BLACK WOLF
CODE OF CONDUCT

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CODE OF CONDUCT

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Abstract

This Document must be read only by all involved parties and implement its Protocols & Procedures accordingly

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1. Policy Statement

Black Wolf Company for Security and Personal Protection Services Ltd. is committed to providing security services lawfully, professionally, ethically and with full respect for human rights.
The Company shall conduct its activities in accordance with:

1. Applicable Iraqi and Kurdistan Regional Government laws and regulations.
2. Applicable international human rights law.
3. International humanitarian law where applicable.
4. The International Code of Conduct for Private Security Service Providers.
5. The United Nations Guiding Principles on Business and Human Rights.
6. The Voluntary Principles on Security and Human Rights.
7. ISO 18788:2015.
8. ANSI/ASIS PSC.1-2022.
9. Black Wolf's approved policies and procedures.

No client instruction, management order, contractual obligation, emergency, security threat or exceptional circumstance shall justify unlawful conduct or a violation of this Code.

2. Purpose

The purpose of this Code is to:

1. Establish mandatory standards of conduct for all Black Wolf personnel.
2. Protect the rights, safety and dignity of persons affected by Company operations.
3. Prevent unlawful, abusive, discriminatory or unethical conduct.
4. Define the responsibilities and limitations of security personnel.
5. Establish clear reporting and accountability requirements.
6. Support implementation of the International Code of Conduct throughout the Company.

3. Scope

This Code applies to:

- Owners and directors.
- General and senior management.
- Department managers.
- Project supervisors.
- Team leaders and shift leaders.
- Static guards and access-control personnel.
- Personal Security Detail personnel.
- Drivers.
- K9 handlers.
- Administrative and support personnel.
- Temporary and reserve personnel.
- Consultants and trainers.
- Any other person acting for or on behalf of Black Wolf.

This Code applies while personnel are on duty, representing the Company, using Company or client property, carrying Company-issued equipment or weapons, travelling on official business or performing any activity connected with Black Wolf operations.

Black Wolf currently delivers security services directly through its own personnel, management, licensing and operational oversight and does not use subcontractors for the provision of security services. Where Black Wolf engages a subcontractor or other third party to perform security services, compliance with the applicable principles of this Code will be incorporated into the relevant contractual arrangements, together with appropriate selection, vetting and training requirements.

The principles of this Code form part of the standards applicable to Black Wolf personnel and are communicated through employment documentation, induction, training and related Company procedures in an appropriate and accessible format.

4. Individual Responsibilities

Every person covered by this Code shall:

1. Understand and comply with this Code and related Company procedures.
2. Perform duties lawfully, honestly and professionally.
3. Treat all persons with dignity, fairness and respect.
4. Exercise authority only for legitimate security purposes.
5. Follow lawful instructions and approved post orders.
6. Refuse any manifestly unlawful instruction.
7. Report actual or suspected violations promptly.
8. Cooperate with lawful investigations and disciplinary procedures.
9. Protect relevant evidence and records.
10. Complete mandatory training.
11. Remain accountable for their own decisions and actions.
12. Seek guidance when uncertain about the correct course of action.

Following an order shall not excuse unlawful conduct.

Personnel receiving an instruction that appears unlawful or contrary to this Code shall not carry it out and shall report it immediately through the chain of command, Human Resources or senior management.

5. Management Responsibilities

Managers, supervisors, team leaders and shift leaders shall:

1. Demonstrate lawful and ethical leadership.
2. Ensure personnel understand their duties and limitations.
3. Provide clear operational instructions.
4. Monitor personnel performance, welfare and fitness for duty.
5. Prevent and respond to misconduct.
6. Ensure incidents and complaints are reported.
7. Protect complainants and witnesses from retaliation.
8. Preserve confidentiality and evidence.
9. Escalate serious matters to senior management.
10. Implement corrective actions and prevent recurrence.

A manager who knowingly ignores, conceals or fails to report serious misconduct may be subject to disciplinary action.

6. Respect for Human Rights

Black Wolf personnel shall respect the human rights of all persons, including employees, clients, visitors, contractors, community members and persons affected by Company operations.
Personnel shall respect:

1. The right to life and personal security.
2. The right to dignity and humane treatment.
3. Freedom from torture and cruel, inhuman or degrading treatment.
4. Freedom from slavery, trafficking and forced labour.
5. Freedom from unlawful discrimination.
6. The right to privacy.
7. Freedom of expression, association and peaceful assembly.
8. Protection from arbitrary apprehension or detention.
9. Protection from unlawful deprivation of property.
10. Labour rights and safe working conditions.
11. The special protections afforded to children and vulnerable persons.

Security requirements shall not be used to justify arbitrary, discriminatory, humiliating or abusive treatment.

7. Prohibited Conduct

Black Wolf personnel shall not commit, participate in, facilitate, encourage, conceal or knowingly benefit from:

1. Genocide.
2. Crimes against humanity.
3. War crimes.
4. Torture.
5. Cruel, inhuman or degrading treatment or punishment.
6. Extrajudicial, summary or arbitrary killing.
7. Enforced disappearance.
8. Kidnapping or hostage-taking.
9. Rape or sexual violence.
10. Sexual exploitation or sexual abuse.
11. Human trafficking.
12. Slavery, forced labour or debt bondage.
13. Child exploitation or the worst forms of child labour.
14. Unlawful possession or trafficking of weapons, ammunition or drugs.
15. Terrorism or support for terrorist activity.
16. Organized criminal activity.
17. Unlawful apprehension or detention.
18. Unlawful destruction or seizure of property.
19. Any other serious criminal or human rights abuse.

Known or suspected prohibited conduct shall be reported immediately.

8. Torture and Ill-Treatment

Torture and all forms of cruel, inhuman, humiliating or degrading treatment are strictly prohibited.
Personnel shall not:

1. Inflict physical or psychological pain to obtain information or compliance.
2. Strike, kick, choke, burn or otherwise abuse a person under control.
3. Threaten a person or their family.
4. Use force as punishment.
5. Deny essential food, water or medical attention.
6. Assist another person or authority in committing such conduct.
7. Conceal or fail to report suspected torture or ill-treatment.

Personnel witnessing such conduct shall, where safe and lawful, take reasonable steps to prevent further harm and shall report the matter immediately.

9. Gender-Based Violence, Sexual Exploitation, Abuse and Harassment

Black Wolf does not tolerate gender-based violence, sexual exploitation, sexual abuse, sexual violence or sexual harassment, whether occurring within the workplace, during Company operations or in connection with Company activities.
Personnel are expected to remain alert to risks of sexual or gender-based violence and to report known or suspected concerns through the appropriate Company or competent reporting channels.
Personnel shall not:

8. Commit or threaten sexual violence.
9. Engage in unwanted sexual comments, advances, gestures or contact.
10. Request sexual favours in exchange for employment, protection, access, assistance or benefits.
11. Exploit a person’s vulnerability or unequal position for sexual purposes.
12. Exchange money, employment, goods, services or protection for sexual activity.
13. Engage in sexual activity with any person under 18 years of age.
14. Produce, possess, access or distribute child sexual abuse material.

15. Facilitate or conceal sexual exploitation or abuse.
16. Retaliate against a victim, complainant or witness.

Reports shall be handled confidentially, sensitively and with respect for the dignity and safety of the affected person.

10.Human Trafficking, Forced Labour and Child Protection

Black Wolf shall not use or benefit from human trafficking, slavery, forced labour, compulsory labour or debt bondage.
Personnel shall not:

1. Recruit or transport persons through force, fraud, deception or coercion.
2. Restrict a worker's freedom of movement.
3. Withhold wages to compel continued employment.
4. Retain identity documents to prevent a person from leaving employment.
5. Charge unlawful recruitment fees.
6. Threaten employees or their families.
7. Facilitate or conceal trafficking or forced labour.

Black Wolf shall not employ any person under 18 years of age to perform security services.
Personnel shall immediately report any concern involving child abuse, child exploitation, trafficking, forced labour or unlawful recruitment practices.

11.Equality and Respectful Treatment

Black Wolf shall provide a workplace free from unlawful discrimination, harassment, bullying and abuse.
Personnel shall not discriminate on grounds including:

- Race or colour.
- Ethnic or national origin.
- Sex or gender.
- Religion or belief.
- Disability.
- Age, except for lawful occupational requirements.
- Marital or family status.
- Social origin or status.
- Political opinion where unrelated to legitimate duties.
- Any other status protected by applicable law.

Personnel shall not use insulting, degrading, threatening or discriminatory language.
Access-control, searching and security decisions shall be based on legitimate and objective security requirements and shall not involve unlawful profiling.

12.Use of Force

Personnel shall take all reasonable steps to avoid the use of force.
Communication, warnings, de-escalation and other non-force measures shall be used where safe and practicable.
Where force is unavoidable, personnel shall:

1. Use force only for a lawful purpose.
2. Use only the minimum force strictly necessary.
3. Ensure the force is proportionate to the threat.
4. Stop immediately when the threat ends.
5. Take reasonable precautions to avoid harm to bystanders.
6. Provide or arrange medical assistance as soon as possible.
7. Report the incident immediately.
8. Follow the Black Wolf Rules on the Use of Force.

Force shall never be used:

- As punishment.
- To obtain information.
- In retaliation.

- To intimidate.
- Because a person is disrespectful.
- For discriminatory reasons.
- Solely to protect property where doing so would create a disproportionate risk to life.

13.Use of Firearms

Firearms may only be carried and used by trained, licensed, competent and formally authorized personnel.
A firearm may only be used against a person:

1. In self-defence or defence of another person against an imminent threat of death or serious injury.
2. To prevent a particularly serious crime involving an imminent and grave threat to life.

Where circumstances permit, personnel shall identify themselves, issue a clear warning and allow sufficient time for the warning to be followed before using a firearm.
Personnel shall not:

1. Fire solely to protect property.
2. Fire at a fleeing person who does not present an imminent grave threat.
3. Fire without identifying a lawful target.
4. Carry an unauthorized weapon.
5. Carry a weapon while impaired or unfit for duty.
6. Use a weapon to threaten, punish or intimidate.
7. Transfer a weapon or ammunition without authorization.
8. Discharge a firearm except in accordance with applicable law and Company procedures.

Every firearm discharge, except during authorized training, shall be reported immediately and investigated.

14.Apprehension, Searches and Handover

Black Wolf personnel do not possess general law-enforcement powers.
Personnel may only temporarily apprehend a person where lawful and strictly necessary:

1. To protect themselves or another person from an imminent threat of violence.
2. Following an attack or serious offence against protected persons or property, pending handover to a Competent Authority.

Any apprehension shall:

1. Be based on reasonable grounds.
2. Use the minimum force necessary.
3. Last for the shortest possible period.
4. Be reported immediately.
5. Result in handover to a Competent Authority at the earliest opportunity.
6. Be properly documented.
7. Protect the person from abuse or humiliation.
8. Provide access to urgent medical treatment where required.

Apprehended persons shall not be interrogated, punished, tortured, publicly displayed or photographed for personal purposes.
Searches shall be conducted lawfully, respectfully and only for legitimate security purposes. Personnel shall protect privacy, respect cultural sensitivities and use the least intrusive search method appropriate to the identified risk.
Personal searches should be conducted by personnel of the same sex where reasonably practicable.

15.Weapons, Equipment and Identification

Personnel shall only possess or use weapons, ammunition, vehicles, radios, protective equipment and other assets that are lawfully authorized and issued.
Personnel shall:

1. Carry only assigned weapons and equipment.
2. Complete required training before use.
3. Follow issue, return and inventory procedures.

4. Keep weapons and ammunition secure.
5. Immediately report loss, theft, damage or malfunction.
6. Never lend, sell, transfer or modify weapons without authorization.
7. Wear approved uniforms and identification while on duty.
8. Carry required Ministry of Interior identification and authorization.
9. Never use another person's badge or identification.
10. Not wear unauthorized military, police or government insignia.

Personnel shall comply with the Black Wolf Weapons and Ammunition Management Procedure and relevant operational instructions.

16.Professional Conduct and Fitness for Duty

Personnel shall:

1. Report for duty on time and fit to perform assigned responsibilities.
2. Remain alert and at their assigned position.
3. Follow lawful post orders and operational instructions.
4. Maintain accurate logs and records.
5. Protect confidential information.
6. Treat clients, colleagues and members of the public professionally.
7. Maintain appropriate appearance and hygiene.
8. Report hazards, incidents and suspicious activity.
9. Use Company and client property responsibly.
10. Avoid behaviour that could damage public trust or the Company's reputation.

Personnel shall not:

1. Sleep while on duty.
2. Abandon a security position without relief or emergency authorization.
3. Falsify attendance, patrol, training or incident records.
4. Permit unauthorized access.
5. Disclose security arrangements without authorization.
6. Possess or consume illegal drugs.
7. Consume alcohol while on duty.
8. Report for duty under the influence of alcohol, drugs or impairing medication.
9. Carry a weapon while impaired, medically unfit or excessively fatigued.
10. Engage in violence, harassment, bullying or intimidation.

17.Anti-Bribery and Corruption

Black Wolf prohibits bribery, fraud, extortion, embezzlement, kickbacks and all other forms of corruption.
Personnel shall not:

1. Offer, request, give or accept a bribe.
2. Accept payment in exchange for ignoring a security requirement.
3. Facilitate unauthorized access or removal of property.
4. Demand unofficial payments.
5. Falsify invoices, expenses, payrolls or time records.
6. Use Company funds or property for unauthorized purposes.
7. Use another person to perform a prohibited act.
8. Conceal suspected corruption.

Any suspected bribery, fraud or corruption shall be reported immediately.

18.Gifts and Conflicts of Interest

Personnel shall not accept or provide gifts, money, hospitality, discounts, favours or benefits intended to influence a decision or create an improper obligation.
Any permitted gift or hospitality shall be modest, lawful, transparent and authorized in accordance with Company procedures.

Personnel shall disclose any actual, potential or perceived conflict of interest, including:

1. Financial interests in clients, suppliers or competitors.
2. Family or personal relationships affecting impartiality.
3. Outside employment or business activities.
4. Personal involvement in recruitment or procurement decisions.
5. Gifts or benefits connected with Company business.

Personnel shall not use Company information, property, authority or business opportunities for private benefit.

19.Confidentiality, Privacy and Information Systems

Personnel shall protect confidential information belonging to Black Wolf, its clients, employees, visitors, contractors and partners.
Personnel shall:

1. Access information only for authorized duties.
2. Share information only with authorized recipients.
3. Keep physical and electronic records secure.
4. Protect visitor registers, CCTV records and personnel information.
5. Follow password and information-security requirements.
6. Immediately report lost data or unauthorized access.
7. Retain or dispose of records according to Company procedures.

Personnel shall not:

1. Disclose operational or client information without authorization.
2. Photograph protected sites, documents or systems without permission.
3. Publish operational information on social media.
4. Share passwords or access credentials.
5. Install unauthorized software.
6. Access unlawful or abusive material using Company systems.
7. Use confidentiality requirements to conceal unlawful conduct or prevent a protected report.

20.Company and Client Property

Personnel shall protect Company, client and third-party property.
Personnel shall not:

1. Steal, misuse or intentionally damage property.
2. Remove property without authorization.
3. Use vehicles, fuel, weapons, radios or equipment for unauthorized purposes.
4. Permit unauthorized persons to use Company assets.
5. Sell or transfer Company property.
6. Use client premises for unauthorized personal or commercial activities.

Loss, damage, theft or misuse of property shall be reported immediately.

21.Political Neutrality and Public Communications

Black Wolf shall remain politically neutral in the provision of security services.
Personnel may participate in lawful political activities in their private capacity but shall not:

1. Represent personal views as Company views.
2. Use Company uniforms, funds, vehicles, weapons or premises for political activity.
3. Campaign while on duty.
4. Intimidate any person because of their political opinion.
5. Make public statements on behalf of Black Wolf without authorization.
6. Publish client or operational information.
7. Use social media to promote hatred, discrimination, violence or unlawful conduct.

The Company shall accurately describe its ICoCA application, membership and certification status and shall not claim to be ICoCA-certified unless certification has formally been granted.

22.Health, Safety and Personnel Welfare

Black Wolf shall take reasonable steps to provide safe and healthy working conditions.
The Company shall provide, as applicable:

1. Risk assessments.
2. Appropriate protective equipment.
3. First-aid and medical arrangements.
4. Emergency and evacuation procedures.
5. Drinking water, sanitation and reasonable rest.
6. Safe accommodation where accommodation is provided.
7. Project-specific safety training.
8. Fatigue-management arrangements.
9. Mechanisms for reporting unsafe conditions.

Personnel shall comply with safety requirements, correctly use protective equipment and immediately report hazards, injuries and near misses.
Personnel may stop or withdraw from an activity presenting an imminent and serious danger that cannot be adequately controlled, provided the matter is immediately reported.

23.Personnel Selection and Training

Black Wolf shall recruit and assign only personnel who are suitably qualified, vetted, trained, competent and legally authorized.
Personnel shall provide complete and truthful information during recruitment and vetting.
The Company shall verify, as applicable:

1. Identity and age.
2. Qualifications and licences.
3. Employment and service history.
4. References.
5. Available criminal and government records.
6. Fitness for the assigned role.
7. Suitability to carry weapons.

Black Wolf provides induction, refresher and role-specific training according to personnel responsibilities and operational requirements. All personnel receive company-wide induction and periodic refresher training covering, as applicable:

- Black Wolf Code of Conduct.
- Human Rights and Respectful Treatment.
- Prohibited Conduct.
- Equality, Harassment, Gender-Based Violence (GBV) and Professional Behaviour.
- Anti-Bribery, Corruption and Conflicts of Interest.
- Confidentiality and Information Protection.
- Reporting Misconduct.
- Grievance, Whistleblowing and Non-Retaliation.
- Unlawful Instructions.
- Health, Safety and Employee Responsibilities.
- Employee Responsibilities and Consequences of Misconduct.

Personnel involved in operational security activities receive additional role-specific training where applicable, including:

- Rules on the Use of Force.
- Firearms and weapons safety.
- Access control and searches.
- Apprehension and handover.
- Incident reporting.
- Emergency response.

- Relevant project and post procedures.

Refresher training is conducted periodically, with additional or remedial training provided where changes, incidents, assessments, audit findings or identified competency gaps indicate a need.
Training attendance, completion and assessment records are maintained through the Company's approved training management records.
Training is managed in accordance with the Black Wolf Training & Competency Procedure and approved training programmes.
Personnel may perform only duties for which they are trained, competent and authorized.

24.Incident Reporting

Personnel shall immediately report any incident involving:

1. Use of force.
2. Firearm discharge.
3. Injury or death.
4. Apprehension or handover.
5. Alleged torture or ill-treatment.
6. Gender-based violence, sexual exploitation, abuse or harassment.
7. Human trafficking or child-protection concerns.
8. Missing weapons or ammunition.
9. Criminal activity.
10. Serious safety incidents.
11. Vehicle accidents.
12. K9 bites or injuries.
13. Bribery or corruption.
14. Serious complaints.
15. Interaction involving alleged abuse by public authorities.
16. Any suspected violation of this Code.

Reports shall be accurate, factual and submitted without concealment, alteration or unreasonable delay.
Personnel shall preserve available evidence and shall not coordinate false accounts, destroy records or interfere with witnesses.
Where a formal incident report is required, the record should include, as applicable, the date, time and location. persons involved. injuries or damage. circumstances leading to the incident. actions taken. and any immediate corrective or protective measures.
Relevant incidents are reviewed internally and reported to the client or competent authorities where required by law, contract or Company procedure.

25.Grievances and Whistleblowing

Black Wolf shall maintain accessible, confidential and fair grievance and whistleblowing mechanisms for personnel and third parties.
Concerns may be reported to:

- A supervisor, project supervisor, team leader or shift leader.
- Human Resources.
- Senior management.
- The designated grievance or compliance contact.
- A Competent Authority where appropriate.
- ICoCA through its available complaint mechanisms where applicable.

Grievance Email: grievance@bw-security.com
Telephone: +964 750 209 1111
Website Form: www.bw-security.com
Office Address: Italian Village One, Villa Number 29, Erbil, Kurdistan Region, Iraq.
Reports may be submitted confidentially. Anonymous reports shall be considered where sufficient information is provided.

26.Non-Retaliation

No person shall be punished or disadvantaged for:

1. Reporting a concern in good faith.
2. Refusing an unlawful instruction.
3. Participating in an investigation.
4. Providing evidence.
5. Assisting an affected person.
6. Contacting a Competent Authority or authorized external mechanism.

A good-faith report shall remain protected even where the allegation is not substantiated.
Retaliation, intimidation, threats, dismissal, demotion, harassment or discrimination against a complainant or witness is prohibited and shall be investigated as a separate violation.

27.Investigations and Cooperation

Personnel shall cooperate with:

1. Internal investigations.
2. Disciplinary procedures.
3. Client investigations where lawfully required.
4. ICoCA oversight and complaint processes where applicable.
5. Lawful investigations conducted by Competent Authorities.

Personnel shall:

- Provide truthful information.
- Preserve evidence and records.
- Maintain required confidentiality.
- Not intimidate complainants or witnesses.
- Not conceal or alter information.
- Not obstruct an investigation.

This obligation applies except where participation or disclosure is prohibited by law.
Serious suspected criminal conduct shall be referred to Competent Authorities where legally required or appropriate.

28.Corrective and Disciplinary Action

Violations of this Code may result in:

1. Corrective instruction.
2. Retraining.
3. Written warning.
4. Removal from a project or position.
5. Suspension.
6. Withdrawal of weapons authorization.
7. Demotion or reassignment.
8. Termination of employment.
9. Recovery of losses where lawful.
10. Referral to a Competent Authority.

Disciplinary action shall be fair, documented, proportionate and consistent with applicable labour law.
Where Black Wolf causes or contributes to an adverse human rights impact, the Company shall take reasonable steps to correct the impact, support appropriate remedy and prevent recurrence.

29.Monitoring and Review

Compliance with this Code shall be monitored through:

1. Site inspections.
2. Internal audits.
3. Management reviews.

4. Personnel interviews.
5. Training assessments.
6. Incident reviews.
7. Weapons inspections.
8. Grievance analysis.
9. Human rights risk assessments and impact assessments, where applicable.
10. Client feedback.
11. Corrective-action monitoring.

This Code shall be reviewed at least annually and whenever there is:

- A significant legal or regulatory change.
- An amendment to applicable ICoCA requirements.
- A serious incident or substantiated grievance.
- A significant change in Company services or operations.
- An audit finding requiring revision.

Yad Mohammed Rashid
General Manager