

Promise #1: HUMAN RIGHTS

DEFINITION: Human rights are the basic rights to which all human beings are entitled.

STATEMENT OF INTENT: At Shearwater we acknowledge our responsibility to respect human rights norms and to make a positive contribution to the advancement of human rights where possible. Our approach is embedded in how we conduct business. We adhere to all relevant protections and legislation in the jurisdictions in which we operate. We also endeavour to align our business practices with the human rights principles outlined by the [“UN Guiding Principles on Business and Human Rights”](#) including:

- Avoid causing or contributing to adverse human rights impacts through our activities and address such impacts if they occur; and
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if we have not contributed to those impacts. Relevant business relationships include those with joint venture partners, suppliers, customers, contractors and host governments.

SCOPE: Our human rights commitments extend to the following areas:

1. Within our organisation;
2. Within our industry; and
3. Within our broader society.

1. HUMAN RIGHTS WITHIN OUR ORGANISATION

Shearwater is committed to respecting the human rights of all employees. We adhere to all relevant legal protections in the jurisdictions in which we operate.

Furthermore, we respect internationally recognised human rights as set out in the International Bill of Human Rights. Relevant sections for our organisation include:

• **Civil and Political Rights:**

- **FREEDOM OF OPINION AND EXPRESSION.** Shearwater does not aim to suppress anyone’s views or opinions. Our statement of values includes the principle: “Speak Freely and Respectfully”;

- **FREEDOM OF PEACEFUL ASSEMBLY AND OF ASSOCIATION.** Shearwater’s non-discrimination policies extend to “religious and political beliefs.” Freedom of association and the right to collectively bargain is supported;

- **DUE PROCESS.** Shearwater ensures access to due process and the right to a fair hearing before any internal disciplinary measure is taken. Any disciplinary measures

taken will be proportionate and subject to review. Shearwater has clear and well-established informal and formal disciplinary procedures. These are designed to give our employees a chance to correct their behaviour when possible. Employees are entitled to have a support person present during any meeting related to a formal disciplinary process. Employees are also able to access free, confidential counselling.

• **Economic, Social and Cultural Rights:**

- **EDUCATION.** Shearwater is proud to facilitate access to education and lifelong learning. We are committed to providing an environment where employees can continue to develop their skills. This is beneficial to employees as well as to the future success of Shearwater. Shearwater covers the cost of achieving and maintaining relevant accreditation/certification and professional qualifications where directly relevant to the employee’s role. We also run a scheme to help facilitate study leave.

2. HUMAN RIGHTS WITHIN OUR INDUSTRY

Our responsibilities do not end with our own operations. Shearwater is committed to encouraging the adoption of ethical business practices, human rights and labour

rights, across the cybersecurity industry. Our efforts specifically focus on:

- **Suppliers:**

Given our broad geographic spread, including the sourcing of labour from locations outside Australia, and an increasingly global supply chain, support for human rights and labour rights is imperative.

Just as we do not tolerate exploitative and inappropriate employment practices within our own organisation, we do not accept such practices by our suppliers. Compliance with labour rights, including child and forced labour provisions, as well as other employment issues, are reviewed during site visits to suppliers as part of standard supply chain interactions.

- **Partners:**

We aim to raise awareness and encourage a commitment to ethical business practices, including human rights and labour rights, through our partnerships.

Shearwater maintains a number of partnerships for mutual commercial benefit. Partnerships exist in the following areas:

- Vendor partners who provide products for sale through a channel arrangement;
- Distributor partners who distribute vendor products for sale through a channel arrangement; and
- Resellers of Shearwater products including Phriendly Phishing, KSec5 and various service offerings.

Shearwater seeks to raise awareness of the principles of ethical business practices, including human rights and labour rights, among our partners through the development of our Code of Ethical Conduct.

Suppliers and partners will be encouraged to sign up to our [Code of Ethical Conduct](#) as a sign of their commitment to the principles contained therein.

3. HUMAN RIGHTS WITHIN OUR BROADER SOCIETY

Shearwater is committed to extending human rights where possible in the broader society.

Our efforts focus on the under-representation of women and indigenous Australians in cybersecurity.

We have launched a number of initiatives to advance these concerns:

- **Katie Duczmal Memorial Scholarship:**

This scholarship is offered in memory of Katie Duczmal, a principal consultant in cybersecurity for Shearwater Solutions. The scholarship aims to support female students who have an interest in a career in cybersecurity and who are in their final year of study.

Valued at \$10,000, the scholarship will reimburse the student for their tuition fees in their final year of study and Shearwater will offer the student a paid internship during that year to give them work experience and mentoring in the field of Information Security.

- **Yerra Traineeship:**

Yerra, a Canberra-based ICT business, seeks to encourage indigenous participation in the ICT industry. Shearwater and Yerra have signed an agreement to establish a pathway for indigenous Australians to enter the cybersecurity industry.

Yerra will identify suitable indigenous trainees, while Shearwater will recommend appropriate educational programs. Shearwater will also provide additional on the job training opportunities, helping participants develop technical and consulting skills.