

19th July 2022

Response by IrisGuard to BHRRC email, requesting information to below questions, dated 7th July 2022

Response requested by 22nd July 2022

Please note: The below information should not be amended in any way as it constitutes an official response by IrisGuard UK Ltd

1. a. Does your company provide surveillance solutions, products, services or equipment to government clients in the Middle East and North Africa in the context of migration and/or border control? If so, please specify which products and which Middle Eastern & North African countries.

[IrisGuard does not provide products / solutions for surveillance.](#)

b. How many surveillance solutions, products, services, or equipment have been distributed by your company at border crossings, checkpoints or refugee camps in the past 5-10 years?

[Please refer to answer in Question 1a.](#)

c. Are you willing to provide BHRRC with updated lists of your surveillance solutions, products, services or equipment, as well as your government clients and border agencies in the Middle East & North Africa region, in the future?

[N/A](#)

2. a. Is your company or subsidiary carrying out due diligence to identify, prevent, and mitigate human rights risks before supplying governments or border agencies in the Middle East and North Africa region with surveillance solutions, products, services or equipment? If so, please outline the risks identified.

[IrisGuard does not provide products / solutions for surveillance.](#)

Note:

[Our general business practice is, before engaging in any business relationship IrisGuard checks if the organisation and any subsidiaries are on any sanctions list or reside within a currently sanctioned country. We then perform a DDIQ \(AI-based automated due diligence solution\) process using a third-party analytics platform which identifies, classifies, and ranks any flagged risks. Only after both these processes are complete to our own satisfaction would we engage a potential client. This process is also mandated by our key shareholders including Goldman Sachs.](#)

b. Does your company or subsidiary conduct any consultations with affected communities (such as migrants, refugees and asylum seekers) and human defenders as part of your due diligence process?

IrisGuard's role is to provide iris biometric verification systems to our UN and humanitarian clients, who themselves have direct contact with the affected communities' refugees and beneficiaries.

IrisGuard is not therefore authorized to conduct direct liaison with beneficiaries. Our clients produce regular operational reports and updates and provide on ground information for beneficiaries using their services, which are printed and publicly available via their website as well as external communication for those who are subscribed.

Note:

Extensive research projects commissioned by our clients include direct feedback from beneficiaries on a range of issues. Conclusions are made available to us where appropriate to improve our systems for our client.

c. Is your company or subsidiary taking any other actions to ensure that the surveillance solutions, products, services or equipment that you supply or distribute on border crossings, checkpoints, or in refugee camps are not causing or contributing to adverse impacts on the rights of migrants, refugees and asylum seekers (e.g., discrimination, detention, mistreatment, mass collection of data, tracking their movement without rescuing them, etc.)? If yes, could you share these actions with BHRRC?

IrisGuard does not provide products / solutions for surveillance.

Note:

Our general business practice and as a signatory member of the UN Global Compact SDGs, we are proud to reaffirm our continued support of the ten principles. We regularly report on specifically delivering on 6 of the SDGs including Gender Equality (Goal 5), Reduced Inequalities (Goal 10) as well as Peace, Justice and Strong Institutions (Goal 16). Our latest Communication on Progress report is submitted on an annual basis to our stakeholders, partners and the public and is available [here](#).

Our iris biometric systems provide our clients with a transparent and accountable method of targeted assistance distribution. The UNHCR is bound to implement our systems in accordance with its Policy on the Protection of Personal Data for Persons of Concern (2015) and as part of adhering to that policy UNHCR has undertaken Data Protection Impact Assessments on the use of IrisGuard systems, which IrisGuard has cooperated with and fully supported.

d. Does your company or subsidiary have a grievance mechanism in place for people to raise concerns or complaints?

As per our response to Question 2b, IrisGuard's role remains outside of the direct liaison with individuals / beneficiaries.

Note:

Our general business practice is, we have a fully monitored enquiries email system, telephone and address published, which allows any person to freely contact us.

With our main client for refugee support, the UNHCR are accountable to the people they serve and have comprehensive grievance mechanisms in accordance with the policy on Accountability to Affected People. These mechanisms allow people who may have interacted with IrisGuard equipment or systems as part of interactions with UNHCR's broader systems to lodge any grievances, complaints or feedback.

e. Does your company have a human rights policy or internal process governing your provision of surveillance solutions, products, services or equipment to government clients or border agencies in the context of migration?

IrisGuard does not provide products / solutions for surveillance.

3. Is your company or subsidiary planning to stop engaging in the sale or provision of a range of surveillance solutions, products, services or equipment to Middle Eastern & North African countries with a track record of human rights violations?

N/A. Please refer to answer to Question 1a