



# Jubba Security Company

*Protect & Serve*

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## **Jubba Security Company General Policies and Code of Conduct**

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Responsible Policy: HR Department

Approved By: Senior management Team

This document explains Policies, Code of Conduct and states our enduring commitment to the highest ethical standards combined with strict adherence to national and international law. Although this is not a legally binding document it explains the principles and ethical standards that apply to our staff. Jubba Security expects every employee, contractor, agent or any other person or company acting for or on our behalf to comply with this Code and in so doing, act with honesty and integrity whilst exercising good judgment.

### **GENERAL**

The Jubba Security Company provides both hard security and soft security. We provide static, armoured escort protection, personal protection, security risk assessment, commercial crime investigation, resources and infrastructure. Jubba Security is proud to be a solution-driven company that always resolves the challenges of working in a complex environment. We partner with our clients for a deeper understanding of what is required and deliver cost-effective solutions without compromising on quality. Dedicated to ensuring our clients mobilize on time, no matter how complex the project, we ensure clients' operations are conducted without interruptions while maintaining a strong yet unobtrusive presence. To our clients, we are a successful business enabler proven by our ongoing client relationships and their repeat business over the years. we ensure that technical and logistical considerations are complimented by safety and physical security at all times.

### **ENVIRONMENTS AND CONTEXT**

Jubba Security Company's commitment to sustainability has never been stronger. Our approach is integrated throughout our business to strive to protect the environment, empower community, local economy and get results the right way—today and tomorrow.

We are devoted, and enjoy, finding ways in which we can reduce the impact of our work both in the office and when work takes us away from the office. It is our policy to: Buy and use vehicles approved as per latest emission norms and cannot cause the air pollution.

As small businesses owners our policy is to help the local economic growth by providing employment opportunities to people who may not be employed by large organizations and big companies. For the growth of an economy and community, the circulation of money within the community is very important

Jubba Security Company believes the importance of local communities and societies. Addressing human rights helps mitigate global risks. Businesses thrive in an environment where civic rights are respected. Promoting workers' rights increases productivity and profitability. Our policy is not to use excessive force. This policy respects for human rights and improves relations with local civil society

## **PERFORMANCES AND IMPROVEMENT**

As a company we 'strive for excellence' and have an enduring commitment to continual improvement. We are passionate about delivering a service and performance that exceeds the expectations of our clients. We seek new opportunities and innovative solutions to overcome challenges efficiently and excel in our field.

## **CULTURE, ETHICS AND RESPECT**

Jubba Security Company conducts services honestly and honorably, and we expect our clients and suppliers to do the same. Our advice, assistance and the methods imparted through our training and service delivery, take proper account of ethical considerations, *together* with the protection and enhancement of the moral position of our clients and suppliers. As an international operator, our contractors and employees will consider, in the execution of their duties, local laws, customs and culture. We will ensure that our services and conduct is delivered within legal boundaries and company policy whilst respecting local customs.

### ***Workplace Harassment***

The Company is committed to providing a work environment that provides employees equality, respect and dignity. In keeping with this commitment, the Company has adopted a policy of "zero tolerance" with regard to employee harassment. (1) enduring the offensive conduct becomes a condition of continued employment; or (2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

This policy applies to all terms and conditions of employment. Harassment of any other person, including, without limitation, fellow employees, contractors, visitors, clients or customers, whether at work or outside of work, is grounds for immediate termination. The Company will make every reasonable effort to ensure that its entire community is familiar with this policy and that all employees are aware that every complaint received will be promptly, thoroughly and impartially investigated and resolved appropriately. The Company will not tolerate retaliation against anyone who complains of harassment or who participates in an investigation.

### **Sexual Harassment**

Sexual harassment is prohibited by JUBBA SECURITY POLICY, and applies equally to men and women. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when the conduct: (1) explicitly or implicitly affects a term or condition of an employee's employment; (2) is used as the basis for employment decisions affecting the employee; or (3) unreasonably interferes with

an employee's work performance or creates an intimidating, hostile or offensive working environment.

## **FINANCIAL ACCURACY**

All financial transactions must be conducted correctly and honestly. Employees must obtain adequate approval from personnel with the correct level of financial authorization. Employees must not intentionally do anything, which may be dishonest, misleading or incorrect. All transactions must be recorded accurately and promptly and held for audit purposes.

## **CONFLICT OF INTEREST**

Employees must not engage in any activity which conflicts or competes with the interests of JSC or in any way damage the company's reputation for integrity. Employees must not exploit their position or influence, or misuse any JSC asset including confidential information, for their own personal gain or benefit or that of an unauthorized third party. This also precludes any unfair bias or favoritism during the recruitment of personnel or any other business activity. Any potential conflict of interest must be reported to senior management.

## **LEGAL AND REGULATORY COMPLIANCE**

JSC and its employees comply with all national and international, which include legislation on trade, export controls and financial and political sanctions. We ensure that all of our activities are carried out lawfully and comply with the terms and conditions of our control licenses and any imposed international restrictions. We operate within strict guidelines, which include Rules on the Use of Force when employing armed guards. We maintain global oversight of our legal responsibilities through government and local engagement and membership of regulatory industry bodies.

## **INTERNATIONAL CODE OF CONDUCT**

Our company has applied to become member, and affiliate of the International Code of Conduct for Private Security Service Providers and has therefore partnered with other companies who to operate in compliance with the Code's principles and standards. We strive to ensure our staff; services, policies and procedures reflect these principles and values

## **HUMAN RIGHTS**

Jubba Security obeys to the rule of law, and acknowledges our corporate responsibility to respect human rights. We believe that all businesses and organizations, including ourselves, should avoid causing any adverse effect on human rights. JSC also endorse the principles of the security companies and the United Nations Guiding Principles on Business and Human Rights and their "Respect, Protect, Remedy" framework.

## **EQUALITY AND DISCRIMINATION**

**Jubba Security** aims to treat all our people fairly and with respect, and to comply with applicable employment laws. Issues of gender, race, religion, color, age, personal disability or sexual orientation must never influence our decisions or actions. All employment decisions will be made on qualifications and competency compared to clearly stated job specifications. JSC will not tolerate any form of harassment or abuse; employees or co-workers should report any

harassment or discriminatory behavior to senior management or a Human Resources representative.

## **HEALTH AND SAFETY**

We place the highest priority on the health and safety of our employees, contractors and other third parties. We have implemented a variety of measures including our Health and Safety Policy and a safe system of work to ensure a safe working environment. We recognize the inherent dangers and limitations presented by the complex environments in which we operate and ensure that reasonable precautions are taken. All personnel are to be aware of this policy and relevant risk assessments, they must use all the protective equipment supplied and follow JCS procedures and training guidelines. All personnel are actively encouraged to report any health and safety risks or near miss situations. Our policies and processes are compliant with Occupational Health & Safety Management Standard.

## **DRUGS AND ALCOHOL**

We operate a zero-tolerance policy towards drugs and alcohol, which means that any person found to be under the influence of illegal drugs whilst on duty will have their contract terminated with immediate effect. The Jubba Security Drug and Alcohol Policy clearly states that employees are not permitted to consume illegal drugs. Furthermore, they are not permitted to have any Qaad/ chewing green leaves in their possession during the work hours. We aim to ensure that the use of drugs does not in any way compromise the safety and efficiency of our services.

## **REPORTING OBLIGATIONS**

Staffs are required to report, known or reasonable suspicion of the commission of any of the acts identified in this document or signatory documents to senior management. In turn senior management are required to investigate the issue and report this to the appropriate authority if necessary; this may include one or more of the following: the Client, the Competent Authorities in the country where the act took place, the country of nationality of the victim, or the country of nationality of the perpetrator.

## **THE WEAPON CONDUCT/USE**

### **Weapons**

Jubba Security Company is authorized to carry small armed. Jubba Security Officers or agents are issued or permitted to wear or carry a firearm or other weapons, including but not limited to AK47, handgun, handcuffs, batons, mace, pepper spray, stun guns, knives, saps, etc. while on duty.

- 1- **General Rules:** Jubba Security Company are required their Personnel to, treat all persons humanely and with respect for their dignity and privacy and will report any breach of this Code.
- 2- **Rules for the Use of Force:** Jubba security will adopt Rules for the Use of Force consistent with applicable law and the minimum requirements contained in the section on Use of Force in international Code of Conduct and agree those rules with the Client.

- 3- Use of Force: Jubba Security Company are required their Personnel to take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable law. In no case shall the use of force exceed what is strictly necessary, and should be proportionate to the threat and appropriate to the situation.
- 4- Jubba Security Company are required that their Personnel not use firearms against persons except in self-defense or defense of others against the imminent threat of death or serious injury, or to prevent the perpetration of a particularly serious crime involving grave threat to life.
- 5- To the extent that Personnel are formally authorized to assist in the exercise of a state's law enforcement authority, Jubba Security Company will require that their use of force or weapons will comply with all national and international obligations applicable to regular law enforcement officials of that state and, as a minimum, with the standards expressed in the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Official

### **Weapons Training**

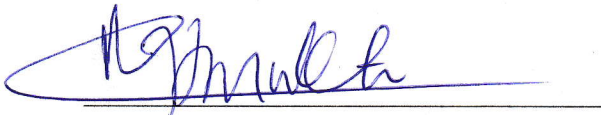
Jubba Security Company are required that:

- a) Personnel who are to carry weapons will be granted authorization to do so only on completion of appropriate training with regard to the type and model of weapon they will carry. Personnel will not operate with a weapon until they have successfully completed weapon-specific training.
- b) Personnel carrying weapons must receive regular, verifiable and recurrent training specific to the weapons they carry and rules for the use of force.
- c) Personnel carrying weapons must receive appropriate training in regard to rules on the use of force. This training may be based on a variety of relevant standard

## COMPLAINTS AND GRIEVANCES

Jubba Security has an established complaints and grievance procedure to address any issues or allegations raised. JSC will:

1. Welcome any report or allegation of improper and/or illegal conduct, including such acts or omissions that would violate the principles contained in this Code. Procedures will be fair, transparent and offer effective remedies, including recommendations for the prevention of recurrence.
2. Investigate allegations promptly, impartially and with due consideration to confidentiality;
3. Keep records about any such allegations, findings or disciplinary measures. Except where
4. prohibited or protected by applicable law, such records should be made available to a Competent Authority on request;
5. Cooperate with official investigations, and not participate in or tolerate from their personnel, the impeding of witnesses, testimony or investigations;
6. Take appropriate disciplinary action, which could include termination of employment in case of a finding of such violations or unlawful behavior; and ensure that their Personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.



Muktar Hassan Hirsi

Jubba Security Company

The General Director