

# SALADIN SECURITY Ltd

## HUMAN RIGHTS POLICY STATEMENT

Saladin strongly supports Private Security Industry regulations, including transparency and accountability of the industry. As an organisation we welcome and provide our continuous and ongoing support for the international agreement on the *“Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies during Armed Conflict”* (“Montreux Document”) created in association with the ICRC and the Swiss Initiative in September 2008. Developed collaboratively between government and industry experts, the Montreux Document was agreed by 17 States including the US and the UK.

This policy applies to Saladin Security Ltd, its legal affiliates and subsidiaries. We understand that stricter standards may be implemented as an alternative or in addition to this policy. Should there be any inconsistencies between this policy and laws that may apply to the area of human rights and professional standards, applicable law will prevail.

Saladin is fully committed to supporting and ensuring legal compliance, obligations and best practices of States (whether this be in Contracting, Territorial or Home areas), and welcomes the opportunity to work collaboratively with these States and is committed to ensuring they meet their responsibilities. Moreover, in meeting applicable human rights and professional standards, Saladin is fully committed to working with commercial clients (in line with the client’s goals) in order to meet applicable human rights and professional standards.

In meeting obligations and good practice recommendations as outlined by the Montreux Document, Saladin is committed to supporting the States within whose territory we operate (Host Nations), contracting States (our Clients) as well as the US and UK Governments. We fully understand and take into account that in ensuring that we deliver compliant services we must take into account any inherent risk and in so doing will warrant conformity to all relevant national law and international humanitarian law including human rights law.

The Montreux Document is an internationally-recognised, non-binding multi-lateral agreement that suggests voluntary guidelines for companies involved in the worldwide provision of security. By promoting and encouraging States’ obligations and best practice, and by undertaking relevant and related policies, Saladin works to comply with and advance the requirement of those guidelines.

One of the strongest tones to come from The Montreux Document strongly underscored the importance of compliance with International Criminal, Humanitarian and Human Rights Law together with Host Nation Law. In recognising the need for our personnel to receive key training and information on these laws and practices (including human rights obligations), Saladin provides core training for staff. In terms of contract management, we also provide legal oversight in order to ensure compliance. We work closely with governments and relevant ministries in the countries within which we are contracted and recognise and follow Host Nation laws of those countries. Moreover, we ensure that it complies with its own corporate policy of accountability. We will investigate and sanction any accidental or deliberate legal violations. These actions will be supported by our Code of Conduct Policy that outlines compliance with International Criminal, Humanitarian and Human Rights laws. In addition, we maintain codes of conduct that support human rights obligations, ethical

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practices and policies against bribery and corruption. These codes and policies help to prevent actions at any level including illegal acts such as unethical payments, business dealings, bribery or money laundering. As an integral part of its risk assessment process and security planning we advise clients to conduct human rights impact assessments in line with its own internal policy that requires personnel to conduct a human rights impact assessments.

Our corporate vision guides us to conduct business within our Group-wide policies. In providing a consistent approach and standards, the Group ensures these policies apply universally and are reviewed and tested regularly to take account of any sector and external environmental changes as well as to ensure that we respond to our clients' needs.

Saladin conducts its business processes and procedures in a consistent way that ensures quality and reliability, whilst taking into account local circumstances that may require specific adjustments or adaptations. By ensuring this consistent yet flexible approach to business processes and procedures, we help to improve quality and standards across our business, identifying and adopting best practice as required.

Saladin creates a culture of learning, best practice and continuous improvement by conducting regular reviews and audits of its existing internal controls and governance procedures to ensure best practices. While working towards PSC-1: 2012 compliance, we continue to review and audit our services based on risk and continuous improvement. This approach will support our conformity guarantee with relation to national and international legal and human rights obligations while ensuring that we maintain a focus on key service areas. We work to ensure compliance with external and internal policies and obligations by implementing a blend of audit methodologies including providing access to dedicated internal auditors.

In all operations Saladin ensures transparency and accountability while adhering to a stringent Code of Conduct. Our ethical business approach ensures that our operations conform to national business regulations within the countries that we operate. Saladin protects its integrity as a security provider through its due diligence policy that prevents conflicts of interest or association damage the ethical basis for contracting parties. In addition to this, our transparent supplier management policy ensures that the Company's Code of Conduct and business ethics underpins those standards held by suppliers and contractors.

Saladin achieves appropriate service performance authorisation across all areas of its operation including providing the necessary financial and economic undertakings. The Company ensures stringent procedures that adhere to Host Nation State rules and governing laws. This includes the acquisition of appropriate legal authorisation and operating licenses that accord with relevant Host Nation State laws.

International and national legal obligations as well as a knowledge of the importance of building a positive business reputation underpin our approach to ensuring lawful acquisition and subsequent use of equipment (in particular weapons and other licensable equipment). Guided by transparent internal guidelines and by sourcing multiple independent suppliers Saladin ensures procurement due diligence and value with relation to all new suppliers. We

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adhere to all domestic and international export and import controls, complying with all weapons non-proliferation treaties and other trade related sanctions when providing weapons to operations worldwide. Moreover, when purchasing equipment and weapons, Saladin consistently observes Host Nation law and additional licensing requirements that Clients may expect or impose.

Saladin has developed solutions to deal with the high risk and potential dangers linked to hostile and complex environments. Through the provision of support staff, competitive pay, accommodation and life support during deployment, and the highest quality equipment Saladin works continuously to ensure exacting standards. In order to prevent people trafficking, we have in place key practices including undertaking our own recruitment or undertaking due diligence on recruiting companies. These policies help to ensure that personnel contracts are fair and transparent and prevent people being employed through coercive, blackmailing or other means or conditions that would fall under the definition of people trafficking or forced labour. In addition, all third country nationals recruited by us will receive contracts in a language they can understand. In order to maintain our professional standards for health and safety, recruitment is overseen by dedicated and qualified staff members.

Saladin's selection criteria for security providers exceeds designated contract standards (including age, experience, key qualifications and past performance) while reflecting the specific requirements of the contract and the clients. Prior to confirming personnel in post, Saladin inducts and trains personnel in operations and business ethics prior to using them on tasks and activities, and provides monthly continuation training along with promotional and additional skills training courses. By our vetting, clearing and monitoring, we appropriately and effectively ensure employment security. Proof of equivalent clearance must be provided by all other NATO country nationals and we require criminal record checks from all security providers to screen out those individuals/recruits who have previous convictions for serious offences or any offences that have occurred in the last 5 years. Only 'very good' conduct level is acceptable when recruiting former military personnel. Saladin provides the requisite weapons training and clearance for Arming Authority as well as authorisation to carry firearms only to those security providers who receive positive outcomes from ongoing performance reviews. We will only arm those personnel who undertake training on applicable rules for use of force, graduated use of force and weapons deployment, International Humanitarian Law, Human Rights Law and Host Nation Law. Saladin maintains a high standard and precision when it comes to records of these attainments. Senior management is fully responsible for a high level of command and supervision while maintaining all individual programme performance reporting.

By ensuring internal regulation and organisational procedures we ensure that monitoring, supervisory and internal accountability mechanisms for personnel and the overall Company are maintained to a high standard. Saladin maintains accurate and up to date records concerning personnel and property records to ensure that accountability mechanisms can prevent improper and unlawful conduct by personnel at any level. Using its own investigation process, we investigate all significant incidents in order to recommend courses of action and in order to provide a foundation for discipline of culpable personnel. Saladin submits all required external agency audits and cooperates fully with relevant auditors and authorities. Saladin terminates all contracts and imposes financial penalties in cases where fault is

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identified. In these cases, we may also request appropriate assistance from higher investigative authorities. All newly-recruited and contracted individuals or service providers must adopt clear and transparent illustrating practices surrounding the prevention of bribery or corruption. All personnel must accept Saladin's ethics policies, in the context of applicable national law, and must also agree to comply with rules surrounding force, Military Instruction (where relevant), UK law (and other relevant law, e.g. where working for the US Government or the home nation law of an individual which has extra territorial effect) and International Law.

All "rights holders" that Saladin comes into contact with receive full recognition of their human rights. Saladin assesses risk and impact of its operations with relation to rights holders through "context consultations" and seeks to mitigate any potential human rights issues;

The impact of our operations on human rights is assessed through engagement with stakeholders and communities within which it operates. In this way, Saladin works to ensure that it understands and can take account of the potential human rights impacts of its operations. Through a corporate culture that demands respect for human life, dignity, freedom of speech and worship, and the freedom from want or fear, Saladin ensures it delivers its clients mission while aiming to support the human rights of the local communities within which it operates.

Saladin contributes (where appropriate) to the social, environmental and economic well-being of the local population in countries that may be considered complex. We maintain a positive impact on the security, safety and human rights of the local population as does our relationship-building with local leaders by performing security operations in a responsible and sensitive way. Saladin seeks to build capacity within the community by: Improving the lives of the individuals within local communities affected by company activities through engaging with local community leaders; Enhancing local employment and training opportunities by supporting local economic activity and by providing local employment opportunities; Minimising our environmental impact; Maximising social impact by implementing a zero-tolerance and preventative approach to corruption, money-laundering, human trafficking and forced labour. We have a multi-layered approach to corporate social responsibility (CSR) that includes both formal and informal channels. Formal CSR work begins with a clear understanding of the company's impact on local communities, and the activities of which we operate. The informal channel for CSR work is built on a foundation of positive local relationships and engagement with local leaders. In addition, we provide mandatory cultural awareness training for all personnel who deploy overseas.

Our personnel are professional and sensitive to client needs whilst complying with Host Nation regulations. Senior managers and operators are observant of competing environmental threats. Our principles concerning use of force are outlined within its Code of Conduct underscored by principles and training based on past experience that include using minimum force and only where absolutely necessary.

Saladin creates opportunities to enhance and promote the positive elements of cultural difference and ensures that it has a diverse work force in order to promote cultural integration at all levels that build mutual trust and respect. We promote constructive

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dialogues between our organisation and those communities within which our personnel are based.

Our culture of continuous improvement supports our aim to deliver services that conform to human rights practices and laws. Saladin's management review process ensures that any systemic improvements are identified and then implemented so that individual issues can be prevented or resolved in a consistent and timely manner.