

# STATEMENT OF CONFORMANCE

## Operating Standards in Iraq

As the CEO of Control Risks' High Risk Managed Services (HRMS) and the Director responsible for our Iraq operations, I endorse this statement of conformance with the principles of the Montreux Document and the International Code of Conduct for Private Security Providers (ICoC).



Andreas Carleton-Smith, CEO, High Risk Managed Services, Control Risks

## Overview

**Our mission:** Control Risks is a specialist risk consultancy that helps create secure, compliant and resilient organisations, providing the insight and intelligence to realise opportunities and grow.

We have been fulfilling our mission in Iraq since 2003. We understand that our success has depended on retaining the trust and respect of our clients and business partners, as well as government officials, and the communities among whom we operate. Control Risks is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices. We apply our Code of Ethics in Iraq as we do in all other jurisdictions in which we operate. The Company does not take part in acts of corruption, or pay bribes or receive kickbacks either directly or indirectly. Our people are expected to use their judgement not just to avoid malpractice but to promote good practice. We expect our clients, suppliers, subcontractors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own.

We comply with relevant laws and regulations, including applicable international humanitarian law (IHL). We consider that business integrity goes beyond compliance with the law, and involves the application of our four core values. These are: integrity and ethics, professionalism and excellence, collaboration and teamwork, and commitment to people. Our commitment to these values lies at the heart of the company.

## Our policies

Alongside our Code of Ethics and core values, a well-established set of policies underpins our work and our internal processes. Our Human Rights policy is central to our operations in Iraq. Control Risks respects the full range of human rights, and our policy takes account of the Universal Declaration of Human Rights; the UN Guiding Principles on Business and Human Rights; the Montreux Document; the International Code of Conduct for Private Security Providers (ICoC); and the Voluntary Principles on Security and Human Rights. Control Risks is a founding member of the ICoC Association and operates in accordance with the principles contained in the Code. The company has been a participant in the UN Global Compact since 2007. Our Code of Ethics, Human Rights policy and Anti-Bribery and Anti-Corruption policy are available on our website ([www.controlrisks.com](http://www.controlrisks.com)).

## Our clients

Control Risks will only work on projects and with clients that conform with the principles of Montreux and ICoC, and with our own integrity standards. We will not undertake any assignment that is against local or international law, or which is prohibited by UN sanctions or which makes us complicit – even indirectly – with human rights abuses. Before taking on new business in Iraq we will consider whether the project could have any adverse impact on the human rights of anyone who may be affected by the proposed work.

## Our people

Our exacting selection, vetting and recruitment processes ensure that we hire only those people of appropriate calibre, skills, qualifications and experience to meet the demands of our Iraq operations. We provide initial and ongoing training programmes to ensure our people remain competent, and regularly evaluate their fitness and performance.

Control Risks is committed to the principles of diversity, equality and non-discrimination. We demonstrate our commitment through our employment practices, and in the way we work with each other and with our suppliers and clients. The Company is committed, wherever practicable, to achieving and maintaining a workforce which broadly reflects the communities in which it operates. We remunerate our people fairly, and we promote a working environment in which everyone is treated with respect and dignity. If an employee is found to have carried out an act of harassment or bullying against a fellow employee then he or she will be subject to disciplinary action.

## Risk management

Our risk management is in line with the highest corporate governance standards, our risk management processes are compliant with the UK Corporate Governance Code and risk management is embedded in the Company's business processes. We conduct due diligence enquiries on agents, representatives and subcontractors before entering a commercial relationship with them.

Prior to embarking on any new project in Iraq, a risk assessment is conducted. We conduct detailed threat and risk assessments prior to all planned movement in Iraq as part of a detailed journey management process, and identify and avoid unacceptable security risks. The security services Control Risks provides in Iraq are based on up-to-date information and analysis. Our national liaison and compliance functions help us ensure that we maintain a 'framework of consent' and freedom of movement for both our own and our clients' personnel throughout Iraq.

## Health, safety and the environment

Control Risks is committed to safeguarding the health and safety of our people, our clients and the communities who may be affected by our operations. We are committed to respecting the environment and acting in a socially responsible manner worldwide, in compliance with applicable HSE laws and regulations. Control Risks Iraq is externally certified to ISO45001:2018.

## Quality

Control Risks Iraq maintains a quality and security operations management system, with detailed documented processes in place covering every aspect of our work in Iraq, including the import, export, handling, training and rules for the use of all equipment needed for its operations. Our processes are regularly reviewed and updated where necessary to maintain the quality of the services we provide to our clients and to ensure continual improvement. Our quality and security management system has been externally certified as compliant with ISO9001:2015, ISO18788:2015 and PSC1:2012.

Incident management and business continuity plans are regularly reviewed and rehearsed to ensure continuity of service to our clients. We will seek to remedy any adverse impact on human rights. We regularly review and rehearse incident management and business continuity plans to ensure continuity of service to our clients. We will take prompt action to investigate and if necessary remedy any adverse human rights impacts.

## Raising a concern, grievance or complaint

Our people are encouraged to refer to Control Risks' Ethics Committee if they are in any doubt about the human rights or other ethical implications of a proposed course of action, for example a breach of the ICoC. If they suspect that a member of Control Risks is engaged in unacceptable or unethical conduct and feel unable to raise the issue with their line manager, they are able to make an anonymous report using our third party whistleblowing service. Our employees are able to make use of our Grievance policy if they are dissatisfied with the outcome of informal discussions. If a third party wishes to make a complaint, they may use our website to contact Control Risks management or our General Counsel. Other mechanisms are available where appropriate to ensure that language or technology requirements do not prevent a third party from making a complaint.