

**VOLUNTARY PRINCIPLES INITIATIVE**  
**SUMMARY OF IMPLEMENTATION EFFORTS DURING 2016**

This report provides an overview of Participants' efforts to implement the Voluntary Principles on Security and Human Rights (the "Voluntary Principles" or "VPSHR") during the calendar year 2016. 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 2017 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. For this year, the Secretariat received reports from seven members of the Government Pillar, nine members of the NGO Pillar, and twenty-four members of the Corporate Pillar.

This year's reports included information on Participants' activities in the following countries and territories: Algeria, Angola, Argentina, Australia, Azerbaijan, Bolivia, Botswana, Brazil, Bulgaria, Burundi, Cameroon, Canada, Chad, Chile, China, Colombia, Cuba, Democratic Republic of Congo, Dominican Republic, Ecuador, Egypt, Equatorial Guinea, Finland, France, Georgia, Ghana, Greece, Guinea, Guatemala, Guyana, Honduras, Indonesia, Iraq, Italy, Ivory Coast, Jamaica, Kenya, Laos, Liberia, Libya, Madagascar, Malawi, Mali, Malaysia, Mexico, Mongolia, Morocco, Mozambique, Myanmar, Namibia, the Netherlands, Nigeria, Papua New Guinea, Peru, Rwanda, Senegal, Sierra Leone, South Africa, Spain, Suriname, Switzerland, Tanzania, Thailand, Trinidad & Tobago, Turkey, Uganda, United Arab Emirates, United Kingdom, United States, Venezuela, Western Sahara, and Zambia.

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The Plenary approved new Reporting Guidelines at the 2016 Annual Plenary Meeting. The Reporting Guidelines are intended to help: (i) support transparency regarding efforts to support and implement, and/or assist in the implementation of, the Voluntary Principles; (ii) assist Participants in reporting on efforts to implement the Voluntary Principles to the Plenary; and (iii) facilitate the exchange of good practices among Participants.

Copies of the Voluntary Principles Initiative Reporting Guidelines for each Pillar are available on the Voluntary Principles website ([www.voluntaryprinciples.org](http://www.voluntaryprinciples.org)) under "Resources." Generally, there are five major topic areas covered by each Pillar's guidelines:

- A. Commitment to the Voluntary Principles;
- B. Policies, Procedures, and Related Activities;
- C. Promotion and Outreach

- D. Country Implementation; and
- E. Lessons and Issues.

The reports are *not* intended to grade implementation by one Participant against another. Participants are expected to describe their efforts to implement the Voluntary Principles each year recognizing any and all security and legal considerations, as well as practical issues related to the collection of required information.

**A. COMMITMENT TO THE VOLUNTARY PRINCIPLES**

The Reporting Guidelines ask Participants to include the following information in their annual reports:

<b>Corporate Pillar</b>	<ul style="list-style-type: none"> <li>• Public statement of commitment or endorsement of the Voluntary Principles; engagement in the Voluntary Principles Initiative; and transparency</li> <li>• Examples of promoting awareness of the Voluntary Principles throughout the organization, including within the value chain</li> <li>• Examples of promoting and advancing implementation of the Voluntary Principles internationally</li> </ul>
<b>Government Pillar</b>	<ul style="list-style-type: none"> <li>• Commitment to the Rules of the Voluntary Principles Initiative</li> <li>• Statement of commitment or endorsement of the Voluntary Principles</li> <li>• Statement of commitment to implementation National Plan(s), where applicable</li> <li>• Describe Engagement in the Voluntary Principles Initiative</li> <li>• Describe government engagement in the Voluntary Principles Initiative</li> </ul> <p><b><i>Transparency and Dialogue</i></b></p> <ul style="list-style-type: none"> <li>• Describe how the government shares information about efforts to assist in implementation of the Voluntary Principles with other Participants and the public</li> </ul>
<b>NGO Pillar</b>	<ul style="list-style-type: none"> <li>• Describe how you have engaged in the Voluntary Principles Initiative over the past year</li> </ul>

	<ul style="list-style-type: none"> <li>• Describe efforts to increase transparency, both internally and externally, regarding your efforts to implement or support implementation of the Voluntary Principles</li> <li>• Describe any efforts to engage in dialogue with other participants in the Voluntary Principles Initiative</li> </ul>
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## 1. Corporate Pillar

### ➤ ***Public statement of commitment or endorsement of the Voluntary Principles; engagement in the Voluntary Principles***

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 referenced 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 on Business and Human Rights and noted that implementation of the Voluntary Principles was consistent with that commitment. One member of the Corporate Pillar described its publication of a human rights briefing paper, based on the U.N. Guiding Principles, that is the first of its kind produced by an international oil and gas company. The briefing paper discusses six human rights issues in the company's operations and activities including the risk of misuse of force. Other Corporate Participants noted that their commitments to the Voluntary Principles through key conventions of the International Labor Organization.

Many Corporate Participants noted that they publicly report their participation in the Voluntary Principles Initiative and their commitment to the Voluntary Principles on their corporate websites and in corporate reports. Another Corporate Participant stated that it had reported on its adherence to the Voluntary Principles in its company sustainability report, which was independently "assured" by an international auditing firm. The same company also stated that its in-country security personnel communicate the importance of complying with the Voluntary Principles to local private security guards, public security officials, and host government officials through meetings and working groups. Another Participant cited training for on-the-ground security personnel on the Voluntary Principles as an example of its commitment to the Voluntary Principles.

Another company noted that its CEO and executives regularly mention the company's participation in the Voluntary Principles Initiative in speeches, presentations, and investor updates.

Some Corporate Participants noted that while budgetary constraints limited their participation in the Voluntary Principles Initiative, they continued to work closely with other Participants to discuss key issues and to promote the Voluntary Principles in the countries in which they operate. Most companies noted that they were active in the Voluntary Principles Initiative including through participation in: Annual Plenary Meetings; the Implementation Working Group and the Governance Working Group; and in-country processes, including the new In-Country Implementation Pilot Groups. Several companies noted that their commitment to the Voluntary Principles Initiative is reflected in their past or current participation in the Steering Committee.

Corporate Participants also noted their commitment to and promotion of the Voluntary Principles Initiative through their involvement in related events and initiatives, such as the Prospectors and Developers Association of Canada conference; the Kenya Oil & Gas Association; the IPIECA Social Responsibility Working Group; and the International Council on Mining and Metals.

➤ ***Examples of promoting awareness of the Voluntary Principles throughout the organization or government including within the value chain***

Members of the Corporate Pillar cited a number of different types of platforms and initiatives by which they have sought to promote awareness of the Voluntary Principles within their organizations.

One member of the Corporate Pillar noted that its operating sites are required to use a Voluntary Principles key performance indicator checklist when developing site-based procedures. The company also noted that it has also recently approved a new human rights due diligence standard that includes security and human rights-related risks. The due diligence standard was piloted at one site in 2015 and 2016 and, by the end of 2016, was extended to all of the company's operations.

Many Participants in the Corporate Pillar cited specific training initiatives as key to their efforts to promote the Voluntary Principles within their organizations. One company noted that, at each of its operating sites, there is continuous reinforcement of the expectations contained in the Voluntary Principles through ongoing training of security personnel and security and rights risk assessments. Another member of the Corporate Pillar also cited its recent roll-out of a new computer-based training module and reported that, to date, over 1200 employees in 46 countries have taken the training.

Many members of the Corporate Pillar also cited efforts to promote the Voluntary Principles in their engagements with host governments. One member of the Corporate Pillar noted that, in 2016, it provided training on the Voluntary Principles to over 3,000 contracted security personnel, including host government security providers.

One company notes that it has participated in an initiative sponsored by a Participant in the Government Pillar to promote the Voluntary Principles to companies, security providers, and government representatives in Madagascar.

Another member of the Corporate Pillar reported that it was working with trade officials from its home government to develop a multi-stakeholder workshop on implementing the Voluntary Principles.

➤ ***Examples of promoting and advancing implementation of the Voluntary Principles internationally***

Member of the Corporate Pillar provided examples of diverse engagements with both government representatives and international institutions intended to promote and advance implementation of the Voluntary Principles

One member of the Corporate Pillar cited a recent visit by a research team from the Kofi Annan International Peacekeeping Training Centre to one of its operating sites. The research team sought to observe how the company seeks to operate with respect for human rights in the context of its engagements with both private and public security providers.

A member of the Corporate Pillar reported on its participation in a June 2016 workshop in Ghana that was organized by a member of the NGO Pillar that was focused on efforts to implement the Voluntary Principles in Ghana's extractive industry.

One company noted that representatives from one of its operating locations in Peru presented information regarding the Voluntary Principles at a series of community workshops in 2016. The company also reported that it has been an active participant in the Voluntary Principles Implementation Working Group in Peru, which involves corporate, civil society, and government representatives. Other companies also cited their participation in the Peru Implementation Working Group.

Another member of the Corporate Pillar cited its involvement in a project left by UNICEF Canada to assess how implementation efforts with regard to the Voluntary Principles could better incorporate consideration of children's rights.

Several companies and a member of the NGO Pillar reported on their involvement with an initiative sponsored by a member of the Government Pillar to promote good governance and human rights in the context of Madagascar's extractive sector. The initiative has focused

implementation of both the Voluntary Principles and the U.N. Guiding Principles on Business and Human Rights and has included joint trainings and roundtable discussions involving companies, government representatives, public and private security forces, and civil society organizations.

Another member of the Corporate Pillar reported that it has sought to promote the Voluntary Principles in the context of its engagement in with the Responsible Jewellery Council, the International Council on Mining and Metals, and the United Nations Global Compact. Another company stated that it had sought to promote the Voluntary Principles through its participation in an event sponsored by a member of the Government Pillar at the Prospectors and Developers Association of Canada (“PDAC”) conference.

## **2. Government Pillar**

### ➤ ***Statement of commitment or endorsement of the Voluntary Principles***

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 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, the U.N. Guiding Principles, and other global human rights initiatives.

Several members of the Government Pillar highlighted the Voluntary Principles a key tool for implementing the U.N. Guiding Principles, alongside their own internal programs for business and human rights in the extractive sector.

As in prior years, 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.

### ➤ ***Statement of commitment to implementation National Plan(s), where applicable***

All members of the Government Pillar referenced their commitments to the Voluntary Principles National Plans for advancing human rights and security in the extractive sector. Government Participants noted that their National Plans codify and articulate their commitment to the Voluntary Principles Initiative and its objectives. Governments discussed how the Plans helped them frame and achieve various goals for raising security and human rights standards, and for engaging with in-country stakeholders.

One member of the Government Pillar noted that in 2017 it will promote best practice in extractives industries by delivering on the state-based objectives of its National Action Plan, including strengthening the established in-country community of practice regarding the Voluntary Principles, and using its leadership position within the Kimberley Process to promote the Voluntary Principles Initiative as the leading global forum for human rights and security in the extractives sector.

➤ ***Describe government engagement in the Voluntary Principles Initiative***

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.

Several Government Participants reported that they had worked with other members of the Government Pillar to organize multi-stakeholder conferences, workshops, or other events on the Voluntary Principles that included representatives of multiple government agencies, companies, and civil society.

Several Governments referenced their participation in Voluntary Principles Initiative Working Groups, including the Governance Working Group and the Implementation Working Group. One Government referenced its involvement in an informal group of Participants that had conducted research and prepared proposals regarding the future governance of the Voluntary Principles Initiative.

Another member of the Government Pillar described its leadership in outreach to several countries, adding that its embassies in those countries continue to work with other Government Participants to build external awareness of the Voluntary Principles and support for the Voluntary Principles Initiative.

➤ ***Describe how the government shares information about efforts to assist in implementation of the Voluntary Principles with other Participants and the public***

Members of the Government Pillar cited unilateral and multilateral efforts in 2016 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 Government Participants reported on projects intended to promote Voluntary Principles implementation including initiatives undertaken in partnership with civil society organizations and companies.

Members of the Government Pillar reported maintaining close working relationships with other Voluntary Principles Participants in all three Pillars as part of collaborative efforts to promote greater understanding of the Voluntary Principles and the benefits of Voluntary Principles implementation.

One member of the Government pillar noted a number of forums and initiatives through which it has sought to promote the Voluntary Principles, including: the Nairobi Process, working with a Voluntary Principles Observer; efforts to implement the OECD's "3 T" supplement to the *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*; and the Better Gold Initiative.

### 3. NGO Pillar

➤ ***Describe how you have engaged in the Voluntary Principles Initiative over the past year***

Members of the NGO Pillar cited their participation in both the Implementation Working Group and the Governance Working Group. They also reported on their participation on the Steering Committee and their attendance at the 2016 Annual Plenary Meeting.

Members of the NGO Pillar also cited engagement with in-country training efforts and their participation in roundtables organized with other Voluntary Principles Participants. Several NGOs cited their work in developing Terms of Reference for the In-Country Implementation Pilot Groups.

NGOs also reported on their bilateral engagements with other Participants in the Voluntary Principles Initiative to support and promote Voluntary Principles implementation.

➤ ***Describe efforts to increase transparency, both internally and externally, regarding your efforts to implement or support implementation of the Voluntary Principles***

Members of the NGO Pillar noted their efforts to increase the transparency of their Voluntary Principles Implementation efforts. One NGO Participant reported that it made public its efforts to promote the Voluntary Principles through its website, annual reports, and other media publications.

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 all staff members were not directly engaged in the specific programs.

One member of the NGO Pillar noted that key staff learned more about implementation of the Voluntary Principles as the organization undertook conflict and human rights assessments for companies and developed training tools. The NGO added that it has several staff members with special expertise on the Voluntary Principles who are working on projects with other Participants in the Initiative.

Another NGO Participant described how the organization holds regular staff meetings to share information across different program areas in order to strengthen its work, and incorporate strategies and lessons learned from different aspects of its work, including efforts to promote implementation of the Voluntary Principles.

One member of the NGO Pillar noted its dissemination of Voluntary Principles tools and documents to security forces and local communities in Nigeria, including men and officers of the Nigerian Police Force, traditional rulers, civil society organizations, women groups, non-state security providers and members of the judicial administration.

Several NGO Participants noted that they have published public versions of their Voluntary Principles annual reports.

➤ ***Describe any efforts to engage in dialogue with other participants in the Voluntary Principles Initiative***

As in previous years, members of the NGO Pillar noted efforts to engage in dialogue with other Participants. One NGO described its extensive engagement with members of both the Government and Corporate Pillars to discuss specific issues related to in-country implementation efforts.

One NGO Participant reporting meetings members of the Government and Corporate Pillars to discuss Voluntary Principles implementation in Nigeria and the launch of the In-Country Implementation Pilot Group in Nigeria. A key outcome of such engagement was an agreement to hold a cross-Pillar consultative meeting in early 2017 regarding in-country implementation efforts.

Another NGO noted that it had collaborated with several Participants to present on the use of model clauses for agreements with public security providers at the 2016 U.N. Forum on Business and Human Rights.

Another member of the NGO Pillar cited its efforts to participate in formal and informal discussions with Participants from other Pillars regarding promotion of the Voluntary Principles and the strengthening of the Voluntary Principles Initiative.

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

The Reporting Guidelines ask Participants to include the following information in their annual reports:

<p><b>Corporate Pillar</b></p>	<ul style="list-style-type: none"> <li>• Relevant policies, procedures, and/or guidelines (or changes thereto from the previous reporting year) to implement the Voluntary Principles</li> </ul> <p><b><i>Risk Assessment</i></b></p> <ul style="list-style-type: none"> <li>• Company procedure to conduct security and human rights risk assessments and integrate findings</li> </ul> <p><b><i>Engagements with Security Forces</i></b></p> <ul style="list-style-type: none"> <li>• Company procedure or mechanisms to report security-related incidents with human rights implications by public/private security forces relating to the company’s activities</li> <li>• Company procedure to consider the Voluntary Principles in entering into relations with private security providers</li> <li>• Company procedure or mechanism to investigate and remediate security-related incidents with human rights implications by public/private security providers relating to the company’s activities</li> </ul>
<p><b>Government Pillar</b></p>	<p><b><i>Rule of Law</i></b></p> <ul style="list-style-type: none"> <li>• As related to the Voluntary Principles, describe relevant policies, legislation, procedures, and/or guidelines relevant to promoting and protecting human rights, consistent with international human rights obligations</li> <li>• As related to the Voluntary Principles, describe (where appropriate and feasible) if the government has conducted or assisted with security sector reform, strengthening of the rule of law, and developing institutional capacities.</li> </ul>

	<ul style="list-style-type: none"> <li>• Within the context of the Voluntary Principles and in accordance with national and international law, describe how the government takes appropriate steps to prevent, investigate, punish and redress human rights abuses within its territory and/or jurisdiction by third parties, including extractive companies and public and private security providers.</li> </ul> <p><b>Verification and Accountability</b></p> <ul style="list-style-type: none"> <li>• Describe progress on the execution of Voluntary Principles National Action Plan.</li> <li>• Provide a summary of the findings of the verification process as outlined in the Government Pillar Verification Framework.</li> </ul>
<b>NGO Pillar</b>	<ul style="list-style-type: none"> <li>• Provide a summary of the findings of the verification process as outlined in the NGO Pillar Verification Framework</li> </ul>

## 1. Corporate Pillar

➤ ***Relevant policies, procedures, and/or guidelines (or changes thereto from the previous reporting year) to implement the Voluntary Principles***

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.

All members of the Corporate Pillar highlighted their work integrating the Voluntary Principles into security guidelines and protocols. In particular, companies referenced how they manage, deploy, and train security resources to understand, use, and respect the Voluntary Principles. Several companies noted that these practices including the insertion of security-related human rights provisions/ clauses in the companies’ contracts with private security providers.

Many members of the Corporate Pillar noted that they had developed codes of conduct that serve to guide company policy on human rights and security procedures. Through such codes, companies make specific reference to human rights and voluntary commitments, including the Voluntary Principles.

Companies described ongoing efforts to refine their internal processes for identifying and reporting security-related human rights challenges in the context of risk assessments. One company discussed its efforts to begin streamlining human rights risk assessments across the

business, in an effort to centralize reporting on any potential issues, including those related to security. Another company noted that it has integrated the Voluntary Principles into various procedural documents, including guidelines for the management of artisanal and/or illegal miners; procedures for handling trespassing by women on mine sites; and procedures for the reporting and escalation of human rights allegations and related legal violations.

One Corporate Participant noted the use of guidance notes to compel company sites to implement performance objectives relevant to their security arrangements.

One member of the Corporate Pillar noted that it continues to employ a security and human rights toolkit to help centralize and make uniform security and human rights standards and procedures across all company operations. The same company also outlined its ongoing rollout of a new online human rights training module for employees.

One Corporate Participant described the development of a sustainable development scorecard that identifies environmental, social, and human rights issues during project development. Under this system, project teams use a sustainable development scorecard and related tools that remain active throughout the development phase of the project. As the project evolves, the company updates, records and tracks new risks on a risk register. They also incorporate steps to mitigate these risks into the development management plans and keep company management informed of how risks are being mitigated.

Companies also noted how their procedures and protocols to implement the Voluntary Principles are reflected through company participation in, and commitment to, other international voluntary initiatives and standards dedicated to the promotion of sound environment stewardship, human and labor rights, and financial transparency. Companies cited the United Nations Global Compact, the Extractive Industries Transparency Initiative, the U.N. Declaration on Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

### **Risk Assessment**

#### ***➤ Company procedure to conduct security and human rights risk assessments and integrate findings***

All members of the Corporate Pillar said that they employ threat and risk assessment processes to determine what security resources are appropriate at specific operating locations. 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 specific locations. Companies also noted that sites that have been identified as higher risk are required to go through additional levels of assessment.

One member of the Corporate Pillar recently implemented a new risk assessment tool designed to enhance operational due diligence by strengthening awareness of potential human rights impacts and risks.

At the site level, one company noted its use of third party assessments of the social and security risk factors as part of its Voluntary Principles compliance audits. The assessment includes an evaluation of the site's relationship with the surrounding communities, the potential for violence and conflict, the overall respect for the Rule of Law, and the strength of institutions that enforce the law in the host country. The same company added that additional work is planned on specific use of the Voluntary Principles' Implementation Guidance Tool in order to better identify associated risks within operations.

Another member of the Corporate Pillar stated that site managers conduct threat and vulnerability assessments at operations, adding that the procedures for this are being updated and will play a larger role in future company training programs. One company also described how it engages a number of security service providers at its facilities and ensures that adherence to the Voluntary Principles is a contractual obligation.

One Corporate Participant outlined its use of a set of criteria to determine whether its sites are classified as a Category 1, 2, or 3 security risk in relation to security and human rights. Specific elements of the Voluntary Principles are incorporated into this risk assessment tool, including such things as the strength of the rule of law in a country; documented security and human rights violations; and the institutional strength of a country's public security.

➤ ***Company procedure or mechanisms to report security-related incidents with human rights implications by public/private security forces relating to the company's activities***

Members of the Corporate Pillar described robust procedures and mechanisms for reporting security-related incidents with human rights implications at their operations. Corporate Participants referenced various internal frameworks and protocols for documenting any allegations of human rights abuses by public and private security and recording any incidents of inappropriate physical force used by security providers in the protection of company personnel and facilities.

One company noted that all of its sites are required to adopt the company's procedure for reporting and investigation of security related incidents. The procedure includes a classification of security incident levels (from levels 1-5, with 5 being the most critical).

Another member of the Corporate Pillar noted that its operational community relations teams, joined by senior management and security management, meet regularly with local communities to discuss their concerns, including those related to security. Any incidents identified either through operational grievance mechanisms, or in community meetings, are investigated internally.

One company described its two-channel protocol for incident reporting: Channel 1 - all sites are required to have a grievance mechanism that is aligned with international standards, specifically the U.N. Guiding Principles; Channel 2 - more serious security-related human rights incidents that are deemed to be material (for example, allegations of serious injury or death) might be surfaced either through the first channel, or, more likely, through a direct incident report by the site security or community relations departments.

Many Corporate Participants also noted the use of internal, anonymous “complaint boxes” that allow all employees and contractors to raise grievances and report any breaches of corporate commitments to security and human rights.

➤ ***Company procedure to consider the Voluntary Principles in entering into relations with private security providers***

Members of the Corporate Pillar noted that they have in place strong vetting procedures for private security providers. Many companies stated that they carry out due diligence on each private security provider that they employ. These due diligence efforts include evaluations of: the provider’s professional reputation in the country or industry; reported cases of violence by the provider’s personnel; the provider’s awareness of security and human rights issues; the provider’s screening procedures for its security personnel; the provider’s training programs on the use of force and other Voluntary Principles-related elements.

Many members of the Corporate Pillar stated that they require all private security contractors to be compliant with: the Voluntary Principles; company policies and procedures on the use of force; and corporate codes of conduct on security and human rights. Many Corporate Participants noted that their contract language references to international standards, including the Universal Declaration on Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

One company noted that its code of conduct prohibits the employment of military and/or police personnel services except in cases of emergency, meaning the company only contracts with private security forces. This contracting is done at the asset level, with support from the company’s director of global security and global supply chain functions, who help ensure that concerns such as security and human rights are considered. The risk profile of each operating location helps define the composition and characteristics of the private security guard force that is engaged.

Another company reported that sites that use private security are required to demonstrate that security personnel have been screened, to the extent possible, for past human rights abuses and criminal records and that they have been trained on security and

human rights and the use of force. The company noted that sites are required to measure and report on contractor performance on an annual basis, using key performance indicators.

### **Engagements with Security Forces**

➤ ***Company procedure or mechanism to investigate and remediate security-related incidents with human rights implications by public/private security providers relating to the company's activities***

Members of the Corporate Pillar described various internal protocols and frameworks for investigating and remediating incidents with human rights implications by public and private security providers.

Several companies reported a “zero tolerance” policy for security and human rights-related violations at their operating locations and described a range of measures to enforce company policies and procedures in order to prevent such violations from occurring.

One Corporate Participant noted the use of a standardized reporting procedure to report potential violations of the Voluntary Principles. In addition, the company has developed a web-based system for reporting events, allegations and incidents. The company explained that online system has not only enhanced the integrity and archiving of data relating to the Voluntary Principles, but has also served as a learning tool for stakeholders across the company's worldwide operations.

Another member of the Corporate Pillar uses a company-wide incident management system to register, report, track, and address all sustainability-related incidents. The system allows the sites to flag any incident with human rights implications, which prompts appropriate investigation and follow up.

Another 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 company explained that in the event of an allegation of a human rights violation involving public or private security personnel, a complete internal investigation must be conducted to understand what occurred, what controls are in place, and what additional controls are needed to prevent a similar incident from occurring in the future. The company added that its corporate legal counsel will assign an investigation team comprised of departments that are not directly involved in the incident. In cases involving public security, the company will advocate for an external investigation and subsequently follow up on the findings.

## 1. Government Pillar

- ***As related to the Voluntary Principles, describe relevant policies, legislation, procedures, and/or guidelines relevant to promoting and protecting human rights, consistent with international human rights obligations***

As in previous years, several members of the Government Pillar cited National Action Plans on Business and Human Rights as part of their broader efforts to promote and protect human rights. Governments noted that the Voluntary Principles are a useful tool for clarifying their policies in human rights.

One member of the Government Pillar outlined the policies, treaties, and agreements it uses to enforce human rights protections. That Government Participant reported that it has ratified the International Labour Organization's eight core conventions, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the European Convention on Human Rights. In addition, national legislation ensures that citizens have a remedy for the breach of rights that are protected by the European Convention on Human Rights.

Another member of the Government Pillar noted that its federal council published a background report on the national commodities sector and made several recommendations to help strengthen human rights implementation. The Voluntary Principles are mentioned several times in the report and in the follow-up reports on the implementation of the recommendations. The Government Participant further notes that it will support the development of a guide on how to implement the U.N. Guiding Principles in the commodities trading sector.

Another Government Participant reported that its trade arm is in the process of finalizing a voluntary agreement on responsible business conduct in the global supply chain. The agreement will include the government's trade arm; international and national human rights NGOs; and business stakeholders in the jewelry industry, finance sector, and industry associations that represent gold and goldsmith wholesalers. The same Government Participant also cited its leadership in the European Union, through which it has prioritized making global value chains more sustainable and the further development of regulations on conflict minerals.

One Government Participant noted that it has updated the best practices segment of its sustainable development program for the mining industry. An important part of the program is a series of handbooks available for public download. The handbooks, which have been translated into several languages, will be utilized to assist developing countries to build capacity in the management and regulation of sustainable mining practices and engendering community acceptance of mineral resources development.



- ***As related to the Voluntary Principles, describe (where appropriate and feasible) if the government has conducted or assisted with security sector reform, strengthening of the rule of law, and developing institutional capacities.***

A member of the Government Pillar noted that, through its leadership in the European Union, two new policy resolutions were recently adopted. The first affirmed that the European Union can have a positive impact on sustainable development by promoting responsible management of global value chains and making them inclusive. The second affirmed the need for responsible business practices in the extractives sector that are highly attentive to human rights law.

Another Government Participant noted that the protection of human rights through strong rule of law is a cornerstone of its foreign policy and constitutional values. The Government Participant reported that its policy on international cooperation for the period 2017–2020 explicitly mentions the government’s participation in the Voluntary Principles Initiative as part of its international commitments in the area of business and human rights and as reflective of its efforts to establish international standards for corporate social responsibility. The same Government Participant also explained that its human rights strategy for 2016-2019 states that the government promotes respect for human rights by the private sector including through implementation of the U.N. Guiding Principles and participation in multi-stakeholder initiatives like the Voluntary Principles Initiative.

One member of the Government Pillar described its commitment to rule of law in the context of human rights and responsible business practices. The Government noted that it has enacted specific laws protecting human rights and governing business activities that are codified in both statute and regulations. The Government reported that it is subject to international human rights obligations under customary international law and as a result of the international legal instruments it has signed and ratified.

- ***Within the context of the Voluntary Principles and in accordance with national and international law, describe how the government takes appropriate steps to prevent, investigate, punish and redress human rights abuses within its territory and/or jurisdiction by third parties, including extractive companies and public and private security providers.***

Members of the Government Pillar provided several examples of steps that they have taken to prevent, investigate, punish, and redress human rights abuses. One Government cited two dispute resolution mechanisms that have been established to facilitate dialogue and to help communities and companies in the extractive sector address disputes. One mechanism exists within the office of the National Contact Point, established as part of the Government’s commitment to the OECD Guidelines for Multinational Enterprises. The other is within the Office of the Extractive Sector CSR Counsellor, a position established in 2009 as part of the Government’s strategy to advance corporate social responsibility within the extractive sector.

Another member of the Government Pillar also cited its National Contact Point in discussing pathways for victims of human rights abuses to seek resolution of specific disputes.

One Government noted that it has ratified a range of international treaties and agreements, including the core Conventions of the International Labor Organization, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the European Convention on Human Rights. The Government cited its national Human Rights Act, which provides individuals within its country a remedy for breaches of rights that are protected by the European Convention on Human Rights. The Act applies to all public authorities and other bodies performing public functions, including, as appropriate, private companies.

➤ ***Describe progress on the execution of Voluntary Principles National Action Plan.***

As discussed in above, many members of the Government Pillar specifically referenced their Voluntary Principles National Action Plans and the efforts they are making to advance them.

One member of the Government Pillar reported that since joining the Voluntary Principles over five years ago, most of the goals set forth in its National Action Plan have been achieved or are being pursued continuously, including efforts to increase corporate awareness of the Voluntary Principles or to “mainstream” the Voluntary Principles with the national government.

Another Government Participant stated that, in 2017, it plans to further advance the goals in its National Action Plan by: promoting best practices in the extractive industry, strengthening the established national community of practice on the Voluntary Principles; and using its leadership in the Kimberley Process to promote the unique value of the Voluntary Principles Initiative.

➤ ***Provide a summary of the findings of the verification process as outlined in the Government Pillar Verification Framework.***

Several Government Participants noted their participation in the development and drafting of the Government Pillar Verification Framework.

Members of the Government Pillar reported various ways that they sought to implement verification processes. Several Government Participants pointed out that they either served as peer reviewers or made presentations as part of the verification presentations made by Participants in 2016. Some Government Participants also reported that they served as peer reviewers or presenters at the 2016 Annual Plenary Meeting. Several Government Participants added that they plan on contributing to verification presentations at the 2017 Annual Plenary Meeting or at some point later in 2017.

## 2. NGO Pillar

➤ ***Provide a summary of the findings of the verification process as outlined in the NGO Pillar Verification Framework***

Several NGO Participants noted their participation in the development and drafting of the NGO Pillar Verification Framework.

Members of the NGO Pillar reported various ways that they sought to implement verification processes. Several NGO Participants pointed out that they either served as peer reviewers or made presentations as part of the verification presentations made by Participants in 2016. Some NGO Participants also reported that they served as peer reviewers or presenters at the 2016 Annual Plenary Meeting. Several NGO Participants added that they plan on contributing to verification presentations at the 2017 Annual Plenary Meeting or at some point later in 2017.

## C. PROMOTION/IMPLEMENTATION

The Reporting Guidelines ask Participants to include the following information in their annual reports:

<b>Corporate Pillar</b>	<ul style="list-style-type: none"> <li>• Overview of country operations selected for reporting</li> <li>• Engagements with stakeholders on country implementation</li> <li>• Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreements with private security providers, as well as public security forces</li> <li>• Examples of supporting outreach, education, and/or training of (i) relevant personnel, (ii) private security, (iii) public security, and/or civil society (e.g., local NGOs, community groups)</li> <li>• Company procedures to review progress on implementing the Voluntary Principles at local facilities</li> </ul>
<b>Government Pillar</b>	<ul style="list-style-type: none"> <li>• Public communication of commitment to the Voluntary Principles.</li> <li>• Describe how the government engages with external stakeholders on the Voluntary Principles.</li> <li>• Promotion of the Voluntary Principles within the government.</li> </ul>

	<ul style="list-style-type: none"> <li>• Coordination in-country around the Voluntary Principles.</li> <li>• Describe how the government conducts outreach with domestic extractive companies to encourage them to implement the Voluntary Principles and join the Voluntary Principles Initiative.</li> <li>• Describe how government enables and supports companies in implementing the Voluntary Principles.</li> <li>• Describe how government engages in conflict areas to assist Corporate Participants to help them identify, prevent and mitigate the human rights related risks of their security arrangements.</li> </ul> <p><b><i>Risk Assessment</i></b></p> <ul style="list-style-type: none"> <li>• Describe how the government engages with companies on issues related to company risk assessment.</li> </ul> <p><b><i>Public Security</i></b></p> <ul style="list-style-type: none"> <li>• Describe government efforts to promote and allow for training of public security providers.</li> <li>• Describe how government works with companies around engagement with public security forces.</li> <li>• Describe how the government promotes and enables inclusion of Voluntary Principles language in agreements between companies and public security providers.</li> </ul> <p><b><i>Private Security</i></b></p> <ul style="list-style-type: none"> <li>• Describe government efforts to promote and allow for training of private security providers.</li> <li>• Describe how the government develops appropriate policies and oversight for the government’s own use of private security service providers.</li> </ul>
<p><b>NGO Pillar</b></p>	<p><b><i>Promotion</i></b></p> <ul style="list-style-type: none"> <li>• Describe your efforts to raise awareness of and promote understanding of the Voluntary Principles with both internal and external stakeholders.</li> </ul>

	<ul style="list-style-type: none"> <li>• Describe efforts to engage and facilitate participation of non-member CSOs, affected communities, and other relevant stakeholders in the Annual Plenary Meeting or workshops</li> <li>• Describe your efforts to promote the adoption of the Voluntary Principles into relevant government or corporate policies, as well as international standards and/or guidelines.</li> </ul> <p><b><i>Country Implementation</i></b></p> <ul style="list-style-type: none"> <li>• Describe efforts to strengthen the rule of law in the countries where you work.</li> <li>• Describe efforts to conduct and monitor risk assessments for potential human rights violations in the areas where you work</li> <li>• Describe your efforts to strengthen policies, procedures and guidelines related to the implementation of the Voluntary Principles</li> <li>• Describe your efforts to engage with or support engagement with the public security sectors and/or private security sectors in the countries where you work.</li> <li>• Describe efforts to hold Voluntary Principles participants accountable for upholding their roles and responsibilities as members of the Voluntary Principles Initiative.</li> </ul>
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**1. Corporate Pillar**

➤ ***Overview of country operations selected for reporting***

Members of the Corporate Pillar provided information on a wide range of operating locations in their annual reports. Examples of these operations include: hydrocarbon production in Cuba, northwestern Canada, and Madagascar; crude production in the West Qurna oilfield and oil distribution via pipeline distribution systems in Basra and Zubair in southern Iraq; offshore deepwater production assets in Ghana and Kenya; gold mining in South Africa; integrated gas development in Malaysia; gold and precious metal extraction in Argentina, Honduras, and Mexico; precious metal development in Guinea; offshore hydrocarbon production in the Niger Delta region of Nigeria; oil and gas production and exploration in the Democratic Republic of the Congo and Myanmar; development of oil and gas assets and the administration of such assets in Algeria, Angola, Brazil, Tanzania, and Venezuela;

production at the Luwmana Mine in Zambia; extractives operations in Australia, Chile, and Trinidad & Tobago; petroleum production and exploration in Senegal; and the development of natural resources in remote parts of Papua New Guinea.

➤ ***Engagements with stakeholders on country implementation***

Members of the Corporate Pillar reported working and engaging with many local stakeholders to support company efforts to further Voluntary Principles implementation. Many Corporate Participants noted extensive engagements with public and private security forces in connecting with their operating sites.

One member of the Corporate Pillar reported that it is continuing to refine its strategy for engaging on security and human rights issues with host governments, including by drawing from the model clauses for agreements with public security providers approved by the Voluntary Principles Initiative in 2016, and by working to ensure that their engagement efforts are contextually appropriate for each host government.

Another Corporate Participant described its corporate process for engaging stakeholders. The company noted that stakeholder identification efforts include the local, regional, and national security forces of each country in which the company operates. Engagement with these forces is typically done through a combination of government affairs personnel and company security representatives. In some cases, the company security personnel participate in public-private partnerships designed to share information and best practices related to infrastructure security.

Other members of the Corporate Pillar provided specific examples of recent engagements, including:

- A formal joint workshop on maritime security and the Voluntary Principles that was held with the Myanmar Navy, the Myanmar Oil & Gas Enterprise, and various offshore operators.
- Participation and engagement with several multi-stakeholder forums facilitated by the Myanmar Centre for Responsible Business (MCRB) and other NGOs on environmental impact assessments and on the use of grievance mechanisms.
- Formal environment, security, and health impact assessment consultations and focus group meetings that were carried out with host communities in preparation for offshore seismic surveys, and grievance mechanisms that were implemented for all survey activities.

Some members of the Corporate Pillar cited their engagement with Participants in other Pillars during the 2016 Annual Plenary Meetings; meetings of the Implementation Working

Group and the Governance Working Group; the Strategy Retreat held by the Voluntary Principles Initiative Steering Committee in June 2016; and other associated gatherings and collaborations involving Voluntary Principles Initiative Participants.

With respect to local communities, one company reported that it actively engages with local stakeholders at its operating location in Peru in order to create awareness of company policies and the Voluntary Principles. The company helped organize an annual safety fair where security personnel hand out gifts and information about the Voluntary Principles and the company's security policy. The company's community relations staff has sought to engage community members in discussions regarding violence in the region and the efforts of multiple stakeholders to minimize its negative impacts.

➤ ***Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreements with private security providers, as well as public security forces***

Members of the Corporate Pillar described the implementation of extensive processes to conduct vetting of private security personnel. All Corporate Participants also reported making reference to the Voluntary Principles in their contractual relationships with private security providers.

One member of the Corporate Pillar reported that it had provided training on the Voluntary Principles to all of its security service providers. The Participant added that the security providers are required to have an established process in place to verify compliance with the terms and conditions of their contracts, including the completion of such training.

Another Corporate Participant reported that its contracts with private security providers include specific clauses setting forth the company's expectations with regard to ethics, human rights, and social responsibility. The clauses indicate that these expectations are applicable to the provider's employees and subcontractors and state that the providers should be prepared to demonstrate compliance.

One member of the Corporate Pillar provided a detailed breakdown of the criteria that is used in selecting qualified private security contractors:

- Criminal background checks on personnel providing services to the company;
- Management system that contains security procedures, a drug and alcohol policy, and a code of conduct;
- Employee selection procedure that includes: pre-employment medical screening, assessment and fitness for work evaluation, and confirmation of employee competencies and qualifications;

- A formal process for reporting and investigating incidents;
- Legal and/or regulatory compliance to provide professional or security-related services;
- Results from due diligence investigation conducted by the company's ethics and integrity division, including potential for past human rights abuse;
- Security related technical capabilities and competencies (includes training);
- Adequate control measures to manage weapons used for security purposes (if applicable);
- Adequate control measures to manage firearms used for security purposes (if applicable); and
- Consulting with the company's relevant group security regional manager prior to entering into a contractual agreement with a supplier

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

Members of the Corporate Pillar described various ways by which they have supported outreach and training efforts.

One Corporate Participant noted that it launched its security and human rights toolkit at its Malaysia operations in 2016. Using the toolkit, the company's global head of security engaged colleagues from a variety of functional areas in discussions regarding the Voluntary Principles.

A member of the Corporate Pillar explained that, at one of its operating locations, it partnered with an NGO Participant and a range of local stakeholders, including journalists from local radio stations, to produce a radio program that providing information to nearby communities and others on human rights issues, including the Voluntary Principles.

Another Corporate Participant noted that it communicates its human rights policy internally and externally, and that its company-wide human rights online training program is available to all employees. The online program includes a section on Voluntary Principles implementation. The company also reported that it has a range of security and human training products for different target audiences, including a three-day company course on the Voluntary Principles that is available in several languages.

One member of the Corporate Pillar reported that all of its security personnel at certain higher-risk locations receive training that covers the Voluntary Principles, the company's use of force procedure, and the security code of conduct. This training is provided before personnel can begin work for the company. The training is conducted during their induction, and



refresher training is provided on a minimum of an annual basis at all sites. Comprehension is tested through written and/or oral exams. The Company Participant also reported that most of its operating sites have adopted scenario testing for security personnel, that includes the use of video to more realistically simulate field conditions and to improve comprehension.

➤ ***Company procedures to review progress on implementing the Voluntary Principles at local facilities***

All members of the Corporate Pillar reported having in place procedures and mechanisms to review progress they have made in implementing the Voluntary Principles at local facilities. Several Corporate Participants noted that they utilized gap analyses on security and human rights standards at some, or all, of their sites in 2016.

One company developed standardized tools for conducting a site-level gap analysis against the company's security and human rights compliance standard and for implementing plans to address identified gaps. These tools were rolled out as part of the company's broader sustainability framework implementation plan for designing and implementing company-wide minimum standards across sustainability-related functions.

Another member of the Corporate Pillar described use of a corporate review panel that guides the implementation of the company's incident reporting and management standards. The review panel covers all high-, major-, and extreme-risk rated incidents in the environment, community and security disciplines.

One Corporate Participant stated that it believes implementation of the Voluntary Principles is most effective when field-level staff own the process. Accordingly, the company reported that its security and human rights toolkit is designed to enable local ownership of security and human rights. The company added that at the corporate level, it conducts human rights risk assessments at assets deemed to be high risk. This includes an analysis of the extent to which the company is effectively implementing the Voluntary Principles and any gaps that should be addressed.

## **2. Government Pillar**

➤ ***Public communication of commitment to the Voluntary Principles.***

Members of the Government Pillar all reported making extensive efforts to engage the public with regard to the governments' commitments to implementing the Voluntary Principles. Government Participants noted a variety of outreach initiatives to increase public awareness of the Voluntary Principles and the government work to advance implementation.

One Government Participant described the publication of examples of the in-country work done by its embassies on the Voluntary Principles. The government also noted the

publication of its 2017 annual human rights report, which includes extensive discussion of Voluntary Principles implementation. Furthermore, the government is conducting internal research to better understand awareness of the Voluntary Principles amongst national and international stakeholders, with the goal of broadening awareness externally over the coming years.

One member of the Government Pillar noted that its government officials regularly participate as speakers on business and human rights issues, including the Voluntary Principles, in the context of courses, workshops, and panel discussions organized by civil society or private sector organizations.

➤ ***Describe how the government engages with external stakeholders on the Voluntary Principles.***

Members of the Government Pillar all reported extensive engagements with external stakeholders to advance implementation of the Voluntary Principles. Government Participants also highlighted their unique capacity to frame Voluntary Principles dialogues through bilateral relationships, partnerships, and official engagements with other governments worldwide.

In this vein, one government noted that it remained engaged in 2016 through its embassies and other diplomatic posts, particularly in Angola, Burma, Colombia, Iraq, Kenya, Mali, Peru, and Zimbabwe. The government reported that it had provided it had provided information and guidance to its in-country personnel in order to enable support for host governments, with awareness raising and implementation of the Voluntary Principles highlighted as a key objective.

Other members of the Government Pillar described their outreach to members of the business and civil society communities to address complex security and human rights challenges in the extractives sector. These cross-pillar engagements sought to encourage national-level companies and NGOs to strengthen their relationships with the Voluntary Principles Initiative through discussion of the challenges and opportunities the Voluntary Principles present. Government Participants also reported collaborative partnerships and engagements with national companies who have not yet joined the Voluntary Principles Initiative, including encouraging participation in regional workshops on security and human rights.

➤ ***Promotion of the Voluntary Principles within the government.***

Members of the Government Pillar discussed efforts to promote the Voluntary Principles within their respective governments. One Government Participant reported that one of its goals for 2016 and future years is to mainstream the Voluntary Principles across agencies and departments. Another government noted that it is providing background information and

context on the Voluntary Principles to its embassies and other diplomatic posts in support of the In-Country Implementation Working Groups.

One member of the Government Pillar said that since 2012 the Voluntary Principles have been an integral part of many briefings for newly appointed ambassadors and of trainings for newly recruited diplomats and experts in the government's branch for civilian peace-building. In 2016, the government's foreign affairs ministry human security division collaborated for the first time in a joint training session for new diplomats on corporate social responsibility and business and human rights, including the Voluntary Principles.

Another member of the Government Pillar said its investment and economic division within its foreign affairs and trade ministry works with colleagues in other foreign affairs branches as well as in other government departments including the department of industry, innovation and science to collaborate on Voluntary Principles implementation and awareness.

Another Government stated that the Voluntary Principles are included in the training course that is provided to its economic officers before they are posted at country embassies around the world. The Government also reported that economic, human rights, and political officers at its embassies around the world are regularly provided with information regarding the Voluntary Principles and the Voluntary Principles Initiative.

➤ ***Coordination in-country around the Voluntary Principles.***

Members of the Government Pillar described various ways in which they coordinate with local stakeholders and in-country personnel in order to advance implementation of the Voluntary Principles. Several Government Participants noted that they are actively collaborating with their missions and local stakeholders in Myanmar, Ghana, and Nigeria to help launch the In-Country Implementation Pilot Groups.

One Government reported that, in 2016, it maintained close working relationships with other Government Participants, extractive companies, and civil society organizations to promote greater understanding of the Voluntary Principles and strengthen implementation and effectiveness, including at the in-country level.

Another member of the Government Pillar described its extensive work with stakeholders in Peru and the Democratic Republic of Congo. In Peru, the government's embassy continued to facilitate outreach and implementation activities, particularly by providing support to the Peru Working Group, and by seeking to increase awareness of the Voluntary Principles at a national level and within the Government of Peru through bilateral engagements. In the Democratic Republic of Congo, the government's embassy continues to convene regular meetings of the Voluntary Principles Working Group in Kinshasa to discuss and coordinate Voluntary Principles outreach. The government also reported that it is co-chairing a

stakeholder group in the Democratic Republic of Congo with another Government Participant, and has visited mining sites in the country to assess Voluntary Principles implementation.

Another member of the Government Pillar noted that it has been the Voluntary Principles lead on outreach to Indonesia and is actively collaborating with other Participants as well as representatives of Indonesian civil society in order to advance implementation of the Voluntary Principles within the country.

➤ ***Describe how the government conducts outreach with domestic extractive companies to encourage them to implement the Voluntary Principles and join the Voluntary Principles Initiative.***

Members of the Government Pillar reported on government-led initiatives to advance Voluntary Principles implementation and efforts to encourage companies to join the Voluntary Principles Initiative.

One Government Participant noted that five companies based within its jurisdiction are Participants in the Voluntary Principles Initiative and that it continues to reach out to other companies regarding the Voluntary Principles. The government noted that, in 2016, it updated elements of its sustainable development program for the mining industry and encouraged both national and international companies to promote sustainable development and industry self-regulation through the adoption of leading principles.

Another member of the Government Pillar noted its close collaboration with domestic companies in the extractives and commodity trading sectors on human rights issues, in particular maintaining close contact with a Corporate Participant that is headquartered in its country. In March 2016, the government visited two of the company's international mining sites to discuss the company's Voluntary Principles implementation efforts and other human rights-related issues.

➤ ***Describe how government enables and supports companies in implementing the Voluntary Principles.***

Members of the Government Pillar described general and specific ways that they work with companies to further Voluntary Principles implementation. One Government Participant reported that, as a follow-up to the issuance of a government background report on commodities, which included recommendations for extractive sector operators, it is also supporting development of a guide for the implementation of the U.N. Guiding Principles by the commodities trading sector.

Another member of the Government Pillar reported that it funded and participated in an extractive sector-wide impact assessment that helped mining companies identify impacts

caused by their operations on local communities. The assessment was presented to several coal-producing companies in October 2016.

A member of the Government Pillar noted that its broad engagement with companies on Voluntary Principles implementation efforts are enshrined in the government's commitments to the Voluntary Principles themselves. The government explained that the ever-increasing profile of its national companies with international operations and the government's internationally-recognized expertise in responsible mining provides the foundation for the government's involvement and leadership in the Voluntary Principles Initiative.

The same Government Participant also noted that in 2017 it plans to promote best practices in the extractives industries by: delivering on its National Action Plan; strengthening the established community of practice on the Voluntary Principles within its country; and by using its leadership role in the Kimberley Process to promote Voluntary Principles implementation among extractive sector companies.

- ***Describe how government engages in conflict areas to assist Corporate Participants to help them identify, prevent and mitigate the human rights related risks of their security arrangements.***

Members of the Government Pillar described tools and processes that they have developed to directly and indirectly assist members of the Corporate Pillar in their management of human rights-related risks in security operations.

Several members of the Government Pillar noted their close involvement with the Voluntary Principles Observer as part of an effort to develop guidance and toolkits for Corporate Participants in relation to companies' engagement with public and private security forces as well as with communities in complex environments.

Another Government Participant noted several examples of its engagement with companies' security operations in Colombia and Peru. In Colombia, the Government Participant highlighted that, in 2016, it became a board member of the Mining and Energy Committee on Security and Human Rights, which is focused on companies' roles in implementing human rights standards as part of their security protocols. In Peru, the Government Participant reported that it provided feedback and guidance on public and private security operations in connecting with its participation in a January 2016 meeting of the Peru Working Group.

### Risk Assessment

- ***Describe how the government engages with companies on issues related to company risk assessment.***

One member of the Government Pillar reported that, through its CSR Counsellor's Office and its Trade Commissioner Service, it has provided training and guidance to companies with regard to risk assessment. The guidance has covered the Voluntary Principles as well as the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, the Kimberley Process Certification Scheme, and the U.N. Guiding Principles on Business and Human Rights.

Another member of the Government Pillar reported that it has provided financing for the development of tools intended to help companies assess human rights impacts. One project that the Government has supported has been developed by the Geneva Centre for the Democratic Control of Armed Forces ("DCAF") and the International Committee of the Red Cross ("ICRC"), both Observers to the Voluntary Principles Initiative. The project has involved the creation of a knowledge hub to share existing tools and good practices with regard to engagements with security providers in the context of extractive sector developments (<http://www.securityhumanrightshub.org/>).

### Public Security

- ***Describe government efforts to promote and allow for training of public security providers***

Members of the Government Pillar stressed the importance of providing public security providers with the proper training on human rights compliance and use of force.

One Government Participant noted that it is sometimes the case that a host government's responsibility to provide adequate training and to ensure adequate oversight and accountability of public security forces is not fully or effectively implemented. The Government stated that initiatives like the Voluntary Principles can provide a framework for businesses to cooperate in the implementation of human rights-focused security by public security providers.

Another member of the Government Pillar stated that it was actively working with members of its military forces to support Voluntary Principles training for public security forces in Africa.

- ***Describe how government works with companies around engagement with public security forces.***

Members of the Government Pillar reported on their work with companies regarding public security engagement. One Government Participant said that it consistently encourages

extractive sector companies working with public security to use the Voluntary Principles as a method to reduce and ultimately eliminate human rights incidents.

- ***Describe how the government promotes and enables inclusion of Voluntary Principles language in agreements between companies and public security providers.***

Governments cited a range of efforts to promote inclusion of language regarding the Voluntary Principles in agreements between companies and public security providers. One Government states that its trade commissioners have actively to promote the Voluntary Principles in advising companies operating abroad on responsible business practices. The Government has also been a proponent of the model clauses for agreements with public security providers that were approved by the Plenary at the 2016 Annual Plenary Meeting.

Another Government cited its efforts to finance of the development of practical tools and guidance materials related to the Voluntary Principles. These materials are meant to assist companies in their engagements with public security providers, including in the negotiation of agreements.

Finally, a member of the Government Pillar reported that it working on several projects to improve the training that is provided to public security providers, including with regard to human rights and the Voluntary Principles.

### **Private Security**

- ***Describe government efforts to promote and allow for training of private security providers.***

Members of the Government Pillar reported examples of their efforts to further the training of private security providers on human rights-related matters.

One Government Participant reported that it works closely with industry partners as a member of the Security in Complex Environments Group. The Government Participant added that the government has been instrumental in ensuring that private security providers conform to requirements promulgated by the International Organization of Standards. These standards provide a minimum level of assurance that human rights considerations are taken into account in the recruitment, training, and deployment of private security personnel.

- ***Describe how the government develops appropriate policies and oversight for the government's own use of private security service providers.***

Several Governments cited their respective roles in drafting the International Code of Conduct for Private Security Providers.

One Government cited national legislation that requires private security companies based in its jurisdiction to become members of the International Code of Conduct Association for Private Security Service Providers (“ICoCA”).

Another Government reported that it is working with the private security service sector to raise the operating standards for private security providers. The Government also noted its role as a Board member of the ICoCA. The Government reported that encourages “all states, businesses and NGOs contracting [private security providers] to recognize ICoCA membership and certification to relevant standards in their contracting processes” and stated that it will do likewise.

Another Government stated that it had sponsored the development of management standards for private security providers that are based on the Montreux Document and International Code of Conduct for Private Security Providers. The Government’s Department of Defense required demonstrated compliance with management standards for its private security contractors. In addition, parts of the Government are now requiring membership in the ICoCA as a condition of contracts with private security providers.

### **3. NGO Pillar**

#### **Promotion**

➤ ***Describe your efforts to raise awareness of and promote understanding of the Voluntary Principles with both internal and external stakeholders.***

Members of the NGO Pillar reported extensive efforts to promote and raise awareness of the Voluntary Principles among a myriad of stakeholders. Several NGO Participants noted that they consider the Voluntary Principles a valuable entry point for company engagement with host country governments and civil society organizations regarding promotion of security and human rights issues.

One NGO reported that it has played an active role in promoting the Voluntary Principles in international forums, at companies’ local operations and headquarters, with host governments in Europe, Southeast Asia, South American, and Sub-Saharan Africa.

Another member of the NGO Pillar cited its involvement in the development of model clauses for agreements with public security providers. The NGO noted that the model clauses were approved at the 2016 Annual Plenary Meeting and the NGO also presented the model clauses in a dedicated session at the November 2016 U.N. Forum on Business and Human Rights. The session also included participation by several Government and Corporate Participants. In addition, the NGO has sought to raise awareness of model clauses among both NGOs and companies.



Consistent with its efforts in previous years, one member of the NGO Pillar reported that it promoted the Voluntary Principles directly with companies at both the project- and corporate-level. The NGO's efforts included the facilitation of discussions focused on the value of the Voluntary Principles to companies in the oil and mining sectors, as well as outside the extractive industry, in sectors such as renewable energy, agribusiness, and infrastructure.

A member of the NGO Pillar noted that it raised awareness among internal stakeholders by building the capacity of public and private security providers and employees of Corporate Pillar members at both onshore and offshore locations in West Africa. Externally, the NGO sought to raise awareness of the Voluntary Principles through participation at human rights events, including a meeting of the African Coalition on Corporate Accountability.

➤ ***Describe efforts to engage and facilitate participation of non-member CSOs, affected communities, and other relevant stakeholders in the Annual Plenary Meeting or workshops***

Members of the NGO Pillar stated that that they used opportunity provided by the 2016 Annual Plenary Meeting to hold side meetings of Participant and non-Participant NGOs that focused on human rights and security challenges in local communities affected by extractive sector operations. One NGO Participant added that it will host a civil society meeting comprised of NGO Pillar and non-Participant civil society organizations immediately prior to the 2017 Annual Plenary Meeting. Other members of the NGO Pillar also drew attention to the engagement of non-Participant civil society organizations through a range of workshops and events in 2016.

One NGO Participant noted its collaboration with a Government Participant and a West African NGO to support Voluntary Principles implementation in West Africa. The collaboration intends to provide targeted trainings to four local communities and to facilitate local multi-stakeholder dialogue platforms for community members and local civil society organizations to discuss Voluntary Principles-related conflict drivers and potential grievance mechanisms to ameliorate such conflicts.

Another member of the NGO Pillar reported that it engaged non-Participant civil society organizations in Nigeria by setting up an in-country Voluntary Principles call for Nigerian NGOs to discuss business and human rights, to raise awareness of the Voluntary Principles, and to encourage NGOs to actively participate in implementation efforts in Nigeria. The NGO Participant also reported that it is engaging other NGO Pillar members regarding the possibility of supporting non-Participant NGOs and other relevant stakeholders' participation at Annual Plenary Meetings.

- ***Describe your efforts to promote the adoption of the Voluntary Principles into relevant government or corporate policies, as well as international standards and/or guidelines.***

Members of the NGO Pillar described various ways in which they have promoted the adoption of the Voluntary Principles into policies and international standards. One NGO Participant noted that it has raised the visibility of the Voluntary Principles through its involvement in IPIECA. The NGO Participant has encouraged all IPIECA members to consider the applicability and use of the Voluntary Principles not just in areas associated with extractive sector conflicts, but also in a range of other contexts, including those not traditionally associated with the Voluntary Principles, such as responding to protests in Europe.

Another NGO reported that it is currently carrying out a needs assessment and gap analysis specific to the implementation of the Voluntary Principles in the Democratic Republic of the Congo, and hopes that it will lead to the development of a policy, procedure, or guideline that could be used in the employment of private sector security providers.

One NGO reported that it has engaged the Government of Nigeria regarding the Voluntary Principles, leading to the establishment of an inter-ministerial committee to develop Nigeria's position and potential policies on the Voluntary Principles. The NGO Participant also noted that it encouraged the Nigerian police to incorporate the Voluntary Principles in their weekly personnel lectures and in their human rights policies.

#### **NGO Pillar Country Implementation**

- ***Describe efforts to strengthen the rule of law in the countries where you work.***

Members of the NGO Pillar reported on operations and activities in a diverse range of country and regional settings. All members of the NGO Pillar described efforts that they have made to strengthen rule of law and respect for human rights.

In Peru, one NGO Participant reported that it acted as an observer on a Company Participant's human rights committee, providing recommendations to ensure that project management adhere to best practices on security and human rights.

In Ghana, an NGO Participant described its engagement with a collaborative peace building program that will foster multi-stakeholder dialogue in an effort to develop best practices and improve respect for human rights throughout communities impacted by extractive sector operations.

In Colombia, one NGO Participant reported that it continued to seek ways to realize the right to effective remedy on behalf of victims of human rights violations that have been associated with past and present security challenges in the extractive sector. The NGO's efforts

have included engagement with government authorities, companies, victims, home governments, buyers, and other stakeholders in the coal supply chain.

In the Democratic Republic of the Congo, the same NGO Participant noted its participation in dialogues with stakeholders involved in and affected by gold mining production, adding that its efforts have coincided with an improved security and human rights situation in the area, in particular in relation to the persistent tensions between artisanal miners and mining companies.

In Nigeria, a member of the NGO Pillar reported several initiatives that it has embarked on to strengthen rule of law, including:

- Building the capacity of public security forces, including the Army, Navy and the Nigerian Police on human rights, including the Voluntary Principles and other international humanitarian laws;
- Engaging in a number of media activities, including a series of live radio programs in the Nigerian states of Delta and Ondo to raise public awareness and to encourage citizens' demand for improved transparency and accountability in government and the justice administration system; and
- Creating a multi-stakeholder dialogue on criminal justice administration, and security reform in South and Southeast Nigeria, in communities emerging from some of the worst forms of violent conflict and security.

➤ ***Describe efforts to conduct and monitor risk assessments for potential human rights violations in the areas where you work***

Members of the NGO Pillar reported that they viewed and used risk assessments as an essential management tool to guide the implementation of projects in high-risk environments.

One NGO Participant noted on-going projects in the Democratic Republic of Congo, Rwanda, and Burundi, to assess the risks associated with metals mining and the metals supply chain. In 2016, the project was expanded to include Uganda. The NGO described this supply chain initiative as a comprehensive system to provide due diligence and traceability of conflict-free minerals, produced and traded free of human-rights abuse. The NGO also carried out three Voluntary Principles trainings that gave particular focus to the risk assessment process.

Another member of the NGO Pillar reported that it conducted risk assessments and provided associated training to security staff from platinum mining operations in South Africa. The assessments and training reviewed events that could trigger Voluntary Principles-related risks and/or impacts, specifically around situations of social and labor unrest. These exercises also reviewed causes and consequences as well as preventive and mitigating measures to be

taken, in order to ensure company responses are up-to-date and fit-for-purpose in a highly dynamic environment.

One member of the NGO Pillar reported that after it conducted an analysis of the risks associated with gold mining in the Democratic Republic of the Congo. The analysis focused on Voluntary Principles implementation. As part of the analysis, the NGO engaged in dialogue with companies operating there, in close consultation with local stakeholders.

➤ ***Describe your efforts to strengthen policies, procedures and guidelines related to the implementation of the Voluntary Principles***

Members of the NGO Pillar provided multiple examples of ways in which they are working to strengthen policies, procedures, and guidelines to further the implementation of the Voluntary Principles.

One NGO Participant enumerated several policies and procedures it had advanced in 2016 related to the implementation of the Voluntary Principles.

These activities included:

- Using key aspects and policies of the Voluntary Principles, such as security and human rights and risk assessments, as the focus of dedicated human rights and business roundtable discussions;
- Continuing to develop and deliver training programs on the Voluntary Principles;
- Participating in discussions related to the Voluntary Principles and security sector reform; and
- Performing assessments, trainings, and provided advice on the Voluntary Principles for various clients, including multilateral financial institutions.

Another NGO Participant also provided details on efforts throughout the year to strengthen policies and procedures related to Voluntary Principles implementation. The NGO described a multi-faceted approach based on the context and peculiarities of communities in Nigeria. The approach was based on feedback from stakeholders including communities, government, and companies. The NGO's approach included:

- Empowering communities to hold duty-bearers responsible and to demand greater accountability;
- Strengthening civil society to increase knowledge and to expand engagement through joint and shared learning spaces;

- Partnering with extractive sector companies to strengthen and expand knowledge and promote policy reform;
- Partnering with government institutions to ensure compliance; and
- Creating effective mechanisms for dialogue, joint problem solving and networking.

➤ ***Describe your efforts to engage with or support engagement with the public security sectors and/or private security sectors in the countries where you work.***

Members of the NGO Pillar reported on activities in several countries in which they supported engagement with security forces to strengthen human rights compliance.

In Papua New Guinea, one NGO Participant described its ongoing efforts to implement recommendations from a report on violence against women perpetrated by private security personnel in the gold mining sector.

In Honduras, the same member of the NGO Pillar reported that it continued to work with a natural resource company to encourage acknowledgement and amelioration of human rights risks posed by the company's security arrangements, including by incorporating the Voluntary Principles into the company's management systems.

In the Democratic Republic of the Congo, Burundi, and Uganda, another NGO Participant noted that it continues to implement a project to monitor for security risks in mining and mineral supply chains. As part of project implementation, the NGO reported that it worked with local authorities and communities to address the risk of conflict or abuse. It has closely monitored the status of security in and around extractive sector operations to ensure that there are no human rights violations, no activities by non-state armed groups, no engagement of the public security forces in mining or taxation, and no other activities that do not conform to the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*.

In Mali, a member of the NGO Pillar reported that it provided introductory training on the Voluntary Principles to both private and public security forces at mining sites located on the border with Côte d'Ivoire. The training focused on critical security tasks with the most risk of negative human rights impacts, such as responding to illegal mining conducted by organized criminal networks. The training also focused on enhancing collaboration and coordination between public and private security.

➤ ***Describe efforts to hold Voluntary Principles participants accountable for upholding their roles and responsibilities as members of the Voluntary Principles Initiative.***

Members of the NGO Pillar reported on a number of efforts to hold other Voluntary Principles Participants accountable to their roles and responsibilities as members of the Voluntary Principles Initiative. A number of NGO Participants noted that they had participated in efforts to finalize the Roles and Responsibilities documents for each Pillar.

Several members of the NGO Pillar noted that the text of the Voluntary Principles requires that Corporate Participants ensure that key staff members are aware of their human rights responsibilities and that those responsibilities are considered when making security arrangements.

One NGO Participant noted that it convenes a regular human rights and business roundtable that has included discussions on Participants’ roles and responsibilities with regard to implementation of the Voluntary Principles. The roundtable will continue to give special attention to the extractive sector while also increasing attention to other industry sectors in order to facilitate the sharing of best practices and lessons learned across industries.

**D. LESSONS AND ISSUES**

The Reporting Guidelines ask Participants to include the following information in their annual reports:

<b>Corporate Pillar</b>	<ul style="list-style-type: none"> <li>Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization</li> </ul>
<b>Government Pillar</b>	<ul style="list-style-type: none"> <li>To help determine what best practices and lessons learned can be leveraged going forward, provide a summary of issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the government, (e.g. successful/unsuccessful engagement and implementation; from lessons learnt any changes to future priorities and plans for continued or emerging opportunities)</li> </ul>
<b>NGO Pillar</b>	<ul style="list-style-type: none"> <li>Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization</li> </ul>

## 1. Corporate Pillar

### ➤ ***Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization***

Members of the Corporate Pillar Participants identified a variety of lessons and recommendations with regard to the Voluntary Principles generally, as well as with regard to implementation efforts specifically:

#### *Project-Level Implementation of the Voluntary Principles*

- Strong, early community engagement by the operating company with a professed commitment to implementation of the Voluntary Principles has been critical to providing for stable security environments in high risk areas.

#### *Engagement with Security Forces*

- It can often be a struggle to maintain the interest of public security forces when it comes to continuing to raise awareness of the Voluntary Principles. Companies need to be creative when presenting Voluntary Principles literature.
- It is necessary to ensure that formal instruments exist to both articulate and reinforce Voluntary Principles obligations and the company's expectations.

#### *Engagement with Host Governments*

- When host governments resist engaging in dialogue or signing agreements on Voluntary Principles matters, the options available to companies are limited. 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.
- Joint industry engagements on the Voluntary Principles with government authorities has been a useful approach in several countries and is likely to be the continued engagement approach with host governments.

#### *Corporate Management Systems*

- Adapting existing, successful management systems to more specifically reflect human rights considerations (rather than creating an entirely new, separate system) can be a more effective and successful approach, and should be advanced as a model for future use and implementation.

- Corporate Participants should continue to foster a broader understanding of the Voluntary Principles throughout their businesses operation and capitalize on opportunities to deliver awareness/training sessions on the Voluntary Principles where appropriate.
- One Corporate Participant noted the importance of compliance with international human rights laws, adding that it is working on its compliance statement under the U.K. Modern Slavery Act. The statement will include information on the steps the company has taken to help educate security providers about modern slavery challenges, including around reporting slavery and human trafficking incidents.

## 2. Government Pillar

- ***To help determine what best practices and lessons learned can be leveraged going forward, provide a summary of issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the government, (e.g. successful/unsuccessful engagement and implementation; from lessons learnt any changes to future priorities and plans for continued or emerging opportunities)***

Members of the Government Pillar Participants identified a variety of lessons and recommendations with regard to the Voluntary Principles generally, as well as with regard to implementation efforts specifically:

### *Governance of the Voluntary Principles Initiative*

- It is important that new Government Participants as well as established Participants that have not taken on leadership roles in the Voluntary Principles Initiative, join the Steering Committee and take on the role of Government Chair as soon as possible and as soon as their Voluntary Principles experience allows it.
- Many Government Participants noted outreach and increasing membership in the Voluntary Principles Initiative as one of the most salient long-term goals. Even where membership is not a short-term objective, awareness and endorsement can encourage companies to incorporate the Voluntary Principles, which in turn will help lessen the chances of conflict.
- One member of the Government Pillar said it supports making the Voluntary Principles as accessible as possible. Specifically, the Government suggested reducing barriers that may limit participation, including narrow entry criteria that presently excludes mining services companies.



- Another Government stated that verification with regard to Voluntary Principles implementation efforts is important to help ensure that Participants and the public are satisfied that companies are meeting their commitments under the Voluntary Principles. The Government stated that verification is a key component of Voluntary Principles implementation and that it is critical to making the Voluntary Principles Initiative sustainable.

#### *In-Country Implementation Working Groups*

- Over the next year, further development of the In-Country Implementation Working Groups in Burma, Ghana, Nigeria, and Peru will be a crucial step towards showing the value that the Voluntary Principles Initiative can offer.

#### *Outreach*

- Outreach efforts should be intensified in order to broaden the participation of both host and home governments of extractive companies.
- There is a need for tailored approaches to reflect the different perspectives and needs of stakeholders. Some people attending Voluntary Principles sessions or events have a lot of prior experience and knowledge, while others have never heard of them. Addressing the different needs of various actors and organizations is important, but more valuable for all involved if done separately. Ideally, the level of detail or depth of a discussion should be strategic and indicated to participants in advance.
- There should be nuance and coordination on outreach efforts. Ideally, outreach can be undertaken in a way that makes it clear whether one is encouraging implementation of the Voluntary Principles or encouraging an application for membership in the Voluntary Principles Initiative. Coordination across the Initiative in order to avoid false expectations or unnecessary rejections of applications would be ideal.

#### *Transparency*

- Good reporting requires comprehensive tracking. A Government Participant noted that a challenge it faced in putting together its 2016 annual reports was the tracking of its outreach and promotion of the Voluntary Principles and the Voluntary Principles Initiative. Going forward, the Government Participant said it will continue to try to be as proactive as possible in collecting information for future annual reports, as well as for the government's own internal awareness.

### 3. NGO Pillar

➤ ***Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization***

Members of the NGO Pillar Participants identified a variety of lessons and recommendations with regard to the Voluntary Principles generally, as well as with regard to implementation efforts specifically:

#### *Implementation of the Voluntary Principles*

- Project-level implementation has limitations in what it can achieve, but it can have quite significant impact nevertheless. NGO Participants have come across critical improvements in security and human rights situations that may be the result of Voluntary Principles implementation, but that are not claimed as such for a variety of reasons.
- The local enabling environment is an implementation issue and the Voluntary Principles should develop guidance for its members how to create it. This must be a priority issue for the In-Country Implementation Pilot Groups.
- Voluntary Principles-related risks are present in urban environments, where private security is the main source of security provision. Issues like the use of firearms and urban crime also affect companies' operations, making the Voluntary Principles a useful tool for "non-traditional" environments and non-extractive companies. Important adaptations are also required, however, to make sure the measures taken reflect the level of severity and probability of risks.
- Joint engagement by different companies, supported by their home governments, on improving human rights compliance among public security forces can make a difference, but such engagement is uncommon. The Voluntary Principles Initiative should make this a priority. The value of the Voluntary Principles is that it offers a platform and forum for companies, governments, and NGOs to challenge human rights violators together. The In-Country Implementation Pilot Groups will need to focus on these matters.

#### *Engagements with Public Security*

- Awareness raising is necessary to make sure that private security guards/firms understand how Voluntary Principles can add value to their jobs.
- It is important to continue to engage all relevant actors in Voluntary Principles implementation. This includes redoubling NGO efforts in engaging with public security forces, who are often the source of many of the problems that the Voluntary Principles

seeks to address. At the same time, they are perhaps the most neglected stakeholder in the Initiative.

*Value Proposition of the Voluntary Principles Initiative and the Voluntary Principles*

- The critical test for the long-term value of the Voluntary Principles will be their implementation by companies, the development and implementation of country plans, and the creation of a sustainable governance structure for the Voluntary Principles Initiative.
- Growing the membership of the Voluntary Principles Initiative and overcrowded Annual Plenary Meeting are not necessarily measures of success, as several Corporate and NGO Participants with strong human rights commitments have left the Voluntary Principles Initiative.
- One NGO Participant reported that the Voluntary Principles Initiative struggles to articulate its added value and justify the time and effort spent by its members. Its agenda is too much oriented on process and too little on the specific problems that Participants would like to resolve together.
- The geographic spread of Participants represented on Steering Committee and Working Group calls enrich the implementation strategy of the Voluntary Principles Initiative, particularly in the listing of priority countries with regard to in-country implementation efforts.

*Increasing Awareness Regarding the Voluntary Principles*

- Integrating the Voluntary Principles in incident resolution processes has a critical learning impact on local stakeholders. It can provide the opportunity to continue raising awareness and demonstrate how the Voluntary Principles must be taken into account in daily extractive activities.
- One member of the NGO Pillar reported that while the Voluntary Principles is specifically focused on security operations in the extractive sector, its application has wider implication for other sectors. Awareness of the Voluntary Principles is increasing at the local level and non-security personnel of extractive companies are developing interest on utilizing the benefits of the Voluntary Principles in their daily routine.