BLACK WOLF
RULES FOR USE OF FORCE POLICY

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USE OF FORCE POLICY

BW-P2608

Abstract

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

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1. Policy Statement and Purpose

Black Wolf Company for Security and Personal Protection Services Ltd. requires personnel to avoid the use of force wherever reasonably possible.
Where force becomes necessary, it must be lawful, strictly necessary, proportionate to the threat and limited to the minimum level reasonably required to achieve a legitimate security objective.
The purpose of this policy is to:

- Establish Black Wolf's principles governing the use of force.
- Protect life, dignity and human rights.
- Provide clear limitations on the authority of personnel.
- Promote communication, de-escalation and restraint.
- Establish requirements for firearms and potentially lethal force.
- Ensure use-of-force incidents are reported, reviewed and appropriately addressed.

Force must never be used as punishment, retaliation, intimidation, discrimination, coercion or to obtain information.

2. Scope and Authority

This policy applies to Black Wolf personnel performing duties where the use of force may reasonably arise, including:

- Security personnel.
- Static guards.
- Team leaders and shift leaders.
- Project supervisors.
- Personal security personnel.
- Armed drivers and other authorized operational personnel.
- Managers and supervisors responsible for security operations.

Personnel have no authority to use force beyond:

- Applicable law.
- Their assigned duties.
- Their approved training and demonstrated competency.
- Black Wolf policies and Rules for the Use of Force.
- Lawful project-specific instructions and requirements.

Personnel are individually responsible for their decisions and actions when using force.
Any instruction to use unlawful, unnecessary or excessive force must be refused and reported through the appropriate Company channels.
A client instruction, superior order, emergency or contractual requirement does not justify unlawful conduct.
Where different requirements apply, personnel must follow the lawful requirement that provides the greatest reasonable protection to life and human rights.

3. Core Principles for the Use of Force

Black Wolf personnel are guided by the following principles:

3.1 Avoidance and De-Escalation

Reasonable efforts should be made to prevent the need for force through measures such as:

- Calm communication.
- Clear lawful instructions.
- Verbal warnings.
- Time and distance.
- Use of barriers or cover.
- Withdrawal where safe and appropriate.
- Requesting supervisory or emergency support.

3.2 Lawful Purpose

Force may only be used for a legitimate and lawful security purpose.

3.3 Necessity

Force may only be used where the legitimate objective cannot reasonably be achieved through safer or less harmful means.

3.4 Proportionality

The type, level and duration of force must remain proportionate to the seriousness and immediacy of the threat.

3.5 Minimum Force

Only the minimum force reasonably necessary should be used.
Force must stop when the threat or lawful need for force ends.

3.6 Precaution

Before and during the use of force, personnel should consider:

- Members of the public.
- Vulnerable persons.
- Other personnel.
- The surrounding environment.
- The possibility of escalation.
- The foreseeable consequences of the action.

3.7 Accountability

Any reportable use of force must be documented and reviewed in accordance with Company incident-management requirements.

4. Use of Force Framework

The following framework assists personnel in selecting an appropriate response.
It is **not a mandatory sequence**, and personnel are not required to move through every level before responding to an immediate threat.
Personnel should continually reassess the situation and reduce or stop force when circumstances permit.

Level 1 – Presence and Communication

Personnel may:

- Maintain a professional security presence.
- Identify themselves where appropriate.
- Observe and assess behaviour.
- Communicate calmly.
- Give clear and lawful directions.

Level 2 – De-Escalation and Protective Action

Personnel may, where appropriate:

- Give verbal warnings.
- Create time and distance.
- Use barriers or cover.
- Withdraw or reposition.
- Protect affected persons.
- Request assistance.
- Contact competent authorities.

Level 3 – Physical Control or Restraint

Physical control may be used only when lawful and necessary to:

- Protect a person from harm.
- Prevent an imminent act of violence.
- Overcome active resistance where legally authorized.
- Carry out a lawful temporary apprehension.

Only approved techniques within the individual's training and competency may be used.

Level 4 – Approved Less-Lethal Equipment

Where legally authorized and provided by Black Wolf, approved less-lethal equipment may only be used by trained and authorized personnel when lower-risk measures are inadequate.

Level 5 – Firearms / Potentially Lethal Force

Firearms may only be used under the strict conditions established in Section 6 of this policy.

5. Physical Force, Restraint and Temporary Apprehension

Physical force or restraint may only be used where lawful, necessary and proportionate.
Where temporary apprehension is legally justified, personnel should:

- Use only the minimum force necessary.
- Treat the person humanely and with dignity.
- Protect the person from unnecessary harm.
- Provide or arrange medical assistance where required.
- Keep the apprehension as short as reasonably possible.
- Arrange handover to a competent authority at the earliest opportunity.
- Report and document the incident.

Personnel must not:

- Punish an apprehended person.
- Conduct unauthorized interrogation.
- Use torture or cruel, inhuman or degrading treatment.
- Apply unnecessary pain.
- Use restraint techniques creating an unacceptable risk of suffocation or serious injury.
- Continue restraint after it is no longer necessary.

6. Firearms and Potentially Lethal Force

Firearms may only be carried or used by personnel who are:

- Legally authorized.
- Properly trained.
- Currently competent.
- Medically and operationally fit.
- Formally authorized by Black Wolf.

A firearm may only be used against a person:

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

Firearms must not be used solely to:

- Protect property.
- Prevent escape.
- Enforce compliance.
- Punish or retaliate.
- Intimidate.
- Disperse persons where there is no qualifying threat to life.

Where circumstances reasonably permit and doing so would not create additional danger, personnel should:

- Identify themselves.
- Give a clear warning.
- Allow reasonable time for the warning to be followed.

A warning is not required where delay would create an imminent risk of death or serious injury.

Before firing, personnel should consider:

- Whether the threat has been clearly identified.
- The intended target.
- Background and surroundings.
- Bystanders.
- Foreseeable consequences.

Indiscriminate fire and firing without a clearly identified lawful threat are prohibited.
Any firearm discharge must be directed only toward stopping the imminent threat.
Firing must stop immediately when the threat ends.

7. Prohibited Uses of Force

Black Wolf personnel must not:

- Use force against a compliant person who presents no threat.
- Continue force after the threat has ended.
- Use force as punishment or revenge.
- Use force to intimidate or harass.
- Use force for discriminatory reasons.
- Use force to obtain information or a confession.
- Use excessive, reckless or indiscriminate force.
- Use potentially lethal force solely to protect property.
- Use unauthorized weapons, ammunition, restraints or equipment.
- Use torture or cruel, inhuman or degrading treatment.
- Deliberately restrict breathing through unauthorized or dangerous restraint techniques.
- Alter, conceal or destroy evidence relating to a use-of-force incident.
- Provide false or misleading information about a use-of-force incident.
- Obstruct an authorized review or investigation.

8. Actions Following Use of Force

Following any reportable use of force, personnel should take the following actions as circumstances permit:

8.1 Make the Situation Safe

- Stop using force when the threat ends.
- Secure weapons and equipment.
- Protect affected persons and bystanders.
- Request additional support where required.

8.2 Medical Assistance

First aid or appropriate medical assistance should be arranged for injured or affected persons at the earliest safe opportunity.
Medical assistance should be provided without unlawful discrimination, including to persons who may have presented the original threat.

8.3 Immediate Notification

The responsible supervisor and Operations Department / Security Operations Center should be informed without unnecessary delay.
Emergency services and competent authorities should be contacted where required.

8.4 Preserve Evidence

Relevant evidence should be protected, including where applicable:

- The incident scene.
- Weapons and ammunition.
- CCTV footage.
- Radio and communication records.

- Photographs.
- Documents and logs.
- Witness information.

Personnel should not coordinate accounts or interfere with witnesses.

8.5 Written Reporting

Use-of-force incidents requiring formal documentation should be reported through the Black Wolf **Incident Management & Reporting Standard Operating Procedure**.
A written use-of-force or incident report should normally be completed before the end of the relevant shift or within **24 hours**, unless medical, safety or other exceptional circumstances prevent this.
The shorter reporting period for use-of-force incidents takes priority over the general formal incident-reporting timeframe.

9. Reportable Use-of-Force Events

The following events should be formally reported:

- Physical force resulting in injury.
- Significant physical restraint.
- Use of authorized less-lethal equipment.
- Presentation or pointing of a firearm at a person in response to a threat.
- Firearm discharge outside authorized training.
- Injury or death associated with use of force.
- Property damage caused during a use-of-force incident.
- Temporary apprehension involving force.
- Alleged excessive or unlawful force.
- Assistance to competent authorities involving the use of force.
- Any incident where a supervisor determines formal review is appropriate.

10.Review and Investigation

Use-of-force incidents are reviewed in accordance with the Incident Management & Reporting SOP.
The level of review should reflect the seriousness and circumstances of the incident.
Serious incidents, including firearm discharge, death, serious injury, allegations of excessive force or significant human rights concerns, require formal internal review or investigation.
The review should consider, as applicable:

- Date, time and location.
- Persons involved.
- Circumstances leading to the incident.
- Threat presented.
- Force used.
- Warnings and de-escalation measures.
- Injuries or damage.
- Medical assistance.
- Weapons or equipment involved.
- Witness information.
- Available evidence.
- Whether applicable policy and procedures were followed.
- Corrective or preventive action required.

Where practicable, persons responsible for conducting a formal investigation should not have been directly involved in the incident.
Personnel are expected to cooperate with legitimate investigations.

11.Corrective Action, Accountability and Remedy

Where a review identifies a breach, weakness or competency gap, appropriate action may include:

- Clarification of instructions.
- Retraining.
- Remedial competency assessment.
- Increased supervision.
- Changes to operational procedures.
- Changes to equipment or risk controls.
- Disciplinary action where justified.
- Suspension or withdrawal of weapons authorization.
- Referral to a competent authority where required.

Where Black Wolf causes or contributes to an adverse human rights impact, reasonable steps should be taken to support appropriate remedy and prevent recurrence.
No person should face retaliation for making a good-faith report or cooperating with a legitimate investigation.

12.External Reporting

Relevant clients should be informed of use-of-force incidents in accordance with contractual and project-specific reporting requirements.
Competent authorities should be notified where required by law or where serious injury, death, suspected criminal conduct or other circumstances require external referral.
Internal review must not delay:

- Emergency medical assistance.
- Legally required reporting.
- Cooperation with an official investigation.

13.Training and Competency

Personnel performing duties involving potential use of force should receive appropriate initial and recurrent training.
Training may include:

- Applicable legal requirements.
- Black Wolf Code of Conduct.
- Human rights and respectful treatment.
- Necessity and proportionality.
- Communication and de-escalation.
- Use-of-force decision-making.
- Restraint and temporary apprehension.
- Medical assistance.
- Incident reporting.
- Practical and scenario-based exercises.

Armed personnel must also receive appropriate:

- Weapon-specific handling training.
- Firearms safety training.
- Rules for the Use of Force training.
- Practical competency assessment.
- Recurrent training appropriate to their duties and authorization.

Personnel who are not appropriately authorized, trained, competent or fit for duty must not perform a role requiring use-of-force or firearms authority.
Training, assessments and authorizations are recorded through the Company's approved training-management system.

14.Weapons and Equipment

Only weapons, ammunition, restraints and other controlled equipment that are:

- Legally authorized.
- Approved by Black Wolf.
- Properly recorded.

- Inspected and serviceable.
- Appropriate to the assigned duty.

may be carried or used.

Detailed requirements for the acquisition, storage, issue, return, transport, maintenance and accountability of weapons and ammunition are controlled through the **Black Wolf Weapons & Ammunition Management Standard Operating Procedure**.

15.Responsibilities

15.1 General Manager

The General Manager provides overall management oversight and approves:

- This policy.
- Significant changes to the Company's use-of-force framework.
- Serious disciplinary or systemic corrective actions where appropriate.

15.2 All Personnel

Personnel are responsible for:

- Applying this policy.
- Avoiding and minimizing force.
- Remaining within their authority and training.
- Reporting reportable incidents.
- Seeking guidance where requirements are unclear.

15.3 Team Leaders, Shift Leaders and Project Supervisors

Supervisory personnel are responsible for:

- Briefing personnel on applicable requirements.
- Monitoring compliance.
- Intervening where reasonably possible to prevent unlawful force.
- Arranging medical assistance.
- Ensuring incidents are reported.
- Supporting preservation of evidence.
- Escalating serious incidents appropriately.

15.4 Operations Department

The Operations Department is responsible for:

- Implementing this policy operationally.
- Developing relevant project-specific Rules for the Use of Force.
- Confirming operational roles and authorized equipment.
- Supporting use-of-force training requirements.
- Reviewing operational incidents.
- Coordinating corrective actions relating to operations.

15.5 Human Resources

Human Resources supports matters involving:

- Personnel conduct.
- Human rights or workplace concerns.
- Disciplinary processes.
- Non-retaliation.
- Training or competency gaps requiring follow-up.

16.Project-Specific Rules for the Use of Force

Where operational circumstances require more detailed project-specific Rules for the Use of Force, the Operations Department may develop such rules based on:

- Applicable law.
- Project duties and risks.
- Personnel authority.
- Authorized weapons and equipment.
- Client requirements.
- Black Wolf Code of Conduct.
- This policy.

Project-specific rules must not provide broader authority to use force than permitted by applicable law and this policy. Relevant personnel should be briefed and trained on applicable project-specific requirements before deployment.

Yad Mohammed Rashid
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