



Jubba Security Company

Protect & Serve

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Jubba Security Company Human Right Policy/Practice

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Responsible Policy: Policy Department/HR

Approved By: Senior management Team

Objective:

Jubba Security Company is a private security company endeavors to respect and address actual human rights issues within our scope of control. Jubba Security Company fully supports and adheres to the principles of both the United Nations Global Compact and the Universal Declaration of Human Rights. Our company does not accept human rights violations and will not collaborate with any partners that tolerate such behavior.

1. SCOPE:

This policy applies to all employees, contractors, and subcontractors of Jubba Security Company, across all operations. It is intended to operate in conjunction with Jubba Security' Vision, Mission, and Values, and other company policies such as the Code of Conduct. It covers activities in which the company directly or indirectly influences, including:

- **Physical Security Operations:** Personnel deployed in high-risk environments.
- **Consulting and Advisory Services:** Security assessments and strategic advice.
- **Training Programs:** Internal and client-facing training on security protocols, including human rights considerations.
- **Technology and Surveillance:** Use of security technology that may impact privacy or civil liberties.
- **Supply Chain:** Ensuring suppliers, subcontractors, and partners comply with our human rights standards.

2. POLICY

Jubba Security obeys to the rule of law, and acknowledges our company 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.

Jubba Security Company is committed to acting in a manner that signals our belief in human rights, dignity, and fairness, as reflected in our Code of Conduct, Vision, Mission, and Values, and policies, including our employment practices, non-discrimination policies, and our health and safety policies. Further, Jubba Security will comply with all local laws and regulations regarding human rights in all locations in which we operate and adhere to the principles of the United Nations Global Compact and the Universal Declaration of Human Rights. Jubba Security will not willingly or knowingly assist in any violation of human rights, benefit from human rights abuses, or remain silent when human rights violations are being committed.

a. **Policy on detention**

The company policy of detention is prohibited at all time.

b. **Policy on apprehending persons**

Jubba Security Private guards do not have the same authority as law enforcement officers to detain or arrest individuals. However, in some cases, they may be authorized to make a citizen's arrest if they witness a crime being committed. Jubba Security Guards are governed by the laws and regulations of Somali Government which allows only citizen arrest in the area where they operate. In general, our security guards are expected to act within the boundaries of the law and to cooperate with police when necessary.

When comes to apprehension, our security guards have no authority under the law beyond that of a private citizen. Their principal duty is to observe, report, and prevent rather than apprehend. Company employees are forbidden from arresting or apprehending any person for any reason. This includes when you are traveling to and from your duty station while wearing the Company uniform

c. **Prohibition of Torture or Other Cruel, Inhuman or Degrading Treatment or Punishment**

Jubba Security Company personnel are forbidden to engage in torture or other cruel, inhuman or degrading treatment or punishment.

d. Use of Force

Security guards may use force only when strictly necessary as the last resort and only to the extent required for self-defense and the people they protect during their operation, always in accordance with Jubba Security SOP, Ethics and Code of Conduct.

In cases where force is used, such incidents should be properly reported to the appropriate authorities and to the company, as soon as it is safe to do so. Jubba Private Security also aspires to conform with the legal duty to rescue any persons, including suspected assailants, who no longer pose a threat and may be at risk of drowning or worsening of injuries. Medical aid should be provided to injured persons, including to the offenders

e. Sexual Exploitation and Abuse or Gender-Based Violence

Jubba Security is committed to promote human rights within its forces by preventing 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

f. Human Trafficking

Jubba Security company strictly prohibits trafficking in persons in all our operations, in those of our recruitment business partners and subcontractors, and in the delivery of security services at our customers' sites and operations.

Company personnel in the performance of their duties will not engage in or contribute to human trafficking and will be alert for and report any such cases to the competent authority

g. Prohibition of Slavery and Forced labour.

Our company personnel shall not be subject to any form of forced, compulsory, bonded, or indentured labor. All work must be voluntary, and personnel shall have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.

h. Prohibition on the worst Forms of Child Labour

Jubba Security respects the rights of children (anyone under the age of 18) to be protected from the worst forms of child labour, including:

- All forms of slavery or similar practices – such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children in the provision of armed services.
- The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances.

- The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs.
Work, which by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

i. **Prohibition of the recruitment of children for the provision of security services.**

Jubba Security Company prohibits the recruitment and employment of any person under 18 years of age.

j. **Discrimination.**

Jubba Security does not tolerate discrimination with respect to employment and occupation, including not making employment-related decisions based on any characteristics protected by applicable law, such as age, color, gender, gender identity, national origin, physical or mental disability, race, religion, sexual orientation or any other legally protected personal basis.

- k. **Raising Concerns:** All persons are encouraged to report any concerns regarding human rights to Jubba Security Company through the reporting processes outlined in the Code of Conduct.

3. **Due Diligence Process**

Our human rights due diligence process seeks to identify, assess, prevent, mitigate, and remedy potential adverse human rights impacts associated with our operations. This includes:

3.1 **Risk Identification**

We will conduct thorough assessments to identify potential risks in the following areas:

- **Use of Force:** Risks of excessive use of force or abuse of authority.
- **Privacy and Surveillance:** Risks related to monitoring, data protection, and privacy violations.
- **Labor Rights:** Ensuring fair treatment of employees, contractors, and local communities, including preventing forced labor or exploitation.
- **Cultural and Social Impact:** Understanding and respecting local customs, values, and potential community relations risks.
- **Discrimination and Equal Opportunity:** Ensuring the fair and equal treatment of all individuals, regardless of gender, race, ethnicity, nationality, or other protected characteristics.

3.2 Risk Assessment

We will evaluate the scale and likelihood of risks identified, based on the following categories:

- **Scope:** The range and reach of human rights impacts—whether local, national, or international.
- **Scale:** The potential severity of impacts, ranging from low-level concerns to severe human rights violations.
- **Likelihood:** The probability of identified risks occurring based on past incidents, operating context, and emerging trends.

4. Risk Management Strategy

Once risks are identified and assessed, the company will take proactive steps to mitigate them, with an emphasis on continuous monitoring and improvement:

4.1 Prevention and Mitigation

We will adopt preventive measures such as:

- Training all personnel in human rights standards and ethical conduct.
- Developing clear policies on the use of force, security operations, and respect for community rights.
- Vetting subcontractors and suppliers to ensure they adhere to our human rights standards.
- Collaborating with local communities to understand their concerns and perspectives.

4.2 Remediability

We are committed to addressing any human rights violations swiftly and effectively. If an adverse human rights impact occurs, we will:

- **Remediation Mechanisms:** Provide accessible channels for victims of human rights abuses to report complaints and seek redress.
- **Corrective Actions:** Take immediate corrective action, such as disciplinary measures, revising operational protocols, or offering compensation to affected individuals or communities.
- **Independent Oversight:** Engage third-party monitors or auditors to assess the effectiveness of corrective actions and ensure compliance with human rights standards.

5. Likelihood of Risks

We will continually evaluate and adjust our due diligence process based on the likelihood of risks. This involves:

- Monitoring geopolitical developments, local security situations, and evolving human rights standards in regions where we operate.
- Engaging in dialogue with human rights organizations, governmental bodies, and local communities to stay informed about emerging risks.
- Reviewing past incidents and near-misses to learn from them and adjust our operations accordingly.

6. Reporting and Accountability

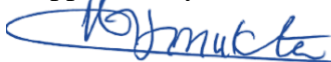
Our commitment to human rights is monitored through regular internal audits, assessments, and stakeholder engagement. The company will:

- Publish an annual report on human rights due diligence, outlining the steps taken, risks identified, and corrective actions implemented.
- Maintain a grievance mechanism for both employees and external stakeholders to report human rights concerns confidentially.
- Establish an internal Human Rights Committee responsible for overseeing the implementation and enforcement of this policy.

7. Conclusion

Jubba Security is committed to the highest standards of human rights due diligence in all our operations. We will continue to refine and improve our processes, collaborating with stakeholders and learning from experiences to ensure that we respect, protect, and promote human rights across all aspects of our work.

Approved By:



Muktar Hassan Hirsi

The Managing Director

Jubba Security Company