WEST COAST RISK LIMITED

HUMAN RIGHTS POLICY

WCR-SEC-POL-0003

POLICY STATEMENT

WCR Voluntary Principles on Security and Human Rights Policy Statement

West Coast Risk Ltd recognises and accept that our operations can impact the human rights of individuals and communities in the area in which we operate. WCR are seeking to meet its corporate responsibility to respect human rights as part of its best-practice approach to risk management by implementing an effective VPSHR plan into the business strategy.

The WCR Human Rights mission is to:

"Maintain the security and safety of our operations, in a context that protects human rights."

David Butler
Managing Director
West Coast Risk Corporation Ltd

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1. INTRODUCTION

West Coast Risk Corporation Limited (WCR) is committed to maintaining the highest level of human rights protections for its staff, clients, customers, stakeholders across all sites. WCR and equally as committed to protecting the human rights of those who may commit an illegal or criminal activity that requires a security intervention.

WCR's Use of Force ethos is based around the principles of necessity, proportionality, and reason. This ensures that should force be required by WCR, the minimum level of force shall be used for the shortest amount of time possible to mitigate the threat. This Human Rights policy outlines the principles, guidelines, and procedures that govern security practices within the organisation, aligning with the company's core values.

2. SCOPE

The policy applies to all employees and contractors working with WCR. Training of the policy will be provided by WCR prior to any security deployment by an individual to a client site.

3. OBJECTIVE

The primary objective of this Human Rights policy is to ensure the protection of West Coast Risk's people and reputation. By implementing and adhering to this policy, West Coast Risk aims to create a safe environment that promotes the safety and well-being of all stakeholders.

4. WCR VPSHR PHILOSOPHY

WCR believes that respect for human rights is essential for sustainable development and responsible business practises. The WCR VPSHR philosophy is founded on the belief that security companies can play a positive role in promoting respect for human rights, whether in a calm environment or the most challenging. By upholding the VPSHR principles, WCR will contribute to a safe working environment for all clients, contractors, and staff, whilst supporting sustainable economic growth and social progress in our working environment.

5. WCR VPSHR COMMITMENT

WCR will ensure that a robust and effective VPSHR management system exists within the organisation which is designed to:

- Demonstrate its commitment to the Voluntary Principles on Security and Human Rights.
- Ensure that all WCR employees are aware of their VPSHR responsibilities.
- Involve staff at all levels of our organisation.
- Provide a systematic approach to identify and control VPSHR risks.
- Provide VPSHR training and awareness to all WCR staff.
- Measure and monitor the company VPSHR performance.
- Establish a system of accountability to ensure that any allegations or incidents of human rights abuses are promptly and thoroughly investigated, with appropriate actions taken.
- Report WCR human rights performance to our stakeholders.

- Remain consistent with International best practises and local and International laws and regulations.
- Seek to achieve continuous improvement in VPSHR performance.
- Maintain VPSHR records as per company and legal requirements.

WCR will ensure that adequate resources are available to meet these objectives, in proportion to its business needs. We will regularly monitor and review the implementation and effectiveness of this Policy.

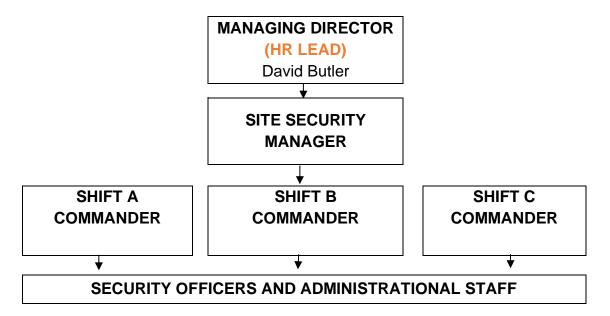## 6. WCR RESPONSIBILITIES FOR VPSHR
6.1 Management and Review

This WCR VPSHR Policy has been developed to outline our approach to respecting and managing human rights at the West Coast Risk Project.

WCR will:
- Make this plan available to all workers and ensure they have the opportunity to read, understand, clarify and ask questions.
- Plan, through risk assessments, to complete all security working duties in a respectful manner for WCR staff, other employees working on the West Coast Risk Contract, and the local community population.
- Keep a copy of the VPSHR Policy readily available for the duration of the contract
- Review the plan regularly throughout this project and make any revisions known to those working on the project.

6.2 WCR Human Rights Organisation

6.3 WCR Human Rights Responsibilities

6.3.1 Managing Director

The Managing Director has overall accountability for the establishment, implementation and maintaining the company VPSHR management system to ensure that:

- The WCR VPSHR statement of intent is achieved.
- The VPSHR implementation plan is completed and continually reviewed.
- Commitment, and support by all personnel to the development of a positive human rights culture.
- Participation of all key stakeholders in the development of a working environment compliant with VPSHR guidelines.
- Support continuous improvement on VPSHR matters.

6.3.2 Site Security Managers

The Site Security Manager's roles include:

- Observing all VPSHR guidance, rules and regulations are adhered to.
- Providing advice and assistance on VPSHR matters to employees.
- Leading by example and promoting sound VPSHR practices at every opportunity.
- Undertaking inspection of the security posts to ensure that VPSHR knowledge and compliance is implemented effectively
- Command security incidents, arrests and detentions in a manner consistent with VPSHR principles
- Reporting and investigations of grievances or alleged human rights abuses.

6.3.4 WCR Staff Members

All WCR staff on the West Coast Risk Project are responsible for:

- Taking reasonable care that their conduct does not adversely affect the human rights of others.
- Complying with VPSHR instruction and training.
- Understanding the force continuum and the necessity, proportionality, and reasonable uses of force
- Understanding members of vulnerable groups and the special human rights measures that should be applied to the individual groups.
- Reporting any human right related incident to the site security manager within 1 hour.

7. WCR ARRANGEMENTS FOR VPSHR

7.1 VPSHR Implementation Plan

WCR have designed a VPSHR implementation plan to ensure compliance with best practises which will be completed at every WCR operational site:

The WCR VPSHR Implementation Plan can be broken down into six stages:

7.1.1. Establishing Human Rights Context

In order to establish the Human Rights context for the project, the following considerations must be given;

- Scope and scale of assessment
- Company operations and current relationships with stakeholders
- Country and Regional specific Human Rights context
- Stakeholder identification
- Human Rights Impact Assessment at each site

7.1.2. Identify, Analyse, and Evaluate the Project Human Rights Risks

The identification of human rights risks through a VPSHR risk assessment to include the following:

- Political and economic context
- Local security dynamics

- Public and private security forces
- Rule of Law and judicial system
- Stakeholder and community issues

Following the identification, analysis and evaluation of the Human Rights risk must be completed, including:

- Likelihood of each risk manifesting
- Impact of each risk occurring
- Risk acceptance or response?

The approach taken for this assessment is fully compatible with established risk management procedures and in line with ISO 31000 risk-management framework and the West Coast Risk Security Management Plans will be created for each site encompassing specific human rights risks and requirements for each location. Using an ISO approved risk assessment methodology ensures that each VPSHR risk has been formally assessed to understand potential for violent conflict and risks to communities relating to WCR and West Coast Risk's presence.

7.1.3. Human Rights Risk Treatment Plan

Once risks have been identified they can then be analysed and evaluated prior to a producing a formal Human Rights risk treatment plan to provide a level of mitigation to reduce the likelihood of the risk occurring and the project's vulnerability against the risk should it occur. The risk treatment plan shall include:

- Code of Conduct
- Stakeholder consultation mechanisms
- Effective grievance mechanism
- Integration with core business functions
- Accurate and systematic approach to mitigating Human Rights risks
- Organisation and stakeholder training

7.1.4. VPSHR Training Plan

VPSHR training is essential for staff, security providers, and local communities to understand and implement a VPSHR friendly system of operating. The following groups should receive training:

West Coast Risk HoDs

- Train the trainer VPSHR
- Human Rights Framework
- Corporate responsibility
- Assessing security risks to VPSHR
- Roles and responsibility of security personnel
- Vulnerable groups
- Grievance reporting procedures

- Implementing the VPSHR
- West Coast Risk VPSHR goals

Private Security (WCR)
- Introduction to Human Rights
- Security Human Rights risks
- Site specific Human Rights risks
- Security responsibilities
- VPSHR implementation and goals
- Use of Force
- Arrest and detention
- Medical assistance
- Searching
- Vulnerable groups
- Grievance reporting procedures

7.1.5. Training Delivery

From the training plan the audiences and training dates will be set. Full attendance for all WCR staff will be mandatory prior to site deployment and training logs will be completed for attendance records. The training presentations will vary depending on the audience and the delivery will be a mixture of guided PowerPoint presentations with scenario based VPSHR exercises for students to work through in groups and then as a class.

7.1.6. Verification

Implementation of the voluntary principles is an ongoing process which must be reviewed on a regular basis. WCR must demonstrate that we are actively committed to maintaining the principles laid out in the plan, and remedying any problems identified. Risks must be monitored to understand if a risk scenario and level has changed, and where additional mitigation may be required. Annual VPSHR refresher training will be scheduled, as well as a mechanism in place to capture all on-boarding staff through the induction/arrival process. Grievance mechanisms must also be reviewed to verify their effectiveness.

7.2 Relevant Legislation

IFC's Performance Standard 4:
http://www.ifc.org/wps/wcm/connect/a40bc60049a78f49b80efaa8c6a8312a/PS4_English_2012.pdf?MOD=AJPERES.

International Code of Conduct for Private Security Service Providers: www.icoca.ch/.

UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials: www.ohchr.org/EN/ProfessionalInterest/Pages/UseOfForceAndFirearms.aspx.

UN Code of Conduct for Law Enforcement Officials:
www.ohchr.org/EN/ProfessionalInterest/Pages/LawEnforcementOfficials.aspx .

UN Guiding Principles on Business and Human Rights
GuidingPrinciplesBusinessHR_EN.pdf (ohchr.org)

Voluntary Principles (VPs) on Security and Human Rights:
http://www.voluntaryprinciples.org/what-are-the-voluntary-principles/

8. COMPLIANCE

West Coast Risk is committed to complying with all applicable laws, regulations, and industry standards related to human rights across all its sites.

9. REPORTING AND MONITORING

West Coast Risk has well established mechanisms to monitor and assess the effectiveness of security controls across all sites. Incidents and security breaches are reported promptly to the appropriate authorities for investigation and resolution.

10. SYSTEM EVALUATION

This policy shall be reviewed at least after two years by members of the Security Department and presented to the Standard Committee for approval, or when organizational changes take place or required as part of internal and external audits. The WCR Document Controller will monitor compliance with the document control system on an ongoing basis.

11. DISTRIBUTION

List physical locations which require a controlled copy of this document.

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

13. CONTRAVENTION

Any breach of this policy shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary procedure.

14. DOCUMENT CHANGE PROCESS

The process of document change starts when the document custodian identifies there is need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off and submit it to the Document Controller.

The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.