



**MARITIME AND UNDERWATER SECURITY CONSULTANTS LIMITED  
(MUSC)**

**QHSE MANAGEMENT SYSTEM  
HUMAN RIGHTS FRAMEWORK  
DOCUMENT NO: MUSC-QHSE-P20  
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## 1 Purpose

MUSC is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities. The purpose of this procedure is:

- to identify the types of behaviour prohibited by MUSC's Human Rights policy
- to provide procedures to follow when complaints of discrimination or harassment made by partners or employees of MUSC arise and to ensure that all partners and employees of MUSC are aware that harassment and discrimination are unacceptable practices incompatible with our company standards, and a violation of the law.
- to ensure that all partners and employees of MUSC recognize that under the United Nations Guiding Principles on Business and Human Rights, MUSC has a corporate responsibility to respect Human Rights, avoid infringing upon Human Rights and address Human Rights issues, whilst seeking to prevent or mitigate adverse human rights impacts that our operations may have.
- To establish a framework for identifying, mitigating against and remediating human rights infringements.
- To identify what MUSC as an organization can do to promote equality and diversity within a Human Rights Framework.

## 2 Scope

This procedure applies to all MUSC activities.

## 3 Responsibilities

**Management Representative** is responsible to establish this document.

**Managing Director** is responsible to review this document.

**CEO** is responsible to approve this document for implementation.

**ALL EMPLOYEES of MUSC** including vessel crew are responsible to implement this system in their respective work areas.

## 4 References

1. United Nations Guiding Principles on Business and Human Rights
2. The Ten Principles of the United Nations Global Compact
3. International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
4. Universal Declaration of Human Rights
5. Transparency in Supply Chains etc. A practical guide
6. UNICEF Strategy to Prevent and Respond to Sexual Exploitation, Abuse and Sexual-Harassment
7. NTER-AGENCY STANDING COMMITTEE Policy Statement: Gender Equality in Humanitarian Action

## 5 Prohibited Conduct

MUSC upholds and supports the right to equal treatment without discrimination or harassment. Discrimination and harassment are prohibited.

MUSC prohibits discrimination or harassment on the basis of the following grounds, and any combination of these grounds:

- Age
- Creed (includes religion)
- Sex (including pregnancy and breastfeeding)
- Gender Identity and Gender Expression
- Sexual Orientation
- Family status (such as a parent-child relationship)
- Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- Disability (including mental, physical, developmental or learning disabilities)
- Race
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Colour
- Association or relationship with a person identified by one of the above grounds
- Perception that one of the above grounds applies.

Anyone at MUSC found to have engaged in conduct constituting Code-based discrimination and/or harassment may be subject to disciplinary action, up to and including termination.

MUSC Employees and Contractors must refrain from sexual activity with any person under the age of 18, regardless of the local age of consent, i.e. the local or national laws of the country in which the employee works. Ignorance or mistaken belief of the child's age is not a defense. Failure to report such a relationship may lead to disciplinary action.

MUSC Employees and Contractors will not exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition against exchange of money for sex means MUSC Employees and Contractors may not engage the services of sex workers while on MUSC business, including on MUSC premises or accommodation, or while travelling to/from or attending workshops, meetings and trainings, regardless of the local or national law concerning sex work or prostitution in the country.

## 6 Reporting Workplace Harassment

This section outlines reporting workplace harassment for Human Rights Code-Based Discrimination and/or Harassment. MUSC encourages the reporting of all incidents of harassment and discrimination, regardless of who the alleged offender(s) might be. This includes all incidents of sexual harassment and abuse.

All employees have a right to freedom from reprisals or threat of reprisals for refusing to accept harassment in any form, for making a formal complaint or cooperating in an investigation.

How to Report Workplace Harassment:

- Partners or employees can report incidents or complaints of Code-based discrimination and/or harassment verbally or in writing.
- The report of the allegation(s) should include the following information:
  - a) Name(s) of the person who has allegedly experienced Code-based discrimination and/or harassment and contact information

- b) Name of (any) alleged harasser(s), position and contact information (if known)
- c) Names of the witness(es) (if any) or other person(s) with relevant information to provide and contact information (if known)
- d) Details of what happened including date(s), frequency and location(s) of the alleged incident(s)
- e) Any supporting documents the person who complains of Code-based discrimination and/or harassment may have in his/her possession that are relevant to the complaint.
- f) List any documents a witness or another person may have in their possession that are relevant to the complaint.

#### Who to Report Workplace Harassment To:

- An incident or a complaint of workplace harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.
- Complainants are encouraged to report any incidents or complaints of Code-based discrimination and/or harassment to the Operations Manager or Project Manager.
- If the Operations Manager or Project Manager is the person engaging in the discrimination/harassment, contact the Managing Director.
- The Operations Manager or Project Manager shall be notified of the workplace harassment incident or complaint so that they can ensure an investigation is conducted that is appropriate in the circumstances. The HR Manager or Project Manager will be responsible for investigating the specific complaint promptly.

## 7 Reporting Policy Violations

We strive to create workplaces in which open and honest communications among all employees are valued and respected. MUSC is committed to comply with applicable labour and employment laws wherever we operate. The Company also ensures employees are aware of the Human Rights Policy through training. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to report a potential violation of this policy, should raise those questions and concerns with Project Manager or the Operations Manager or as per the confidential Whistleblowing procedure.

## 8 Whistleblowing

If employees have witnessed or been affected in any way with regards to ethics, code of conduct sexual harassment, exploitation or abuse, and human rights then they should have the ability to report findings confidentially.

Currently MUSC operates designated contact person procedures where staff and temporary employees are encouraged to contact this person in the event and are assured of anonymity. Contact details are to be included in each department's employee handbook.

The Designated Person will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

Employees should be reminded that if allegations result in court proceedings then the whistleblower may have to give evidence in open court if the case is to be successful.

As the Company grows, however, consideration should be given to creating online portals that offer complete anonymity for whistleblowing so that the whistleblower can gain further confidence that their identity is protected, and that third parties and external stakeholders can also have this facility open to them.

## 9 Investigating Complaints

- MUSC will ensure that an investigation appropriate in the circumstances is conducted when the Operations Manager or Project Manager receives a complaint of workplace harassment.
- Complaints or incidents of workplace harassment will be investigated in a fair, respectful and timely manner.
- The Operations Manager or Project Manager will determine who will conduct the investigation into the incident or complaint of workplace harassment. Depending on the allegations and the people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.
- The investigation must be completed in a timely manner, generally within 90 days or less, unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.
- After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by MUSC.
- Confidentiality Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by law.

## 10 Human Rights Due Diligence

### 10.1 Assessing our Human Rights Impacts

- A Human Rights Baseline Study (HRBS) is to be undertaken prior to expanding our business into any new market or country.
- It may be required to be undertaken prior to a new project; however this will be decided on a case-by-case basis.
- Conflict-affected countries will require a detailed assessment and may require subsequent assessments due to the potential for human rights risks to change over time.
- The HRBS should identify the areas where MUSC's operations have the potential to infringe upon the human rights of anyone connected with the project or service area, be it MUSC's employees, contractors, subcontractors, stakeholders, or people in the local community.

### 10.2 Integration of Findings

- The results of the HRBS is to be acted upon with the findings integrated into MUSC's procedures.
- Company training should be reviewed to include the findings to promote awareness within the Company.
- Job Descriptions should be updated to account for the findings of the HRBS with relevant work packages developed to mitigate against potential human rights infringements.

### 10.3 Tracking Responses to Impacts

- If required, a Human Rights performance indicator should be developed to track potential infringements and to monitor mitigation measures.

- Feedback from Employees, Clients, Local Communities and other affected stakeholders should be gathered at stipulated regular intervals.

#### 10.4 Remediating Human Rights Impacts

- If it is found that MUSC has caused or contributed to negative human rights impact, we are to actively engage in remediation through legitimate mechanisms.
- The remediation will depend on the infringement; however this should be at an operational-level with the affected individual or communities actively engaged with access to the remedy. Local issues should be addressed at the local level.

### 11 Training & Awareness

The contents of this procedure should be relayed to full time staff by documented training session at least once per year.

Employee handbooks in individual departments should contain additional information about how Human Rights and the contents of this procedure effect the circumstances of the specific department and should be communicated to all full time employees and temporary contractors associated with that service line.

Additional awareness campaigns can be considered on a project-by project basis. Projects that involve any or all the following should be given strong consideration:

- Projects that involve extensive involvement with third parties such as local communities or embedding into another organization.
- Projects that involve working in post-conflict and/or poverty-stricken countries
- Projects that involve large numbers of temporary contractors

### 12 Gender Mainstreaming

Gender mainstreaming (GM) is the approach to policy-making that considers both women's and men's interests and concerns. Within the context of MUSC as an organization that means integrating a gender perspective into the design and implementation of our business services. Specifically, this can take the form of considering both men and women in:

- Recruitment
- The design of processes, systems and projects
- The provision of facilities and equipment.
- Emergency and Contingency planning

As per MUSC's policies, our employment practices and procedures are to be reviewed to ensure gender mainstreaming.

#### 12.1 Training and Awareness

MUSC staff involved with the above processes are to be given training / awareness sessions in the following to be able to apply Gender Mainstreaming in their work areas:

- Definition of GM and what it requires.
- Goals of GM.
- How to implement GM within the context of our organization.

Departments should tailor the training and awareness of staff to the specifics of the department. For example: employees working within MUSC's Explosive Threat Mitigation service lines should be encouraged to take the Gender and Diversity in Mine Action Online Training Course programmed by the Geneva International Centre for Humanitarian Demining.



## 12.2 Recruitment

Gender neutral language is to be used in job advertisements and job descriptions so to not discourage one gender from not applying.

Where there is competition for a particular role, consideration should be made to make recruitment decisions on a scorecard basis to generate role-appropriate questions and to limit the potential for bias.

In a panel-interview scenario, both men and women should be represented in the recruiting panel, where possible.

As the organization grows, realistic gender balance goals should be put in place in regard to recruitment.

Gender recruitment data is to be collected, where permissible, to measure gender balance and mainstreaming in the recruitment process.