BLACK WOLF
HUMAN RIGHTS POLICY

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Abstract

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

General Manager

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1. Policy Statement

Black Wolf Company for Security & Personal Protection Services Ltd. is committed to respecting the human rights, dignity and fundamental freedoms of all persons affected by its activities.

Black Wolf recognizes that private security services may directly affect personnel, clients, local communities and other stakeholders. The Company therefore conducts its activities lawfully, responsibly and professionally, with due regard for human dignity, responsible security practices and the protection of fundamental rights.

Black Wolf does not tolerate serious human-rights abuse, including torture, cruel or degrading treatment, forced labour, human trafficking, child labour, sexual exploitation and abuse, gender-based violence, unlawful discrimination or other serious abusive conduct.

The Company's approach is guided by applicable law and relevant internationally recognized principles, including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights, the International Code of Conduct for Private Security Service Providers and applicable principles of international humanitarian law.

2. Purpose

The purpose of this policy is to establish Black Wolf's principles and responsibilities for respecting human rights throughout its activities.

The policy supports the Company in:

- Preventing human-rights abuse.
- Identifying and managing human-rights risks.
- Protecting personnel and affected persons.
- Delivering security services responsibly.
- Providing appropriate reporting and grievance mechanisms.
- Addressing allegations of misconduct or abuse.
- Supporting accountability and appropriate remedy.
- Promoting continual improvement.

3. Scope

This policy applies to Black Wolf personnel and activities undertaken by or on behalf of the Company, including:

- Security personnel.
- Management and administrative personnel.
- Operational and support personnel.
- Temporary and contract personnel.
- Personnel working at client or project locations.
- Subcontractors acting on behalf of Black Wolf, where applicable.
- Company offices, project sites, client locations, transportation activities and other operational environments.

4. Human Rights Commitment and Fundamental Rights

Black Wolf respects the rights and dignity of personnel, clients, local communities, visitors, suppliers, contractors and other persons who may be affected by its activities.

The Company seeks to respect fundamental rights relevant to its operations, including:

- Life and personal security.
- Freedom from torture or ill-treatment.
- Equality and freedom from unlawful discrimination.
- Privacy.
- Freedom of expression.

- Freedom of association.
- Peaceful assembly.
- Freedom of movement.
- Protection against unlawful deprivation of property.
- Access to appropriate complaint and grievance mechanisms.

Where security activities may affect these rights, any restriction must have a lawful basis, serve a legitimate security purpose and remain necessary and proportionate to the circumstances.

Where international humanitarian law applies to an operating environment, Black Wolf personnel are expected to respect the relevant requirements applicable to their activities.

Black Wolf will not knowingly participate in, facilitate or support serious unlawful conduct or human-rights abuse.

5. Management Responsibilities

Senior management provides overall oversight of the Company's human-rights commitments.
The **General Manager** provides leadership, resources and management oversight.

The **Human Resources Department** supports implementation through recruitment, employment practices, workplace conduct, grievances, disciplinary processes and personnel awareness.

The **Operations Department** incorporates human-rights considerations into operational planning, supervision, risk assessment, use-of-force controls, weapons management and incident management.

Project Supervisors, Team Leaders and Shift Leaders support implementation at operational level and ensure personnel understand requirements applicable to their duties.

All personnel are expected to:

- Treat people with dignity and respect.
- Follow this policy and related Company procedures.
- Avoid conduct that may cause or contribute to abuse.
- Report suspected human-rights violations.
- Cooperate with legitimate investigations.
- Raise concerns where safety or rights may be at risk.

Instructions from a supervisor, client or other person do not justify human-rights abuse.

6. Human Rights Due Diligence and Risk Assessment

Black Wolf applies a risk-based approach to identifying and managing human-rights risks associated with its operations.

Human-rights considerations may form part of:

- Project and operational risk assessments.
- Security risk assessments.
- Personnel vetting.
- Client and contract review.
- Supplier and subcontractor assessment.
- Operational planning.
- Use-of-force planning.
- Weapons management.
- Incident analysis.
- Training needs assessment.

Where significant human-rights risks are identified, the Company may complete a Human Rights Risk Assessment, Human Rights Impact Assessment or equivalent documented assessment.
Identified risks should be evaluated, appropriate controls established and their effectiveness monitored.

Where Black Wolf causes or contributes to an adverse human-rights impact, reasonable steps should be taken to address the situation and prevent recurrence.

7. Respect for Personnel, Non-Discrimination and Working Conditions

Black Wolf seeks to provide a professional, safe and respectful working environment.

Personnel should be treated fairly throughout recruitment, employment, deployment, training, promotion, disciplinary action and separation.

The Company does not tolerate:

- Physical or psychological abuse.
- Bullying.
- Harassment.
- Intimidation.
- Unlawful discrimination.
- Retaliation.
- Humiliating or degrading treatment.

Employment decisions should be based on legitimate business requirements, qualifications, competence, performance and applicable legal requirements.

Black Wolf seeks to maintain working conditions consistent with applicable requirements relating to wages, working hours, rest periods, leave, occupational health and safety, employment terms and accommodation where provided.

8. Forced Labour, Human Trafficking and Child Protection

Black Wolf prohibits:

- Forced labour.
- Bonded labour.
- Slavery.
- Servitude.
- Human trafficking.
- Child labour contrary to applicable law.

Personnel must not be forced to work through violence, intimidation, coercion, unlawful restriction of movement, debt bondage, unlawful retention of identity documents or unlawful withholding of wages. Recruitment should be lawful and transparent.

Black Wolf will not knowingly engage personnel, suppliers or subcontractors involved in forced labour or human trafficking. The Company complies with applicable minimum-age requirements and does not knowingly employ children below the legally permitted working age. Where security activities may affect children, personnel should exercise particular care to protect their safety and dignity.

9. Torture, Ill-Treatment and Serious Human Rights Abuse

Black Wolf prohibits torture and cruel, inhuman or degrading treatment or punishment.
Personnel must not engage in, encourage, facilitate or tolerate:

- Torture.
- Physical abuse.
- Sexual abuse.
- Unlawful punishment.
- Cruel or degrading treatment.
- Coercion.
- Serious threats intended to intimidate or punish.
- Other serious abusive treatment.

Suspected or observed abuse should be reported promptly through the Company's established reporting channels.

10.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.

Personnel must not:

- Engage in sexual exploitation or abuse.
- Use their position or authority to obtain sexual favours.
- Engage in unwanted sexual conduct.
- Exploit persons who may be vulnerable because of their circumstances.
- Engage in gender-based physical, sexual or psychological abuse.
- Threaten, intimidate or harass persons on the basis of gender.
- Tolerate serious sexual misconduct by persons acting on behalf of the Company.

Reports involving gender-based violence or sexual misconduct should be handled sensitively, confidentially and without retaliation.

Reasonable measures should be taken to protect affected persons, complainants and witnesses from further harm or intimidation.

11.Recruitment, Vetting and Screening

Black Wolf maintains appropriate recruitment, vetting and screening controls for personnel assigned to security duties.

Screening may consider:

- Identity.
- Qualifications.
- Employment history.
- Experience.
- Training.
- Competence.
- Other legally permissible information relevant to the role.

Black Wolf should not knowingly recruit or deploy personnel where reliable information indicates involvement in serious human-rights abuse, unlawful violence, sexual exploitation or other serious misconduct incompatible with the assigned duties.

Personnel should be appropriately trained and competent before undertaking duties requiring specific authorization.

12.Responsible Security Operations

Human rights form part of Black Wolf's operational security requirements.

Use of Force

Force should be avoided wherever reasonably possible. Where force becomes necessary, it must be lawful, necessary, proportionate and limited to the minimum level reasonably required. Detailed requirements are established through the **Use of Force Policy – BW-OPS-P-UOF-2026-1** and **Rules for Use of Force – BW-OPS-RUF-2026-01**.

Weapons and Ammunition

Weapons and ammunition may only be handled, carried or used by appropriately authorized, trained and competent personnel.Storage, issue, return, movement, inventory and accountability requirements are governed by the **Weapons & Ammunition Management Standard Operating Procedure – BW-OPS-SOP-WAM-2026-1**.

Temporary Apprehension and Restraint

Black Wolf personnel do not possess general law-enforcement authority. Temporary apprehension may only occur where lawful and strictly necessary, including protection against imminent violence or following an attack or serious

offence pending handover to a competent authority. Any person under Black Wolf's temporary control must be treated humanely and protected from unnecessary force, punishment, abuse or unauthorized interrogation.

13.Local Communities and Affected Persons

Black Wolf recognizes that its activities may affect local communities and other persons in areas where services are provided.

Operations should be conducted in a manner that:

- Respects local communities.
- Minimizes unnecessary disruption.
- Respects applicable law.
- Takes appropriate account of local customs where consistent with human rights.
- Protects persons from unnecessary harm.
- Considers the needs of vulnerable persons.
- Promotes professional and respectful engagement.

Where significant risks to communities are identified, appropriate preventive or mitigating measures should be incorporated into operational planning.

14.Clients, Suppliers and Subcontractors

Black Wolf expects relevant clients, suppliers, subcontractors and business partners to respect applicable human-rights principles.

Human-rights considerations may be included in:

- Due-diligence activities.
- Supplier assessment.
- Subcontractor assessment.
- Contract review.
- Procurement controls.
- Performance monitoring.

Where appropriate, relevant human-rights and Code of Conduct requirements should be incorporated into contractual arrangements.

Where a business relationship creates a significant human-rights concern, Black Wolf may require corrective action, increase monitoring, escalate the matter to management, suspend relevant activities or terminate the relationship where justified and legally permissible.

15.Training and Awareness

Black Wolf provides human-rights training and awareness appropriate to personnel responsibilities through the Company's Training & Competency system.

Training may address:

- Human rights and respectful treatment.
- Code of Conduct requirements.
- Non-discrimination.
- Gender-based violence.
- Sexual exploitation, abuse and harassment.
- Torture and ill-treatment.
- Forced labour and human trafficking.
- Child protection.
- Use of force.

- Weapons accountability.
- Incident reporting.
- Grievance and whistleblowing mechanisms.

Human-rights content is incorporated into induction, refresher and role-specific training as appropriate.
Training records are maintained in accordance with the **Training & Competency Procedure – BW-AD-TCP-2026-1**.

16.Reporting, Grievance and Whistleblowing

Personnel should promptly report actual or suspected human-rights violations, serious misconduct or other significant concerns through established Company channels.

Formal incidents are managed in accordance with the **Incident Management & Reporting Standard Operating Procedure – BW-OPS-SOP-IMR-2026-1**.

Human-rights incidents requiring formal registration are recorded through the **Company Portal Incident Register under the HSE Department**.

Black Wolf also maintains grievance and whistleblowing mechanisms through which concerns may be raised by personnel and, where appropriate, affected third parties.

Reporting mechanisms should be:

- Accessible.
- Understandable.
- Fair.
- Timely.
- Appropriately confidential.
- Free from retaliation.

Retaliation against a person raising a concern in good faith or cooperating with a legitimate investigation is prohibited.

17.Investigation, Corrective Action, Remedy and Discipline

Allegations of serious human-rights violations or misconduct should be reviewed according to their nature and seriousness.

Depending on the circumstances, Black Wolf may:

- Conduct an internal review or investigation.
- Appoint appropriately competent personnel.
- Preserve and review relevant evidence.
- Interview relevant persons.
- Apply interim protective measures.
- Refer matters to competent authorities where required.
- Establish corrective or preventive actions.
- Apply disciplinary or contractual measures.

Where Black Wolf caused or contributed to an adverse human-rights impact, reasonable steps should be taken to address the impact and support appropriate remedy. Serious violations may result in removal from duty, suspension, termination of employment, contractual action or referral to competent authorities. Disciplinary action should be fair, proportionate and consistently applied.

18.Records and Confidentiality

Black Wolf maintains appropriate records demonstrating implementation of this policy.
Records may include:

- Human-rights risk assessments.
- Training records.

- Personnel screening records.
- Incident records.
- Investigation records.
- Grievance records.
- Corrective-action records.
- Use-of-force reports.
- Weapons-related records.
- Supplier or subcontractor assessment records.
- Management-review records.

Sensitive personal, grievance and investigation information should be handled confidentially and access restricted to authorized personnel with a legitimate need.

Records are maintained in accordance with applicable legal and Company document-control requirements.

19.Monitoring and Management Review

Black Wolf periodically monitors implementation of its human-rights commitments.

Monitoring may consider:

- Human-rights risks.
- Serious incidents.
- Grievances and complaints.
- Use-of-force incidents.
- Investigation findings.
- Training results.
- Project inspections.
- Audit findings.
- Corrective-action status.
- Supplier or subcontractor concerns.

Trends and recurring issues should be reviewed to identify weaknesses, emerging risks and opportunities for improvement. Senior management periodically reviews significant findings and ensures appropriate responsibilities and resources are established where further action is required.

20.Communication and Accessibility

This policy should be communicated to relevant personnel through appropriate Company channels. Personnel should receive appropriate awareness of their responsibilities during induction and refresher activities. Where relevant, human-rights expectations may also be communicated to clients, suppliers, subcontractors and other affected stakeholders. Reasonable efforts should be made to ensure personnel understand the policy regardless of their role, language or level of education.

Yad Mohammed Rashid
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