

**VOLUNTARY PRINCIPLES INITIATIVE**  
**SUMMARY OF IMPLEMENTATION EFFORTS DURING 2013**

This report provides an overview of Participants' efforts to implement the Voluntary Principles on Security and Human Rights (the "Voluntary Principles") during 2013. The information contained in this report reflects 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 2014 Annual Plenary Meeting.

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

This year's reports included information on Participants' activities in the following countries: Afghanistan, Algeria, Angola, Argentina, Australia, Azerbaijan, Bangladesh, Belgium, Bolivia, Botswana, Brazil, Burkina Faso, Canada, Chad, Chile, China, Colombia, Democratic Republic of Congo, Dominican Republic, Ecuador, East Timor, Equatorial Guinea, France, Georgia, Germany, Ghana, Guatemala, Guinea, Haiti, Honduras, Indonesia, Iraq (including the Kurdistan Region of Iraq), Jamaica, Jordan, Kazakhstan, Kenya, Kosovo, Laos, Liberia, Libya, Malaysia, Mali, Madagascar, Mexico, Mongolia, Mozambique, Myanmar, Namibia, The Netherlands, New Zealand, Nigeria, Norway, Oman, Pakistan, Panama, Papua New Guinea, Peru, the Philippines, Poland, Qatar, Russia, Rwanda, Saudi Arabia, Sierra Leone, South Africa, South Sudan, Suriname, Switzerland, Tanzania, Thailand, Turkey, Uganda, United Arab Emirates, United States, United Kingdom, Vietnam, Zambia, and Zimbabwe.

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

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

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

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

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

There are four main sections to the Reporting Guidelines:

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

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

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

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

All Participants affirmed their commitment to the Voluntary Principles. Participants provided examples of statements, reports, and policies in which they had publicly stated their commitment. Participants also cited a range of activities through which they had provided affirmative demonstration of their commitment during 2013, including: training initiatives; public and private advocacy and dialogue; and the development of policies and procedures. The diversity of Participants’ efforts is reflective of the different capacities and functions of each Pillar.

Members of all Pillars referenced the U.N. Guiding Principles on Business and Human Rights in the context of expressing their commitment to the Voluntary Principles. One member of the Government Pillar noted that its national action plan to implement the U.N. Guiding Principles explicitly references the Voluntary Principles. Several Corporate Pillar members referenced efforts to align their operations with the expectations established in the U.N. Guiding Principles and noted that implementation of the Voluntary Principles is an important part of their companies’ commitment to respect human rights.

Members of all Pillars cited participation in the Steering Committee and Working Groups as reflective of their commitment to the Voluntary Principles. Participants in the Government Pillar also referenced their past, current, or future service as the Government Chair. Several Participants also cited their participation in the Strategic Retreats that were held in June 2013 and October 2013.

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

### *Government Pillar*

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

Several members of the Government Pillar observed that participation in the Voluntary Principles Initiative is consistent with broader public sector efforts to strengthen corporate social responsibility standards and business and human rights frameworks. One member of the Government Pillar stated that it had joined the Voluntary Principles Initiative in order to promote the Voluntary Principles as a best practice standard for companies in the extractive sector.

### *Corporate Pillar*

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

One member of the Corporate Pillar noted that it had adopted a new strategic plan with regard to the management of human rights impacts in 2013 and that this plan specifically addressed Voluntary Principles implementation. As part of this strategic plan, the company is revising its code of conduct to include specific reference to the Voluntary Principles.

Another member of the Corporate Pillar reported that it had updated its internal Voluntary Principles implementation guidelines in 2013 in order to align them with the Implementation Guidance Tools (“IGT”). Several other members of the Pillar also cited the IGT as a key source document for internal training initiatives. Members of the Pillar also cited their participation in the Key Performance Indicators (“KPI”) Volunteer Group<sup>5</sup> and other efforts to develop performance indicators to assess implementation of the Voluntary Principles.

Finally, a member of the Corporate Pillar provided detailed information on its efforts to ensure that a recently acquired subsidiary is operating consistently with the company’s commitment to the Voluntary Principles.

### *NGO Pillar*

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

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<sup>5</sup> The KPI Volunteer Group is not an official Voluntary Principles Working Group. It is an independent initiative.

encourage partner organizations to learn about and promote the Principles. NGOs also referenced their role in convening roundtables and other forums meant to bring stakeholders together to discuss security and human rights-related concerns.

One member of the NGO Pillar noted that its commitment to the Principles is expressed through its work to facilitate dialogue with local communities impacted by extractive sector operations. The NGO observed that its work aids companies and governments in their efforts to implement the Principles.

Another member of the NGO Pillar noted that its commitment to the Voluntary Principles was consistent with its overall objective of holding governments accountable for their human rights obligations. The NGO observed that the Principles serve as an important platform for companies to engage with host country governments and civil society organizations with regard to security and human rights concerns.

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

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

#### *Government Pillar*

Similar to their reporting against Reporting Guideline A.1, members of the Government Pillar cited efforts to promote awareness of the Voluntary Principles both at home and as part of outreach efforts to other governments. Members of the Government Pillar referenced engagements with multiple governmental departments and agencies that were intended to promote the Voluntary Principles. Many members of the Government Pillar discussed efforts to provide their missions and embassies with more guidance materials regarding the Voluntary Principles as a way of strengthening and facilitating outreach efforts.

Members of the Government Pillar also reported on efforts to promote other international human rights and business standards, including the U.N. Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Code of Conduct for Private Security Providers.

Several members of the Government Pillar noted that their support for the Voluntary Principles was aligned with broader public sector initiatives to promote economic development and international trade. One government stated that it had recently released a report on the commodities sector, and observed that this report had served to highlight the diverse challenges associated with resource extraction, including security and human rights concerns.

One member of the Government Pillar reported that it was working to ensure that multiple government departments have the capacity to promote extractive sector development in a manner that protects and respects human rights. This government's efforts include the development of a guide on security and human rights for investors in the extractive sector and

the provision of training to military forces on the Voluntary Principles and international humanitarian law.

### *Corporate Pillar*

Similar to their reporting against Reporting Guideline A.1, members of the Corporate Pillar cited a range of policies, principles, directives, and guidelines by which they have incorporated their commitment to the Voluntary Principles into the management of their operations.

One member of the Corporate Pillar reported that it had established the following strategic objectives for the period 2013-2015:

- Training all entities operating in countries assessed as “Voluntary Principles risk countries” within 3 years;
- Creating and maintaining a complete database of Voluntary Principles implementation actions in relevant countries;
- Conducting Voluntary Principles risk assessments at entity level to ensure proper support to affiliates; and
- Promoting the signature of Memoranda of Understanding with host governments providing public security forces and ensuring necessary training for private and public security forces to ensure optimal implementation in the field of the Voluntary Principles.

Many members of the Corporate Pillar referenced toolkits, guidance materials, and assessment mechanisms specific to security and human rights-related concerns. Several member of the Pillar cited efforts undertaken in 2013 to update specific aspects of their management systems and standards.

One company reported that it had released two detailed guidance notes to the entire company in 2013 that addressed the topics of security and human rights and engagements with public security forces. The primary internal audiences for these guidance notes are site and project management teams.

One member of the Pillar reported that it had piloted a new security and human rights toolkit in 2013. The toolkit includes sections on: engaging stakeholders; developing risk assessments; interacting with public security providers; interacting with private security providers; and managing equipment transfers.

Several members of the Corporate Pillar reported on their efforts to assess implementation of the Voluntary Principles either internally or with the assistance of

independent assessors. One company reported that it had conducted a self-assessment against the KPIs developed by the KPI Volunteer Group and that it had identified gaps that it was now working to address. The company reported that the exercise had strengthened its compliance with the Voluntary Principles. Another member of the Pillar stated that it had recently engaged an external social auditor to assess its implementation of the Voluntary Principles at select sites. The assessment had included a review of policies, procedures, and training programs at both the global and country levels.

One member of the Corporate Pillar noted that it had experienced a significant terrorist attack at one of its operating locations in 2013. The company's review of this attack led to the development of a set of recommendations related to security and the development of a new corporate unit focused on security and emergency preparedness.

#### *NGO Pillar*

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

Several member of the NGO Pillar referenced work to develop toolkits and other guidance materials to assist in the delivery of Voluntary Principles training programs. One NGO reported that it had worked to develop KPIs to assess its own efforts to assist in the implementation of the Voluntary Principles.

Another NGO referenced its work on revisions to the NGO Roles & Responsibilities document and the revised NGO Entry Criteria as reflective of its commitment to the Principles and to the Initiative.

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

All members of the Corporate Pillar reported using risk assessments to evaluate security and human rights-related risks at project sites. One company reported that it conducts risk assessments at all sites, at a frequency commensurate with the perceived level of risk. Considerations associated with the risk assessments include, but are not limited to:

- the identification of specific security risks;
- the potential for violence;
- the human rights records of security forces and individual employees of security forces; and
- the potential for equipment transfers to private and public security forces.

This is consistent with reporting from several other members of the Corporate Pillar that stated that the time intervals between risk assessments are dependent upon initial assessments of the relative risk levels of the specific locations in question.

One company reported that it had conducted more than 90 site-level security risk assessments during 2013. The company also conducted country-level risk assessments for countries that the company had identified as “VPSHR priority countries.” The company reported that it utilized the IGT to conduct these assessments.

Another member of the Pillar reported that it had integrated comprehensive security and human rights analyses into all new country entry assessments in 2013 for countries identified as “high risk” according to external risk indices. Another member of the Pillar reported that it had made significant steps toward an integrated and systemic approach to risk identification, including in the process of new country entry.

Companies reported that they had consulted both internal and external subject matter experts in conducting risk assessments and in developing assessment tools. One company reported that it engages third parties to conduct risk assessments prior to initiating exploration or starting project development in jurisdictions with a relatively high potential for violence or human rights abuses. The third-party risk assessments typically cover a wide range of issues, including many of the following:

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

Another member of the Corporate Pillar reported that it had contracted with an external advisory firm to facilitate a corporate-level human rights impact assessment to help identify impacts across the company’s portfolio and to assess gaps. As part of the assessment, the company conducted two international-level stakeholder meetings to receive input on the assessment’s methodology and approach and to present initial findings.

Another company reported that it had engaged an external assessor to assess security and human rights-related risks in the context of annual (or bi-annual) assessments of site-level implementation of the Voluntary Principles. In 2013, this external assessment process concluded that the overall risk of security-related human rights violations remained low at most of the company’s sites due to the sites’ ability to influence this risk through the use of force controls, training for private security, and engagement with public security. At some sites,

however, the risks remained higher, despite a high level of compliance with the Voluntary Principles, especially in cases where rule of law and the institutional strength of public security were weak.

One company reported that its corporate security department had developed a new tool to help corporate affiliates conduct their own security and human rights assessments. In 2013, the tool was piloted in three countries. Another member of the Corporate Pillar reported that it created a team of group security professionals in 2013 to apply a systematic approach to security in high-risk countries where the company has people on the ground. The security personnel were selected from across the company as result of their experience related to security risk management in challenging operating environments. The team has created an assessment and validation tool for security measures in these complex environments.

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

All members of the Corporate Pillar reported that they had established mechanisms and procedures by which incidents with potential security and human rights implications could be reported to specific personnel within the company. Several companies described the existence of multiple channels for such reporting, including the use of anonymous reporting mechanisms such as drop boxes, as well as confidential reporting hotlines. Several companies reported that they had escalation procedures by which reports of incidents with a certain level of severity are immediately brought to the attention of corporate-level personnel.

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

Another member of the Corporate Pillar reported that all sites are required to have a grievance mechanism in place that is consistent with the expectations established in the U.N. Guiding Principles on Business and Human Rights. The grievance mechanism is managed through a grievance officer and a third party can report any grievance or incident via this mechanism. Sites are required to communicate the mechanism to communities impacted by the company's operations. In 2013, an external assessment of the company's implementation of the Voluntary Principles found that there had been progress in terms of raising community members' awareness of site-level grievance mechanisms.

Finally, one company reported that it had adopted a standardized reporting procedure that was supported by a web-based system. The system allows for the recording of events, allegations, and incidents and helps to ensure the integrity and the archiving of data related to incidents. The company observed that the system has helped to raise awareness of its commitment to the Voluntary Principles throughout the company.



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

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

Many companies reported that clauses citing the Voluntary Principles are now required in contracts with private security providers. One company noted that the text of the Voluntary Principles is appended to its master service agreements. Several companies reported making recent changes to contracting practices with regard to private security providers.

One member of the Corporate Pillar reported that all private security companies engaged by the company are signatories of the International Code of Conduct for Private Security Providers. Several members of the Pillar reported that this would be a requirement for their private security providers in the future.

Another member of the Corporate Pillar reported that its internal framework on security and human rights includes model language for contracts with private security providers. The model language includes provisions requiring personnel to be trained on, and to act consistently with our Statement of Principles on Security and Human Rights, applicable laws and regulations, provisions of the Universal Declaration on Human Rights, the Fundamental Principles and Rights at Work of the 1998 International Labor Organization Declaration, UN Code of Conduct for Law Enforcement Officials, and UN Principles on the Use of Force and Firearms by Law Enforcement Officials.

One reported that it included contract clauses in its engagement with private security personnel that require contractors to communicate the company's ethics, human rights and social responsibility expectations to their employees and subcontractors, as well as to demonstrate compliance. The company reported that it had initiated an internal assurance process in 2013 in order to review its progress in incorporating these contract clauses uniformly in private security contracts.

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

- [Security Provider] must ensure that the Security Provider Personnel and any state military or law enforcement authorities working with the Security Provider Personnel to provide the Services are aware of the requirements of and have been fully trained to comply with the UN Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN Code of Conduct for Law Enforcement Officials.

- [Security Provider] must ensure that the Security Provider Personnel and any state military or law enforcement authorities working with the Security Provider Personnel to provide the Services do not violate the rights of individuals exercising their right of freedom of association and peaceful assembly, or any other rights recognized by the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- The Service Provider is aware that the Company is a signatory and committed to operate in accordance with the Voluntary Principles on Security and Human Rights (“VPSHR”) and the Security Provider represents and covenants that it will not act or omit to act in any way that is in conflict with or inconsistent with the Company’s commitment to the VPSHR.

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

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

Several companies provided information on incident reporting and tracking tools used to record information regarding alleged incidents and to track follow-up activities, including investigations. A number of companies also reported that they had procedures and policies explicitly requiring that company personnel provide full cooperation to any government officials investigating security-related incidents.

One company reported that all human rights allegations, including security-related incidents, are referred to the site-level Human Rights Compliance Officers, who oversee the process of documenting all allegations and assign an internal team to conduct an assessment of the allegation. The outcome of the assessment process is reported to the corporate human rights legal counsel, the corporate Human Rights Compliance Officer, site management, the complainant, and the individual respondent. For cases involving security-related incidents by public security personnel, the Human Rights Compliance Officer and site management ensure that these incidents are reported to the appropriate government institution for investigation. The company investigates cases involving private security personnel. Cases may also be reported to the government for investigation, as appropriate.

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

### *Government Pillar*

Members of the Government Pillar referenced a large number of intra-governmental consultations and training sessions intended to raise awareness of the Voluntary Principles across different governmental departments and agencies. Members of the Government Pillar noted that they had made a concerted effort to provide more resources and training regarding the Voluntary Principles to personnel at missions and embassies. One government referenced the inclusion of the Voluntary Principles as a discussion point at an August 2013 meeting of its national Ambassadors.

Several Governments referenced websites that had been established to provide information regarding the Voluntary Principles and other corporate social responsibility standards.

Governments reported on participation in regional forums and bilateral meetings intended to promote Voluntary Principles implementation. Several governments referenced the development of materials and platforms intended to raise awareness regarding the benefits of Voluntary Principles implementation, including both public websites and government intranets.

### *Corporate Pillar*

Most members of the Corporate Pillar provided information on training initiatives and noted that these initiatives have raised awareness regarding the Voluntary Principles within their organizations. One company reported that all security personnel are trained at least annually on the Voluntary Principles. The company reported that it had provided security guards with reference cards on the use of force and the Voluntary Principles, and that human rights and security policies were posted at guard stations, main gates, and security offices.

One company noted that it had developed a new human rights training module in 2013 that makes explicit reference to the Voluntary Principles. The module is now included in the induction program for new employees. The company also reported that all public and private security personnel must complete training on the Voluntary Principles before beginning employment at any of the company's operating sites.

One member of the Corporate Pillar reported that it was piloting a "Human Rights ambassador program" in one of its operating locations. Through the program, training on human rights and the Voluntary Principles is provided to a broad range of non-security employees.

Another company reported that it includes a “security and human rights” section in the quarterly news updates sent to senior executives. The news updates provide information on concrete actions that have been undertaken to implement the Voluntary Principles and highlight the importance of managing security and human rights-related risks. The company noted that its global security personnel had recently been asked to present on the use of armed security to the corporate Executive Committee. This presentation led to a new reporting requirement whereby global security must provide quarterly reports to the Chief Executive Officer on the status of public security support and the preventive measures in place to manage security and human rights-related risks.

Another member of the Pillar reported that it had conducted workshops on the Voluntary Principles in three different countries in 2013. Attendees at the workshops included country asset protection managers, security personnel, community liaison officers, and social performance teams.

#### *NGO Pillar*

Members of the NGO Pillar also cited efforts to increase awareness of the Voluntary Principles within their organizations. Members of the NGO Pillar referenced holding staff retreats, board meetings, and roundtables in order to familiarize people throughout their organizations with the Voluntary Principles.

One member of the NGO Pillar cited outreach efforts to its country offices to encourage engagement with Voluntary Principles activities. Another member of the Pillar noted that it had held an international summit with all of its member organizations at which it promoted the Voluntary Principles.

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

Participants in all Pillars reported that they had participated in the U.N. Forum on Business and Human Rights in December 2013 with several Participants highlighting their participation in a panel dedicated to the Voluntary Principles.

#### *Government Pillar*

Members of the Government Pillar cited unilateral and multilateral efforts to engage governments that are not currently Voluntary Principles Participants in dialogues regarding the benefits of participation in the Voluntary Principles Initiative. Several governments highlighted their contributions to the Outreach and Implementation Working Group as reflective of their commitment to raising awareness of the Voluntary Principles among both other governments and the extractive sector. Many governments referenced public speeches and documents that cited the benefits of Voluntary Principles participation and implementation.

Members of the Government Pillar also referenced support for work by members of the NGO Pillar to promote Voluntary Principles implementation in specific countries. Several governments observed that they had provided funding for the development of studies and practical tools intended to promote Voluntary Principles implementation.

Several governments referenced efforts to highlight the Voluntary Principles in the context of their participation in international organizations and initiatives such as the Organization of American States, the Kimberley Process, the Extractive Industries Transparency Initiative, the Global Business Initiative on Human Rights, the Institute for Human Rights and Business, the Myanmar Centre for Responsible Business, the Better Gold Initiative, and the Association for the International Code of Conduct for Private Security Providers.

Members of the Government Pillar also reported on efforts to raise awareness regarding the Voluntary Principles among extractive sector companies, including both direct engagements with companies and presentations at extractive industry associations.

#### *Corporate Pillar*

Many members of the Corporate Pillar referenced their participation in the Outreach and Implementation Working Group. Several companies reported on efforts to coordinate with members of the Government Pillar on outreach efforts to specific countries.

Companies also referenced specific efforts to promote the Voluntary Principles with local stakeholders in the countries and regions in which they have operations. Companies hosted workshops, roundtables, and other events to provide information and foster dialogue on security and human rights-related concerns.

Several members of the Corporate Pillar reported that they had participated in meetings organized by the incoming Government Chair to discuss the development of strategic priorities for the Voluntary Principles Initiative in 2014 and 2015.

Several members of the Corporate Pillar referenced engagement with the International Code of Conduct Association. Member of the Corporate Pillar also referenced support for a project on security sector reform currently lead by DCAF and the ICRC. Several members of the Corporate Pillar also reported that they were actively participating in IPIECA's Social Responsibility Working Group, and that this engagement allowed them to engage information on best practices related to the implementation of human rights policies and procedures. One member of the Corporate Pillar reported that it had helped to create a Responsible Security Task Force within IPIECA, which focuses on operational-level issues related to security and human rights. This Task Force held a workshop in November 2013 in Washington, D.C., which was focused on best practices for working with public and private security providers on the ground. Several members of the Corporate Pillar reported that they were participating in the Task Force.

### *NGO Pillar*

Members of the NGO Pillar referenced their participation in, or dialogue with, a range of international institutions and initiatives when describing activities through which they have sought to promote the Voluntary Principles. NGOs referenced engagements with the World Bank; Prospectors and Developer Association of Canada; Global Reporting Initiative; Equitable Origin; the Bettercoal Initiative, and the International Chiefs of Police.

Member of the NGO Pillar also reported on their efforts to highlight the Voluntary Principles at international conferences and summits, including the U.N. Forum on Business and Human Rights and the U.N. Social Good Summit.

One member of the NGO Pillar observed that the Voluntary Principles had been incorporated into its efforts to engage the European Union in discussion regarding the sourcing of conflict minerals and the Dutch Government on the promotion of corporate social responsibility in coal industry.

One member of the NGO Pillar cited its efforts to promote the Voluntary Principles with companies that are not yet Participants, including companies that are not in the extractive sector.

Finally, another member of the NGO Pillar noted that its Nigerian Country Director had attended the 2013 Annual Plenary Meeting in The Hague, and was thus able to engage other Participants in discussions about outreach work in Nigeria and Ghana.

## **C. COUNTRY IMPLEMENTATION**

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

Voluntary Principles Participants reported on policies, advising, contracts, assessments, dialogues, workshops and trainings related to security and human rights focusing on a wide range of countries, including: Afghanistan, Algeria, Angola, Argentina, Australia, Azerbaijan, Bangladesh, Belgium, Bolivia, Botswana, Brazil, Burkina Faso, Canada, Chad, Chile, China, Colombia, Democratic Republic of Congo, Dominican Republic, Ecuador, Equatorial Guinea, France, Georgia, Germany, Ghana, Guatemala, Guinea, Haiti, Honduras, Indonesia, Iraq (including the Kurdistan Region of Iraq), Jamaica, Jordan, Kazakhstan, Kenya, Kosovo, Laos, Liberia, Libya, Malaysia, Mali, Madagascar, Mexico, Mongolia, Mozambique, Myanmar, Namibia, The Netherlands, New Zealand, Nigeria, Norway, Oman, Pakistan, Panama, Papua New Guinea, Peru, the Philippines, Poland, Qatar, Russia, Rwanda, Saudi Arabia, Sierra Leone, South Africa, South Sudan, Suriname, Switzerland, Tanzania, Thailand, Turkey, Uganda, United Arab Emirates, United States, United Kingdom, Vietnam, Zambia, and Zimbabwe.

For the purposes of this summary report, Participant activities in the following countries are described below: Colombia, Indonesia, Ghana, Peru, South Africa, and Tanzania.

## 10. Engagements with stakeholders on country implementation

### Colombia

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

Participants in several Pillars reported participating in a May 2013 workshop on the Voluntary Principles and the U.N. Guiding Principles on Business and Human Rights that was held in Cartagena, Colombia.

Members of the Corporate Pillar also discussed efforts to implement the Voluntary Principles in the context of their own operations in Colombia. One member of the Corporate Pillar reported that it had engaged with several members of the NGO Pillar in 2013 to conduct a joint risk assessment at the site of its operations in Colombia. The company observed that this assessment had been a valuable exercise as it had identified gaps and generated recommendations for an action plan to address deficiencies.

Another member of the Corporate Pillar reported that it had designed a operational procedure for implementing the Voluntary Principles in Colombia which included risk assessments of both risks to the company and risks to local communities. The company reported that the primary lessons that it has learned in the context of its Colombian operations are that it is important to make agreements with public security providers known to local communities and that it is important to inform communities about the company’s commitment to operating with respect for human rights.

A member of the Corporate Pillar reported that it had conducted risk and impact analyses of its existing and planned operations in Colombia including an examination of security and human rights-related issues. The company also reported that it was working to assess implementation of the Voluntary Principles in Colombia using a set of performance indicators developed in collaboration with a member of the NGO Pillar.

One company reported that it had coordinated with a Colombian extractive sector company to form a working group dedicated to Voluntary Principles implementation at one of its operating locations in Colombia. The working group is focused on risk analysis, training, and due diligence.

Another company reported that it had rebid its contract for a private security contractor in Colombia in 2013. During the re-bidding of the contract, private security providers were required to include the following provisions in their proposals:

- policies, programs, and internal management procedures that allow the bidding company to operate in a manner consistent with human rights, international humanitarian law, and the Voluntary Principles;
- policies, programs, and procedures that promote the welfare of stakeholders while providing for the continuity of operations;
- demonstrations of the existence and operation of grievance mechanisms for both internal and external stakeholder to enable prompt and efficient responses to allegations with regard to human rights; and
- training programs covering human rights, international humanitarian law, and the use of force.

A member of the Corporate Pillar reported that, it had included clauses specific to the Voluntary Principles, human rights, and international humanitarian law in agreements signed with the Colombian Army, the National Police, and the Attorney General's Office in 2013. Another member of the Pillar reported that it had financed the completion of a 100-hour course on human rights and international humanitarian law for Colombian Army officials.

A member of the NGO Pillar reported that it had worked with companies in Colombia to implement a set of Voluntary Principles performance indicators. The NGO also reported that it had worked to facilitate dialogues between companies and public security providers regarding the Voluntary Principles. Finally, the NGO reported that it had conducted trainings for army and police personnel in Colombia, as well as for judicial authorities and embassy staff.

Another member of the NGO Pillar reported that it had convened a regional conference on the Voluntary Principles in Colombia in June 2013. Attendees at the conference came from Argentina, Brazil, Peru, Colombia, Guatemala, Peru, Panama, and Guatemala. The conference was part of an initiative funded by a member of the Government Pillar to reduce levels of violent conflict associated with extractive sector projects and natural resources management.

Several members of the NGO Pillar reported that they had conducted security and human rights risk assessments in Colombia for members of the Corporate Pillar.

### **Ghana**

Participants in several Pillars referenced participation in roundtables and workshops on the Voluntary Principles organized in Ghana by a member of the NGO Pillar during 2013.

Members of the Government Pillar referenced bilateral and multilateral efforts to encourage Ghana to join the Voluntary Principles Initiative. One member of the Government Pillar referenced a demarche to Ghana's Minister of Land and Natural Resources, encouraging Ghana to join the Voluntary Principles Initiative. Another government referenced financial



support for a study conducted by member of the NGO Pillar to assess awareness of the Voluntary Principles in Ghana.

One member of the Corporate Pillar reported that its Ghanaian operations had undertaken an effort to raise awareness about the Voluntary Principles in the context of the company's security arrangements. The company noted that it had included the Voluntary Principles as one of the discussion points in its consultations with traditional authorities and local government authorities in Ghana. The company also reported that it had briefed the Ghanaian Petroleum Commission on the Voluntary Principles and encouraged the Commission to promote the Voluntary Principles within the country.

Another member of the Corporate Pillar reported that it had provided training on the Voluntary Principles to its employees, its security staff, law enforcement personnel, and military personnel in Ghana. During 2013, 75 corporate security employees, 1,292 security contractors, and 43 government security officers completed the annual human rights and Voluntary Principles training. The company also reported that it requires all contract security companies in Ghana to maintain specific language in their contracts detailing how they will train their personnel on the Voluntary Principles.

A member of the NGO Pillar reported that it had undertaken a multi-stakeholder survey in Ghana in 2013 in order to establish baseline information regarding awareness and implementation of the Voluntary Principles. The survey solicited information from government bodies, host communities, civil society organizations and extractive sector companies.

A member of the NGO Pillar reported that it had held two workshops in Ghana regarding the Voluntary Principles in June and October 2013. The NGO also reported that it had convened multi-stakeholder dialogues regarding the Voluntary Principles in cooperation with the Ghana Commission on Human Rights and Administrative Justice. These dialogues were held in August and November 2013.

### **Indonesia**

Several members of the Government Pillar referenced meetings with representatives of the Government of Indonesia at which they discussed Voluntary Principles implementation and participation. One member of the Government Pillar reported that it had sought to have the Voluntary Principles referenced in an official question at the annual European Union-Indonesia Human Rights Dialogue. Members of the Government Pillar also referenced support for the Indonesian Center for Ethics ("ICE") and its efforts to raise awareness regarding the Voluntary Principles within Indonesia.

A member of the Corporate Pillar reported that it had focused on enhancing the communication channels between village security personnel, local government, and the local police in Indonesia during 2013. Another member of the Corporate Pillar also reported that it

was supporting a program to enhance communication between and relationships with local village leaders, communities, and other stakeholders near its operations in Indonesia.

Several members of the Corporate Pillar reported that they had provided training on the Voluntary Principles for all security personnel assigned to Indonesia operations in 2013. One company reported that it had also provided training on the Voluntary Principles to the police assigned to its Indonesia operations. Another company reported that training for its contract security guards had been provided by the Indonesian National Human Rights Commission, while training for company employees and management had been provided by ICE.

Another company reported that it had facilitated several activities to promote the Voluntary Principles with local police in Indonesia, including joint exercises between the company's security personnel and local police. The company reported that training was a significant area of focus for its Indonesian operations, and noted that it had provided training for 30 Army officers and 104 police officers in 2013. It also reported that joint exercises had provided opportunities to test civil disturbance management plans and procedures and adherence to the Voluntary Principles in volatile crowd situations. Another member of the Pillar reported that it had provided training on human rights and the Voluntary Principles to 1,488 police and military personnel in Indonesia in 2013.

A member of the Corporate Pillar reported that it had held several meetings with the Indonesian Human Rights Commission in 2013, and that it had engaged in meetings with community leaders, partner organizations, and local authorities to discuss Voluntary Principles implementation.

One company stated that, in 2013, it entered into a revised Memorandum of Understanding with the provincial commander of the national police in the province where its Indonesian affiliate has operations. The Memorandum of Understanding details the working relationship between the company and the public security personnel, including areas of support, coordination and commitment to the company's policies and procedures, including business ethics and human rights. The Voluntary Principles are incorporated by reference and included as an attachment to the Memorandum of Understanding.

Finally, a member of the Corporate Pillar reported that it had used the KPIs to conduct a review of its operations in Indonesia.

## **Peru**

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

Several members of the Government Pillar stated that they had engaged in discussions with representatives of the Government of Peru regarding Peru's potential participation in the

Voluntary Principles Initiative. One government reported that its Minister of Foreign Affairs had met with the Peruvian Prime Minister in order to encourage Peru to join the Voluntary Principles Initiative. Another government reported that it had hosted a dinner at its embassy in Lima in order to discuss the Voluntary Principles with senior representatives of the Government of Peru.

A member of the Corporate Pillar reported that it was an active participant in the Security Committee of the Sociedad Nacional de Minería Petróleo y Energía (“SNMPE”), an association of extractive sector and gas companies in Peru. In the context of its participation, the company has sought to promote the Voluntary Principles. The company also participates in the Voluntary Principles Working Group in Peru in order to promote best practices and to encourage the Government of Peru to join the Voluntary Principles Initiative.

One company reported that it had conducted outreach in 2013 at its mine site in Peru to increase promotion of the Voluntary Principles with security employees, contractors and host government security personnel working in the project area. Another member of the Corporate Pillar reported that it had hosted a multi-stakeholder workshop on the Voluntary Principles in Peru in October 2013.

A member of the Corporate Pillar reported that it was working to promote engagement between security personnel and community members near its operations in Peru. The company has hosted several community events meant to lower fears and build trust. Another member of the Corporate Pillar reported that, after conducting an assessment of its implementation of the Voluntary Principles in Peru, it implemented an improved grievance management system at one of its operating locations in the country.

One company reported that its Peruvian operations had provided four different Voluntary Principles training modules for employees, contractors and government personnel in 2013. The company delivered the training to 34 security employees, 1,260 contractors, and 6,206 police personnel. Another member of the Pillar reported that members of its Global Security, Communities & Social Performance, and External Affairs teams had conducted a site visit to Peru to better assess security risks, potential sources of conflict, and to implement integrated risk management plans.

A member of the NGO Pillar reported that it had worked with a member of the Corporate Pillar to help implement both the Voluntary Principles and the U.N. Guiding Principles on Business and Human Rights in the context of the company’s Peruvian operations. The NGO reported that this work included trainings for company personnel and for private security providers.

A member of the NGO Pillar reported that one of its member organizations had been involving in leading and facilitating the Voluntary Principles Working Group in Peru. The Working Group meets every quarter, and the Steering Committee of the Working Group every two weeks. As part of this work, the NGO and its member organization had helped to set

strategy for the Working Group and to identify ways to better promote the Voluntary Principles. The NGO and its member organization have also undertaken an effort to evaluate the state of security in the Peruvian extractive sector within the framework of the U.N. Guiding Principles on Business and Human Rights.

A member of the NGO Pillar reported that it had been involved in an initiative funded by a member of the Government Pillar to reduce levels of violent conflict associated with extractive sector projects and natural resources management in Peru.

### **South Africa**

Several members of the Government Pillar reported that that they had been engaged in active outreach to the Government of South Africa during 2013. One member of the Government Pillar noted that it had worked with several other Government Pillar Participants to develop strategies for current and future outreach to South African officials. Another member of the Government Pillar reported that it had held meetings with the South African Department of Mineral Resources and the Department of International Relations and Cooperation in order to promote the benefits of Voluntary Principles implementation and participation in the Voluntary Principles Initiative.

One member of the Corporate Pillar reported that its global security team had visited South Africa in 2013 in order to update the security risk register and evaluate the existing security risk mitigation strategies. The company noted that the security risk level at its operating location in South Africa had increased significantly during 2013 and that the global security team had provided immediate support to local site managers and security personnel, including intensive training focused on human rights and the proper use of force. The company also reported working with a member of the NGO Pillar to provide an intensive five-day train-the-trainers workshop on the Voluntary Principles to personnel in South Africa.

Another member of the Corporate Pillar reported that, during 2013, it provided internal training and guidance on the Voluntary Principles to South Africa personnel at all levels of the company. The company noted that it also provided training to its private security contractors.

One company reported that it used a mix of police and private security personnel in the context of its operations in South Africa. The company noted that its contract with its private security provider includes clauses related to the Voluntary Principles and to use of force.

One member of the Corporate Pillar reported that it had conducted two risk assessments in South Africa in 2013. A company also reported that, in 2013, it had conducted an internal governance audit of its policies and procedures to address security and human rights-related risk in the context of its operations in South Africa.

Another company reported that its South African operations had conducted a comprehensive analysis of Voluntary Principles implementation, working in partnership with a

member of the NGO Pillar. The results of the analysis were discussed in a cross-functional in-country workshop which led to the adoption of a number of recommendations. The company's South Africa operations also recently drafted detailed guidance materials on the Voluntary Principles.

Finally, a member of the Corporate Pillar reported that it had included the Voluntary Principles in training provided to its leadership personnel in South Africa and its induction training for new South African personnel.

A member of the NGO Pillar reported that it had worked with a member of the Corporate Pillar to conduct trainings on the Voluntary Principles and the U.N. Guiding Principles on Business and Human Rights for company staff in South Africa. The staff that participated in these trainings included members of the security, government relations, social performance, and community engagement departments.

A member of the NGO Pillar reported that it is working to engage representatives of South African civil society organizations in dialogue regarding the Voluntary Principles in order to build support for an in-country implementation process.

### **Tanzania**

Members of the Government Pillar reported on efforts to coordinate with other Participants on outreach to the Government of Tanzania regarding the benefits of Voluntary Principles participation and implementation. One member of the Government Pillar reported that it had raised the Voluntary Principles in meetings with Tanzania's Foreign Minister. The government also reported that it was engaged in discussions with a member of the Corporate Pillar regarding how best to coordinate outreach efforts to Tanzania.

A member of the Corporate Pillar reported that it had undertaken a substantial revision of its stakeholder engagement strategies in Tanzania in 2013, specifically with regard to public security. The company reported that this shift in approach had substantially decreased the numbers of allegations and incidents associated with security and human rights concerns.

Another member of the Corporate Pillar reported that it was piloting a "Human Rights ambassador program" in Tanzania. Through the program, training on human rights and the Voluntary Principles is provided to a broad range of non-security employees.

One company reported that it had provided human rights training to the police officers used to escort corporate personnel traveling throughout the country. The company also noted that it had provided Voluntary Principles training to members of the Tanzanian military who provide security for the company's operations. The company noted that it had held meetings with senior members of the Tanzanian military to discuss this training and to emphasize the importance of Voluntary Principles implementation.

A member of the NGO Pillar reported that it operates two field offices in Tanzania. Its work in Tanzania has addressing the way that communities, the police, and extractive sector companies deal with conflict. The NGO provides trainings on conflict resolution and helps to engage marginalized groups with the community. The NGO reported that it had conducted 89 training sessions for local police on Tanzania in 2013, reaching 1664 officers. It also reported that it had conducted 39 training sessions for community leaders, reaching 298 key decision-makers.

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

Many members of the Corporate Pillar provided specific information on efforts to incorporate the Voluntary Principles into contracts with private security providers and Memorandums of Understanding with public security providers. Several members of the Pillar reported that it is now mandatory within their companies to specifically cite the Voluntary Principles in contract language or reference them in Memorandums of Understanding.

Several companies reported that they require private security providers to be signatories to the International Code of Conduct. One company reported that, in addition to the Voluntary Principles, it incorporates the following standards into arrangements with public security forces: the United Nations Basic Principles on the Use of Force and Firearms for Law Enforcement Officials and the United Nations Code of Conduct for Law Enforcement Officials.

One member of the Corporate Pillar reported that it had developed a scorecard to evaluate local private security providers against the Voluntary Principles. During 2013, the company used this scorecard as part of a self-assessment process conducted in collaboration with private security providers and public security forces. The goal of the self-assessment process was to enable better implementation of the Voluntary Principles in the selection process for security providers.

A number of companies reported that the Voluntary Principles were included in the selection criteria for new security providers. One company reported that it had recently engaged a civil society organization with human rights expertise to help it develop a questionnaire for screening potential security providers.

One member of the Corporate Pillar reported that it asks all of its sites to only engage with private security personnel that have been approved by its global security team. In order to be approved, private security providers are subjected to a rigorous procurement process, including background screening and training on the Voluntary Principles.

One company reported that all third-party suppliers are provided training with regard to human rights and the Voluntary Principles. The company also stated that all government

security personnel are provided with briefings on the Voluntary Principles before they are deployed in the context of the company's operations.

Another member of the Corporate Pillar reported that it had a specific procedure to guide decisions to engage public security agencies. Prior to any engagement, the company must carry out due diligence using external specialists. This due diligence includes a review of external human rights reports and the national laws that regulate the conduct of public security agencies, particularly in such areas as the use of force, treatment of apprehended persons, and incident review processes.

Another member of the Corporate Pillar reported that any decision to provide support to public security forces must be approved by the global head of security and the company's Executive Committee. Support must be limited to accommodation, offices or storage facilities, basic living necessities, transportation, non-lethal equipment, and non-military/police style training support. The support must also be part of a written protocol between the corporate site or project and the relevant public security organizations. This protocol must be consistent with the company's guidelines on security and human rights.

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

*Government Pillar*

Members of the Government Pillar reported on activities taken in conjunction with their participation in the Outreach and Implementation Working Group, including the development of national action plans for outreach to specific countries. Governments also referenced specific efforts to engage their missions and embassies in outreach to specific countries. These efforts included delivering training to diplomatic personnel as well as providing outreach tools such as fact sheets and other guidance materials. Governments also reported that they had conducted outreach to specific companies that are not yet Participants regarding the benefits of Voluntary Principles participation and implementation.

One member of the Government Pillar referenced efforts to meet with all companies based in its jurisdiction to discuss the Voluntary Principles Initiative and Voluntary Principles implementation.

*Corporate Pillar*

Many members of the Corporate Pillar reported on a range of different training initiatives undertaken in 2013. One member of the Corporate Pillar reported that it had utilized a train-the-trainers model at several operating locations in order to ensure the sustainable transfer of knowledge in in case of security personnel turnover.

### *NGO Pillar*

Members of the NGO Pillar reported on efforts to provide Voluntary Principles training as well, often in partnership with members of the Corporate Pillar. One member of the Pillar reported that it had worked to engage stakeholders throughout Latin America in dialogue regarding the Voluntary Principles. The NGO also reported that its Executive Director had made a presentation on the Voluntary Principles to representatives of the extractive sector in Colombia at the request of the U.N. Global Compact Office for Latin America.

Another member of the Pillar stated that it had promoted security and human rights training in the context of its work with the ITRI Tin Supply Chain Initiative. The NGO also reported that it had worked with another member of the NGO Pillar to promote awareness of security and human rights concerns in both the Democratic Republic of Congo and Rwanda.

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

Several members of the Corporate Pillar reported that they had worked to pilot the KPIs that had been developed by the KPI Volunteer Group and that this had helped to pinpoint strengths and weaknesses with regard to implementation of the Voluntary Principles. One company reported that, as a result of its work piloting the KPIs, it had worked to develop processes to better track and monitor its implementation of the Voluntary Principles in 2013. The company also reported that it had worked to improve communication between social performance and security personnel.

One member of the Corporate Pillar reported that it had developed an internal security governance group to audit specific elements of the company's implementation of the Voluntary Principles. Each internal audit produces an action plan, as necessary, to address any identified concerns. Corporate security personnel track implementation of action plans. The company also reported that many of its sites are required to have annual or bi-annual independent Voluntary Principles and human rights assessments conducted by an independent external assessor. In 2013, 11 independent assessments were conducted.

One company reported that a corporate review panel guided the implementation of the company's incident reporting and management standards. This panel has identified remedial actions and help to engage regional- and operational- level personnel in discussion about implementation of improvements.

One member of the Corporate Pillar reported that, in 2013, it had conducted an internal gap assessment and assurance review of its progress in implementing the Voluntary Principles at the corporate and field levels. Another company reported that it had conducted a gap analysis of its security and human rights program in 2013. Finally, a member of the Pillar reported that it had engaged two civil society organizations to provide independent feedback on the company's implementation of human rights training at one of its sites.



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

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

##### **Outreach**

- Participants need to broaden the appeal of the Voluntary Principles Initiative through efforts to promote the economic and trade benefits of participation.
- There is a case for showing that the Voluntary Principles are a tool that may contribute to prevent conflict around the extractive sector through the provision of a space for enhanced dialogue.
- It may be beneficial to adopt a staged approach to government outreach. We can best fulfill the ultimate goal of broadening implementation of the Voluntary Principles by targeting outreach in phases – awareness, endorsement and then membership. Even where government membership is unlikely, endorsement or understanding by governments can facilitate companies using the Voluntary Principles and therefore reduce the risk of conflict.
- Outreach is very sensitive to shifting political circumstances and internal resources in both Participant Governments and in priority countries. This has been challenging in a global environment of fiscal restraint, but a key lesson learned is to order these activities, and to maintain and update channels of communication in order to better seize opportunities for joint activities, and ensure that outreach is sustained when geopolitical realities become more challenging.
- To gain new members and to avoid Participants leaving the Voluntary Principles Initiative, it will be key to show and analyze the business case for implementing the Voluntary Principles, supported by evidence of the positive impact of implementation, including in the prevention of conflicts.
- NGO participation in the Voluntary Principles Initiative should be increased so that the Initiative does not lose its credibility.
- In 2013, the Voluntary Principles Initiative has had to say goodbye to leading human rights advocacy NGOs, while most of the NGO participants that have joined are specialized in constructive engagement. This has upset the diversity balance within the NGO pillar. At the same time, we are still waiting to welcome the first NGO from host countries. The

Voluntary Principles Initiative will have to become attractive for a wider variety of NGOs that it currently appears to be.

### **Engagement of Host Governments**

- Dealing with government security agencies continues to be a challenge, especially when those governments are not Participants in the Voluntary Principles Initiative. More bilateral discussions are required to facilitate dialogues with host governments.
- Cross-Pillar efforts to conduct outreach and implement the Voluntary Principles are critical because, ultimately, successful implementation of the Voluntary Principles requires collaboration and the active participation of all three Pillars. Host governments also need to be brought into the Voluntary Principles Initiative, given their role as sovereign authority over their own national police and military forces.
- The role of national governments in the implementation of the Voluntary Principles must be elevated for the continued success of the Principles. Many issues faced by rural communities stem from a lack of government buy-in and support. Where governments are absent or lack the capacity to provide social services, companies are looked upon as a surrogate to provide social service support. This is not only impractical, but also creates tension between the company and communities. To help manage and set the proper expectations, the Voluntary Principles Initiative and its Participants must better engage governments at all levels.
- Challenges with persuading some host governments to sign security agreements that incorporate Voluntary Principles considerations persist. A company's ability to finalize such agreements is weak. In the absence of finalized security agreements, companies may endeavor to establish a memorandum of understanding on security issues that includes respect for the Voluntary Principles.

### **Assurance**

- The development of greater accountability standards is important. This should be done in ways that maintain the accessibility of the Voluntary Principles Initiative and that avoid creating barriers to participation.
- Verification is important to ensure to the satisfaction of both Voluntary Principles Initiative Participants and the public that companies are meeting their commitments under the Voluntary Principles. It is also a key component of Voluntary Principles implementation and critical to making the Voluntary Principles Initiative sustainable in the long term.
- The Voluntary Principles Initiative should ensure practical implementation of the Voluntary Principles, strengthen accountability and collect evidence of its positive impact on the

ground. Moving forward with the benefits and outcome assessment will be key to this effort.

### **In-Country Implementation**

- A flexible approach to implementation, and one that recognizes that implementation strategies are not “one size fits all,” is important.
- As one gets closer and closer to the operational level, the high-level language of the Voluntary Principles can lose relevance and may even be potentially harmful. Military and police officials, for example, do not necessarily need to be taught international humanitarian and human rights law, as much as they need to be trained about proper behavior, use of force, and command and control. Additionally, showing military and police officials respect and discussing their needs and expectations, as opposed to coming to them with packaged training materials, provides more traction.
- Implementation requires engaging directly with public security forces, which are often the source of many of the problems that the Voluntary Principles Initiative seeks to address. At the same time, these public security agencies are perhaps the most neglected stakeholders in the Initiative.
- It is important to have all three Pillars engaged in in-country processes. This requires creating appropriate roles, responsibilities, and rules of engagement for each Pillar.
- In the context of in-country processes, some in-country NGOs are more interested in addressing issues related to labor or environmental rights or social investment projects which may not be of direct relevance to the Voluntary Principles Initiative. If an in-country process is to involve NGOs, it is important to find a way by which these issues can be incorporated in to the discussions or find the appropriate spaces through which these topics can also be addressed.
- One of the biggest challenges working in rural areas is creating an efficient and effective communication mechanism which allows not only for proper dissemination of information, but also adheres to each community’s unique culture. Not following proper chain of command within tribal or community customs can be devastating for an external actor looking to connect and create positive relationships. Entering into these relationships must never be rushed; consultations should involve many actors to ensure that true representatives are being engaged. In general, it is necessary to have field staff who are seen as trustworthy and impartial members of the community. Extensive training on local customs and “do no harm” is recommended before communication strategies are implemented.

### **Implementation: Management Systems**

- Once corporate leaders have been provided information regarding the Voluntary Principles, they continue to express interest in Voluntary Principles implementation. They understand that Voluntary Principles implementation promotes, rather than obstructs, business.
- Efforts to implement enhanced stakeholder engagement programs and “community enhanced security” have reduced the number of security and human rights incidents despite an overall increase in general crime statistics in certain operational locations.
- Use of appropriate checklists ensures uninterrupted and professional monitoring of Voluntary Principles implementation by private security providers.
- An increased degree of communication and cooperation between security, legal, and sustainability and external relations departments has aided in the coordination of efforts on Voluntary Principles implementation.

### **Training**

- Using a third party to provide Voluntary Principles training inspires and cultivates a sense of responsibility in staff and security personnel.
- A combination of training sessions, briefings, workshops, seminars, community events and exercises appear to contribute to continuous improvement. These activities improved relationships with private and public security as well as the communities and other stakeholders.

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

- The Voluntary Principles Initiative has to build on the momentum created by the current international developments in the field of business and human rights to further develop the VPI and seek complementarities with other initiatives. It is particularly important to highlight the added value of the Voluntary Principles as a means to implement the U.N. Guiding Principles on Business and Human Rights. Implementation of the Voluntary Principles Strategy (2013-2016) will help ensure consistency with the U.N. Guiding Principles.
- The Voluntary Principles Initiative cannot isolate itself from the principal international standard on business and human rights, namely the U.N. Guiding Principles on Business and Human Rights. Integrating the U.N. Guiding Principles in to the work of the Initiative is paramount for credibility of the Initiative as well as for its attractiveness to new Participants. The way forward is to: (1) include the state duties set forth in the Guiding in the responsibilities of Government Participants; (2) make effective remedy provision a

performance criteria for both Government and Corporate Participants; and (3) strengthen internal and external assurance mechanisms.

- Participants need to continue to work to close the gaps that exist between the Voluntary Principles Initiative and the U.N. Guiding Principles. Specifically, there needs to be greater accountability and transparency, improved quality of reporting, a more effective space for sharing best practice and discussing challenges, and more opportunities for involving affected communities.
- The Voluntary Principles Initiative's greatest strength lies in its ability to serve as a platform for candid discussion and collaboration around shared objectives, including successes and challenges experienced during implementation.
- The Voluntary Principles Initiative continues to be a top-down initiative that has failed to acquire a decisive bottom-up dimension. More often than not, people whose lives are affected by large projects are not aware of the Voluntary Principles or their contribution to security and human rights. The value of the Voluntary Principles Initiative depends on the outcome of local processes, which only rarely have a truly tri-partite dimension. A disconnect between what the Voluntary Principles should deliver and what they are seen to deliver by local communities is unacceptable and undermines the credibility of all NGO engagement.
- Other sectors, beyond the extractive sector, experience similar security and human rights issues and can benefit from implementation of the Voluntary Principles.