



# Human Rights Policy

POLICY | ZSS-POL-002 | Revision 00

| Prepared by  | Reviewed by    | Approved by    | Effective date |
|--------------|----------------|----------------|----------------|
| Omar Mahmood | Muthanna Ahmed | Muthanna Ahmed | 1 October 2026 |

## 1. Purpose

Commit Alzeizfoon to respecting human dignity and preventing, mitigating and remedying adverse human rights impacts associated with private security services.

## 2. Scope

Binding on personnel, managers, labour providers and subcontractors, and applicable to interactions with clients, visitors, communities and public security authorities.

## 3. Roles and responsibilities

Authorised Director provides accountability; IMS/Human Rights Focal Point leads due diligence; Operations enforces site controls; HR and Training manage personnel safeguards; all staff must report concerns.

## 4. Non-negotiable commitments

- Prohibit torture, cruel or degrading treatment, arbitrary detention, discrimination, harassment, retaliation, slavery, forced labour, human trafficking, child labour and sexual exploitation or abuse.
- Respect life, security, privacy, equality and lawful freedoms of assembly and expression; treat every person with dignity regardless of nationality, gender, language, religious belief, disability or other protected status.
- Use lawful, defensive security measures only; use force only when strictly necessary, reasonable and proportionate, consistent with the company RUF and applicable law.
- Do not knowingly facilitate abuses by clients, public forces or subcontractors; escalate improper instructions and stop unsafe or unlawful conduct.

## 5. Due diligence and stakeholder engagement

- Conduct a human rights impact assessment before new high-risk assignments and update it at least annually, following material incidents or significant context changes.
- Consult affected workers, communities and legitimate local stakeholders in a safe, culturally appropriate way without compromising privacy or safety.
- Prioritise severe impacts by scale, scope and irremediability; assign mitigation owners, deadlines, monitoring indicators and residual-risk decisions.
- Evaluate public/private security coordination, checkpoints, searches, data handling, vulnerable people, labour conditions and grievance accessibility.

## 6. Prevention, complaints and remediation

- Train all staff before deployment in rights, reporting, site instructions and escalation; refresh competency annually and after material changes.
- Maintain accessible, confidential complaint channels for personnel and external parties without retaliation, under ZSS-POL-008.
- Promptly provide medical and safeguarding support; investigate impartially, preserve evidence, refer crimes to competent authorities and pursue corrective action and appropriate remedy.
- Inform clients of material rights risks and support lawful external oversight, without falsely representing ICoCA membership or certification.

## Records, monitoring and review

- The document owner retains implementation records and ensures they are searchable, access-controlled and preserved according to the approved records-retention schedule (PRO\_SOMS\_07).
- Nonconformities, corrective actions and lessons learned are logged and reviewed under PRO\_SOMS\_02; the policy is reviewed at least annually and when law, threat, client scope or a serious incident changes.
- Internal audit and management review evaluate implementation, not merely document existence (PRO\_SOMS\_03 and PRO\_SOMS\_04).

## IMS and external references

- IMS interfaces: PRO\_SOMS\_05, PRO\_SOMS\_09, PRO\_SOMS\_14, PRO\_SOMS\_22
- External: Iraq Law 52/2017 (as amended); ISO 18788; ICoC; VPSHR, to the extent relevant and legally applicable.