ULTIMATE SECURITY LIMITED

HUMAN RIGHTS POLICY

SOP: 0010 | ISSUE 02

PREPARED BY:	**HEAD OF HUMAN RESOURCE**	**APPROVED BY:**	**GENERAL MANAGER**
SIGNATURE:		**SIGNATURE:**	
DATE:	19/11/2026	**DATE:**	19th/11/2026

ULTIMATE SECURITY LIMITED
P.O. BOX 21544, KAMPALA (U)

PROCEDURE:	**HUMAN RIGHTS POLICY**
NUMBER:	**SOP: 0010**
ISSUE:	**02**
EFFECTIVE DATE:	**01 JANUARY 2027**
REVISION:	**01 JANUARY 2028**
DISTRIBUTION:	**Public**
CONTROL:	**HEAD OF HUMAN RESOURCE**

ULTIMATE SECURITY HUMAN RIGHTS POLICY

1. Purpose

This policy sets out the commitment of Ultimate Security (U) Limited (USL) to respect human rights in all its operations and business relationships, and how USL meets that commitment.

2. Scope

This policy applies to all USL directors, managers, employees and trainees, and to contractors, subcontractors, suppliers and any other person acting on behalf of USL, at all USL offices, client sites and wherever USL business is conducted.

3. Standards

USL respects internationally recognised human rights and complies with the laws of Uganda. This policy is based on:

- the Constitution of the Republic of Uganda, 1995 and applicable laws, including the Employment Act, the Occupational Safety and Health Act, the Prevention and Prohibition of Torture Act, the Data Protection and Privacy Act and the Police (Control of Private Security Organisations) Regulations, 2013;
- the Universal Declaration of Human Rights and the International Labour Organization core conventions;
- the UN Guiding Principles on Business and Human Rights;
- the International Code of Conduct for Private Security Service Providers (ICoC);
- the Voluntary Principles on Security and Human Rights; and
- the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.

4. Our commitments

USL is committed to the dignity and worth of every person. In particular, USL:

1. **Respects the right to life, liberty, security and dignity** of all persons, including employees, clients, visitors, suspects and communities.
2. **Prohibits torture and cruel, inhuman or degrading treatment** in all circumstances, including at times of conflict, emergency or client pressure.

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3. **Uses force only as a last resort**, when necessary and proportionate, in accordance with the Use of Force and Firearms Procedure (OPS 016). Firearms are used only to protect life.
4. **Apprehends but does not detain or interrogate.** Suspects are handed to police without delay in accordance with the Apprehension, Hand-over and Search Procedure (OPS 040).
5. **Provides fair working conditions:** written contracts, lawful working hours with a weekly rest day, overtime paid at the rates set by the Employment Act, timely payment of wages, lawful deductions only, leave and social security.
6. **Prohibits forced labour, child labour, human trafficking and slavery.** No fees or deposits are charged to recruits or employees, and identity documents are never retained.
7. **Does not tolerate sexual harassment, sexual exploitation, gender-based violence, discrimination or harassment** on grounds of sex, race, ethnicity, nationality, religion, political affiliation, disability, HIV status, pregnancy or social status, in accordance with the Sexual Harassment, Sexual Exploitation and Gender-Based Violence Policy (HR 008).
8. **Respects freedom of association and collective bargaining**, including the right of employees to join a trade union of their choice without retaliation.
9. **Provides a safe and healthy workplace** in accordance with the Health and Safety Policy (HR 007).
10. **Protects privacy and personal data** collected through CCTV, access control, alarm monitoring, vehicle tracking and personnel records, in accordance with the Data Protection and Privacy Policy (ICT 001).
11. **Respects the rights of communities** around the sites it protects, and does not take part in forced evictions or the unlawful restriction of access to land, water or livelihoods.
12. **Provides access to remedy** through a grievance mechanism open to employees, clients, members of the public and communities.

5. Human rights due diligence

USL identifies, prevents, mitigates and accounts for its human rights impacts through a Human Rights Impact Assessment (HRIA), which is reviewed quarterly by management and the Board and updated before USL enters a new service line, region or high-risk site, and after any serious

human rights incident. Before deployment at construction, extractive, land-related or other high-risk sites, USL carries out a security and human rights risk assessment in line with the Voluntary Principles on Security and Human Rights.

6. Business relationships

- Client contracts include human rights clauses covering the use of force, apprehension, working conditions, facilities at posts and data protection.
- USL does not accept assignments or instructions that would require its personnel to act contrary to this policy.
- Suppliers and subcontractors must comply with the USL Supplier Code of Conduct. Serious or repeated breaches lead to termination of the contract.
- Where USL works alongside police or other public security forces, it encourages respect for human rights and records and reports any abuse it observes.

7. Roles and responsibilities

Role	Responsibility
Board of Directors	Approves this policy, receives a quarterly human rights report and reviews the HRIA quarterly.
General Manager	Ensures this policy is integrated into all operations and adequately resourced; chairs the ESHS Steering Committee.
Human Rights and Compliance Officer	Coordinates human rights due diligence, the HRIA and the grievance mechanism; monitors implementation; reports monthly to the General Manager.
Head of Human Resource	Owns this policy; ensures fair recruitment, working conditions, training and the handling of employee grievances.
Head of Operations	Ensures operations comply with OPS 016, OPS 040 and OPS 001; reviews all use of force and apprehension incidents.
Supervisors and inspectors	Brief personnel on this policy, monitor conduct at posts and report incidents and concerns.
All personnel	Comply with this policy and report any actual or suspected breach.

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8. Training and communication

All personnel receive training on this policy during basic training and annual refresher training. The policy is published on the USL website, displayed at USL offices, shared with clients, suppliers and subcontractors, and explained to personnel in English and local languages.

9. Grievances and remedy

Any person may raise a concern or complaint about USL conduct through the channels set out in the Grievance and Complaints Procedure (HR 009), including the publicly available telephone line and email address, the official complaints channel for guards, and female focal persons for sexual harassment complaints. Complaints may be made anonymously. USL investigates every complaint, provides or cooperates in appropriate remedy, and does not tolerate any retaliation against a person who raises a concern in good faith.

10. Monitoring and reporting

- Monthly: progress on the HRIA action plan, incidents and grievances are reported to the General Manager.
- Quarterly: a human rights report is presented to the Board, together with the review of the HRIA.
- Annually: USL publishes a summary of its human rights performance and reports to clients and, on membership, to the International Code of Conduct Association.

11. Breaches

Breaches of this policy are investigated and lead to disciplinary action, which may include dismissal, termination of contracts with suppliers and subcontractors, and referral to police where an offence may have been committed.

12. Review

This policy is reviewed annually, or earlier when required by changes in law, operations or the findings of the HRIA.

13. Related documents

- Use of Force and Firearms Procedure, OPS 016
- Apprehension, Hand-over and Search Procedure, OPS 040
- Incident Handling Procedure, OPS 001

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- Recruitment and Selection Policy, HR 003
- Salaries, Allowance and Other Benefits Policy, HR 005
- Health and Safety Policy, HR 007
- Sexual Harassment, Sexual Exploitation and Gender-Based Violence Policy, HR 008
- Grievance and Complaints Procedure, HR 009
- Data Protection and Privacy Policy, ICT 001
- Human Rights Impact Assessment

14. Revision history

Issue	Date	Changes
01	01 July 2024	First issue, authorised by the General Manager
02	01 January 2027	Approved by the Board and made public; added the UN Guiding Principles and Voluntary Principles; expanded commitments on working conditions, fair recruitment, sexual harassment, privacy and communities; added human rights due diligence, business relationships, roles, training, grievances, monitoring and review