



Human Rights Policy

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Northern Rangelands Trust

HUMAN RIGHTS POLICY

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NRT's mission is to build resilient community conservancies, that transform lives, secure peace and conserve natural resources.

Our value proposition is to support member community conservancies to be strong, independent, sustainable, well-governed and well-managed local institutions, with genuine community-led decision-making, widely understood and approved by the community at large, leading to strong community ownership.

Respect for human rights is an essential value for NRT. In our support for community conservancies, we recognize that all people are equal in dignity and rights. We are all equally entitled to our human rights and without discrimination.

POLICY OBJECTIVES

The objective of documenting NRT's Human Rights Policy is to provide an overview of expectations for employees, member conservancies and partners. Community Conservancy being separate and distinct entities shall develop their own human rights policies and grievance/complaints mechanisms to support this policy.

In addition, the Human Rights policy exists to:

1. Inform employees, business partners and customers of NRT's commitment to human rights.
2. Establish NRT's commitment to 'know and show' its respect for human rights through on-going human rights due diligence.
3. Maintain NRT's high ethical standards.
4. Contribute to the realization of human rights within and beyond communities impacted by NRT's operations.

OUR COMMITMENTS

1. NRT is committed to developing an organizational culture which implements a policy of respect for internationally and nationally recognized human rights and seeks to avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights (UNGPs).
2. We support the *United Nations Guiding Principles on Business and Human Rights* 'Protect, Respect, Remedy' framework.
3. We conduct our operations in a manner that respects the human rights of all people, complying with all legal requirements.
4. In meeting our responsibility to respect human rights, we strive to respect and promote relevant international human rights standards, including UN instruments establishing or elaborating on the rights of specific groups. We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: women; children, youth and people with disabilities.
5. We respect the human rights and values of people in communities that are impacted by our activities, and promote community led decision making.
6. We treat everyone who works for NRT fairly and without discrimination. Our employees will enjoy a conducive working environment where we ensure, inclusion in decision making, transparency and accountability, financial accountability, teamwork, equal opportunities for all including affirmative action, fair labour practices, equitable distribution of benefits.
7. We continuously evaluate our operations to identify, assess, and address salient human rights risks; engage key stakeholders; and prioritize key areas where we have the greatest opportunity to have a positive impact on communities we work with and employees.

AREAS OF FOCUS

We will meet our responsibility to respect human rights by implementing the UNGPs and incorporating these principles into the internal processes, policies or guidance that support our activities and operations, in our different areas of focus.

The below sections describe how we will deliver on these commitments in the areas of the human rights of communities and indigenous persons; security; equality and non-discrimination; and labour rights of the workforce.

Human rights of communities and indigenous persons

We respect the rights of communities and indigenous peoples (IPs) and, where they may be affected by our operations and project activities, our approach is consistent with the principles set out in international standards for consultation and engagement with indigenous persons, including the UN Declaration on the Rights of indigenous Peoples (UNDRIP). We manage the potential human rights impacts of our operations and activities carefully, working to enhance the benefits to communities, and to mitigate negative impacts. Listening and responding to community concerns is central to our approach.

To support this approach, we provide guidance to our employees, boards and employees of our member conservancies on engaging with local communities, maintaining continuous communication and feedback loops, and managing the process of receiving and responding to community complaints. This guidance requires that the following principles be consistently upheld.

Free, Prior and Informed Consent: We recognise that it is important that we identify and consult with communities and indigenous persons, applying the principles of free, prior and informed consent (FIPC) in a practical and consistent way. We do this prior to the commencement of projects or activities, and continuously throughout operations and projects. We do this through mutually agreed, transparent and culturally appropriate consultations and impact management processes, which include the convening of village level (zonal) meetings in member conservancies to identify priorities and agree on activities. NRT ensures participation in the meetings is representative of various group interests, such as elders, women, youths are engaged in our activities before any implementation. After consultations, decisions are made through traditional community-decision-making structures.

Reliance on community decision-making structures: NRT member community conservancies are led by the community decision making structures on activities it undertakes within the community

conservancies. These entail decisions by at least three quarter of the membership of the Community's General Assembly, which are pre-dated by the village level consultations that ensure members of the conservancy are consulted, and informed of activities being proposed.

Representation of community members within NRT: NRT also recruits its employees from the indigenous communities to ensure the organization understands and responds to the needs of the indigenous communities appropriately.

Security

NRT and the Community Conservancies use a human-centered approach to improving security in Northern Kenya. We invest in community policing to complement government agencies. We work closely with the National Police Service (NPS), The Kenya Wildlife Service (KWS), The Kenya Forest Service (KFS), to provide a community-led approach to reducing conflict.

We carefully assess security threats and risks to our operations and work with government and partners to mitigate negative consequences. NRT conservancy Scouts, including those who have National Police Reserve status, work in strict adherence to the Police Act, Wildlife Act 2013, and the Criminal Procedure Code. They address community concerns and protect their safety and security through the community policing initiative.

While recruiting and deploying Scouts in security and anti-poaching operations, we endeavor to draw from the respective communities in the member conservancies. NRT ensures that conservancy scouts are adequately trained and well equipped in knowledge, skills, and the necessary equipment to carry out anti-poaching operations. They do this by working with the communities and other stakeholders in conformity with the requisite laws of Kenya.

We undertake continuous risk and threat assessments, as part of our operations, which include assessment, mitigation and response to security incidents. These are incorporated into our core-security related processes. The risk and threat assessments we undertake include assessments of risks and threats to human rights, including community rights.

Equality and non-discrimination

As stated in our Code of Conduct, we offer equal opportunities to everyone. To achieve this, we adhere to the Constitutional requirement that all people are treated fairly, irrespective of their race, gender, ethnicity, age, physical ability, religion, sexual orientation, or other status. We have put in place the necessary measures and policies to guide our operations so that the rights of indigenous and marginalised communities, women, children and persons with disabilities are respected as we engage with the communities we work with.

Labour rights of our workforce

Respect for our employees' human rights is integral to our recruitment, management and diversity and inclusion processes. We provide guidance to managers and employees of respecting the rights of all members of our workforce, and consistently monitor our workplace environment to help identify and prevent potential discrimination or other human rights impacts.

Our human resources policies and standards help us establish fair labour practices and a positive work environment. We want to create and maintain a workplace that is free of harassment, intimidation, inhumane treatment and discrimination based on race, colour, national origin, religion, gender, age, sexual orientation, gender, marital status, disability, or any other characteristic protected by applicable laws.

We will take appropriate measures to communicate our human rights policy and our expectations concerning the responsibility to respect human rights, and to adequately address human rights complaints, incidents or impacts when they occur.

This will be achieved through provision of adequate resources for human rights related activities, annual trainings, projects aimed at promoting human rights, continuations engagement with staff on human rights issues, ensuring that staff are able to access multiple channels to make anonymous complaints relating to human rights, and including human rights considerations in social and environmental impact assessments. By doing this we aim to enable our operations to identify potential impacts on the rights of

individuals and local communities and workers affected by our activities. NRT shall also work with the relevant partners, communities and stakeholders where necessary to promote and enforce these rights and will include human rights clauses in its contracts and agreements.

HOW WE DELIVER ON OUR COMMITMENTS

NRT delivers on the commitments and values listed above through policy and code of conduct documents, human rights impact assessments, trainings and awareness-raising, cooperation and stakeholder initiatives, and grievance mechanisms and remediation. Each of these are described below.

Code of Conduct and policy documents

Our code of conduct includes human rights provisions. Human rights standards are also included in our Human Resource Policy Manual, Children and Vulnerable Adults safeguarding policy, Gender Diversity Policy, Policy on Harassment, Sexual Abuse and Abuse Policy and Procedure, and Whistleblowing Policy.

Our expectations of member conservancies and partners reinforce and support our commitment to respect human rights. Our contracts and MOUs with partners will include human rights provisions, incidence reporting, escalation channels and contract voidance as part of our due diligence process.

Contractors will also be provided with LPO's and LSO's that spell out expectations on human rights compliance.

Consistent with the UNGPs, in those instances where there is a conflict between a legal requirement and our policies, we seek to apply the higher standard while complying with all applicable laws.

Assessment of human rights impacts

We work to embed human rights into our projects and undertake independent assessments of potential adverse human rights impacts, as part of our due diligence process.

In identifying, assessing and addressing the human rights impacts of our operations and relationships, we will consult with those who may be affected, by ensuring public participation in human Rights Impact assessments commissioned before project implementation, as well as, environment and social impact assessments conducted as deemed appropriate.

Our staff and experts will engage with communities and other stakeholders as part of our assessment process to share information, consider suggestions and discuss possible ways to address their concerns. Engaging with communities is an important part of our approach to adhering to human rights and providing access to remedy.

By working with local communities, we are able to jointly identify solutions and opportunities, including through the assessment reports. We have community feedback mechanisms at our operations and projects to receive, track and respond to questions and complaints from community members. This enables us to capture and resolve concerns quickly in a transparent way, and to track our performance. Where the adverse human rights impacts that have occurred amount to criminal activities, we will follow due process by working closely with the relevant government agencies.

We will apply our human rights due diligence process to our contractors and partners, where our risk-based criteria warrants it.

Trainings and awareness-raising

We provide guidance and training to our staff and those of member conservancies on the practical implementation of this policy and human rights principles.

In the first year of this policy being adopted, an initial training of trainer (TOT) session, and one follow up session will be held with Staff on this Policy. The TOT will include training on how to train community conservancies on the use of this policy. Thereafter, the key staff trained will conduct annual training sessions with both the staff and the member conservancies.

Co-operation and multi-stakeholder initiatives

We will continue to take a constructive and progressive role in human rights-related multi-stakeholder initiatives and believe that multi-stakeholder efforts are an effective means of promoting reasonable standards for human rights practices at an operational level.

We will make sure that our written partnership documents and agreements with county and national governments, regulatory bodies and public authorities will include segments that outline our human rights commitments and expectations, in consistency with this policy.

Grievance mechanisms and remediation

We seek to make grievance mechanisms available to communities we serve and our workforce. We do not impede access to state-based judicial processes. A full description of these processes is included in the section below.

HOW WE PROVIDE ACCESS TO REMEDY

Where we have potentially caused or contributed to adverse impacts, we commit to providing and facilitating access to remedy through various remedy mechanisms, which include consulting the community on the best way to provide a remedy.

NRT does not require individuals or communities to permanently waive their legal right to bring a claim through a judicial process as a precondition of raising a grievance through an NRT grievance mechanism, nor will NRT obstruct national judicial processes.

Community Complaints Mechanisms

This section can only be filled once consultations with communities have been conducted to understand how they feel most comfortable making complaints.

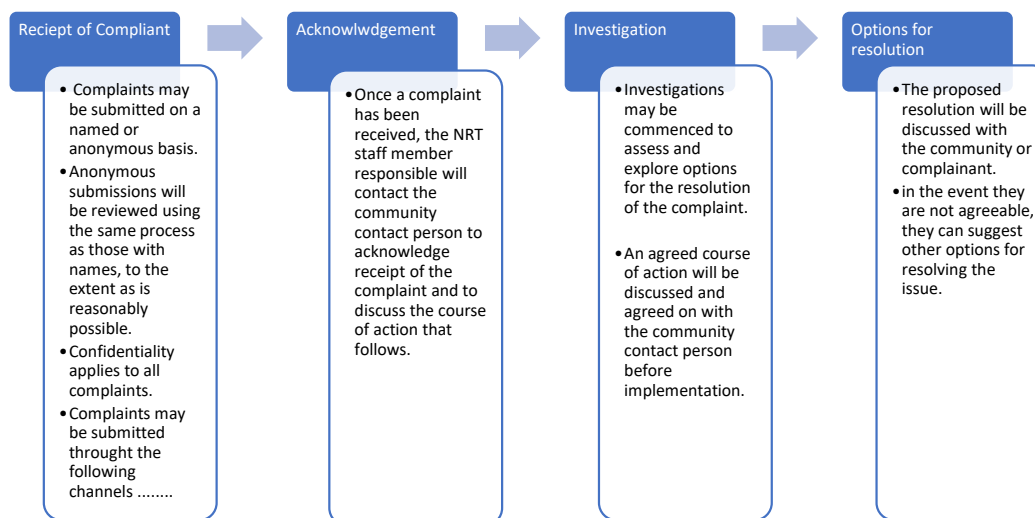
Access to remedy available to workers, contractors and partners

Our policies provide grievance mechanisms and access to remedy for our staff, contractors and partners, through the filing of formal complaints. These complaints may be submitted to the line manager or focal point for the worker, contractor or partner, or any member of the management team, verbally, by message or by email. NRT also provides confidential and anonymous communications channels that are supported by the Whistleblower Policy, are available to employees, contractors and partners.

In line with this policy and the requirements of our Code of Conduct, our grievance mechanisms require recording and reporting of grievances raised, including in relation to human rights, and actions taken to address them.

COMMUNITY COMPLAINTS PROCESS

This section should include a visual flow chart, such as the one below. The steps on the diagram below are suggestions only – this cannot be finalized until consultations have been had with the community.



MANAGEMENT AND RESPONSIBILITY FOR HUMAN RIGHTS IN NRT

Every employee at NRT has a responsibility for ensuring the respect and protection of human rights, and to bring to the attention of management any violations that they become aware of.

Our managers must be familiar with our Human Rights Policy, as well as the standards set by our Code of Conduct. They need to be able to demonstrate how they are actively preventing or responding to human rights risks and abuses, and how they are deliberately managing operations that respect people's human rights and contribute to their realization.

Ultimate responsibility for NRT's human rights performance lies with the COO who will actively ensure corporate accountability to this Policy and other policies that are related. The Board of Directors will approve the Policy and monitor its implementation through the Executive Committee.

Employees will be trained on this Policy during their onboarding/ orientation and will also participate in the yearly refresher trainings targeting all employees.

This policy will be reviewed one year of its adoption to ensure it is working effectively. After this, it may be determined that it will be reviewed either annually or every two years. Employees who are members of the SMT as well as staff in Human Resource, Legal, Security, Governance, Gender and Capacity Building departments will be involved in the review process. The Human Resources Lead will be responsible for scheduling the review meetings and process.

Failure to abide by this policy may be grounds for disciplinary action or dismissal.