

**VOLUNTARY PRINCIPLES INITIATIVE**  
**SUMMARY OF IMPLEMENTATION EFFORTS DURING 2015**

This report provides an overview of Participants' efforts to implement the Voluntary Principles on Security and Human Rights (the "Voluntary Principles" or "VPSHR") during 2015. The information contained in this report is based on the individual annual reports submitted by Participants in the Initiative of the Voluntary Principles on Security and Human Rights (the "Voluntary Principles Initiative") in anticipation of the 2016 Annual Plenary Meeting.

Each year, Participants' annual reports provide considerable detail on implementation efforts and outreach activities in countries around the world. The summary report is intended to highlight good practice and progress in Participants' implementation efforts.

This year's reports included information on Participants' activities in the following countries: Algeria, Angola, Australia, Azerbaijan, Bangladesh, Bolivia, Botswana, Brazil, Burma, Burundi, Canada, Chad, Chile, China, Colombia, Cuba, the Democratic Republic of Congo, Ecuador, El Salvador, Equatorial Guinea, Ethiopia, Fiji, France, Georgia, Germany, Ghana, Guatemala, Guinea, Haiti, Honduras, Indonesia, Iran, Iraq (including the Kurdistan Region of Iraq), Ivory Coast, Jamaica, Kazakhstan, Kenya, Laos, Liberia, Libya, Madagascar, Malaysia, Mali, Mexico, Mongolia, Morocco, Mozambique, Namibia, the Netherlands, Nigeria, Norway, Pakistan, Papua New Guinea, the Philippines, Panama, Peru, Russia, Rwanda, Senegal, Sierra Leone, Solomon Islands, Spain, South Africa, Suriname, Switzerland, Tajikistan, Tanzania, Thailand, Trinidad & Tobago, Tunisia, Turkey, Uganda, United States, United Kingdom, Uruguay, Venezuela, Vietnam, Yemen, and Zambia.

\* \* \* \*

The structure of this report is based on the Voluntary Principles Draft Reporting Guidelines.<sup>1</sup> These guidelines were first used by Participants to prepare annual reports in advance of the 2010 Annual Plenary Meeting.<sup>2</sup> The Guidelines are intended to:

- (i) support transparency regarding efforts to implement (and/or assist in the implementation of) the Voluntary Principles;
- (ii) assist Participants in reporting on efforts to implement the Voluntary Principles; and
- (iii) facilitate the exchange of good practices among Participants.<sup>3</sup>

---

<sup>1</sup> The Initiative of the Voluntary Principles on Security and Human Rights, Governance Rules, Appendix 5, *Voluntary Principles Draft Reporting Guidelines*. All Participants are required to submit an annual report each year.

<sup>2</sup> Therefore, this is the seventh year that Participants have prepared their annual reports in a manner guided by the Reporting Guidelines.

<sup>3</sup> The Initiative of the Voluntary Principles on Security and Human Rights, Governance Rules, Appendix 5, *Voluntary Principles Draft Reporting Guidelines*.

There are four main sections to the Reporting Guidelines:

- A. Commitment to the Voluntary Principles;
- B. Policies, Procedures, and Implementation Activities;
- C. Country Implementation; and
- D. Lessons and Issues.

Companies are required to report on Reporting Guidelines (A)-(C). Governments and non-governmental organizations (“NGOs”) are required to report on the following Reporting Guidelines: A; B.2; B.7; B.8; C.9; C.10; and C.12. Reporting on (D) is optional for all three Pillars.

## **A. COMMITMENT TO THE VOLUNTARY PRINCIPLES**

### **1. Statement of commitment or endorsement of the Voluntary Principles<sup>4</sup>**

All Participants affirmed their commitment to the Voluntary Principles. Participants provided examples of statements, reports, and policies in which they had publicly stated their commitment.

Members of all Pillars referenced the U.N. Guiding Principles on Business and Human Rights (the “U.N. Guiding Principles”) in the context of expressing their commitment to the Voluntary Principles. Members of all Pillars also cited participation in the Steering Committee and specific Working Groups as reflective of their commitment to the Voluntary Principles Initiative.

Participants in all Pillars also referenced attendance at a June 2015 Strategy Retreat organized by the Steering Committee. At the retreat, Participants collaborated on the development of an action plan to achieve objectives consistent with the goals set forth in the 2014-2016 Strategy Document.

Participants also cited a range of activities through which they demonstrated their commitment during the reporting year, including: training initiatives; public and private advocacy and dialogue; and the development of policies and procedures. The diversity of Participants’ efforts is reflective of the different capacities and functions of each Pillar.

#### *Government Pillar*

Participants in the Government Pillar noted that implementation of the Voluntary Principles is consistent with a broader commitment to protect and promote human rights. One government noted that it required security contractors engaged to protect government officials

---

<sup>4</sup> The section numbers in this report correspond to the section numbers in the Reporting Guidelines.

and assets to provide training to their personnel on international law, including human rights and humanitarian law. Another government noted that it was working to create synergies between the Voluntary Principles, the International Code of Conduct for Private Security Service Providers, and its own national action plan to implement the U.N. Guiding Principles.

Multiple governments cited the engagement of diverse ministries, agencies, and departments in discussions regarding the importance of the Voluntary Principles in the context of extractive sector activities. Several governments referenced specific speeches and written publications that highlighted their commitment to the Voluntary Principles.

Participants in the Government Pillar also referenced their past, current, or future service as the Government Chair.

### *Corporate Pillar*

Members of the Corporate Pillar cited a range of specific policies, principles, guidelines, codes, and assurance mechanisms by which they have incorporated their commitment to the Voluntary Principles into the management of their operations. Members of the Pillar referenced both stand-alone policies on security and human rights as well as more general human rights policies as consistent with their commitment to Voluntary Principles implementation. Several companies cited specific reports and speeches in which they had cited their commitment to the Voluntary Principles.

Many members of the Corporate Pillar cited their commitment to operating consistently with expectations set forth in the U.N. Guiding Principles and noted that implementation of the Voluntary Principles was consistent with that commitment.

One Participant noted that its efforts to implement the Voluntary Principles are consistent with its commitment to the Principles for Sustainable Development put forth by the International Council on Mining & Metals (“ICMM”). The Principles commit the company to “uphold[ing] fundamental human rights and respect for cultures, customs and values in dealings with employees and others who are affected by its activities.” Another company noted that its commitment to the Voluntary Principles was consistent with its adoption of the World Gold Council’s Conflict Free Gold Standard, which aims to ensure that gold and gold-bearing materials are produced in a manner that does not cause, support or benefit unlawful armed conflict, or contribute to serious human rights abuses or breaches of international humanitarian law.

One company noted that, in 2015, it had sought to integrate human rights standards, including its Voluntary Principles commitments, into the management of a new part of its business. Specifically, the company integrated human rights concerns into the management of its shipping suppliers.

Another company noted that it now had two full-time corporate-level employees dedicated to implementing the Voluntary Principles. These employees support operating sites with implementation efforts, promote conflict prevention activities, and strengthen the company's security and human rights framework.

Finally, a member of the Corporate Pillar reported that it had launched a new human rights guide in 2015 that renewed and reaffirmed its commitment to the Voluntary Principles.

#### *NGO Pillar*

Members of the NGO Pillar cited efforts to promote the Voluntary Principles at international conferences, in bi-lateral dialogues with companies, and in the context of specific in-country programmatic efforts.

Several members of the NGO Pillar noted that they had been engaged in the development of an overarching strategy for the growth and development of the Pillar, with the intent of strengthening the Voluntary Principles Initiative as a multi-stakeholder institution.

Several NGOs cited efforts to provide training to other stakeholders regarding the Voluntary Principles and to use the Principles as a platform to address security and human rights concerns in countries around the world.

One member of the Pillar noted that it envisioned "a world in which the principles of democracy and human rights guide the vision and actions of governance in heightening peace and development" and noted that this vision was consistent with the goals of the Voluntary Principles Initiative. Another NGO noted that the Voluntary Principles are "closely aligned with the organization's mission of transforming conflict and promoting sustainable peace and development."

## **B. POLICIES, PROCEDURES, AND RELATED ACTIVITIES**

### **2. Relevant policies, procedures, and/or guidelines**

#### *Government Pillar*

As in previous years, several members of the Government Pillar cited National Action Plans to implement the U.N. Guiding Principles in discussing efforts to promote the Voluntary Principles. Governments noted that the Voluntary Principles are a useful tool for addressing security and human rights challenges and for clarifying expectations for extractive companies with regard to security and human rights.

One Participant in the Government Pillar noted that, in 2015, it had published a three-year human rights strategy which specifically cited support for multi-stakeholder initiatives like the Voluntary Principles Initiative. A number of governments cited efforts to convene formal

and informal dialogues with members of the extractive sector to discuss human rights challenges.

One government noted that, in 2015, it had entered into a joint initiative with companies in the gold supply chain, ranging from jewelry companies to mining companies, to promote responsible business conduct. The government noted that it would use this platform to promote implementation of the Voluntary Principles.

#### *Corporate Pillar*

Members of the Corporate Pillar cited a range of policies, principles, directives, standards, and guidelines by which they have incorporated their commitment to the Voluntary Principles into the management of their operations.

One member of the Corporate Pillar noted that community- and security-related matters are addressed at the level of the Board of Directors by a Social, Ethics, and Sustainability Committee. The company noted that its security framework and associated standards provide a base for measuring corporate compliance with its Voluntary Principles commitments.

Another member of the Corporate Pillar reported that it used external assessors to monitor site-level conformance with the Voluntary Principles. The company noted that, in 2015, there were changes in the frequency of these external assessments, which are now carried on a bi-annual, rather than an annual, basis. The company stated that this change in frequency allows for sufficient time for the implementation of recommendations between assessments.

Another member of the Corporate Pillar reported that its internal performance standards include the following minimum requirements with regard to security and human rights:

- human rights related impacts from security-related risks are identified and relevant stakeholders engaged to develop and manage security programs that respect human rights and fundamental freedoms;
- designate single point accountability for Voluntary Principles implementation;
- conduct a gap analysis annually against the Implementation Guidance Tools (“IGT”) and implement an improvement plan to close identified gaps; and
- provide notification in writing to security providers of [the company’s] commitment to the Voluntary Principles, including the requirement for private security providers, or request for public security providers, to operate consistently with the Voluntary Principles.

One company reported that its operations integrity management system for the upstream part of its business was strengthened in 2015 through the creation of a specific security system that includes expectations for the implementation of the Voluntary Principles.

One company reported that, in 2015, it had developed and approved a new security and human rights standard to strengthen the implementation of its security policy. The security and human rights standard is intended to ensure that site-level operations are conducted in a manner consistent with the Voluntary Principles and was developed, in part, based on IGT. Another member of the Corporate Pillar also reported that it had recently developed internal Voluntary Principles guidelines based on the IGT.

One company reported that it had revised its corporate security policy in 2015 and adopted a procedure establishing a framework for forming collaboration agreements with public security forces that are aligned with the Voluntary Principles. Another company reported that it had revised its internal guidance note and toolkit for security and human rights during the reporting year.

#### *NGO Pillar*

Many members of the NGO Pillar reported on efforts to integrate the Voluntary Principles into their programs and activities and to raise the profile of the Voluntary Principles as a key standard for extractive sector companies seeking to operate with respect for human rights.

One NGO reported that it had developed training programs specific to the Voluntary Principles during the reporting period and that it had organized roundtables on business and human rights.

Another NGO reported that its organizational strategy was consistent with the Voluntary Principles. Specifically, its strategy is based on the following principles:

- Empowering communities to hold duty-bearers responsible;
- Strengthening civil society to increase engagement and to expand knowledge through joint- and shared-learning spaces;
- Partnering with extractive companies to strengthen and expand knowledge and enable policy reform;
- Partnering with government to ensure compliance; and
- Creating effective mechanisms for dialogue, joint problem solving and networking.

Another member of the NGO Pillar reported that its organizational approach to the Voluntary Principles rests on four pillars:

- Building a company-wide commitment to meaningful stakeholder engagement;
- Informing and empowering local communities;
- Creating effective mechanisms for dialogue, collaboration, and dispute resolution; and
- Building local government capacity to be more transparent, communicative, and effective at promoting sustainable community development.

Finally, one NGO reported that its programmatic efforts in the reporting year had focused on risk assessments, training and capacity building, community outreach and engagement, and the development of communication protocols.

### **3. Company procedures to conduct security and human rights risk assessments**

All members of the Corporate Pillar reported using risk assessments to evaluate security and human rights-related risks at project sites.

Many members of the Corporate Pillar stated that the time intervals between risk assessments are dependent upon initial assessments of the relative risk levels of the specific locations in question. Companies also noted that sites that have been identified as higher risk are required to go through additional levels of assessment.

One company noted that a number of specific elements of the Voluntary Principles are incorporated into its risk assessment tool including: the strength of rule of law in a country; documented security and human rights violations; and the institutional strength of a country's public security. The company also observed that its risk assessment process involves a review of human rights reports by governments, international agencies and non-governmental agencies, combined with on-the-ground interviews with governmental, non-governmental and community actors. Another company reported that it incorporated external stakeholder feedback, security incident analysis, internal audits, annual International Finance Corporation ("IFC") audits and bi-annual independent audits into its risk assessment process.

A member of the Corporate Pillar reported that each of its sites is required to conduct an annual security risk assessment. Sites are also required to identify both existing and additional controls to avoid or mitigate risks identified during these assessments. On a bi-annual or tri-annual basis, an independent assessor is brought in to conduct site-level risk assessments as well as to evaluate site-level compliance with the Voluntary Principles.

Another company noted that members of its Social Performance and Security staff conduct Voluntary Principles risk assessments at the site level, supported by expertise from corporate-level personnel. During these assessments, specific actions to mitigate identified risks are agreed upon and incorporated into a Voluntary Principles implementation plan.

A member of the Corporate Pillar reported that it had revised its risk management framework in 2015 in order to more explicitly address security and human rights concerns.

Another member of the Pillar reported that, in 2015, it had conducted an evaluation of the risk management processes that it uses to evaluate security- and human rights-related risks specifically. This evaluation concluded that while assessments are completed in each region there is an opportunity to improve risk identification, mitigation and management by developing a more centrally coordinated and standardized approach to risk management. The company then developed a standardized security and human rights risk assessment template that will be utilized by all sites in 2016.

#### **4. Company procedures or mechanisms to report incidents that have potential security and human rights implications for company operations**

All members of the Corporate Pillar reported that they had established mechanisms and procedures by which incidents with potential security and human rights implications could be reported to specific personnel within the company.

Most members of the Corporate Pillar reported that they had established multiple channels for such reporting, including anonymous reporting mechanisms and dedicated personnel to whom concerns can be raised directly. One company noted that it had developed a web-based system for reporting events, allegations, and incidents. The company noted that this system has enhanced the integrity and archiving of data relating to the Voluntary Principles and has also raised awareness of relevant compliance requirements within the company.

One company reported that all of its sites are required to have a grievance mechanism that is aligned with the expectations set forth in the U.N. Guiding Principles. Any grievance or incident can be reported by a third party through these mechanisms, which are managed by site-level grievance officers.

Another company reported that all incidents that have human rights implications are reported to a corporate-level cross-functional human rights committee. The minutes from these committee meetings are submitted to a corporate Executive Vice President for Safety & Sustainability.

One company reported that each of its higher-risk operating locations has a Human Rights Compliance Officer. The role of these Compliance Officers is to receive, document and follow-up on any formally or informally reported human rights allegations – including those related to the conduct of public and private security providers.

One member of the Pillar reported that it had undertaken a review of its complaints and grievance mechanisms during the reporting period. The goal of the review was to ensure that the mechanisms are accessible, transparent, and accountable to local communities and aligned with the expectations set forth in the U.N. Guiding Principles. On the basis of the review, the



company has developed internal guidance materials which aim to strengthen the registration, internal reporting and investigation of community concerns and potentially high-risk community-related incidents, including security incidents. Another company also reported that it had developed a new human rights grievance mechanism in 2015 in order to provide a formal framework for the submission, assessment, investigation and resolution of concerns. The mechanism was developed so as to be aligned with the U.N. Guiding Principles.

One company reported that each of its operating locations is required to develop procedures for the identification, tracking and collaborative resolution of complaints. The company conducts an analysis of complaint and grievance statistics and trends to evaluate the effectiveness of response times and resolutions.

A number of companies noted that their agreements with private and public security providers require recording and reporting of security-related incidents that have human rights implications. One member of the Pillar reported that, during the reporting period, it had conducted a review of the existing Memorandum of Agreement with public security in a specific operating location and had subsequently revised the agreement to include more explicit language on the reporting of incidents.

#### **5. Company procedures to consider the Voluntary Principles when entering into relationships with private security providers**

Members of the Corporate Pillar reported using a variety of approaches to ensure that the Voluntary Principles are incorporated into their engagements with private security providers. These approaches include: the use of Voluntary Principles-specific contract language; screening procedures for private security providers; and mandatory training programs for private security personnel.

Many companies reported on efforts to conduct due diligence on private security providers. One company reported that its due diligence includes looking at the following factors with regard to each potential provider: professional reputation in the country or industry; reported cases of violence by its personnel; awareness of security and human rights issues; screening procedures for its security personnel; company training programs on the use of force and other Voluntary Principles-related elements; codes of conduct; and where the company recruits its security guards.

Many members of the Corporate Pillar reported that clauses citing the Voluntary Principles are now required in contracts with private security providers. One company reported that, during the reporting period, it had updated its contract templates to include specific language addressing Voluntary Principles requirements. Several companies also reported that their contract provisions include the explicit ability to monitor contractor compliance with the relevant contracts.

One company reported that it utilizes independent assessors to assess private security provider compliance with the Voluntary Principles. Assessors evaluate a number of factors including: the relevant parts of the service agreement requiring compliance with the Voluntary Principles and corporate security policies; security-related human rights background screening procedures (verified by reviewing personnel files and hiring documents); Voluntary Principles and use of force training programs (verified by reviewing training materials and assessment of training documents such as post-training tests); and the comprehension of private security officials on their responsibilities under the Voluntary Principles (verified through on-site interviews and scenario testing).

One company provided examples of the model clauses that it includes in contracts with private security providers, including:

- [security provider] must procure that [security provider personnel] and any state military or law enforcement authorities working with the [security provider personnel] to provide the Services comply with the requirements of all applicable laws and in particular comply with all applicable laws and international guidelines regarding the local use of force (in particular the International Code of Conduct for Private Security Service Providers);
- [security provider] must ensure that the security provider personnel and any state military or law enforcement authorities working with the security provider personnel (in order to provide the Services) are preventative and defensive only;
- [security provider] must not engage and must ensure that the security provider personnel do not engage in activities exclusively the responsibility of the state military or law enforcement authorities;
- [security provider] must ensure that the security provider personnel and any state military or law enforcement authorities working with the security provider personnel to provide the Services are aware of the requirements of and have been fully trained to comply with the U.N. Principles on the Use of Force and Firearms by Law Enforcement Officials and the U.N. Code of Conduct for Law Enforcement Officials;
- [security provider] must ensure that the security provider personnel and any state military or law enforcement authorities working with the security provider personnel to provide the Services do not violate the rights of individuals exercising their right of freedom of association and peaceful assembly, or any other rights recognized by the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work; and
- [security provider is aware that the Company is a signatory and committed to operate in accordance with the Voluntary Principles on Security and Human Rights (“VPSHR”) and the security provider represents and covenants that it will

not act or omit to act in any way that is in conflict with or inconsistent with the Company's commitment to the VPSHR.

Finally, one company reported that it had developed a global template for sites and projects to use when entering into contractual relationships with private security providers. This template includes a full addendum on security and human rights principles to be respected by the security provider. The template was updated in 2015 to include specific security and human rights training requirements and revised controls for the use of force, weapons and firearms by private security personnel. The use of this template is mandatory for all sites and projects entering into a relationship with private security providers.

**6. Company procedures or mechanisms to address security-related incidents with human rights implications by public/private security forces relating to the company's activities**

Most members of the Corporate Pillar reported that they had procedures in place to ensure that information regarding security-related incidents with human rights implications is reported to specific individuals at various levels of the company. Depending on the severity of the incident, this information might be reported to site-, country-, regional-, or corporate-level management.

Many company reported that they had established incident reporting and tracking tools used to record information regarding alleged incidents and to track follow-up activities, including investigations. One company reported that site-level investigations personnel investigate all incidents involving the use of force and that independent investigators are brought in to investigate incidents involving serious injury, death or potential serious human rights violations.

Another company reported that site-level Human Rights Compliance Officers oversee the documentation of all human rights allegations, including security-related incidents. An internal team is assigned to investigate allegations, a process which includes a review of all relevant facts and witness interviews. Severe incidents, including those involving fatalities, are reported to corporate-level personnel including legal counsel. The company reported that Human Rights Compliance Officers ensure that incidents linked to public security personnel are reported to the appropriate government institution for investigation.

One member of the Corporate Pillar reported that all incidents involving allegations of human rights abuses and reports of inappropriate use of physical force by private or public security agencies are recorded and, if found to be credible, reported to the appropriate authorities for investigation. In accordance with relevant corporate standards, the company requires that an internal investigation be completed for all such cases and events. Internal personnel conduct regular audits of these investigations and corrective action processes are conducted.

## **7. Examples of promoting awareness of the Voluntary Principles throughout the organization or government**

### *Government Pillar*

Members of the Government Pillar reported on efforts to raise awareness of the Voluntary Principles at embassies and missions around the world in order to help facilitate outreach to, and engagement with, host governments. These efforts included the development of toolkits and online resources as well as the delivery of targeted briefings and training programs. Governments also referenced efforts to disseminate information regarding the Voluntary Principles across different departments and agencies.

Another government reported that it had worked with another member of the Government Pillar to organize a multi-stakeholder conference regarding the Voluntary Principles that included representatives of multiple government agencies, companies, and civil society.

One government reported that its embassies in countries that are the focus of Voluntary Principles Initiative outreach efforts have been directed to develop action plans on the Voluntary Principles. These action plans are expected to include: determining the lead host government agency and point of contact for the Voluntary Principles Initiative; identifying additional government agencies that should be involved (if any); coordinating with other Voluntary Principles Initiative Participants in country; and a plan for engagement.

### *Corporate Pillar*

Many members of the Corporate Pillar referenced internal briefings, workshops, and training programs intended to promote employee awareness of human rights commitments, including the Voluntary Principles.

One member of the Corporate Pillar stated that it had developed a Human Rights Ambassador training program, which includes training on the Voluntary Principles for employees across the company's global operations.

Another company reported that all security personnel are trained at least annually on the Voluntary Principles. At most sites, verbal and written testing is conducted to ensure comprehension. Most sites provide interactive training, which includes role-plays, drills, videos and comprehensive scenario testing.

One company reported that its internal Voluntary Principles standard requires that Voluntary Principles-related responsibilities be integrated into the annual performance assessments for key positions throughout the organization and not just in security-related functions.

A member of the Corporate Pillar reported that it has tried to reinforce the implementation of the Voluntary Principles at the site level by providing guards with reference cards on the use of force and the Voluntary Principles. The company has also posted human rights- and security-related policies and procedures at guard posts, main gates, and security offices.

Several companies referenced the use of computer-based training modules. One company reported that it had begun utilizing a new training program in 2015 aimed at further strengthening human rights awareness among employees and select business partners operating in sensitive environments.

One company reported that it had organized nine workshops on human rights impact assessments and community grievance mechanisms during the reporting period. These workshops were held in Bolivia, Brazil, and Trinidad & Tobago. Another company reported that it had organized training programs on the Voluntary Principles in Mexico, France, Haiti, Venezuela, Burma, and Brazil.

#### *NGO Pillar*

Members of the NGO Pillar reported that they had organized roundtables, briefings, and training sessions to familiarize internal staff with the Voluntary Principles.

Several NGOs noted that programmatic efforts to assist in Voluntary Principles implementation had helped raise awareness among internal staff even if they were not directly engaged in the specific programs.

One NGO noted that the Voluntary Principles was now one of its core program areas and that this had helped promote awareness throughout the organization.

### **8. Examples of promoting and advancing implementation of the Voluntary Principles internationally**

#### *Government Pillar*

Members of the Government Pillar cited unilateral and multilateral efforts to engage governments that are not currently Voluntary Principles Participants in dialogues regarding the benefits of participation in the Voluntary Principles Initiative. Several governments also referenced efforts to support implementation of the Voluntary Principles in specific countries. Many governments referenced public speeches and documents that cited the benefits of Voluntary Principles participation and implementation.

Several governments noted efforts to highlight the Voluntary Principles at the Kimberley Process Intercessional. Governments also referenced engagement with industry associations in order to promote the benefits of Voluntary Principles implementation. Other institutions

referenced by governments include, but are not limited to, the OECD, the G7, the G20, the OAS, and the Commonwealth.

One government reported that its export credit agency had assisted with the development of a publication on auditing implementation of the Voluntary Principles. Another government noted that it systematically promotes the Voluntary Principles through the work of its trade commissioners.

Another member of the Government Pillar reported that it had provided financial support for efforts to promote the Voluntary Principles in Nigeria, Ghana, Panama, Peru, and Guatemala.

One member of the Government Pillar reported that it had made presentation on the Voluntary Principles at an AFRICOM event held in Germany.

Several governments reported that they had promoted the Voluntary Principles in the context of their participation in the U.N. Forum on Business and Human Rights.

#### *Corporate Pillar*

Many members of the Corporate Pillar referenced efforts to coordinate with members of the Government and NGO Pillars, as well as with Observers, on outreach efforts to both governments and international institutions.

Members of the Corporate Pillar cited efforts to promote the Voluntary Principles in the context of their participation in other initiatives, organizations, and forums including: IPIECA, the International Council on Mining and Metals, the U.N. Global Compact, Responsible Jewellery Council, the Mining and Energy Committee on Human Rights in Colombia (“CME”), and the U.N. Forum on Business and Human Rights. Several companies reported that they had been engaged in a U.N. Global Compact effort to develop guidance on auditing implementation of the Voluntary Principles. One company reported that it had given a presentation on this guidance at a U.N. Global Compact event in New York.

Another company reported that it had led an industry initiative to develop a Memorandum of Understanding (“MoU”) regarding the Voluntary Principles, transparency of payments and use of force for use by oil and gas companies that are members of the Kenya Oil and Gas Association.

One member of the Corporate Pillar reported that its country security managers had arranged meetings with police officials in specific operating locations in order to emphasize the company’s commitment to the Voluntary Principles.

Finally, a member of the Corporate Pillar reported that it had presented on the subject of security and human rights at a conference of international financial institutions held in Germany.

#### *NGO Pillar*

Members of the NGO Pillar reported on engagements to promote the Voluntary Principles in partnership with members of the Corporate and Government Pillars in a range of countries including, but not limited to, South Africa, Chile, Peru, Colombia, Bolivia, the Democratic Republic of Congo and Nigeria.

One NGO stated that it was working to promote the Voluntary Principles with companies that are not Participants in the Voluntary Principles Initiative, including companies that are not in the extractive sector.

Another NGO reported that it had promoted the Voluntary Principles in the context of engagements with both the Initiative for Responsible Mining Assurance and several international financial institutions.

A member of the NGO Pillar reported that it had been engaged in a U.N. Global Compact effort to develop guidance on auditing implementation of the Voluntary Principles.

A member of the NGO Pillar reported that it had received funding from a member of the Government Pillar to conduct activities to promote conflict-free minerals sourcing. As part of its efforts, the NGO will include the Voluntary Principles in training provided to committees of the Tin Supply Chain Initiative of the International Tin Industry Association. These trainings will take place in the Democratic Republic of Congo.

A member of the NGO Pillar reported that it had initiated and led an informal working group within the Voluntary Principles Initiative that has developed draft model clauses for agreements between government security forces and companies with respect to security and human rights. The model clauses are meant to guide companies and governments in implementing the Voluntary Principles through provisions in security agreements.

One NGO reported that it was working to engage members of the European Union in discussions regarding both conflict minerals and the responsible sourcing of coal and noted that promotion of the Voluntary Principles was a part of these engagement efforts.

A member of the NGO Pillar reported that it had participated in a panel highlighting the Voluntary Principles at the U.N. Forum on Business and Human Rights. The panel was organized by a Voluntary Principles Initiative Observer.

A member of the NGO Pillar reported that it had helped to organize a conference in Peru on the Voluntary Principles. Attendees include representatives of civil society

organizations, companies, and governments, as well as representatives from the International Committee of the Red Cross and the U.N. Regional Centre for Peace, Disarmament and Development in Latin America and the Caribbean.

Finally, a member of the NGO Pillar reported that it had organized two conferences on the Voluntary Principles in Nigeria during the reporting year.

## **C. COUNTRY IMPLEMENTATION**

### **9. Overview of country operations**

Voluntary Principles Participants reported on policies, advising, contracts, assessments, dialogues, workshops, and trainings related to security and human rights in the following countries: Algeria, Angola, Australia, Azerbaijan, Bangladesh, Bolivia, Botswana, Brazil, Burma, Burundi, Canada, Chad, Chile, China, Colombia, Cuba, the Democratic Republic of Congo, Ecuador, El Salvador, Equatorial Guinea, Ethiopia, Fiji, France, Georgia, Germany, Ghana, Guatemala, Guinea, Haiti, Honduras, Indonesia, Iran, Iraq (including the Kurdistan Region of Iraq), Ivory Coast, Jamaica, Kazakhstan, Kenya, Laos, Liberia, Libya, Madagascar, Malaysia, Mali, Mexico, Mongolia, Morocco, Mozambique, Namibia, the Netherlands, Nigeria, Norway, Pakistan, Papua New Guinea, the Philippines, Panama, Peru, Russia, Rwanda, Senegal, Sierra Leone, Solomon Islands, Spain, South Africa, Suriname, Switzerland, Tajikistan, Tanzania, Thailand, Trinidad & Tobago, Tunisia, Turkey, Uganda, United States, United Kingdom, Uruguay, Venezuela, Vietnam, Yemen, and Zambia.

For the purposes of this summary report, Participants' activities in the following countries are described below: Colombia, Ghana, Indonesia, Nigeria, Peru, and Tanzania.

### **10. Engagements with stakeholders on country implementation**

**Colombia** – *Colombia is a Participant in the Voluntary Principles Initiative.*

Members of all three Pillars reported on efforts to promote Voluntary Principles implementation in Colombia. Many Participants referenced working with, and supporting, the Mining and Energy Committee on Human Rights ("CME"), which promotes the Voluntary Principles within Colombia's extractive sector. In particular, members of the Government Pillar referenced the provision of grant funding to CME, as well as participation in CME events and multi-stakeholder dialogues.

One member of the Government Pillar reported that a pilot program to advance the goals outlined in Colombia's Voluntary Principles National Action Plan included several workshops on mechanisms for remedy, analysis of risk and impact, dialogue with communities, and dialogue with local authorities.



One government reported that CME had advised representatives of the Colombian military on security and human rights and had held several workshops on international human rights law and the use of force in situations other than armed conflict.

Another member of the Government Pillar reported that its Colombian mission has been highly active in CME's workshops and trainings, in particular sessions on government protocols to address social protests and the guidelines for agreements between companies and Colombia's security forces.

Several members of the Corporate Pillar reported that they had included the Voluntary Principles in agreements and memoranda of understanding with public security forces in Colombia. Members of the Corporate Pillar also referenced bilateral meetings with public security officials and members of the military in Colombia.

One company emphasized that security and human rights issues are directly incorporated into its contract requirements for security service providers in Colombia. Another company reported that all of its security employees and contractors in Colombia receive human rights training every year.

One company noted that its contract clauses with Colombian security providers require an annual human rights training program. The company also conducted training workshops for its employees in Colombia who interact with local communities to raise awareness on human rights and develop skills to conduct risk and impact assessments. In addition, the company, through its civil society partners, carried out programs to prevent the illegal recruitment of minors by guerrilla groups in Colombia. Another company noted that its security contractor in Colombia gained membership in the International Code of Conduct Association.

A member of the NGO Pillar reported that it was working to assist community members in Colombia to realize their right to effective remedy for human rights violation in the context of the coal supply chain. Another NGO reported that it conducted trainings on human rights and the Voluntary Principles aimed at both its own staff members and public and private security providers.

**Ghana** – *Ghana is a Participant in the Voluntary Principles Initiative.*

In 2015, members of all three Pillars reported on efforts to further integrate Ghana into the Voluntary Principles Initiative and support the Government of Ghana as it implements key security and human rights objectives. In particular, several members worked closely on programs to support the finalization of Ghana's Voluntary Principles National Action Plan.

One government worked extensively with Ghana's Ministry of Lands and Natural Resources to develop a draft Voluntary Principles three-year implementation plan for Ghana, and presented the draft proposal at a major Voluntary Principles stakeholder meeting in Accra.

A member of the Corporate Pillar reported that one of its operating sites in Ghana hosted visits from several international and local NGOs to discuss Voluntary Principles-activities.

Another company reported that it requires all contract security companies to maintain specific language in their contracts detailing how they will train their personnel on the Voluntary Principles in addition to company-sponsored training. During 2015, 36 company security employees, 600 security contractors, and 400 public security officers completed the annual human rights and Voluntary Principles training.

One company reported that it had sought to promote the Voluntary Principles in Ghana through a series of presentations at workshops and conferences. In addition, two members of the Corporate Pillar noted that they provided a joint presentation on their operations at a day-long Voluntary Principles-focused multi-stakeholder meeting in Accra.

Another Corporate Pillar member noted that it requires that its security provider in Ghana conduct human rights risk assessments and that it have specific plans in place to avoid, report, and investigate potential human rights abuses.

A member of the NGO Pillar reported that it had received funding from a member of the Government Pillar to lead a program intended to support Voluntary Principles implementation efforts in Ghana. The program focuses on: establishing multi-stakeholder dialogue with respect to security and human rights; building the capacity of local civil society organizations; increasing public education and understanding of human rights, security, corruption, gender, and violence issues; and contributing to the overall learning and development of best practices in creating an inclusive, multi-stakeholder in-country Voluntary Principles process.

### **Indonesia**

Several members of the Government Pillar referenced multilateral and bilateral meetings with representatives of the Government of Indonesia at which they discussed Voluntary Principles implementation and participation.

One government noted that its Indonesian mission regularly meets with members of the Voluntary Principles interest group in Jakarta, including representatives from the Embassies of several other member of the Government Pillar to discuss how best to engage stakeholders in Indonesia with regard to the Voluntary Principles. The government reported that its mission also met with representatives from the Government of Indonesia to provide information on the Voluntary Principles Initiative and to convey the message that continued security sector reform and a commitment to best practices with regard to human rights promote a strong investment climate in the country.

A member of the Corporate Pillar stated that it provided training on the Voluntary Principles to its own personnel in Indonesia and that it has also invited local police units to

participate in these training sessions. Another company noted that it conducted training for its company security personnel, as well as security service providers at its facilities both onshore and offshore. In addition, directors of the Human Rights National Commission of Indonesia were invited to observe the training.

Another member of the Corporate Pillar reported that it worked with a member of the Government Pillar and other partners to organize a series of meetings in Indonesia during the reporting period that sought to address a number of security-related topics with links to human rights, such as the emergence of new anti-terror laws, the issue of land encroachment from communities, and how best to handle such challenges.

One member of the Corporate Pillar reported that it engages with Indonesia security forces to promote a mutual understanding and commitment to the Voluntary Principles in both strategies and operations.

One company reported that it has established a MoU that covers a three-year term and details the working relationship between the company and the public security personnel assigned to it. The Voluntary Principles are incorporated by reference and included as an attachment to the MoU.

One member of the Corporate Pillar reported that one of its operating sites in Indonesia hosted three joint exercises on the Voluntary Principles with another company, private security, the Indonesian police, and the local Indonesian community.

### **Nigeria**

One member of the Government Pillar reported that multiple members of the Government Pillar are now engaged in promoting Voluntary Principles implementation and participation in Nigeria. Another member of the Government Pillar reported that its embassy has held a series of meetings with local Nigerian stakeholders to promote the Voluntary Principles.

One member of the Government Pillar reported that it had provided support to a number of NGOs active in Nigeria to promote efforts to improve security and human rights in Nigeria and the Niger Delta specifically. The government member also convened several in-country team meetings with the embassies of other members of the Government Pillar and several NGOs to discuss Voluntary Principles advocacy in Nigeria. Another member of the Government Pillar said personnel from its mission in Nigeria engaged with a number of Nigerian NGOs to identify ways to advance the Voluntary Principles.

A member of the Corporate Pillar reported that it remains committed to implementing the Voluntary Principles in its security management and stakeholder engagement plans, which are updated annually. As part of its ongoing stakeholder engagement program, the company also meets frequently with various agencies within the Government of Nigeria, including

security personnel. At these meetings, the Voluntary Principles are often discussed. The company also reported that it ensures all of its contracts with private security service providers include language referencing the Voluntary Principles. The company said that it selects contractors for the provision of private security services via a competitive bidding process that emphasizes adherence to the Voluntary Principles in the bid details and demands that the conduct of the selected security providers align with the Voluntary Principles.

One member of the Corporate Pillar reported that its goal for 2015 was to train 1,000 public and private security personnel, and exceeded that goal by training 1,390 private and government security personnel on the Voluntary Principles. The company's security oversight division also further conducted nine internal security reviews at various facilities, both at operational and office locations in Nigeria. The key features of these assessments were to ensure the adequate provision of guard force training, as well as appropriate awareness levels and understanding of the Voluntary Principles.

A member of the NGO Pillar reported that it had worked to undertake a review of Voluntary Principles implementation in Nigeria as part of a project funded by a member of the Government Pillar. Another member of the NGO Pillar reported that it had participated in a stakeholder dialogue session regarding Voluntary Principles implementation in Nigeria that was held in Abuja in December 2015.

One member of the NGO Pillar reported that it had helped to organize a stakeholder workshop regarding implementation of the Voluntary Principles in Nigeria. Participants in the workshop included civil society organizations, community representatives, companies, and diplomatic representatives of several governments. Another NGO reported that it is actively involved in a multi-year anti-corruption initiative funded by a member of the Government Pillar. The initiative, which references the Voluntary Principles, is especially focused on building more accountable institutions in Nigeria by enhancing institutional transparency and preventing impunity for those who engage in corruption and transnational organized crime.

Another NGO reported that it worked with the legal departments of the Nigerian Police and Military in setting up and strengthening Nigeria's Human Rights Desks through trainings and dissemination of information and communication on the Voluntary Principles. The NGO also carried out training sessions for the public and private security personnel who secure the facilities of a member of the Corporate Pillar at several locations throughout Nigeria.

One NGO reported that it was commissioned by a member of the Corporate Pillar to conduct a comprehensive evaluation of the company's human rights training and implementation programs in Nigeria. The NGO also facilitated training sessions for a member of the Corporate Pillar for private and Nigerian security forces in several locations in Nigeria. In total in 2015, the NGO trained a total of 471 participants.

## Peru

Members of all three Pillars reported that they had engaged in bilateral and multilateral efforts to encourage Peru to become a Participant in the Voluntary Principles Initiative. Members of all three Pillars also described participation in the Voluntary Principles Working Group in Peru.

One member of the Government Pillar reported that its mission in Peru hosted or participated in monthly discussions as a leading member of the Voluntary Principles Working Group in Peru. The mission also funded a day-long course on conflict mitigation, corporate social responsibility, and the Voluntary Principles for 20 community leaders in a specific region of Peru. As part of its engagement with the Working Group in Peru, another member of the Government Pillar reported that it participated in a conference in Lima that included several sessions on the Voluntary Principles with speakers from representatives of several governments, including other members of the Government Pillar.

Another government reported that its mission in Peru continues to engage different Peruvian ministries in discussions regarding the Voluntary Principles. The government's mission also organized a two-week training workshop on the Voluntary Principles for officers of the Peruvian Police. This was developed in collaboration with the Peruvian Ministry of Interior, the Peruvian Police, an Observer, and a member of the Corporate Pillar.

A member of the Corporate Pillar reported that its security personnel have promoted the Voluntary Principles with the Government of Peru, through its sites' cooperation agreements with Peru's División Nacional de Operaciones Especiales and the Unidad de Servicios Especiales de la Guardia Civil del Perú. Another company reported that one of its operations in Peru provided training on the Voluntary Principles and sexual harassment to all of its security employees and 89 percent of its security contractors. Furthermore, training was extended to members of the Peruvian Police, who are assigned to the site. As a result, a total of 353 members of the Peruvian Police were also trained on the Voluntary Principles.

Another company reported that the private security contract at one of its biggest sites stipulates compliance with the operation's sustainable development policies and standards, which include adherence to the Voluntary Principles. A major MoU between the company and the Peruvian Police stationed around the site is currently under review.

One member of the Corporate Pillar presented on the Voluntary Principles to local police detachments at the company's sites in Peru. At one of the sites, the company is focusing on "outside the fence" programs. The company also reported that a combination of briefings, workshops, seminars, and formal training sessions have proven to be effective in integrating the Voluntary Principles and related human rights considerations into its private and public security programs at a major operation. In 2015, its Peruvian operations provided two different training modules for employees, contractors, and government personnel.

A member of the Corporate Pillar reported that it had conducted a human rights risk assessment in Peru, working with a member of the NGO Pillar. The company also reported that it had providing training on human rights and the Voluntary Principles to its own staff, its private security contractor, and members of the police.

A member of the NGO Pillar reported that it had provided training on human rights and conflict mitigation to the Peruvian personnel of a member of the Corporate Pillar. Another member of the NGO Pillar reported that its Peruvian representatives had played a key role in leading and facilitating the Voluntary Principles Working Group in Peru since 2010.

One NGO reported that it continued the implementation of an ongoing project that is supported by several Observers. The project aims to support concrete implementation of security and human rights good practices through a process of multi-stakeholder engagement. Additionally, the NGO provided expert advice to a company that is not in the Voluntary Principles Initiative on how to implement the Voluntary Principles.

### **Tanzania**

Members of all three Pillars referenced efforts to engage the Government of Tanzania on the subject of Voluntary Principles participation and implementation.

One member of the Government Pillar reported that its mission in Tanzania initiated and engaged in efforts alongside other diplomatic partners in the country to promote the Voluntary Principles. This included participation in a consultation with representatives from diplomatic missions, mining companies, civil society, and the Tanzanian Office of the President; multiple meetings with diplomatic missions of other members of the Government Pillar; and in-depth discussions on strategic issues around security and human rights including the Voluntary Principles.

Another member of the Government Pillar said its mission in Tanzania meets regularly with a number of oil and mining companies operating in Tanzania, as well as members of the NGO Pillar to raise awareness of the Voluntary Principles Initiative. The government's mission in Tanzania also interacts with extractive sector stakeholders to discuss the Voluntary Principles through its involvement in the Extractives Development Partners Group.

A member of the Corporate Pillar reported that it engaged the Tanzanian Navy to provide armed security to support a near-shore survey. The company has also provided training that included familiarization on established Tanzanian rules for weapons control procedures and orientation on the Voluntary Principles.

Another member of the Corporate Pillar reported that it provides training on the Voluntary Principles to its security providers and the Tanzanian Navy. Security related human rights training is provided for naval personnel prior to their deployment and refreshed during

the operations. The company reported that it has also held meetings with senior Tanzanian Military officials in order to explain the purpose of the training.

One NGO reported that it continued its work with a major mining company in Tanzania and Tanzanian communities to transform the ways in which stakeholders deal with conflict. The NGO also reported that both community members and the Tanzanian Police reported that the relationship between officers and community members had improved. The NGO said that a total of 958 police officers participated in its trainings on human rights and the Voluntary Principles. Additionally, the NGO participated in the effort to persuade the government of Tanzania to join the Voluntary Principles Initiative through meetings with extractive industry stakeholders, political missions, and other civil society organizations.

### **11. Voluntary Principles considerations in the selection of private security providers, the formulation of contractual agreements with private security providers, and interactions with public security forces regarding security arrangements**

As noted in the country implementation summaries above, many members of the Corporate Pillar reported that all of their contractual agreements with private security providers include specific reference to the Voluntary Principles. Members of the Corporate Pillar also reported on a range of training programs intended to ensure that private security providers adhered to the Voluntary Principles.

One member of the Corporate Pillar reported that all of its contractual agreements and MoUs with private and public security service providers must include references to the company's commitments and obligations to the Voluntary Principles and must clearly articulate what the company expects from its private and public security providers. In addition, the company noted that all of its third-party suppliers are trained in the company's values, policies, and procedures concerning human rights and the Voluntary Principles, while government security personnel are briefed on the Voluntary Principles before deployment.

Another member of the Corporate Pillar reported that the company has specific procedures on how to enter into and manage written agreements with public security agencies. The company noted that before entering into and managing any agreements with public security agencies for any additional external security that might be needed at its sites, the company needs to carry out due diligence using external specialists to help it identify any challenges there might be in working with these agencies. This includes examining external human rights reports and the national laws that regulate the conduct of these agencies, particularly in such areas as the use of force. The company said it then begins a dialogue with public security officials about the arrangements for any additional external security support.

One company said all of its contracts with private security providers stipulate that they will provide Voluntary Principles awareness training to their employees before they are assigned to company worksites. The company reported that the security provider is required to

have an established process in place to verify compliance with the terms and conditions of its contracts, which include training on the Voluntary Principles. The company also noted that this training is conducted on an annual basis for all security service providers.

Another member of the Corporate Pillar said that its baseline assessment identified the need for a consistent approach for incorporating the Voluntary Principles requirements into contract agreements with private security providers, including selection criteria, and that the company will implement this in 2016. For public security, the company reported that its baseline assessment identified that all existing MoUs and other agreements with public security needed to include specific reference to their requirements to adhere to the Voluntary Principles.

One company said that, beginning in 2016 and in line with the company's human rights standards, contractual agreements will include the requirement that the company be notified if a private security provider becomes aware of any human rights issues related to its activities with the company. The company stressed that joint training sessions and exercises are regularly conducted and that they foster trust, communication, cooperation, and coordination between the private and public security providers.

**12. Examples of supporting outreach, education, and/or training of (i) relevant personnel; (ii) private security personnel; (iii) public security personnel; and/or (iv) civil society (e.g., local NGOs, community groups)**

*Government Pillar*

Members of the Government Pillar reported on activities taken in conjunction with their participation in the Voluntary Principles Outreach and Implementation Working Group, including the development of national action plans for outreach to specific countries. Governments also referenced specific efforts to improve the capacity of in-country personnel to support outreach. These efforts included delivering training to diplomatic personnel as well as providing outreach tools such as fact sheets and other guidance materials.

One member of the Government Pillar reported that it regularly engages with national stakeholders on issues related to sustainable natural resources development and standards such as the Voluntary Principles. This includes the Devonshire Initiative, a forum for leading international development NGOs and mining companies to come together in response to the emerging social agenda surrounding mining and community development issues.

Another government noted its support and participation for international agreements and institutions that support or dovetail with the objectives of the Voluntary Principles. In this vein, the government reported that it has been deeply committed to the Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies during Armed Conflict, and the International Code of Conduct for Private Security Service Providers. The government also noted that it was pleased



to see the International Code of Conduct Association join the Voluntary Principles Initiative as an Observer this year, and added that the two initiatives continue to build synergies.

One government also reported that its mission in Angola signed a project contract on the Voluntary Principles with a member of the NGO Pillar that will help raise awareness of the Voluntary Principles in the province of Lunda-Norte, a very important region for Angola's diamond extractive industry. The project will establish a series of workshops in the province for local government officials, extractive companies, private and official security agencies, and national and local civil society organizations to work together to implement the Voluntary Principles in Angola.

#### *Corporate Pillar*

One member of the Corporate Pillar reported that all of its security personnel at certain designated high risk sites are required to receive training on the Voluntary Principles before they begin work. A form is signed that certifies that the person has received the training, has understood it, and will apply it in the course of implementing their job responsibilities. The company also reported that all direct and contracted security personnel must take training on specific elements of their job responsibilities that have some bearing on security and human rights, including: weapons handling and storage; treatment of injured persons; handling of apprehended individuals; identification and reporting of security-related human rights allegations; and others.

Another member of the Corporate Pillar said it led the first regional Responsible Security Task Force in Kuala Lumpur, Malaysia. As part of this, briefings on the Voluntary Principles and scenario based learning were conducted for extractive companies in the region, both signatory and non-signatory companies, with the aim of raising awareness and understanding of practical application of the Voluntary Principles to company risk assessment and mitigation processes.

#### *NGO Pillar*

Members of the NGO Pillar reported on efforts to provide Voluntary Principles training in countries around the world, often in partnership with companies.

A member of the NGO Pillar reported that it had presented at an internal conference organized by a member of the Corporate Pillar regarding conflict and human rights risk assessments in order to raise awareness within the company regarding security and human rights challenges.

A member of the NGO Pillar reported that it had worked with a company that is not a Participant in the Voluntary Principles Initiative to conduct a Voluntary Principles gap assessment with regard to the company's operations in Uganda. The NGO also reported that it had worked with a non-extractive sector company on Voluntary Principles implementation. The NGO also reported that it was working to promote Voluntary Principles implementation

with several extractive sector companies that are not Participants in the Voluntary Principles Initiative and that its efforts include encouraging the companies to apply to join the Initiative.

Another member of the NGO Pillar reported on a project in Peru that combines awareness raising, identification of needs and the co-development of context-specific tools with local civil society and company partners. In October, the NGO presented a draft of guidelines from a related project to the Voluntary Principles Working Group in Peru to receive feedback.

One NGO participated in a one-day policy dialogue hosted in Abuja on implementation of the Voluntary Principles for the Nigerian extractive industries. The NGO was also part of a panel session that reviewed a baseline study carried out by another NGO Participant on the Voluntary Principles in Nigeria. The NGO reported that this meeting provided an opportunity to build a wide in-country process for getting the Government of Nigeria to join the Voluntary Principles Initiative.

Another member of the NGO Pillar reported that a Participant Government renewed the NGO's project to implement the Voluntary Principles in Angola's diamond provinces of Lunda Norte. The aim of this project is to enhance the understanding and effective implementation of the Voluntary Principles while also creating an environment for increased respect for human rights and constructive engagement between stakeholders in Angola's business sector.

### **13. Company procedures to review progress on implementing the Voluntary Principles at local facilities**

One member of the Corporate Pillar reported that it employs a corporate review panel to guide the implementation of its incident reporting and management standards, which includes all high, major, and extreme risk rated incidents.

Another company reported that its risk management and assurance department is now responsible for carrying out audits against the Voluntary Principles standards at certain sites. The audits include a review of sites' implementation of the Use of Force Procedure, the Security Code of Conduct, pre-employment screening procedures, and implementation of public security MOUs. Additionally, the company noted that the sites are required to have, at minimum, a bi-annual or tri-annual external, independent Voluntary Principles security and human rights assessment with regard to their compliance with the Voluntary Principles.

Another company reported that its sites must complete a Voluntary Principles implementation plan. As part of this, local security and social performance managers formally report progress against these implementation plans on a bi-annual basis.

One company reported that its security management review is used to review and assess how the company's business units are implementing security practices at the local level. The Voluntary Principles and human rights are one of several issues assessed through this

process. The company reported that the process includes a checklist and a series of interviews with security staff and management, and an action plan is developed for any corrective measures needed.

Another member of the Corporate Pillar reported that it has been an active participant in the development of Key Performance Indicators (“KPIs”) for the Voluntary Principles. The KPIs, coupled with the company’s extant internal mechanisms for handling complaints and grievances, will provide an indication of the effectiveness of the company’s implementation of the Voluntary Principles. The company also reported that it conducted security related assurance audits with oversight from two members of the NGO Pillar, adding that it was the first time the Voluntary Principles were formally included in the company’s overall assurance process.

One company reported that in 2015 it conducted the first comprehensive assessment of its implementation of the Voluntary Principles since the company applied to the Voluntary Principles Initiative to confirm that Voluntary Principles commitments and security standards continue to be consistently maintained.

Another member of the Corporate Pillar reported that it conducted a major audit of its security and human rights protocols at one of its sites at the request of the company’s board. Fieldwork for this review involved site visits, interviews, and document discovery conducted at the site. In addition, the company conducted a remote desktop review and limited document discovery was also undertaken.

#### **D. LESSONS LEARNED AND RECOMMENDATIONS**

Participants identified a wide variety of lessons and recommendations with regard to the Voluntary Principles generally, as well as with regard to implementation efforts specifically. The following lessons and recommendations do not necessarily represent the views of the Voluntary Principles Initiative as a whole, but rather reflect the suggestions of individual Participants.

#### **Implementation of the Voluntary Principles**

- Members of the Corporate Pillar can play an important role in promoting implementation of the Voluntary Principles by non-Participant companies.
- Implementation of the Voluntary Principles requires an enabling environment for citizens to contribute to implementation, realize their civil liberties, and defend their rights. Absence of an enabling environment is an implementation issue and the Voluntary Principle should develop guidance for its members how to best to take up this challenge.

- It is urgent that the Voluntary Principles Initiative determines what level of civic freedom is required to implement the Voluntary Principles. The Initiative should guide its members how to promote beneficial operating contexts.
- A bottom-up approach to Voluntary Principles implementation has revealed that community residents are highly enthusiastic regarding the Voluntary Principles and are anxious to learn more on how they can utilize it as a tool for dialogue.

### **Engaging Corporate Stakeholders**

- Company-wide engagement takes time. Working at the community level takes time because it is not sufficient to only talk to the Corporate Social Responsibility department of different companies. To enable the success of projects, all departments of a company such as procurement, human resources, communications, etc. need to be engaged, including sub-contractors. When meetings and events are organized to bring companies and communities together, companies should demonstrate sincere interest and engagement, at times sending high-level decision makers to show communities that they take concerns seriously.

### **Engagement of Host Governments**

- Government buy-in and support for the Voluntary Principles is essential. The role of national governments in the implementation of the Voluntary Principles must be elevated. Many issues faced by rural communities stem from a lack of government buy-in and support. Where governments are absent or lack the capacity to provide social services, companies are looked upon as a surrogate to provide social service support. This is not only impractical, but also creates tension between the company and communities. To help manage and set the proper expectations, the Voluntary Principles and its members must better engage governments at all levels.
- In fragile political contexts, there is risk that private companies take over role of government in absence of state/security forces for provision of security services, and basic social needs (education, health). There is a risk of confusion around roles and responsibilities. It is thus important to emphasize that government is primarily responsible for providing security and basic social services to its citizens.
- The Voluntary Principles Initiative can best fulfil the ultimate goal of broadening implementation of the Voluntary Principles by targeting outreach to governments in phases – awareness, endorsement and then membership. Even where government membership is minimal, endorsement and awareness can facilitate companies using the Voluntary Principles, which help to reduce the risk of conflict.
- In order to improve the mainstreaming of the Voluntary Principles and other business and human rights initiatives throughout governments, it is important to work towards a

systematic inclusion of those topics in briefings for economic commissions to host countries.

- For government outreach to be more effective, increased cooperation among pillars is required. To gain new members, in particular host governments, and to avoid Participants leaving the Initiative, it is key to show evidence of the Voluntary Principles' positive impact on the ground, including in the prevention of conflicts. This evidence could be provided by Participants operating and applying the Voluntary Principles in priority countries. Furthermore, Participants from all three Pillars should contribute to outreach activities in host countries, including with high-level representation when appropriate.
- Cross-Pillar efforts to conduct outreach and implement the Voluntary Principles on-the-ground are critical because, ultimately, successful implementation of the Voluntary Principles requires collaboration and the active participation of all three Pillars. The importance of bringing more host governments into the Voluntary Principles Initiative cannot be overstated given their sovereign authority over their national police and military forces.
- Home government support is essential for engaging the right levels of government in host nations and encouraging dialogue on human rights and Voluntary Principles implementation.
- Implementing the Voluntary Principles in joint ventures and partnerships is less challenging when strong national legal frameworks and practices are in place.
- Implementation of the Voluntary Principles in partner-operated projects can be challenging, particularly when the operator is not a member of the Voluntary Principles Initiative nor committed to implementation of the Principles. Being able to refer to common industry good practice is helpful, and provides a good basis for suggesting the expected standards of practice. Nevertheless, such cases also demonstrate the need for increasing government awareness, engagement and membership in the Voluntary Principles Initiative.

### **The Voluntary Principles as a Business and Human Rights Framework**

- In order to maintain its relevance, the Voluntary Principles Initiative must continue to evolve. The adoption of the 2014-2016 Strategy Document was an encouraging sign. It is important for the Initiative to be able to articulate the benefits of Voluntary Principles implementation.
- Discussions regarding how to strengthen the NGO Pillar are encouraging and should continue and progress to concrete action. A strong and engaged NGO Pillar is critical to the functioning and credibility of the Voluntary Principles Initiative.

- The Voluntary Principles Initiative is not a textbook example of a successful multi-stakeholder process. It continues to be a top-down initiative that has failed to acquire a decisive bottom-up dimension. Many people whose lives are affected by large extractive sector projects are not aware of the Voluntary Principles or their potential. The value of the Voluntary Principles depends on the outcome of local processes, which only rarely have a truly tri-partite dimension.
- Drafting a strategy and developing it further during Steering Committee strategic retreats has been a useful experience. It helped to identify common interests among Participants and to drive an agenda to strengthen the Initiative. The process of reviewing progress on implementing the agenda and holding strategic retreats to develop “next goals” for the Initiative should be continued.
- The governance review process that developed out of the strategy discussions must be pursued and should lead to improvements in the Voluntary Principles Initiative on the following issues: review the process and criteria for admission; review of governance structures regarding accountability strengthening the NGO Pillar; considering ways to fill the gap in the Voluntary Principles regarding the provision of effective remedy for victims.

### **Assurance**

- Efforts to promote implementation of the Verification Frameworks are important and should continue.
- The Voluntary Principles Initiative has been considerably strengthened over the last several years. In order to build accountability, credibility and effectiveness of the Voluntary Principles Initiative, Participants should continue to focus on support for verification of implementation. Verification is important to ensure to the satisfaction of both Voluntary Principles Initiative Participants and the public that companies are meeting their commitments under the Voluntary Principles. It is a key component of Voluntary Principles implementation and critical to making the Voluntary Principles Initiative sustainable long-term.
- A robust verification framework is an essential ingredient to a successful multi-stakeholder initiative.

### **Stakeholder Engagement and Dialogue**

- Dialogue in the context of the Voluntary Principles Initiative should be a mutual endeavor to explore common ground and discover new options. The process requires alignment of values, attentive listening, the allocation of sufficient time, the presence of the right people, and the examination of assumptions.

### **Membership in and Admission to the Voluntary Principles Initiative**

- Membership in the Voluntary Principles Initiative comes with duties and responsibilities and the likelihood that these will be respected must be taken into consideration when welcoming new members.
- The Voluntary Principles Initiative should be as accessible as possible by avoiding barriers that may limit participation, such as narrow entry criteria that exclude mining services companies.