



Human Rights Policy

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Preamble

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil ("CILC" or "the Association") is an Argentine non-profit civil association engaged in research, monitoring, training, and institutional cooperation for integrity and the prevention of corruption in public procurement. The Association affirms its commitment to respect internationally recognized human rights throughout all of its activities and business relationships. This commitment applies to every director, manager, employee, contractor, subcontractor, supplier, agent, and business partner acting on behalf of, or in connection with, the Association.

This Policy is informed by the **Universal Declaration of Human Rights**, the **International Covenant on Civil and Political Rights**, the **International Covenant on Economic, Social and Cultural Rights**, the **ILO Declaration on Fundamental Principles and Rights at Work**, the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**, the **OECD Guidelines for Multinational Enterprises**, and applicable Argentine law, including the National Constitution, the Ley de Contrato de Trabajo No. 20.744, and anti-discrimination legislation (Ley No. 23.592). Where standards differ, the Association applies the more protective standard to the extent permitted by law.

The Association recognizes that, as a civil association, its most significant human rights responsibilities arise in the workplace, in its research and institutional activities, in its supply chain, and in the communities where it operates. This Policy establishes binding expectations in each of these areas.

I. Core Commitments

- **No forced or compulsory labor.** The Association prohibits all forms of forced, bonded, indentured, or involuntary labor, human trafficking, and modern slavery in its operations and supply chain. Workers shall never be required to surrender identity documents or pay recruitment fees as a condition of employment.
- **No child labor.** The Association does not employ persons below the minimum legal working age and prohibits the engagement of minors in hazardous work, in accordance with Argentine law and ILO Conventions Nos. 138 and 182.
- **Non-discrimination and equal opportunity.** Employment decisions, including hiring, remuneration, training, promotion, discipline, and termination, shall be based on qualifications, performance, and legitimate business criteria, and never on race, color, sex, gender identity, sexual orientation, age, religion, political opinion, national or social origin, nationality, migration status, disability, union membership, family status, or any other protected characteristic.
- **No harassment or abuse.** The Association prohibits physical, verbal, sexual, and psychological harassment, intimidation, and abuse in the workplace and in all activities of the Association, whether committed by managers, colleagues, contractors, or third parties.



- **Freedom of association and collective bargaining.** The Association respects the right of workers to form and join trade unions of their choice and to bargain collectively, without fear of reprisal, intimidation, or discrimination, in accordance with Argentine law and ILO Conventions Nos. 87 and 98.
- **Fair wages and working hours.** The Association complies with applicable law and collective agreements on wages, overtime, social security contributions, working hours, rest periods, and paid leave, and pays wages regularly, fully, and through documented channels.
- **Safe and healthy working conditions.** The Association provides working conditions that protect life and health, with particular attention to office, remote-work, and travel hazards, as further detailed in the Association's Occupational Health & Safety Policy.
- **Privacy.** The Association respects the privacy of employees, clients, and other individuals and processes personal data lawfully and proportionately, as detailed in the Data Protection and Cybersecurity Policy.

II. Scope of Application

This Policy applies to all activities of CILC, including its offices, remote work, travel, and the premises of counterparties and third parties where the Association carries out its activities. It applies to all personnel regardless of contract type, and the Association expects equivalent standards from its contractors, subcontractors, suppliers, and business partners. Human rights expectations shall be incorporated into supplier and subcontractor engagements as described in the Contractors and Suppliers Policy.

III. Human Rights Due Diligence

Consistent with the UNGPs, the Association undertakes to identify, prevent, mitigate, and account for adverse human rights impacts with which it may be involved. Due diligence shall be proportionate to the size of the Association and the risk profile of its activities and shall include:

- periodic assessment of human rights risks in the Association's operations, with particular attention to labor conditions, workplace safety, and subcontracted work;
- screening of significant suppliers and subcontractors for indicators of forced labor, child labor, unsafe conditions, and unlawful employment practices;
- integration of findings into contracting decisions, activity planning, and supervision;
- tracking of corrective actions and, where appropriate, termination of relationships with parties that refuse to remediate serious abuses.

IV. Community and Client Interactions

The Association conducts its activities, including events, training, and field work, in a manner that respects the rights, safety, and property of neighbors, participants, and the public. Activities shall be appropriately organized and secured; disruption shall be managed responsibly; and concerns raised by community members shall be addressed promptly and courteously.



V. Raising Concerns and Remediation

Any person, whether an employee, a worker of a contractor, a client, or a member of the public, may raise a human rights concern, confidentially and without fear of retaliation, through the channels established in the Whistleblowing Policy, including **info@cilclegal.org**. The Association prohibits retaliation against any person who raises a concern in good faith. Where the Association identifies that it has caused or contributed to an adverse human rights impact, it shall provide for or cooperate in appropriate remediation, and shall use its leverage to encourage remediation by business partners where the impact is directly linked to the Association's operations, products, or services.

VI. Responsibilities and Review

The President holds overall responsibility for this Policy and for allocating the resources necessary for its implementation. Managers and activity supervisors are responsible for applying this Policy in day-to-day operations. All personnel are required to comply with this Policy and to report suspected violations. Violations may result in disciplinary measures up to and including termination of employment or contract. This Policy shall be reviewed at least annually and updated as necessary.

Signed by:

Dzianis Limarau

President, Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Date: 11 September 2026