

# ***DINANT***

***HUMAN RIGHTS POLICY***



## HUMAN RIGHTS POLICY

### INTRODUCTION

This policy establishes the commitment of Dinant Corporation with the respect and promotion of human rights applied throughout the Region, in harmony with its employees, providers and communities in the areas of influence. The policy must be met following the guidelines established by the Presidency, in accordance with international standards and best practices for security and protection of human rights as stated in the UN Declaration of Human Rights.

#### I. Objective:

Establish guidelines and controls to operate in a manner consistent with international standards and best for security and protection of Human Rights.

#### II. Scope:

All employees of Dinant must know and contribute with the fulfillment of Human Rights Policy.

The observance of its implementation and diffusion is the responsibility of the area of Corporate Affairs and its enforcement is the responsibility of all employees.

#### III. Definitions:

**Human Rights:** Rights inherent to all human beings, without distinction of nationality, place of residence, sex, national or ethnic origin, color, religion, language, or other status.

**Voluntary Principles on Security and Human Rights (VPSHR):** Guide recommendations for risk analysis of the political, socioeconomic and security of operating in conflict zones, as well as the impacts of these operations on the dynamics of conflict and human rights situation.

**Public Security Forces:** Units of the State, such as military and the police force, who offer their services to ensure the safety of their citizens and their property.

#### IV. Commitment

Dinant Corporation is committed to operating in a manner consistent with international standards and best practices for security and protection of human rights as stated in the UN Declaration of Human Rights. Dinant respects the responsibility of the host nations where it operates to provide security and maintain law and order in the society. We work with the host nation public security forces in these countries to defend and promote human rights. In meeting these obligations, Dinant uses the Voluntary Principles for Security and Human Rights as the guidelines it will follow. In our efforts to implement the VPSHR, we begin at each site with a risk assessment that considers the following issues:

- Respect the national laws of the country where we are operating
- Examine the potential for violence in each location where we operate
- Explore and understand the root causes of conflict
- Consider the historical, political, environmental, social, cultural and law enforcement situations
- Bring in information from across the spectrum including government, local communities, civil society, other companies, local media and non-governmental organizations
- Assess the human rights records of public security forces (police and military), private security guard service companies and any other groups that might influence the security environment in order to properly analyze the security risks in the area of our operations
- Carefully analyze our own operations to understand any security issues that may arise from our own operations and their effects on the local communities

As part of our commitment to the VPSHR, we accept and embrace our obligation to consult with the stakeholders, especially the local communities around our operations. These consultations will be the forum for making Dinant Corporation policies clear, for soliciting information and concerns by stakeholders and for mutual dialogue. Security issues will be an important element in these consultations. The results of these consultations will be made public for those who did not attend.

As a part of our commitment to good corporate management, we will carefully screen our security employees to insure none are credibly accused of human rights violations or other serious crimes. This screening will also be required of our contract security providers. Consistent with host nation laws, we will ask public security forces to refrain from assigning individuals or units to our area of operations who have been accused of human rights abuses until these allegations have been investigated and any appropriate disciplinary action taken, if required.

Dinant will develop strict rules of the use of force, especially lethal force, for all security personnel operating at Dinant facilities and sites. We will consult with local public security forces to insure they also have rules for the use of force that emphasize using minimum, proportional force in accordance with the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.

Dinant will also consult with public security forces concerning the deployment and behavior of host nation public security forces. In any case where physical force is used, a weapon is discharged or an injury occurs, Dinant will conduct an internal investigation to determine the circumstances and the appropriate follow up action required. If disciplinary action or criminal charges are appropriate, Dinant will support the legal process to see justice done. Dinant will follow the same procedure if there is an allegation of human rights abuse by Dinant employees, contractors or public security forces connected to Dinant operations.

Dinant will be especially vigilant in monitoring any equipment or support material provided to public security forces or contract security guards to insure it is not misused, diverted or associated with a human rights abuse. We will track and periodically inventory all items of equipment as part of the monitoring procedure.

In the event an individual makes an allegation against our own security employees, or public security forces operating on our property or in support of our operations, Dinant will take special precautions to protect the identities of victims, witnesses and alleged perpetrators (until the case has been adjudicated). For witnesses and victims this policy is to protect them from possible retaliation. For the alleged perpetrator, it is to accord them due process of law.

## V. Diffusion

Dinant must publish the Human Rights Policy for its content to be known by stakeholders of the Corporation. Specific activities will be developed in the area of Corporate Affairs to ensure that employees are aware of and comply with the commitments defined in this Policy. Similarly, Dinant will promote providers, public security forces, security personnel and the communities in its area of influence to obtain training in the field of Human Rights.

### I. Noncompliance and communication

Dinant's stakeholders and employees are obliged to report any breach of Human Rights Policy, confidentially and without retribution. To do so, stakeholders and employees may contact the Ethics Committee through:

1. Hotlines throughout the Region for stakeholders:
  - a. Guatemala (502) 2502-7050
  - b. Honduras (504) 2239-8800
  - c. Nicaragua (505) 2251-4069
  - d. El Salvador (503) 2295-7275
  - e. Costa Rica (506) 2272-7587
  - f. Dominican Republica (809) 473-1212

Dinant will establish a Community Grievance Mechanism on every site.

2.Extension #38422 for employees.

3.Email: [etica@dinant.com](mailto:etica@dinant.com)

4.Suggestion Box located at strategic points on the premises of Dinant.

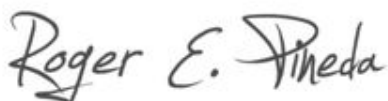
Policy Failure as any aspect related to human rights will be analyzed according to the internal and legal normative, and may result in disciplinary action if necessary.

## VII. Revision and updating

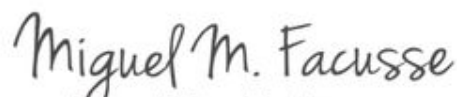
The President and/or Vice President must be responsible for approving the Human Rights Policy. Its content shall be reviewed regularly in accordance to the needs presented by the Corporate Affairs.

## VIII. Exceptions

Any exceptions to this policy must be authorized by the Director of Corporate Affairs and the President and/or Executive Vice President.



Roger Enrique Pineda Pinel  
Director de Relaciones Corporativas



Miguel Mauricio Facusse  
Vicepresidente Ejecutivo