

**VOLUNTARY PRINCIPLES INITIATIVE**  
**SUMMARY OF IMPLEMENTATION EFFORTS DURING 2014**

This report provides an overview of Participants' efforts to implement the Voluntary Principles on Security and Human Rights (the "Voluntary Principles", "VPs" or "VPSHR") during 2014. 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" or "VPI") in anticipation of the 2015 Annual Plenary Meeting.

Each year, Participants' annual reports provide considerable detail on implementation efforts and outreach activities in countries all over 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 and territories: Algeria, Angola, Argentina, Australia, Azerbaijan, Belgium, Bolivia, Botswana, Brazil, Burkina Faso, Burma, Burundi, Cameroon, Canada, Chad, Chile, Colombia, Democratic Republic of Congo, Ecuador, Egypt, Equatorial Guinea, Ethiopia, France, Gambia, Ghana, Guatemala, Guinea, Honduras, Indonesia, Iraq (including the Kurdistan Region of Iraq), India, Jamaica, Kazakhstan, Kenya, Laos, Liberia, Libya, Malaysia, Mali, Madagascar, Mauritania, Mexico, Mongolia, Morocco, Mozambique, Namibia, Nicaragua, Nigeria, Norway, Oman, Pakistan, Panama, Papua New Guinea, Peru, the Philippines, Qatar, Russia, Rwanda, Saudi Arabia, Senegal, Sierra Leone, South Africa, South Sudan, Spain, Suriname, Switzerland, Tanzania, Thailand, Trinidad & Tobago, Tunisia, Turkey, Uganda, Uruguay, United Arab Emirates, United States, United Kingdom, Venezuela, Vietnam, Western Sahara, Zambia, and Zimbabwe.

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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>

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<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 sixth year that Participants have prepared their annual reports in a manner guided by the 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. Participants also cited a range of activities through which they had provided affirmative demonstration of their commitment during 2014, 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.

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

##### *Government Pillar*

Members of the Government Pillar referenced efforts to promote the Voluntary Principles both within their own governments, including at the embassy-level, as well as in the context of their engagements with other governments. These outreach efforts included presentations and other public statements, as well as bilateral meetings with representatives of governments that are not yet Participants in the Voluntary Principles Initiative.

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

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

Several members of the Government Pillar noted that participation in the Voluntary Principles Initiative was consistent with government efforts to protect human rights and to promote respect for human rights among business enterprises.

One member of the Government Pillar noted that it intended to:

guide oil, gas, and mining companies on providing security for their operations in a manner that respects human rights; to strengthen implementation, accountability, and transparency within the Initiative; and to strengthen participation of VPs Initiative Participants in all Pillars through outreach.

Another member of the Government Pillar stated that it saw “high value in the VPs as a practical way to support best practices in the extractive industries.”

Another government reported that it had released a new set of social responsibility guidelines in 2014 specifically for the extractive sector and that these guidelines specifically incorporated 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.

One member of the Corporate Pillar noted that it had engaged a third-party assurance provider to evaluate its efforts to implement the Voluntary Principles both at the corporate-level and at specific operating sites. This review found that the company “is committed at all levels to the implementation of the Voluntary Principles on Security and Human Rights. The sites reviewed were focused on operating in accordance with the Voluntary Principles and all were found to be actively implementing the Principles.”

Several members of the Corporate Pillar referenced the engagement of full-time staff to support their efforts to implement the Voluntary Principles.

### *NGO Pillar*

Members of the NGO Pillar cited public statements and outreach efforts intended to promote the Voluntary Principles as reflective of their commitment both to the Principles and to the Voluntary Principles Initiative.

Members of the NGO Pillar noted that their support of the Voluntary Principles was consistent with broader organizational objectives including support for human rights, the promotion of multi-stakeholder engagement, the protection of the rights of communities, and the promotion of collective security.

One member of the NGO Pillar stated that it viewed the “Voluntary Principles on Security and Human Rights (VPSHR) as a valuable mechanism and tool to manage risk, achieve improved governance and security practices, and strengthen community rights.”

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

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

#### *Government Pillar*

Several members of the Government Pillar cited National Action Plans to implement the U.N. Guiding Principles on Business and Human Rights. One member of the Pillar observed that Voluntary Principles were an “integral” part of its efforts to implement the U.N. Guiding Principles in the context of the extractive sector. Members of the Government Pillar also reported on efforts to promote other international human rights and business standards, including the OECD Guidelines for Multinational Enterprises and the International Code of Conduct for Private Security Providers.

One member of the Government Pillar referenced a National Public Policy on Business and Human Rights and cited its efforts to establish open dialogue with members of the civil society, companies, and local government officials regarding both policy concerns and practical human rights challenges.

Another member of the Government Pillar noted that the Voluntary Principles are an important tool for delivering on the Government’s upstream conflict prevention objectives.

Finally, a member of the Government Pillar stated that it was working to develop a Voluntary Principles “community of practice” within its domestic extractive sector. As part of this effort, the Government has hosted workshops and roundtable discussion with industry associations and civil society organizations.

#### *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.

Several members of the Corporate Pillar reported on their efforts to assess implementation of the Voluntary Principles either through the work of corporate personnel or with the assistance of independent assessors. In this context, members of the Pillar referenced use of the Key Performance Indicators (“KPIs”), first developed by a volunteer group of Voluntary Principles Participants in 2011. Members of the Pillar also referenced use of the Implementation Guidance Tools (“IGT”), including efforts to align their internal assessment documents with the expectations set forth in the IGT.

Members of the Corporate Pillar referenced internal reporting channels that help provide oversight on matters related to security and human rights, including reports to their Boards of Directors.

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 member of the Corporate Pillar reported that it had revised its internal performance standards in 2014 and that these requirements 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 VPs implementation.
- conduct a gap analysis annually against the IGT and implement an improvement plan to close identified gaps.
- provide notification in writing to security providers of [the company’s] commitment to the VPs, including the requirement for private security providers, or request for public security providers, to operate consistently with the VPs.

One company stated that, in 2014, it revised its internal Voluntary Principles guidelines in order to clarify responsibilities for implementing the Voluntary Principles between security and social performance managers at the corporate and site level. The revised guidelines also introduced:

a new requirement for high-risk assets to conduct a VPSHR risk assessment annually; and for medium-risk assets to conduct a VPSHR assessment every two

years...Following a risk assessment, relevant assets are required to develop fit-for-purpose plans to mitigate identified risks, and formally report on progress on implementation of these plans twice yearly. This approach allows Group Security and Social Performance to jointly monitor implementation of the VPSHR based on these plans, and to focus on the assets with the highest risk.

A member of the Corporate Pillar reported that, in 2014, it had developed a new internal framework for implementing the Voluntary Principles across its operations. The framework focuses on:

the integration of cross functional multi-disciplinary expertise to implement the VPs; engagement with key stakeholders; providing assurance that the program and systems are effective and aligned with international best practice.

The company noted that its new framework also “aims to provide systematic and ongoing management of Security and Human Rights risks and encourage continuous improvement.”

Another member of the Corporate Pillar stated that it had engaged in a company-wide effort in 2014 to standardize its approach to stakeholder engagement, an effort which included the development of a corporate-wide set of guidance and implementation tools. The company also noted that it was working to pilot a new grievance mechanism program.

Finally, a member of the Corporate Pillar noted that, in 2014, it had developed a new standard on the approval and management of public security providers. This standard includes a process to formalize memoranda of understanding or other agreements with public security forces and a framework to ensure that the company’s commitments to the Voluntary Principles are fulfilled.

#### *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.

Several members of the NGO Pillar referenced work to develop toolkits and other guidance materials to assist in the delivery of Voluntary Principles training programs. One member of the Pillar noted that its efforts focused on:

training delivery for civil society, the private sector, government and international networks on the VPs and the use of this multi-stakeholder platform to address conflict, security and human rights concerns at the local level in Latin America and the Caribbean and Sub Saharan Africa.

Members of the Pillar also referenced their participation in the Roles & Responsibilities Working Group and engagement with efforts to define the roles and responsibilities of each Pillar.

One NGO reported that it had worked to develop KPIs to assess its own efforts to assist in the implementation of the Voluntary Principles.

### **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.

One member of the Corporate Pillar stated that Voluntary Principles risk assessments at the specific operating sites are conducted by security and social performance staff and that these assessments are guided by a ten-step process outlined in the company's internal Voluntary Principles guidelines. The company noted that during the assessments, actions to mitigate risk are identified and these are incorporated into subsequent Voluntary Principles implementation plans.

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 it may engage third-party providers to conduct risk assessments "in those jurisdictions with the potential for violence or human rights abuses" and in "higher risk locations during due diligence for mergers or acquisitions." The company observed that these third-party risk assessments cover a range of issues, including:

- local and national human rights contexts and dynamics (political, socio-economic, labor);
- potential for conflict, violence, and illegal equipment transfers;
- local and national security capabilities and human rights records;
- governmental commitments to the rule of law, including the reliability, fairness, and efficiency of the legal system; and
- identification of security risks.

One company reported that it had conducted more than 93 site-level security risk assessments during 2014. The company also conducted country-level risk assessments for countries that the company had identified as "VPSHR priority countries." The company reported that it utilized the IGT to conduct these assessments.

Another member of the Corporate Pillar stated that it had engaged a third-party advisory firm to facilitate a corporate-level human rights impact assessment in 2013 and 2014 and that this assessment had involved stakeholder verification meetings with “academia, investors, business partners, NGOs and government to receive input on the assessment’s methodology and findings.” The assessment helped the company to prioritize its areas of focus based on a better understanding of its potential and actual human rights impacts.

One company reported that it had developed a “social risk for projects” initiative in 2014 to conduct risk analyses focusing on understanding community and social issues, impacts, and opportunities that may be associated with specific pre-production projects.

Another member of the Corporate Pillar reported that, in 2014, it had developed a new set of tools to help the company and its affiliates assess risks related to security and human rights. Several components of these new tools were based on the IGT.

Finally, a member of the Corporate Pillar reported that, in 2014, it had integrated human rights risks related to security into its security risk assessment process. The company noted that key elements of this process include “[s]ystematically conducting analyses of countries relevant to our operations (Country Risk Assessments) in order to build a robust knowledge platform about local conditions, business culture and external factors - including human rights and broader social, political, security and ethical issues.”

#### **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 companies reported that they had established multiple channels for such reporting, including anonymous reporting mechanisms and dedicated personnel to whom concerns can be raised directly. Companies also reported on the existence of escalation procedures by which reports of incidents could be escalated to more senior levels of the company based on evaluations of severity.

Two companies explicitly noted that they require their internal grievance and reporting mechanisms to be in line with the criteria for effectiveness of operational-grievance level mechanisms set forth in the U.N. Guiding Principles on Business and Human Rights.

One member of the Corporate Pillar stated that, in the event that a security-related incident with human rights implications takes place in connection with its business units, the following steps must be taken:

- corporate personnel must ensure that appropriate medical care is provided to any injured person;



- corporate personnel must immediately report the incident to the relevant authorities at Group and entity levels – follow-up actions will be taken depending on the local context and type of incident;
- corporate personnel must ensure the protection of any witnesses from internal or external pressure; and
- corporate personnel must, if applicable, conduct internal investigations to establish facts and responsibilities.

One company reported that each of its operating locations has a Human Rights Compliance Officer. The role of these Compliance Officers is to receive, document, and follow up on any human rights-related allegations related to the company's activities.

Finally, one member of the Corporate Pillar noted that it issues public reports regarding proven human rights violations.

#### **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 ensuring that the Voluntary Principles are incorporated into their engagements with private security providers. These approaches included: the use of Voluntary Principles-specific contract language; screening procedures for private security providers; and mandatory training programs for private security personnel.

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 its global operating standards require that the company:

- provide notification in writing to security providers of [the company's] commitment to the VPs, including the requirement for private security providers, or request for public security providers to operate consistently with the VPs; and
- require private security companies engaged by [the company] to be signatories to, or agree in writing to comply with, the International Code of Conduct for Private Security Providers.

A member of the Corporate Pillar reported that it had developed a web-based due diligence tool for contractors and suppliers, including private security providers. This tool includes a risk assessment questionnaire that includes specific questions regarding human rights. Another member of the Corporate Pillar reported that it conducts due diligence on each

private security contractor that it employs and that this due diligence includes an evaluation of the following issues:

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 VPSHR-related elements; codes of conduct; and where the company recruits its security guards from (e.g., whether they are ex-military or police or young people who are then trained as security guards).

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 UN Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN 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
- [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.

Another company reported that it had a two-tiered vetting process for engaging specific private security personnel. The company engages the host country government to conduct background investigations of particular individuals and then conducts interviews to identify personality traits that could be the source of negative behaviors.

Finally, a member of the Corporate Pillar reported that its standard framework agreement includes reference to the Voluntary Principles. The company stated that its security-related contractors include provisions “whereby the security provider undertakes to comply with the VPSHR, to perform services with skilled and qualified personnel who are familiar with the VPSHR, and to ensure personnel are trained and/or attend information sessions on the VPSHR.” The company also noted that the text of the Voluntary Principles is appended to master service agreements.

#### **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 it requires that any security incident at its sites be reported and investigated and that “incidents involving public security are prioritized to ensure engagement at appropriate levels, in an effort to ensure due process.”

A member of the Corporate Pillar reported that human rights-related allegations, including security-related incidents, are reported to site-level Human Rights Compliance Officers. These Officers oversee the process of documenting allegations and assigning internal teams to conduct an assessment of the allegation. The outcomes of these assessments are reported to site-level management and to the individual who raised the initial concern. The company noted that more severe cases, including those incidents that involve fatalities, are reported to a corporate-level sustainable development group and legal counsel. For cases involving public security personnel, the Human Rights Compliance Officer and site-level management report the incident to appropriate government institutions.

One member of the Corporate Pillar reported that it has a “zero tolerance” policy for security and human rights violations at its operating locations. The company noted that site-level personnel investigate all incidents involving the use of force and that independent investigators are brought in to investigate incidents that involve serious injury, death, or human rights violations. The company specifically noted that it had terminated security personnel in 2014 for having breached the company’s policies and procedures related to use of force and the Voluntary Principles.

One company reported that, in 2014, it had revised its security incident investigation and reporting standard. This standard outlines the requirements for investigations into security incidents, including any human rights violations. The standard includes guidance on the identification of underlying causes, the prevention of recurrences, and the requirement to report and apply effective corrective action and control measures.

Finally, several members of the Corporate Pillar reported that they had policies and procedures explicitly requiring that company personnel provide full cooperation to any government officials that may be engaged in investigating incidents in connection with corporate operations.

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

### *Government Pillar*

Many members of the Government Pillar referenced efforts to provide their embassy staffs with more information on the Voluntary Principles in order to help facilitate outreach to, and engagement with, host governments. One government specifically noted that its foreign affairs personnel are in constant communication with embassies “on VP-relevant topics, situations and developments within the VPI” and that “[t]his dialogue serves to increase the embassy staff’s awareness of the VP, as well as their capacity to promote the VP, and their implementation in host countries.”

One government reported that it has asked its embassies in many countries to:

create and maintain a mission action plan on the VPs Initiative, which includes a strategy for: determining the host government lead agency and point of contact for the VPs Initiative, including additional government agencies that should be involved (if any); coordinating with other VPs Initiative Participants in country; and a plan for engagement.

Another member of the Government Pillar stated that all of its diplomatic posts have been provided with materials on the Voluntary Principles and that the government had also incorporated the Voluntary Principles into the staff development plans for foreign affairs personnel.

Finally, a member of the Government Pillar noted that the Voluntary Principles were incorporated into its efforts to promote greater policy coherence within the government as part of its implementation of a National Action Plan on business and human rights.

### *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 has developed a computer-based training focused on human rights, which includes a section on the Voluntary Principles. As of 2014, more than 14,000 of the company's employees had completed this training. Another member of the Corporate Pillar reported that it had developed an internal SharePoint site regarding its corporate social responsibility commitments, including the Voluntary Principles.

One company reported that, in mid-2014, an announcement regarding the company's commitment to the Voluntary Principles was made through the company's intranet, which is accessible by personnel in 35 countries. Another company reported that it was redesigning the section of its intranet dedicated to the Voluntary Principles in order to allow more interactive sharing of guidance materials and tools between corporate headquarters and various operating locations.

A member of the Corporate Pillar reported that it had revised its internal Voluntary Principles guidelines and that these revised guidelines were the subject of a communication delivered in 2014 to all of the company's social performance and security personnel.

One company reported that, in late 2014, it had provided a workshop on the Voluntary Principles to regional and country safety and security managers from all host countries in order to "optimize and unify" the company's response to any security and human rights-related incidents. Another member of the Pillar reported it had worked with a member of the NGO Pillar to develop a one-day Voluntary Principles awareness training session and that this program had been provided to all front-line field staff and both public and private security providers.

Another company reported that it had developed new human rights training in 2014 that incorporates guidance developed by IPIECA and includes a module on security and human rights. The company noted that it was delivering the training globally through a computer-based module.

Finally, a member of the Corporate Pillar reported that it had developed a Human Rights ambassador program and that this program had helped to promote awareness of the Voluntary Principles among non-security employees and contractors.

### *NGO Pillar*

Several members of the NGO Pillar cited efforts to increase awareness of the Voluntary Principles within their organizations through both trainings and workshops.

One member of the NGO Pillar referenced hosting a regular roundtable that addresses security and human rights topics, including the Voluntary Principles. All members of the organization's staff are invited to attend this roundtable.

Another member of the NGO Pillar noted that promoting awareness of the Voluntary Principles was one of its core program activities and that this had helped to ensure that all staff are knowledgeable regarding the Voluntary Principles.

Finally, one NGO reported that it had recently held an international summit with all of its member organizations at which it promoted the Voluntary Principles.

## **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.

One member of the Government Pillar reported that it had developed and distributed tailored materials for outreach to governments that may be interested in joining the Voluntary Principles Initiative. The government noted that these materials discuss the benefits of participation from an investment, productivity, risk management, and best practice perspective.

One government reported that it had worked to promote the Voluntary Principles in a number of international forums, including the Organization for Economic Cooperation and Development, the G7, Asia Pacific Economic Cooperation, and the Organization of American States.

Another government noted that, in order to promote the Voluntary Principles internationally, it was supporting efforts to strengthen the effectiveness and accountability of the Initiative and to ensure that it is aligned with international norms and best practices in the field of business and human rights.

Another member of the Pillar reported that it was funding programs to promote implementation of the Voluntary Principles in several countries, including Nigeria, Ghana, Panama, Peru, and Guatemala.

#### *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. Several member of the Pillar also referenced their participation in the Outreach and Implementation Working Group.

Members of the Corporate Pillar cited efforts to promote the Voluntary Principles in the context of their participation in other initiatives and organizations including: IPIECA, the International Council on Mining and Metals, the U.N. Global Compact, Responsible Jewellery Council, and the Mining and Energy Committee on Human Rights in Colombia.

A member of the Corporate Pillar reported that it had been engaged in in-country working groups and initiatives to promote the Voluntary Principles in Indonesia, the Democratic Republic of Congo, and Peru. One company cited specific efforts to promote the Voluntary Principles in Nigeria, Tanzania, Angola, and Mozambique. Another company reported on its efforts to promote the Principles in Kenya and Ghana.

Finally, a member of the Pillar reported that it was engaged in a multi-stakeholder research effort on conflict prevention in the mining sector that includes members of the Government Pillar as well as Observers. The intended output of the research effort will be a report outlining best practices and international security guidelines.

#### *NGO Pillar*

Members of the NGO Pillar cited a range of outreach efforts intended to promote both implementation of the Voluntary Principles and participation in the Voluntary Principles Initiative. NGOs reported on a range of activities, including lectures, panel discussions, and workshops.

One NGO reported that it had worked to promote the Voluntary Principles with companies that are not currently Participants, including with companies that are not members of the extractive sector.

A member of the Pillar reported that it had promoted the Voluntary Principles in meetings with government officials in Honduras and Morocco. One NGO reported that it was working with a member of the Government Pillar to assess and prepare for the implementation of the Voluntary Principles in Angola. Another NGO reported that it was working with several companies, including members of the Corporate Pillar, to promote Voluntary Principles

implementation in Colombia, Bolivia, Peru, and Morocco. Members of the Pillar also cited efforts to promote the Voluntary Principles in the Democratic Republic of Congo.

Another member of the NGO Pillar reported that it had promoted the Voluntary Principles in connection with its engagement with the following institutions: the Responsible Jewellery Council, the International Code of Conduct for Private Security Providers' Association, and the World Bank. Another NGO noted that it had promoted the Voluntary Principles in the context of participation in the Kimberley Process and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

One NGO reported that it was engaged with a Working Group organized by the UN Global Compact Canada Network to develop a guidance document on the use of key performance indicators in the context of Voluntary Principles implementation.

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.

One member of the NGO Pillar reported that it had facilitated a parallel event at the U.N. Forum on Business on Human Rights that was focused on engaging companies in discussions regarding human rights concerns with a focus on Latin America and Africa.

## **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 and territories: Algeria, Angola, Argentina, Australia, Azerbaijan, Belgium, Bolivia, Botswana, Brazil, Burkina Faso, Burma, Burundi, Cameroon, Canada, Chad, Chile, Colombia, Democratic Republic of Congo, Ecuador, Egypt, Equatorial Guinea, Ethiopia, France, Gambia, Ghana, Guatemala, Guinea, Honduras, Indonesia, Iraq (including the Kurdistan Region of Iraq), India, Jamaica, Kazakhstan, Kenya, Laos, Liberia, Libya, Malaysia, Mali, Madagascar, Mauritania, Mexico, Mongolia, Morocco, Mozambique, Namibia, Nicaragua, Nigeria, Norway, Oman, Pakistan, Panama, Papua New Guinea, Peru, the Philippines, Qatar, Russia, Rwanda, Saudi Arabia, Senegal, Sierra Leone, South Africa, South Sudan, Spain, Suriname, Switzerland, Tanzania, Thailand, Trinidad & Tobago, Tunisia, Turkey, Uganda, Uruguay, United Arab Emirates, United States, United Kingdom, Venezuela, Vietnam, Western Sahara, Zambia, and Zimbabwe.

For the purposes of this summary report, Participants' activities in the following countries are described below: Colombia, Ghana, Indonesia, Nigeria, Peru, South Africa, 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. Several Participants noted that CME modified its rules in 2014 in order to allow civil society organizations to join as full members.

A member of the Government Pillar reported that, in 2014, it had provided support for the development of a guidance tool on security and human rights in Colombia that referenced the Voluntary Principles.

Another member of the Government Pillar reported that it had provided technical assistance for a private sector effort to develop indicators on the implementation of the Voluntary Principles in Colombia.

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

A member of the Corporate Pillar reported that, in 2014, it had conducted five training sessions on the Voluntary Principles with more than 100 private security personnel.

Another member of Corporate Pillar reported that, at the request of its Colombian subsidiary, its private security provider in Colombia had appointed a human rights and Voluntary Principles expert. The company also stated that it had funded workshops for the Colombian national police on conflict resolution and communications strategies.

One company reported that it had implemented a program in Colombia to raise awareness regarding human rights and the Voluntary Principles among key stakeholder groups, including labor unions, student associations, and environmental groups. The program has involved regular engagement with local Colombian NGOs.

A member of the NGO Pillar reported that it was participating in several CME working groups, including groups focused on: engagement with civil society; implementation of the U.N. Guiding Principles; design and implementation of the national public policy on business and human rights; and public security. The NGO reported that it was also working with several Colombian civil society organizations to ensure that their views and concerns are considered in discussions taking place within the Voluntary Principles Initiative.

A member of the NGO Pillar reported that it had provided trainings and workshops on security and human rights to several Colombian companies and a member of the Corporate Pillar.

Another member of the NGO Pillar reported that it had provided recommendations to a member of the Corporate Pillar after conducting a security and human rights risk analysis in Colombia. The NGO noted that its recommendations had been accepted and that, in 2015, it would be helping to assess revised policies and implementation efforts.

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

Several members of the Government Pillar reported that they had provided advice to the Government of Ghana in connection with Ghana's admission to the Voluntary Principles Initiative in May 2014.

A member of the Government Pillar reported that it had provided funding to a Ghanaian NGO to support a grassroots sensitization campaign regarding the Voluntary Principles in three different regions of the country.

Another member of the Government Pillar reported that its embassy in Accra has hosted a series of stakeholder meetings to gather corporate and civil society insight regarding security and human rights in Ghana. The meetings sought to generate a list of recommendations to the Government of Ghana as it works to develop a National Action Plan to implement the Voluntary Principles.

One government reported that it had recently funded a program to increase knowledge and understanding of the Voluntary Principles in Ghana.

Another government reported that it had worked with a Ghanaian NGO to host a civil society roundtable in Ghana to discuss the needs and concerns of communities impacted by extractive sector operations.

A member of the Corporate Pillar reported that, in 2014, it retendered its private security services in Ghana and that it required potential providers to submit plans as to how they would fulfill the requirements of the Voluntary Principles. Specific training on the Voluntary Principles was provided to the provider that was ultimately selected. The company also noted that it requires all public security personnel that help to provide security for its operations to be trained on the Voluntary Principles. Finally, the company reported that it has worked to build relationships with Ghanaian civil society organizations and with representatives of the Government of Ghana in order to help support and promote the implementation of the Voluntary Principles.

Another member of the Corporate Pillar reported that it was providing support to the Government of Ghana as the government works to implement the Voluntary Principles. As part

of this effort, the company noted that its security personnel had provided examples of memoranda of understanding, training plans, and standards to a member of the Government Pillar that is also working to support the Government of Ghana's efforts.

A member of the Corporate Pillar reported that it had sought to promote the Voluntary Principles in Ghana through a series of presentations at workshops and conferences in the country.

### **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 member of the Government Pillar reported that it was working with other governments and NGOs to engage the Government of Indonesia in discussions about participation in the Voluntary Principles Initiative.

Several members of the Government Pillar noted that outreach efforts had been put "on hold" for a period of time in 2014 due to the Indonesian national elections in July 2014.

A member of the Corporate Pillar stated that training on security and human rights was a significant area of focus at its Indonesian operations. The company noted that its security team in Indonesia had participated in five joint training exercises with the local police, with the last exercise taking place in late 2014. The company noted that these exercises had provided opportunities to test civil disturbance management plans and procedures and adherence to the Voluntary Principles in volatile crowd situations.

Another member of the Corporate Pillar noted that it had supported a workshop with eleven private security providers in Indonesia that served to highlight best practices with regard to the Voluntary Principles. The company noted that it had also distributed training materials specific to the Voluntary Principles in the relevant local language.

One company reported that it had provided Voluntary Principles briefings to 35 police and army officers assigned to the geographic area of its operations.

A member of the Corporate Pillar reported that it was currently engaged in dialogue with stakeholders at the international, national, and local level regarding Voluntary Principles implementation at its operations in Indonesia. In 2014, the company implemented a new stakeholder engagement plan to increase the extent of its interactions with key stakeholders. The company specifically noted that it had met with national-level human rights NGOs and representatives of the Indonesian Human Rights Commission to discuss a range of human rights-related issues associated with its operations. The company also reported that it had participated in a roundtable discussion in Jakarta regarding implementation of the U.N. Guiding Principles on Business and Human Rights.

Another company stated that its security personnel in Indonesia had all received refresher training on the Voluntary Principles in 2014. The company stated that it had also provided Voluntary Principles briefings for members of the Indonesian police in 2014.

Finally, a member of the Corporate Pillar reported that its Indonesian operations have issued all private and public security personnel a plastic card that provides guidance on human rights and general safety. The company also reported that it recently conducted three joint exercises involving company security, private security providers, and public security personnel. Two of these exercises involved representatives of the local community.

### **Nigeria**

A member of the Government Pillar reported that many members of the Government Pillar are now engaged in promoting Voluntary Principles implementation and participation in Nigeria. The Government reported that there have been a wide variety of events intended to promote the Voluntary Principles in Nigeria including roundtables, workshops, and bilateral and multilateral meetings. T

One Government noted that a member of the NGO Pillar and the Nigerian National Human Rights Commission had hosted a workshop in early 2014 to explore the viability of the Voluntary Principles as a model for addressing security and human rights issues in Nigeria's extractive sector.

A member of the Government Pillar reported that its embassy has held a series of meetings with local Nigerian stakeholders to promote the Voluntary Principles. The government also reported that it had recently provided a grant to a local Nigerian NGO that is working to strengthen local stakeholders' understanding of the Voluntary Principles.

Another member of the Government Pillar reported that it had provided support to a member of the NGO Pillar to support a series of workshops on security and human rights in Nigeria. The funding also supported a Voluntary Principles sensitization campaign in Nigeria and a baseline study to evaluate the extent to which local stakeholders are aware of the Voluntary Principles.

A member of the Corporate Pillar reported that it had conducted human rights training for its entire Nigerian staff in mid-2014. In 2014, the company provided 146 security contractors and 46 members of its staff with additional training on international humanitarian law, the rights of indigenous peoples, the Voluntary Principles, and conflict resolution.

One company reported that it had maintained an ongoing dialogue with the Government of Nigeria regarding the Voluntary Principles in 2014.

A member of the NGO Pillar reported that it had conducted an awareness session for members of the Nigerian military and police regarding international human rights standards,

including the Voluntary Principles. The NGO also reported that it had engaged in a community sensitization effort to promote the Voluntary Principles within Nigeria. These sensitization sessions were used to create awareness regarding the Voluntary Principles to enable community members to advocate for Voluntary Principles implementation by both the Government of Nigeria and companies operating in Nigeria.

One NGO reported that it had participated in several meetings with civil society organizations as well as representatives of the Government and Corporate Pillars to discuss how best to promote Voluntary Principles participation and implementation in Nigeria.

One member of the NGO Pillar reported had launched a portal on its website allowing stakeholders to voice their support for the Government of Nigeria joining the Voluntary Principles Initiative. The NGO also noted that it had produced a guidance document on the Voluntary Principles that was distributed to security personnel, civil society organizations, government agencies, and communities in Nigeria.

A member of the NGO Pillar reported that it had developed a conflict early warning network in Nigeria and that it was continually seeking to engage both companies and civil society organizations on the issue of security and human rights in the country.

Another member of the NGO Pillar reported that it had partnered with a Nigerian NGO to convene a series of meetings with civil society organizations, youth representatives, and community leaders, to discuss the Voluntary Principles and how best to address concerns about oil and gas development.

Finally, a member of the NGO Pillar reported that it was expanding its work in four states in Nigeria to promote sustainable peace by engaging youth, women, local leaders, and local authorities to discuss the root causes of conflict, including concerns about the oil and gas industry.

## 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 the Working Group had held a series of plenary meetings to address issues ranging from the state of the public and private security in Peru to a new framework agreement between the extractive sector and the Peruvian Police. Another member of the Government Pillar reported that the Working Group had provided space for dialogue among a diverse set of stakeholders on key issues in Peru related to social conflict, human rights, and the extractive sector.

A member of the Government Pillar reported that its embassy in Lima had helped to develop and coordinate awareness-raising activities intended to engage the Government of Peru, local civil society organizations, and companies operating in Peru in discussions regarding the benefits of Voluntary Principles participation and implementation. The Government reported that it had engaged in several bilateral meetings with the Government of Peru to encourage participation in the Voluntary Principles Initiative and to provide updates on the work of the Initiative.

A member of the Government Pillar reported that it had provided funding to support a member of the NGO Pillar in organizing two workshops to raise awareness regarding the Voluntary Principles in southern and central Peru.

Another member of the Government Pillar reported that it had provided financial support for the training of extractive sector companies, private security providers, government officials, and civil society organizations in Peru regarding the Voluntary Principles.

A member of the Corporate Pillar reported that its regional security manager had promoted the Voluntary Principles with the Government of Peru, in part through the company's cooperation agreement with public security agencies. The company reported that its security personnel were active participants in the security committee of the Sociedad Nacional de Minería Petróleo y Energía and had sought to promote the Voluntary Principles in this context.

Another member of the Corporate Pillar reported that it had hosted a multi-stakeholder event in Peru in October 2014 to promote the Voluntary Principles. The event included representatives from NGOs, academia, and the Government of Peru, as well as security staff from other companies operating in Peru. At the event, there were presentations on the Voluntary Principles as well as practical sessions focusing on joint problem solving. One focus of the event was how to address public and private security challenges in order to reduce the risk of conflict.

One company reported that it was working to promote engagement between security personnel and community members near its operations in Peru. The company has hosted several community events to lower fears and build trust between the various groups by increasing interpersonal engagement and dialogue.

Another company reported that it had worked with a member of the NGO Pillar in 2014 to review and improve its security and conflict management processes at an operating location in Peru.

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 lead role in leading and facilitating the Voluntary Principles Working Group in Peru since 2010.

### **South Africa**

Several members of the Government Pillar reported that they had engaged in outreach to the Government of South Africa during 2014 in order to discuss Voluntary Principles participation and implementation. One member of the Government Pillar reported that it had held two meetings with other members of the Government Pillar to discuss outreach to South Africa.

A member of the Corporate Pillar reported that it had conducted consultations with peer companies to discuss outreach to the Government of South Africa regarding the Voluntary Principles.

Another member of the Corporate Pillar reported that it was pursuing ongoing engagement with national, provincial, and local police personnel in South Africa in order to address security issues proactively and in order to reduce the potential for conflict in the context of extractive sector operations.

One company reported that it had conducted Voluntary Principles training for its private security providers in South Africa in early 2014. The training included sessions focused on specific security scenarios.

Another member of the Corporate Pillar reported that it had provided a three-day training course on the Voluntary Principles in mid-2014 to private security personnel at its South African operations. The training targeted armed security managers, security shift supervisors, and functional level security personnel.

Another company reported that all of its security providers in South Africa receive refresher training on the Voluntary Principles each year. The company also report that its contract security in South Africa is managed in accordance with the International Code of Conduct for Private Security Providers.

Finally, a member of the Corporate Pillar reported that it had worked with a member of the NGO Pillar to review its security and human rights policies and management processes in South Africa. Subsequent to this review, the company was working to further integrate the Voluntary Principles into its risk assessment and management tools.

A member of the NGO Pillar reported that it had worked with a member of the Corporate Pillar to conduct a gap analysis of Voluntary Principles implementation, among other issues, at the company's South African operations.

One NGO reported that it had worked closely with two members of the Corporate Pillar to promote the Voluntary Principles to the Government of South Africa and South Africa civil society organizations. This promotion included a number of meetings with government representatives and meetings with the South African Human Rights Commission.

### Tanzania

Members of all 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 it had worked with three other members of the Pillar to engage the newly appointed Tanzanian Minister of Energy and Minerals in discussions regarding the benefits of participation in the Voluntary Principles Initiative.

One member of the Government Pillar reported that its Prime Minister had raised the Voluntary Principles in bilateral discussions with the President of Tanzania. The government also stated that it had organized meetings with the Tanzanian Ministries of Defense, Home Affairs, Energy and Minerals, and the Prime Minister's office.

A member of the Government Pillar reported that it was working to promote the Voluntary Principles among extractive sector companies operating in Tanzania.

A member of the Corporate Pillar reported that it had conducted Voluntary Principles risk assessments in Tanzania in 2014. The company noted that its private security providers in Tanzania are contractually required to adhere to the requirements of the Voluntary Principles and to regular Voluntary Principles-specific performance reviews. The company also noted that it has a memorandum of understanding with public security forces that includes strict controls on the custody and use of weapons.

A member of the Corporate Pillar reported that it was working closely with members of the Government and NGO Pillars to build support for the Voluntary Principles within the Government of Tanzania.

One company reported that human rights training is provided to all public security personnel that may be called upon to provide security for the company's operations.

Another member of the Corporate Pillar reported that it had provided financial support for alternative livelihood activities and youth cooperatives in Tanzania in order to help move community members away from illegal mining activity and towards more sustainable livelihoods. The company noted that this has reduced illegal mining in the vicinity of its operations.



One company reported that it has conducted regular meetings with representatives from a member of the NGO Pillar in Tanzania to discuss security and community-related issues. These meetings are intended to proactively address security risks and to avoid an escalation of conflict between the company's sites and local communities.

A member of the Corporate Pillar reported that it had provided funding for a member of the NGO Pillar to work with police officials and community members to develop training on alternative dispute resolution. These trainings have targeted local decision-makers, including village elders; religious leaders; sub-village and hamlet leaders; local police; security and community relations staff; and local and district-level government representatives.

One NGO reported that has participated in roundtable discussions organized by a member of the Government Pillar on how to engage the Government of Tanzania regarding Voluntary Principles participation and implementation. The NGO reported that it has subsequently reached out directly to key ministries within the Government of Tanzania regarding the Voluntary Principles.

A member of the NGO Pillar reported that it had conducted meetings with the Tanzanian Commission for Human Rights and Good Governance to discuss Voluntary Principles participation and implementation.

One NGO reported that, in 2014, its Tanzanian personnel conducted 78 police trainings and 102 multi-stakeholder meetings to discuss conflict resolution.

#### **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**

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 are familiar with the requirements of the Voluntary Principles.

A member of the Corporate Pillar reported that all of its contractual agreements and memoranda of understanding with both public and private security forces must include references to the company's commitment to the Voluntary Principles. The company also stated that all private security contractors are provided training on the company's policies and procedures concerning both human rights and the Voluntary Principles. Public security personnel are briefed on the Voluntary Principles before they are deployed.

Another member of the Corporate Pillar reported that it had signed seventeen contracts with private security providers in 2014 and that all of these contracts included clauses referencing the Universal Declaration of Human Rights, the guidelines for action contained in

the United Nations Basic Principles on the Use of Force and Firearms, and the requirements of the Voluntary Principles.

One company reported that it had entered into agreements with public security forces in Peru and Ecuador in 2014. In both cases, the agreements included specific reference to the requirements of the Voluntary Principles. The company reported that, in countries in which it has not been able to formalize an agreement with public security forces, it engages in ongoing dialogues with public security personnel regarding the need to formalize agreements and to respect the Voluntary Principles.

With regard to the selection of private security providers, one company reported that it only engages private security providers that have been subject to a rigorous procurement process, including background screening and training, where necessary, on the Voluntary Principles. In cases where specific sites are not able to work with an approved provider, those sites must use a specific procedure to find a private security provider and assess its suitability. If a security provider is identified as suitable, the site must enter into a contract with that provider that contains a specific addendum on the Voluntary Principles.

A member of the Corporate Pillar reported that its sites conduct risk analyses to identify whether it may be necessary to use the support of public security forces. If the analysis shows that the company may need to utilize public security, the site is asked to proactively establish agreements with local public security personnel so that “some controls are already in-place in case of emergency.”

Another company stated that it has a specific procedure on how to enter into and manage agreements with public security providers. This procedure states that, prior to entering into any such agreement, the company must conduct due diligence using external specialists to identify specific challenges that may be connected with particular public security agencies. This due diligence 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, treatment of apprehended persons, incident review processes, etc.” After due diligence is conducted, the company enters into dialogue with public security officials regarding the company’s performance expectations under national law, international law, and voluntary commitments including the Voluntary Principles.

A company noted that any decision to provide support to a public security force must be approved by the company’s Global Head of Security and its Executive Committee. Such support must be limited to accommodation, offices or storage facilities, basic living necessities, transportation, non-lethal equipment, and non-military/police style training support.

**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 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.

Governments also reported that they had conducted outreach to specific companies that are not yet Participants regarding the benefits of Voluntary Principles participation and implementation.

*Corporate Pillar*

Members of the Corporate Pillar reported on a range of different training initiatives undertaken in 2014.

One company reported that it had hosted a session at its corporate offices with two Observers and representatives of the extractive sector to discuss a toolkit intended to support companies operating in complex environments and to promote respect for human rights in such operating contexts.

Another member of the Corporate Pillar reported that it had developed training modules on the Voluntary Principles, basic human rights, and the use of force. These modules are provided to all private security personnel. The company noted that refresher training is provided on an annual basis.

One company reported that it provided online training on the Voluntary Principles to all security guards at critical and high risk sites. The training was highly recommended for security personnel at other operating locations. The company noted that it has made this training available to public security forces, where appropriate. Another company reported that all direct and contracted security personnel must undertake 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; and the identification and reporting of security-related human rights allegations.

A member of the Corporate Pillar reported that, in 2014, it had conducted 22,400 hours of training at its Indonesian operations. The training focused on the company's human rights policy and the Voluntary Principles. Participants in the training included more than 3,600

contractor employees and more than 3,100 individuals representing community leaders and partner organizations, students, local contractors and police and armed forces personnel.

Finally, a member of the Corporate Pillar reported that it requires all contract security companies to include language in their contracts detailing how they will train their personnel on the Voluntary Principles. This training is in addition to training provided by the company.

#### *NGO Pillar*

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

A member of the NGO Pillar reported that it had worked with a member of the Corporate Pillar to provide training on the Voluntary Principles to both public and private security personnel in Nigeria.

Another member of the NGO Pillar reported that it had contributed to a conference on security and human rights in the Democratic Republic of Congo organized by a member of the Government Pillar.

A member of the NGO Pillar reported that it had participated in a multi-stakeholder dialogue on security and human rights in Kenya's extractive sector that was organized by a Voluntary Principles Observer.

One NGO reported that it had developed an action plan to promote Voluntary Principles implementation in Argentina. The NGO reported that it was working with members of both the Corporate and NGO Pillars on this effort.

Finally, an NGO reported that it had worked with the United Nations Development Program to organize two outreach sessions in Peru to promote the Voluntary Principles in the context of the U.N. Guiding Principles on Business and Human Rights.

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

Many members of the Corporate Pillar reported that Voluntary Principles implementation was incorporated into internal assurance and assessment processes. Several companies described how these processes lead to the development of corrective action plans. Many companies referenced use of the KPIs developed by a Voluntary Principles volunteer group as well as the IGT.

A member of the Corporate Pillar reported that its performance in implementing the Voluntary Principles, as well as significant incidents related to the Voluntary Principles, are reported and reviewed at the board level.

One company reported that it was working with a member of the NGO Pillar and a Voluntary Principles observer to pilot Voluntary Principles management performance indicators. Another member of the Corporate Pillar reported that it was using the IGT as a self-assessment instrument in order to gauge its implementation progress.

A member of the Corporate Pillar reported that it had developed an internal security governance group that audits its higher-risk sites against specific elements of the company's internal Voluntary Principles performance standard. These elements include use of force procedures, codes of conduct for security personnel, pre-employment screening, and implementation of memoranda of understanding with public security providers. These audits lead to the development of action plans, as required, and, in 2014, the company developed a new tracking program to promote greater accountability on the implementation of these action plans. In addition to these internal audits, the company's higher-risk sites are required to have, at minimum, a bi-annual or tri-annual external, independent Voluntary Principles security and human rights assessment.

Another member of the Corporate Pillar reported that, based on the results of a gap analysis conducted in 2013, it held a week-long training course in 2014 to introduce its security professionals to a new security and human rights program.

#### **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.

##### **General Outreach**

- In order to strengthen outreach efforts, it is important to show evidence of the positive impacts of Voluntary Principles implementation. In order to show the positive impact of Voluntary Principles implementation and to increase the credibility of the Voluntary Principles Initiative, Participants should continue to pursue efforts to develop impact assessments.
- There is a need to create implementation support materials aimed at smaller oil, gas, and mining companies.
- The Voluntary Principles can be used as a conflict prevention and management tool in areas where extractive operations are only just beginning.

## **Outreach to Host Governments**

- Increased cooperation among Pillars is required in order to strengthen outreach to governments.
- Participants should broaden the appeal of the Voluntary Principles Initiative by promoting the economic and trade benefits of membership.
- In order to broaden implementation of the Voluntary Principles, outreach should be targeted in phases – awareness, endorsement and then membership. Even in situations where government membership is unlikely, endorsement or understanding can facilitate utilization of the Voluntary Principles and therefore reduce the risk of conflict.
- Developing arguments on why the Voluntary Principles are relevant in the context of the artisanal and small-scale mining sectors would make participation in the Voluntary Principles Initiative more attractive for many resource-rich countries.
- The importance of bringing more host governments into the Voluntary Principles Initiative cannot be overstated. Host governments need to be engaged and welcomed into the Voluntary Principles Initiative given their role as sovereign authority over their own national police and military forces.
- Sharing experiences and case studies is the most effective type of outreach to encourage more governments to join the initiative. In 2015, it will be important to continue the work started to identify several case studies to share with governments, in order to demonstrate the positive impact that the Voluntary Principles already have in their countries.
- Engagement regarding whole-of-government security sector reform remains the biggest challenge for advancing the concepts associated with the Voluntary Principles. While it is possible to identify risks, establish good governance, train personnel, provide healthy oversight and investigate security-related incidents, absent government-to-government training regarding democratic principles associated with security sector reform, it is difficult to expand implementation of the Voluntary Principles beyond asset-level activities and contractual agreements.

## **Engagement of Host Governments**

- Persuading certain host governments to sign security agreements that incorporate the Voluntary Principles remains an ongoing challenge.
- Engagement with host governments continues to be a challenge when the government is not a member of the Voluntary Principles Initiative. Regular meetings and engagements covering the Voluntary Principles are helpful.

- 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 Initiative and its Participant must better engage governments at all levels.

### **Assurance**

- There is a need for greater accountability standards within the framework of the Voluntary Principles Initiative. This should be done in a way that maintains accessibility of the Voluntary Principles and avoids creating barriers that may limit participation in the Voluntary Principles Initiative.
- Participants should continue to focus on verification of Voluntary Principles implementation. Verification is important to ensure to the satisfaction of both Participants and the public that companies are meeting their commitments under the Voluntary Principles. Verification is a key component of Voluntary Principles implementation and critical to the sustainability of the Voluntary Principles Initiative. A robust verification framework is an essential ingredient to a successful multi-stakeholder initiative.
- The development of the verification frameworks is a real step forward and all Participants should adopt and implement them.
- Conducting periodic peer reviews offers an independent assessment of Voluntary Principles implementation and provides opportunities for useful feedback and the sharing of best practices.

### **In-Country Implementation**

- Cross-Pillar efforts to conduct outreach and to 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.
- It is important to engage all relevant stakeholders in Voluntary Principles implementation, including public security forces, which are often the source of many of the problems that Participants are seeking to address and yet are, perhaps, the most neglected stakeholders in the Initiative.

- Companies outside the extractive sector face similar issues to those encountered by Participants in the Voluntary Principles Initiative. These companies may benefit from more outreach regarding Voluntary Principles implementation.
- One of the biggest challenges working in rural areas is creating an efficient and effective communication mechanism which allows not only for proper dissemination of information, but also adheres to each community's unique culture. Not following proper chain of command within tribal or community customs can be devastating for an external actor looking to connect and create positive relationships. Entering into these relationships must never be rushed; consultations should involve many actors to ensure that true representatives are being engaged. In general, it is necessary to have field staff who are seen as trustworthy and impartial members of the community.

### **Training**

- Regular Voluntary Principles awareness sessions with public and private security personnel, as well as with company staff, are important in ensuring that the Voluntary Principles remain a key focus area of security risk management
- As one gets closer and closer to the operational level, the high-level language of the Voluntary Principles can lose relevance and may even be potentially harmful. Military and police officials, for example, do not necessarily need to be taught international humanitarian and human rights law, as much as they need to be trained about proper behavior, use of force, and command and control. Additionally, showing them greater respect and discussing their needs and expectations, as opposed to coming to them with packaged training materials, carries a lot more traction.

### **Entry Criteria**

- Recent experiences have shown that the entry criteria and application process need to be reviewed and clarified.

### **The NGO Pillar**

- There is a need to strengthen the NGO Pillar through increased participation and the resolution of funding challenges. Robust and diverse participation by civil society is necessary for an effective and credible multi-stakeholder initiative.

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

- In order for the Voluntary Principles Initiative to adapt to recent international developments and best practices in the field of business and human rights and to be aligned with the U.N. Guiding Principles, Participants should continue to pursue the objectives set forth in the Voluntary Principles strategy document for 2014-2016. The



implementation of the strategy requires in-depth discussions and finding compromise among Participants without, however, compromising on the goals identified in the strategy.

- It is important to align the Voluntary Principles Initiative with the U.N. Guiding Principles. This is paramount to the Initiative's credibility and its attractiveness to potential Participants.
- The Voluntary Principles Initiative should consider ways to provide effective remedy for victims of human rights abuses in connection with the provision of security.
- 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. More often than not, people whose lives are affected by large projects are not aware of the Voluntary Principles Initiative or its potential to contribute to their security and human rights. The value of the Voluntary Principles depends on the outcome of local processes, which only rarely have a truly tri-partite dimension.
- The greatest strength of the Voluntary Principles Initiative lies in its ability to serve as a platform for candid discussion and collaboration around shared objectives, including successes and challenges experienced during implementation.