

## HIGH LEVEL POLICY

### Montreux Document Compliance

Aegis is a dedicated supporter of regulation, transparency and accountability of the Private Security Industry and welcomes the international agreement on the “*Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security Companies During Armed Conflict*” (“Montreux Document”) created in association with the ICRC and the Swiss Initiative in September 2008. The Montreux Document was developed with the participation of government and industry experts and agreed by 17 States including the US, the UK, Iraq and Afghanistan.

Aegis is committed to assisting and ensuring compliance with the legal obligations and best practices of States, whether Contracting, Territorial or Home and welcomes the opportunity to work closely with these States to ensure they meet their responsibilities. Aegis is at the forefront of dialogue in its own Home State via the BAPSC to encourage the UK authorities to regulate and/or recognise the principles of the Montreux Document within UK law.

We aim to support the States within whose territory we operate (Host Nations), the States that contract us (our Clients) and the UK Government as our Home State in meeting their obligations and good practice recommendations under the Montreux Document. Aegis understands that this compliance must take into account the inherent risk associated with the services provided and ensures that Aegis conforms to all relevant national law and international humanitarian law including human rights law.

The Montreux Document, whilst an internationally recognised non-binding multi-lateral agreement, suggests guidelines on a voluntary basis for companies involved in worldwide provision of security. Aegis encourages and promotes States’ obligations and best practice by complying with and furthering the requirement of those guidelines through the following policies:

#### **1. Compliance with International Criminal Law, International Humanitarian Law, Human Rights Law and Host Nation Law.**

One of the strongest tones to come from the Montreux Document is compliance with International Criminal, Humanitarian and Human Rights Law together with Host Nation Law. Aegis recognises the need to educate its personnel about these areas of law and provides training for its staff and legal oversight of its contracts to ensure compliance. Aegis recognises and follows Host Nation laws of all the countries it is currently working in and maintains close working relationships with the relevant ministries of those countries. Aegis has a policy of accountability and no law may be violated when conducting business for or on behalf of Aegis without penalty. Aegis maintains an extensive Code of Conduct on compliance with, amongst other things, International Criminal, Humanitarian and Human Rights laws together with ethical practices policies against bribery and corruption to ensure any that participation in illegal acts including unethical payments, business dealings, bribery or money laundering is not tolerated at any level.

#### **2. Review and Audit**

Aegis is ISO 9001:2008 certified and requires regular reviews and audits of its existing internal controls and internal governance procedures to ensure best practices as followed. Aegis’ reviews and audits seek to identify focus areas and to maintain quality assurance of its policies and procedures to guarantee conformity with national and international legal obligations. Aegis employs dedicated internal auditors on large contracts to ensure compliance with external and internal policies and obligations.

### **3. Transparency and Accountability**

Aegis is committed to transparency and accountability in all areas of our operation. Aegis adheres to a strict Code of Conduct and business ethics and ensures all business operations in Host Nation States are carried out in conformity with national business regulations. Aegis' due diligence policy ensures that no conflicts of interest or association exist with contracting parties that might compromise our integrity as a private security provider.

### **4. Authorisation to perform**

Aegis ensures we achieve the correct identification and authorisation in performance of our services in all areas of operation, these include providing the necessary financial and economic undertakings. The Company is committed to strict adherence of the rules and governing laws of the authorisation and operating licenses in accordance with the national laws of the Host Nation State. Aegis follows best practice procedures expected of the profession and is licensed to practice under the jurisdiction of each country in which we operate. Aegis is authorised to undertake operations within the territories of Afghanistan, Iraq, the UK and the US as well as China on a consultancy basis.

### **5 Acquisition of Equipment**

Aegis takes pride in ensuring lawful acquisition and subsequent use of equipment, in particular weapons and other licensable equipment, consistent with our international and national legal obligations. Aegis' internal guidelines ensure 3 independent suppliers are sourced for any procurement and due diligence is undertaken on all new suppliers. Aegis is a registered Section 5 firearms holder and firearms dealer in the UK. When providing weapons to operations worldwide, Aegis adheres to the export and import restrictions and requirements placed domestically and internationally, and ensures compliance with weapons non-proliferation treaties and other trade related sanctions. In addition, Aegis always observes Host Nation law and any additional requirements imposed by Clients for purchase of equipment and weapons.

### **6. Welfare of Personnel**

Aegis continually endeavours to meet the highest standards regarding the welfare of our personnel. Aegis provides all personnel recourse to support staff, competitive pay, the best available equipment, accommodation and life support whenever deployed. Aegis acknowledges that hostile environments carry high risk and potential dangers and has developed an "Operational Risk Management Policy" to assist all deployed personnel. Aegis has in place practices that prevent People Trafficking activities including performing our own recruitment and where this is not possible, undertaking due diligence on recruiting companies utilised by Aegis. These policies ensure that any persons recruited are not being coerced, tricked, blackmailed or otherwise pressured into accepting employment or conditions that would fall under the definition of People Trafficking. In addition, third country nationals recruited by Aegis receive contracts in their native language. Health and safety is a key driver in maintaining our professional standards given the environment Aegis functions in, and this is overseen by dedicated staff members.

### **7. Selection and Training of Personnel.**

Aegis' selection criteria on their recruited personnel requires a minimum standard well above industry standards, and always reflects the specific requirements of the contract and the Clients they are recruited for. These standards take account of age, experience, relevant qualifications and past documented performance. In addition, Aegis places all personnel through extensive induction training and provides monthly continuation training along with promotional and additional skills training courses. Aegis coordinates and monitors expatriate vetting and ensures that all UK

nationals are cleared to NATO Secret level and all other NATO/Coalition nationals are asked to provide proof of their clearance. Aegis requires criminal record checks to confirm there are no previous convictions for serious offences or any offences that have occurred in the last 5 years and treats such convictions as a bar to recruitment. Former military personnel are not employed with anything less than 'very good' conduct. Aegis conducts ongoing performance reviews for all personnel and we affirm that no personnel are authorised to carry arms without receiving the requisite training on weapons systems and Arming Authority clearance. Aegis ensures that only personnel who require to be armed are armed and all armed personnel are fully informed on the rules for the use of force, graduated use of force and weapons training together with International Humanitarian law, Human Rights law and Host Nation law. Records of these processes are maintained to the highest standard. Aegis places command responsibility on its management and requires not only the highest levels of supervision but also maintains a performance reporting programme on its personnel.

## **8. Internal Organisational Structure and Regulation**

Aegis' internal regulation and organisation ensures the existence of monitoring, supervisory as well as internal accountability mechanisms for both our personnel and the Company itself. The Company is committed to maintaining accurate and up to date personnel and property records and developing accountability mechanisms to ensure that no improper and unlawful conduct by personnel is tolerated at any level. Aegis operates its own internal Board of Inquiry process following the occurrence of significant incidents. Results of this process include recommended courses of action and where required discipline of culpable persons. When required Aegis submits to external agency audits and cooperates fully with documented evidence of this process retained. Where identified, Aegis will terminate contracts, impose financial penalties and where required request assistance from higher investigative authorities. When recruited, all individuals are contracted and requested to accept terms that make it clear Aegis will not tolerate practices that amount to bribery or corruption, that all personnel accept Host Nation law and agree to comply with all RUF, Military Instruction, US and UK law and International Law. Aegis recognises the need for a strong leadership and discipline structure and actively practices a policy of internal discipline and investigation.

## **9 Cultural Integration.**

Aegis reaches out by creating projects that interact with Host Nations. The Aegis Foundation provides civil assistance to programmes in areas of need within the countries Aegis operates in. Aegis prides itself on not only bringing security to the environments it works in but attempts to give to the community basic functions to exist where destroyed by conflict.

## **10. Operational Performance**

Aegis prides itself on the professionalism of its operators. Observance of client needs with the need to observe Host Nation regulations and competing environmental threats are always paramount in the management and operator's minds. These principles are installed through training and experience and include using force only where absolutely necessary,

Aegis recognises the complexities of the industry in which we operate and supports the progression in strengthening the regulatory environment of the Private Security Industry. Aegis prides itself on its reputation and aims to be at the forefront of efforts to develop and promote a shared understanding of good practices, codes and common guidelines for the contract and management of Private Military and Security Companies and looks to the Montreux Document as a step towards regulation and accountability of industry providers. Aegis is actively engaged with the Geneva Centre for the Democratic Control of Armed Forces (DCAF) in developing a Code of Conduct for the industry.