

HUMAN RIGHTS POLICY INCLUDING HUMAN RIGHTS IMPACT ASSESSMENT

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1.0	17/02/2025	BPC	CEO	First Version

APPROVED

CEO

DATE

1. Purpose

This policy aligns Bidvest Protea Coin practices with international frameworks and standards, such as the United Nations Guiding Principles on Business and Human Rights.

It also aims to enhance transparency and accountability by publicly stating the organisation's stance on human rights and reporting on its human rights performance to build trust and confidence among interested parties, by demonstrating a commitment to ethical practices.

2. Scope

Bidvest Protea Coin's Human Rights Policy applies to all employees nationwide or anyone conducting business for or on behalf of the company, regarding contractual, legal and regulatory requirements.

3. Reference

- ISO 18788:2015, Clause 8.1.3
- International Code of Conduct for Private Security Companies
- Montreux Document

4. Associated Documents

None

5. Definitions

Human rights are basic rights inherent to all human beings, regardless of nationality, place of residence, sex, sexual orientation, national or ethnic origin, colour, religion, language or any other status.

6. Policy

Bidvest Protea Coin conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognised Human Rights.

- All employment with Bidvest Protea Coin is voluntary. We do not use child or forced labour in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable international and national laws establishing a minimum age for employment, to support the effective abolition of child labour worldwide.
- Bidvest Protea Coin abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- Diversity is embraced at Bidvest Protea Coin. We recognise that a diverse mix of backgrounds, skills and experiences drives new ideas, innovations and products, ultimately providing us with a sustained competitive advantage.
- We believe everyone should be treated with respect regardless of their background. We are committed to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class.

In addition to this, Bidvest Protea Coin is committed to the following principles:

- To respect all human rights.
- To commit to conducting on-going human rights due diligence to assess and mitigate potential human rights infringements.

Compliance

Employees and suppliers are expected to comply with this and all applicable Bidvest Protea Coin policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities.

Specific to this policy, employees and suppliers are expected to:

- Never infringe on human rights.
- Be alert to any evidence of human rights infringements within our operations or those of our business partners and promptly report any suspected human rights infringements.

Human Rights Impact Assessment (HRIA)

1. Purpose:

This Human Rights Impact Assessment (HRIA) aims to evaluate and mitigate the potential human rights risks and impacts associated with Bidvest Protea Coin operations in South Africa. The assessment will focus on identifying and addressing adverse human rights outcomes stemming from the provision of security services in a semi-hostile environment. The HRIA will ensure compliance with human rights standards and the International Code of Conduct for Private Security Service Providers (the Code) as Bidvest Protea Coin seeks alignment with the International Code of Conduct Association (ICoCA).

2. Human Rights Framework

The key human rights reference documents used to conduct this assessment are:

The HRIA methodology relies on international human rights standards and key reference documents, which include:

- **Universal Declaration of Human Rights (UDHR):** The UDHR is a foundational document setting forth basic human rights principles, including the right to life, liberty and security of person.
- **International Covenant on Civil and Political Rights (ICCPR):** The ICCPR outlines a range of civil and political rights, including freedom from torture, arbitrary detention and the right to a fair trial.
- **International Covenant on Economic, Social and Cultural Rights (ICESCR):** The ICESCR covers economic, social and cultural rights, including the right to work, the right to education and the right to an adequate standard of living.
- **International Code of Conduct for Private Security Service Providers:** The Code is a voluntary set of principles that guide the operations of private security companies in a manner consistent with human rights standards.
- **Montreux Document on Pertinent International Legal Obligations and Good Practices for Nations Related to Operations of Private Military and Security Companies during Armed Conflict:** This document provides a set of principles and best practices for nations and private security companies operating in armed conflict zones.

3. The Assessment

This HRIA will be conducted by Bidvest Protea Coin Contracts Manager and team. The focus will be on assessing compliance with the above-mentioned human rights framework, identifying human rights risks related to Bidvest Protea Coin Security's services and providing recommendations to mitigate the risks.

4. Services provided

- Operations - (CCTV Control Room, Access Control / Foot Patrol / Intervention Team / Respond to Emergencies / Respond to Incidents and Accidents, etc)
- Static Security Guard Services
- Close Protection / Personal Protection Officer (CPO / PPO) Security Services
- Mobile Security Services
- CCTV Support Services
- Journey Management Operations

- Risk Management Services
- Specialised Security Support Operations Services

These services may involve armed security personnel, which presents potential risks related to the use of lethal force, human rights abuses and violations of international law. As Bidvest Protea Coin, there are no incidents that have been recorded hence the risk assessment will include potential threats based on the services offered.

Bidvest Protea Coin's armed services involve the use of firearms, depending on contractual requirements. The company has implemented policies and procedures to maintain quality and ensure the ethical delivery of services, including inter alia: -

- Statement of Conformance Policy
- Human Rights Policy
- Use of Force Policy
- Use of Force Procedure
- Apprehension, Search and Operations in Support of Law Enforcement Policy
- Incident Monitoring, Reporting and Investigations Procedure
- Competence, Awareness and Training Procedure
- Selection, Background Screening and Vetting of Personnel Procedure

Bidvest Protea Coin will provide services in a semi-hostile environment, where tensions or unfriendliness exist without aggression. Relevant provisions of international humanitarian law, as articulated in the four Geneva Conventions and their additional protocols, will also be considered.

5.Human Rights Impact Assessment (HRIA) Methodology

Includes desk-based research, policy review and consultations with relevant stakeholders. These include bilateral interviews and group consultations to ensure compliance with the Code. Stakeholders consist of relevant parties, as described below.

- Company personnel
- Local communities
- Company clients and suppliers
- Local authorities
- Armed groups
- Non-Governmental Organisations (NGOs) and humanitarian organisations

6. Country Overview/Context

South Africa is a country with a complex socio-political history, shaped by apartheid, social inequality and a legacy of human rights struggles. The human rights landscape in the country is defined by both significant progress post-apartheid and ongoing challenges in key areas such as economic inequality, police brutality and access to justice. When assessing the Human Rights Impact of local private security service providers in South Africa, several factors must be considered, including the context of the industry, its regulation and the broader societal issues that may affect human rights.

7. Human Rights Impacts

Herein is a table outlining the potential Human Rights Impact Assessment (HRIA) for each of the identified key risk factors by Bidvest Protea Coin:

Human Right Factor	Potential Impact	Scope	Scale	Remediation	Severity
1. Evaluate Working Conditions	Poor working conditions, low wages, long hours, lack of training or safety measures, exploitation of workers	Affects security personnel and their families	Across the private security industry	Raise wages, ensure compliance with labour laws, enforce health and safety standards, provide proper training	High
2. Monitor Use of Force	Use of excessive force, police brutality, human rights abuses or racial profiling during security operations	Affects civilians, particularly vulnerable groups	Nationwide, especially in high-crime areas	Implement strict use-of-force policies, train security personnel in non-violent conflict resolution	Very High
3. Assess Accountability Mechanisms	Lack of transparency in grievance mechanisms, impunity for security personnel, hindering victims' access to justice	It affects individuals and communities who have been victimized by security personnel	Nationwide, with particular focus on private security firms	Strengthen independent oversight, improve complaint processes, ensure penalties for misconduct	High
4. Promote Non-Discrimination	Discriminatory practices, racial profiling, exclusion of	Affects marginalised racial and socio-	Across both urban and rural settings, especially in	Establish anti-discrimination training, enforce policies for	High

	marginalised communities from protection or fair treatment	economic groups	gated communities	fair treatment, regular audits of security practices	
5. Data Protection and Surveillance	Invasion of privacy, unlawful surveillance, misuse of personal data, lack of informed consent	Affects individuals' privacy and data security	Widespread use of surveillance technology, particularly in public and private spaces	Implement strict data protection regulations, ensure transparency about data use, protect personal data from misuse	Medium-High

8.Explanation of Human Rights Impact Assessment

- **Potential Impact** describes the possible human rights violations or negative outcomes related to each factor.
- **Scope** refers to the range of individuals or groups affected by the issue (e.g., workers, civilians, marginalised groups).
- **Scale** measures the extent of the impact geographically or within the affected sector (e.g., nationwide, sector-wide).
- **Remediation** outlines the actions that can be taken to address the issues identified.
- **Severity** indicates the level of human rights concern, with **high** and **very high** severity requiring urgent attention and strong mitigation measures.

9. Recommendations for Improvement

- Strengthening **regulation and enforcement** by ensuring that the Private Security Industry Regulatory Authority (PSIRA) effectively monitors and addresses human rights violations within the sector.
- Encouraging **transparency and accountability** within security companies, including internal reviews and third-party audits of human rights practices.
- Providing **adequate training** for security personnel on human rights, the use of force and ethical conduct.
- Establishing clear **grievance mechanisms** that are easily accessible to the public and ensuring that they are effective in addressing complaints.
- Ensuring better **labour protections** for security officers, including fair wages, safe working conditions and access to social benefits.

A review of this assessment is recommended in 12 months or in response to significant changes in the operational environment.