of all personnel, clients, and communities. Our health and safety management system is **ISO 45001 certified**, supported by training, incident reporting, and continuous monitoring to ensure safe and sustainable operations in all environments.

7. **Fair Wages and Working Conditions**

We ensure wages meet or exceed legal minimums and reflect fair compensation for work performed. Working hours, overtime, and rest periods comply with international standards and national law. Wage deductions are strictly regulated, and employees are never penalised with unlawful or coercive deductions.

8. Privacy and Data Protection

We respect the right to privacy and ensure all personal and client data is handled in compliance with applicable laws, including **GDPR**. Access to sensitive data is restricted, and confidentiality is strictly maintained to protect employees, clients, and communities.

9. Prevention of Sexual Exploitation, Abuse, and Gender-Based Violence (SEA/GBV)

We have a zero-tolerance policy on SEA and GBV. This includes a prohibition on engaging in or benefiting from commercial sex, irrespective of local legislation. Our survivor-centred approach ensures confidentiality, respect, and access to medical, psychosocial, and legal support for survivors. Regular training, monitoring, and enforcement mechanisms are in place for all personnel.

10. Community Engagement and Environmental Stewardship

We recognise our responsibility to operate in a way that supports and respects local communities and environments. We engage with stakeholders transparently, address grievances through accessible mechanisms, and promote sustainability by minimising environmental impact.

11. Indigenous Peoples' Rights

We respect the rights, cultures, and traditions of indigenous peoples. We engage with communities in good faith, seeking consent and participation where our operations may impact their rights or resources.

Implementation and Accountability

- **Training and Awareness** – Regular training ensures all personnel understand their rights and responsibilities under this Statement.
- **Grievance Mechanisms** – Confidential reporting systems are available to employees, communities, and stakeholders. Complaints are investigated promptly and impartially.
- **Monitoring and Review** – We regularly review our practices, publish updates where appropriate, and engage with independent oversight (e.g. ICoCA).
- **Leadership Responsibility** – Senior management is accountable for implementation, supported by the **Training and Compliance Department**.

Conclusion

By endorsing this Human Rights Statement, Red Castle demonstrates its unwavering commitment to protecting and advancing human rights. We recognise that our responsibility extends beyond compliance and requires active promotion of ethical, safe, and transparent practices in all areas where we operate.

Yours Faithfully,

Alex Breingan

Managing Director, Red Castle



Red Castle – Human Rights & ICoCA Policy

1. Purpose

The Red Castle Human Rights & ICoCA Policy expresses our commitment to respecting, protecting, and promoting human rights and International Humanitarian Law (IHL) in all business operations. It provides clear guidance to our employees, contractors, partners, and stakeholders.

We recognise our responsibility to uphold human rights as outlined in international standards, including:

- The United Nations Universal Declaration of Human Rights
- The International Labour Organization (ILO) Core Conventions
- The United Nations Guiding Principles on Business and Human Rights

As an **Affiliate of the International Code of Conduct Association (ICoCA)**, Red Castle is committed to implementing and aligning its operations with the International Code of Conduct for Private Security Providers (ICoC). This includes adherence to IHL where operations take place in conflict-affected or fragile environments.

2. Scope

This Policy applies to all aspects of Red Castle's operations. It covers employees, contractors, partners, suppliers, and other stakeholders.

At present, Red Castle does not engage subcontractors. However, this Policy defines the standards that would apply should subcontractors be engaged in the future.

3. Commitments

Non-Discrimination and Equal Opportunity

Red Castle is committed to a workplace and operational environment that is **free from discrimination, harassment, or exclusion of any kind**. This includes protection from discrimination based on race, ethnicity, nationality, religion, gender, sexual orientation, disability, age, political opinion, marital status, social origin, or any other status recognised under international human rights law.

We guarantee **equal opportunity in recruitment, promotion, training, and professional development**. Our hiring and employment practices are transparent, merit-based, and designed to prevent bias. No decision regarding employment or advancement will be influenced by personal characteristics unrelated to professional performance.

In addition, Red Castle actively promotes **diversity, equity, and inclusion initiatives** across its operations. We encourage respect for different perspectives and backgrounds, and we believe that diverse teams contribute to stronger decision-making, innovation, and operational effectiveness.

All managers have a duty to promote non-discrimination in their teams, and all personnel are required to treat colleagues, clients, and stakeholders with dignity and respect. Discrimination or harassment

will be investigated promptly and may result in disciplinary measures, including termination of employment or contracts.

Freedom of Association and Collective Bargaining

Red Castle fully recognises and upholds the right of all employees and contractors to **freely join or form trade unions, staff councils, or workers' associations** of their choosing, in line with international labour standards and national legislation.

We respect the right of workers to **bargain collectively** through their chosen representatives. No employee will ever be discriminated against, disadvantaged, or retaliated against for exercising these rights.

Where representative bodies exist, Red Castle is committed to **engaging openly and in good faith** with them, ensuring that employee voices are heard in matters affecting working conditions, wages, and workplace rights.

In contexts where unions or staff councils are not present, Red Castle will ensure that employees still have **safe and confidential channels** to raise concerns and influence decisions that affect their rights and wellbeing.

Managers have a responsibility to foster an environment where freedom of association is respected, and where collaboration between management and workers is constructive and solution-oriented. Any attempt to restrict or interfere with these rights is strictly prohibited and subject to disciplinary action.

Forced Labour and Modern Slavery

Red Castle has a **zero-tolerance policy** towards all forms of forced or compulsory labour. This includes, but is not limited to, bonded labour, debt bondage, indentured labour, and all practices that compel an individual to work against their free will. No individual shall ever be coerced into employment through threats, penalties, withholding of identity documents, restriction of movement, or any form of manipulation.

To prevent and guard against these risks, Red Castle ensures that:

- **No recruitment fees or related costs** are ever charged to candidates. Expenses for medical checks, training, equipment, travel, or visa processing are borne solely by the company.
- **All employees are provided with clear written contracts** in a language they understand before commencing work. These contracts clearly set out their role, wages, working hours, benefits, and rights.
- **Freedom of movement** is respected. Employees retain control of their personal documents at all times, and no restrictions are placed on their ability to leave employment upon reasonable notice.
- **Recruitment and employment practices** are regularly reviewed to ensure compliance with international anti-slavery standards and national labour laws.
- **Managers and supervisors** are trained to recognise potential indicators of forced labour and are responsible for reporting and preventing any practice that may place workers at risk.

- **Supply chain partners** are required to uphold the same standards. Any evidence of forced labour within our supply chain will result in immediate corrective action, contract suspension, or termination.

Red Castle also works proactively to raise awareness among employees and partners about their rights, and we encourage reporting of any suspected incident of forced labour through our confidential grievance channels. All reports are investigated promptly, fairly, and transparently, and corrective measures are taken without delay.

Human Trafficking

Red Castle maintains a **zero-tolerance policy** toward human trafficking in all its forms. This includes, but is not limited to, forced labour, debt bondage, exploitation in recruitment, and trafficking of vulnerable persons such as women, children, and migrants.

To safeguard against trafficking risks, Red Castle ensures that:

- **Recruitment practices** are transparent, ethical, and fully compliant with international standards. No recruitment fees or hidden costs are charged to workers at any stage.
- **Personnel are trained** to remain vigilant for indicators of trafficking, such as restriction of movement, confiscation of identity documents, withholding of wages, or signs of coercion.
- **All employees, contractors, and partners** are obligated to report any concerns or suspicions of trafficking immediately through Red Castle's confidential reporting mechanisms.
- **Suspected cases are escalated without delay** to competent national authorities and handled in line with company procedures and ICoCA commitments.
- **Subcontractors, suppliers, and partners** are required to adhere strictly to anti-trafficking standards. Any non-compliance will result in corrective action, suspension, or termination of contracts.
- **Victim support and referral pathways** are established. Where trafficking survivors are identified, Red Castle will ensure immediate safety, medical care, psychosocial support, and referrals to specialised agencies.

Our approach is proactive and preventive. Red Castle carries out regular **risk assessments in high-risk environments** and includes anti-trafficking safeguards in contracts and supply chain due diligence.

Child Labour

Red Castle maintains a **strict prohibition on child labour** in all operations and supply chains. We will not employ anyone under the minimum working age as defined by national law, or under 18 years of age for hazardous or security-related roles—whichever standard is higher.

To enforce this commitment, Red Castle ensures:

- **Verification of age** during recruitment through reliable documentation (e.g., passports, birth certificates, or other government-issued IDs).
- **No hazardous roles for minors:** under no circumstances will anyone under 18 be placed in work that poses a threat to their health, safety, or moral development.

- **Monitoring of subcontractors and suppliers** to ensure compliance with international child labour standards, including the ILO Minimum Age Convention (C138) and Worst Forms of Child Labour Convention (C182).
- **Immediate corrective action:** any confirmed instance of child labour within Red Castle or its supply chain will result in immediate termination of employment or contractual relationships, and referral to appropriate child protection authorities.
- **Supportive remediation measures:** if a child is found in employment, Red Castle will prioritise the welfare of the child by working with partners, NGOs, or government bodies to facilitate safe withdrawal, access to education, and appropriate support services.
- **Training and awareness** for managers and supervisors to detect and prevent risks of child labour across operations and supply chains.

Red Castle also engages proactively with local communities to raise awareness of child rights and to discourage harmful practices that put children at risk of exploitation.

Prevention of Sexual Exploitation and Abuse (PSEA) and Gender-Based Violence (GBV)

Red Castle enforces a **zero-tolerance approach** to SEA and GBV in all contexts. This prohibition applies to all personnel, including employees, contractors, subcontractors, and partners.

Our commitments include:

- Embedding safeguards against SEA/GBV in all operations.
- Providing mandatory training to all personnel on recognising, preventing, and reporting SEA/GBV.
- Establishing **confidential reporting channels**, including direct access to the Training and Compliance Manager.
- Investigating all allegations promptly and fairly.
- Enforcing disciplinary action, including dismissal or termination of contracts, and referral to relevant authorities.
- Prohibiting procurement of commercial sex, irrespective of local laws, recognising the risks of exploitation.

We adopt a **survivor-centred approach**:

1. Survivors' rights, needs, and wishes are prioritised.
2. Privacy and confidentiality are always protected.
3. Survivors are kept informed of investigation progress.
4. Survivors may provide input into how their case is managed.

Red Castle actively works to identify local and international support mechanisms, including medical, psychosocial, social, and legal services. Where services are not available, we commit to facilitating access through our own resources and partners.

Health and Safety

The health, safety, and wellbeing of employees, contractors, and partners is a top priority for Red Castle. We recognise that our operations often take place in challenging and high-risk environments, and therefore we uphold the highest international safety standards.

Red Castle's health and safety management system is audited and certified against **ISO 45001**, ensuring compliance with international best practice.

To protect our people, we commit to:

- **Preventive Risk Management:** conducting proactive risk assessments in all operating environments, including conflict-affected and fragile areas. Risks are regularly reviewed and updated in line with changes in the operating context.
- **Protective Equipment and Training:** providing personnel with appropriate protective equipment, safe transport, and regular training tailored to their roles and the environments in which they work.
- **Emergency Preparedness:** maintaining clear evacuation procedures, medical contingency plans, and crisis response protocols, regularly tested through drills and scenario-based exercises.
- **Monitoring Wellbeing:** supporting not only physical but also psychological health, including measures to mitigate stress, trauma, and fatigue that can arise in complex environments. Access to counselling or peer support is facilitated where needed.
- **Incident Reporting and Investigation:** all health and safety incidents, near misses, and unsafe conditions are reported through confidential channels, investigated transparently, and used to drive continual improvement.
- **Worker Involvement:** employees are encouraged to raise concerns and participate in health and safety initiatives without fear of reprisal. Engagement with staff feedback is considered essential for risk management.
- **Continuous Improvement:** Red Castle reviews its safety management system regularly, incorporating lessons learned from incidents, audits, and international best practice.

Our approach to health and safety is not only about compliance but about creating a culture of care, accountability, and resilience. By prioritising the wellbeing of our people, we ensure they can perform their duties effectively and responsibly while protecting human dignity.

Fair Wages and Working Conditions

Red Castle is committed to ensuring that all personnel are employed under conditions that respect their dignity, health, and wellbeing. We align our practices with both national labour law and international labour standards, including the ILO Core Conventions.

Our commitments include:

- **Fair and Transparent Pay:** all personnel receive wages that meet or exceed the minimum required by law and are consistent with international fair wage principles. Pay is delivered on time, in full, and without unlawful or unjust deductions.
- **Written Contracts:** every employee is provided with a clear written contract, in a language they understand, outlining their terms of employment, pay, benefits, working hours, rest periods, and termination procedures.
- **Freedom of Employment:** employees are free to terminate their employment at any time without penalty, subject only to the agreed contractual notice period. No practices that restrict freedom of movement or employment are tolerated.
- **No Recruitment Fees:** under no circumstances are recruitment fees or related costs (e.g., travel, training, medical checks, or visas) charged to employees. All such costs are borne entirely by Red Castle.
- **Working Hours and Rest:** working hours are managed in accordance with international best practice. Employees are guaranteed regular rest breaks, weekly rest periods, and paid leave in line with national law. Overtime, where required, is voluntary, limited, and compensated at fair rates.

- **Safe Working Conditions:** working environments are designed to protect health and dignity, and staff have access to protective equipment, training, and welfare facilities.
- **Non-Retaliation:** no employee shall face retaliation for raising concerns about wages, working hours, or working conditions. Red Castle maintains confidential grievance channels to address such matters fairly and transparently.

By embedding these commitments into our employment practices, Red Castle ensures that working conditions foster not only compliance but also respect for human dignity, equality, and long-term wellbeing.

Privacy and Data Protection

Red Castle is committed to respecting the right to privacy and protecting personal data for all employees, contractors, clients, and stakeholders. We recognise that safeguarding information is a core human right and an essential element of trust in our operations.

To uphold this principle, Red Castle ensures:

- **Lawful and fair processing:** personal information is collected, stored, and processed only for legitimate business purposes and in strict compliance with applicable laws, including the EU General Data Protection Regulation (GDPR) where relevant.
- **Data minimisation:** only the data necessary for operational, contractual, or compliance purposes is collected, avoiding unnecessary intrusion.
- **Security and confidentiality:** all personal records are securely maintained with appropriate technical and organisational safeguards, including encryption, restricted access, and secure storage systems.
- **Access control:** only authorised personnel with a legitimate business need may access sensitive data, and such access is logged and monitored.
- **Transparency and rights of individuals:** employees and stakeholders are informed about how their data is used, and they retain the right to access, correct, or request deletion of their personal information, in line with applicable law.
- **Third-party compliance:** all subcontractors, partners, and service providers handling data on behalf of Red Castle must adhere to the same standards of data protection and confidentiality.
- **Breach response:** in the event of a suspected or confirmed data breach, Red Castle will act immediately to contain the incident, inform affected parties as required, and take corrective measures to prevent recurrence.
- **Training and awareness:** all personnel are trained to handle data responsibly and are reminded regularly of their duty to uphold confidentiality.

Red Castle views privacy not only as a compliance requirement but as a fundamental part of respecting human dignity and building trust with our employees, partners, and clients.

Harassment and Abuse of Authority

Red Castle enforces a **zero-tolerance policy** on all forms of workplace harassment, bullying, discrimination, or abuse of authority. This applies to employees, contractors, subcontractors, and partners across all operations.

Harassment is defined broadly and includes, but is not limited to:

- Verbal, physical, or written abuse or intimidation;
- Sexual harassment or unwelcome conduct of a sexual nature;
- Abuse of power or authority for personal gain;
- Discriminatory behaviour on the basis of race, gender, religion, political belief, disability, or any other protected status.

All personnel are required to **treat colleagues and stakeholders with dignity and respect**. Any incidents of harassment or abuse must be reported immediately through Red Castle's **confidential grievance channels**. Reports will be investigated promptly, impartially, and with strict measures to protect privacy and prevent retaliation.

Where harassment is confirmed, **corrective or disciplinary actions** will be enforced, up to and including dismissal or contract termination. Questions on workplace harassment and abuse are also included in personnel exit interviews to support continuous monitoring and learning.

Indigenous Peoples' Rights

Red Castle recognises and respects the inherent rights of indigenous peoples in all areas where we operate. This includes their rights to land, resources, cultural heritage, and self-determination as outlined in the **UN Declaration on the Rights of Indigenous Peoples**.

We commit to:

- Engaging in **free, prior, and informed consultation** with indigenous communities before any activity that may affect their rights, land, or resources;
- Avoiding activities that would displace or disadvantage indigenous peoples;
- Respecting and protecting sacred sites, cultural property, and traditional knowledge;
- Ensuring indigenous peoples have **equal access to employment opportunities**, fair wages, and safe working conditions when engaged by Red Castle;
- Collaborating with indigenous leaders and representatives to resolve grievances fairly and respectfully.

Community Engagement and Environmental Stewardship

Red Castle recognises that its operations have impacts on local communities and the environment. We are committed to **constructive, transparent, and respectful engagement** with affected stakeholders.

This includes:

- Proactively consulting with local communities to understand concerns, expectations, and potential impacts of our operations;
- Establishing clear channels for community members to raise grievances, with guaranteed confidentiality and non-retaliation;
- Supporting local capacity building by partnering with community organisations, where possible;
- Minimising environmental impact by adhering to international standards on waste management, emissions, and resource use;

- Promoting sustainability through initiatives such as local sourcing, energy efficiency, and reduced carbon footprint;
- Monitoring community and environmental impacts regularly and adapting our practices to ensure long-term resilience.

4. Principles and Guidelines

- **Compliance with Laws & ICoC:** All operations comply with national and international law, human rights, and ICoC.
- **Due Diligence & Risk Assessment:** Regular human rights impact assessments are conducted.
- **Managerial Responsibility:** Managers are accountable for promoting human rights within their teams.
- **Supply Chain Standards:** All partners and suppliers must align with Red Castle's human rights commitments.
- **Stakeholder Engagement:** We engage openly with employees, communities, and clients.

5. Grievance Mechanisms

Red Castle maintains accessible, confidential grievance channels, open to employees, contractors, and external stakeholders.

Features include:

- Anonymous reporting permitted.
- Indicative timelines for handling complaints.
- Escalation to higher management or authorities where needed.
- Protection against retaliation.
- Clear process for appeals and remedies consistent with human rights.
- Recording of all allegations, findings, and outcomes.

6. Reporting and Accountability

All personnel are required to report suspected violations, including human trafficking, SEA/GBV, harassment, or breaches of IHL.

Violations will result in disciplinary action, including suspension, termination, or referral to authorities.

7. Training and Awareness

- Induction training for all new staff.
- Regular refresher courses (at least annually).
- Scenario-based exercises.
- Training records including attendance, content, and outcomes.

8. Monitoring and Continuous Improvement

Red Castle reviews this Policy annually. Adjustments are made in line with:

- Evolving ICoCA standards.
- Legal developments.
- Lessons learned from incident reports or grievances.
- Industry best practice.

9. Conclusion

By adopting this Human Rights & ICoCA Policy, Red Castle demonstrates its commitment to upholding the highest standards of human rights and IHL across all operations.

As an **Affiliate of ICoCA**, we commit to aligning with the Code, increasing transparency, and continuously strengthening our practices.

We will work collaboratively with employees, contractors, partners, clients, and communities to ensure that human rights are respected, protected, and advanced wherever we operate.

where we operate.

Yours Faithfully,

Alex Breingan
Managing Director,

