

## Description

This document summarises the Company's policy on human rights, International law, Training and practices in relation to business and human rights as they continue to evolve, the policy takes account of the following:

1. **Universal Declaration of Human Rights.**
2. **Voluntary Principles on Security and Human Rights.**
3. **Montreux Document.**
4. **Principles of the UN Global Compact.**
5. **International Code of Conduct for Private Security Providers.**
6. **UN Human Rights Council's Guiding Principles on Business and Human Rights.**
7. **Training of aforementioned.**

This Human Rights Policy should be read in conjunction with the Code of Ethics and Anti-Bribery and Anti- Corruption policy. Other relevant policies include:

1. **Use of Weapons, Rules for the Use of Force (RUF, to include Escalation Of Force EOF)**
2. **Human Resources and Dignity at Work.**
3. **Subcontractor Management.**
4. **Whistleblowing and Third-Party Complaints.**

## Scope

This policy applies to all parties in the GSC subsidiaries and locations.

Definitions	
<i>Universal Declaration of Human Rights (UDHR)</i>	Fundamental international standard. Includes economic, social and political rights.
<i>Voluntary Principles on Security and Human Rights (VPs)</i>	Addresses the human rights problems associated with security provision for oil, gas and mineral projects in conflict- affected areas. GSC supports the objectives of the VPs, but is not a formal participant.
<i>Montreux Document on private military and security companies</i>	Summary of legal obligations and best practices, including the human rights obligations of governments and security companies in conflict zones. Directed at governments.
<i>UN Global Compact</i>	Strategic policy initiative for businesses committed to adopting universally accepted principles including human rights. GSC is a signatory.
<i>International Code of Conduct for Private Security Providers</i>	Code applying the principles of the Montreux Document to companies. GSC is a signatory
<i>UN Human Rights Council's Guiding Principles on Business and Human Rights</i>	Emphasises state duty to protect human rights, corporate duty to respect human rights (including the need for due diligence) and the need for victims to have access to remedy.
<i>Complicity</i>	Indirect involvement in human rights abuses where harm is committed by another party – for example, another company or the security forces.

## Human Rights Policy

### Overall

AlGhadeer Security Company (GSC) respects the full range of human rights, and will not neglect or downplay any aspect of the *Universal Declaration of Human Rights*. <http://www.un.org/en/universal-declaration-human-rights/>

If GSC has reason to believe that in undertaking an activity it would be complicit in human rights abuses committed by others, it will avoid that activity.

### Employees

GSC employees have the right to work in an environment of mutual trust and respect, where everyone is fairly treated without discrimination.

### Working with clients

GSC will give its clients the best possible advice that is consistent with the human rights responsibilities of the Company and of its clients. If the Company judges that its clients are not prepared to act on this advice, GSC reserves the right to turn down new assignments and to reconsider its role in existing projects.

### Risk assessment

Risk assessment is a fundamental requirement and must include an assessment of the risk that GSC activities could – directly or indirectly – contribute to human rights abuses or to an escalation of conflict. Risk assessment is especially important for high-impact projects and those in areas affected by conflict. GSC initial risk assessment will be subject to constant regular monitoring and regular review.

### Relationships with government security forces

GSC advice will take full account of the record of, and potential for, human rights infringements that could be incurred by working with government agencies.

### Working with subcontractors

All subcontractors must abide by human rights principles that are consistent with this policy. If they fail to do so, GSC has the right to terminate its relationship with them. Prior to working for GSC, subcontractors will be vetted in accordance with GSC HR & Management Policy, which is in line with the laws and legislation of Iraq as per governmental guidance.

### Use of weapons and equipment transfer

When advising clients, GSC will consider the risks that transfer of weapons or equipment to local agencies may lead to human rights abuses.

### Relationships with communities

GSC will take into account human rights considerations when advising clients on the impact of their activities on local communities. Where required a Social Risk Management assessment may be conducted.

### External complaints – Third Parties

GSC will investigate any complaints made by external stakeholders, and/or third parties not directly involved with the company concerning suspected human rights abuses to include other business & professional malpractice fairly and transparently, in accordance with its – GSC45.010 Whistleblowing Policy and Process-v2. All correspondence, contacts details can be found on both our "[Website-Contact Us & the GSC brochure](#)".

**All company personnel, subcontractors, as well as members of the public (Third-Parties) are eligible to make protected disclosures under GSC Whistleblowing policy. NO UNFAIR treatment will be meted against a Whistleblower by virtue of him/her having submitted a PROTECTED DISCLOSURE under this policy.**

**Whistleblowing Committee comprises: Chairman of the Board, Country Manager, Head of Regulatory Legal Affairs & Head of Internal Audit.**

## Authority and Responsibility

### All GSC employees

1. May seek advice from their line manager in cases of uncertainty about how to apply any aspects of this policy.
2. Record any credible allegations of human rights infringements that are – or could be seen to be - associated with the activities of GSC or of a client, as well as any advice given to the client. This includes any credible allegations involving public or private security providers guarding the facilities of GSC or of its clients. Care should be taken to avoid any leaks of sensitive information that could put anyone at risk.
3. Consult their line manager if they:
  - a. encounter any credible allegations of human rights infringements that are – or could be seen to be- associated with the activities of GSC or of a client, as well as any advice given to the client
  - b. Consult a representative of the Ethics Committee in confidence if they are unable to speak to their Manager and if they:
    - i. Encounters any credible allegations of human rights infringements that are – or could be seen to be associated with the activities of GSC or of a client, as well as any advice given to the client
  - c. Make an anonymous report (Telephone hotline) if they do not want to be identified, and:

### Chief Executive Officer (CEO)

- has the duty of Care to report any incidents of suspected human rights abuses to the Ethics Committee.

### Country Manager & Security Director (CM & SD)

In accordance with the Voluntary Principles, if the CEO believes that the Company has a duty to report an allegation of human rights abuses, he will consult the Board on the appropriate course of action.

### Ethics (Whistleblower) Committee

- Consider all requests on the subject of human rights abuses referred by Top Management and other employees, and take action as appropriate.

## Training

### Voluntary Principles of Security and Human Rights (VPSHR)

We feel it is important to understand and adhere to the VPSHR across all our contracts, we have many projects and clients. Adherence to the principles by GSC and all of our employees allows us to support BP's position as a signatory to the principles.

### Contractor adherence to VPSHR

Our work in fragile environments is based on the principle of establishing good relationships within the communities in which we operate. To support this we adhere to the guidelines of the United Nations Global Compact, also known as the Compact or UNGC, is a United Nations initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The Global Compact is a principle-based framework for businesses, stating ten principles in the areas of: human rights, labour, the environment and anti-corruption.

### Levels of staff VPSHR training

All GSC Iraq employees receive regular VPSHR training as part of our Continual Progression Development Programme. VPSHR is covered in numerous courses we conduct, separated into approximately Four 30-minute presentations, delivered in English or Arabic to suit the audience that covering our obligations under the VPSHR, To confirm comprehension we also include table top scenarios for delegate interaction and confirmation.



Regarding the UN Global Compact and the International Code of Conduct for Private Security Providers. All operational employees receive regular compulsory training in the rules for the use of force; this training is also delivered in either English or Arabic. All Security personnel carry a RUF card (English & Arabic)

#### How staff understanding of VPSHR is assessed

As an integral part of the GSC induction and continuation training process VPSHR training is incorporated into the design of all of our induction courses and our employees are continually assessed via a mixture of role play exercises, group discussions and practical scenarios in order to confirm assimilation of the subject matter and achievement of the learning outcomes. The content and delivery of GSC VPSHR training ensures that our employees understand the implications of human rights for the provision of security services and responding to security incidents and that they are able to demonstrate an understanding of how to use effective communications skills to resolve conflicts and deal with aggressive behaviour.

As part of the training one of our Trainers has previously been approved to deliver the ROO Code of Conduct presentation, which is delivered to new arrivals into country.

#### Training for Iraqi staff

Training for Iraqi staff is designed to meet the requirements of the ROO Security Requirements for Contractors (SRC – v9) ensuring that security personnel meet minimum standards

#### Static guard course:

The entry-level employment for Iraqis in armed roles is as a static guard. In order to perform this role, candidates take a static guard training course in Basra. This 7-day course is an intense guard training course designed to meet the fast paced needs of our business users.

Training covers skills such as weapon handling, gate duties and access control, search techniques, conflict management, first aid, VHF communications, international best practices including VPSHR, ICoC for private security companies, UN Global Compact and the Montreux Document, Rules for the use of force, anti-bribery and corruption, the Voluntary Principles, AK47 weapon best safe practice handling.

**First aid training:** All Iraqi employees are trained to a minimum level of emergency first aid at work, in house course, the accreditation for this course is also available and is subject to specific contract/ client requirements.

Progressional training is available in the form of the AoFAQ first person on the scene training. This is a minimum of five days instruction on more advanced first aid, this is not an ACLS mapped course.

**Health, safety and the environment training:** GSC already hold other contracts on the ROO therefore are able to attend through the client's sub-contracted route the ROO Safety Foundation Course.

**Driver training course:** As above in the form of the Rumaila Introductory Driving Course – (RIDC) GSC now possess RoSPA accredited driving instructors whom of which have been delivering said courses since 2021

**Continual Progressional Development:** (CPD) Delivered through a complete Continual Progressional Development programme designed to cover all the core skills expected of each and every operator to be conversant in as a minimum standard; this will include annual driving assessments by RoSPA instructors, furthermore each Designated driver follows the RIDC requirements as a baseline foundation.

**Accreditation:** GSC have at their disposal a fully accredited UK & UAE training centre with Highfield Awarding Body for Compliance, this internal training advantage shall be on-line towards the end of 2023, beginning of 2024.

Further courses available are: <https://www.highfieldqualifications.com/>

HSE – All Highfield Qualifications, see website



First Aid – All Highfield qualifications, See website

Fire Safety

Close Protection

Static Guard and Patrolling

Confined Space

Train the trainer

Assessment Qualifications (Formerly the TAQA Assessor)

Quality Assurance (IQA courses)



E-mail: [info@gsciq.com](mailto:info@gsciq.com) Near Residential Palace  
+964 781 191 1131 Bradeya, Basra, Iraq  
+964 770 007 8288

[www.gsciq.com](http://www.gsciq.com)