

Directive

Security Services with Integrity (SSI)

February 28 2022

Overarching principles

Holcim is committed to the protection of our People, Environment, Assets, and Reputation (PEAR)¹ through a risk-based approach, with the security of people – including communities interacting with our operations– taking priority over all other activities.

Security Services² (private security providers (PSPs), public security forces (PSFs), and armed non-state actors (NSAs)) are relied on only as a last resort and must be selected / managed in a structured manner with professionalism and integrity in line with all applicable laws and regulations³.

Any engagement of security services must systematically identify, assess, prevent, and mitigate associated human rights (HRts) risks to all internal / external stakeholders.

When engaging security services, each Holcim Country CEO (CCEO)⁴ is accountable for adhering to the following overarching principles:

- Respect for human rights
- Lethal weapon / firearm-free environment⁵
- Assessment of risks⁶ and cross-functional risk mitigation
- Cross-functional and community-based security management
- Avoidance of the use of force
- Use of proportional force to risk level faced
- Alignment with Procurement and Compliance processes⁷
- Reporting and investigation of human rights abuses/violations
- Collection and verification of allegations of human rights abuses/violations (grievance mechanism) and provision of adequate remedy
- Continuous improvement.

¹ Refer to the *Security & Resilience Policy*.

² Refer to the Group Security & Resilience (GS&R) online glossary for definitions of the terms used in this Directive like PEAR, Security Services, PSP, PSF, NSA, armed NSA, security guard, lethal weapons, major site, etc.

³ Refer to the *Human Rights and Social Policy* - salient human rights risk "Security-related abuses and violations".

⁴ Or, when there is no CCEO appointed, the most senior member of the local entity(ies).

⁵ Exceptions to be managed via the *Lethal Weapons/Firearms Site Waiver Request Form*. Refer to Footnote 10.

⁶ *Country Threat Assessments*, *Country* and possibly *Site Security Risk Assessments (SRA)*, and the *SSI Sub-Risk Assessment (3-year validity)* using the SRA Tool.

⁷ Including compliance with the *Holcim Code of Business Conduct*, *Holcim Code of Business Conduct for Suppliers*, the *Sustainable Procurement Policy*, and the use of the *Third-Party Due Diligence (TPDD) Tool*.

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All engagement must follow these approval levels, in the order listed below:

- For PSP engagement, without lethal weapons⁸: by the CCEO and Group Security & Resilience (GS&R),
- For PSP engagement with lethal weapons and/or for active PSF engagement⁹, requiring a *Lethal Weapons/Firearms Site Waiver Request Form*¹⁰: by the CCEO, GS&R, Region General Counsel, and Region Head,
- For armed NSA engagement¹¹: by the CCEO, GS&R, Region General Counsel, Group General Counsel, and Region Head

The SSI Programme applies to Countries¹² where:

- Security guards are directly employed by Holcim or contracted via PSPs, and/or
- PSFs are actively engaged/deployed to protect Holcim people and assets, and/or
- Armed NSAs control some areas in which Holcim operates.

Implementation

Engaging Security Services (PSP, PSF, armed NSA)...

- Avoid engagement when there is no security risk, relying on Security Services only as a last resort.
- Strictly follow the *SSI Quick Checklist* and the *SSI Handbook*, using the *Decision-Making Tool* to decide on whether you need Security Services and, if yes, of which type.
- For in-scope countries¹², establish and roll out a training programme for / with adequate frequency:
 - Staff managing the engagement of Security Services / trained periodically,
 - Country ExCo members, Country functions representatives and major² sites' managers / at least yearly, and
 - Relevant newcomers to be inducted on SSI / within 3 months of arrival, while
 - Using the SSI e-Learning and other GS&R material available with regular face-to-face ad hoc presentations.
- Always promote expectations for respecting HRts.

... with Private Security Providers (PSPs)

- Engage PSP to provide preventative and defensive services only, as a primary option preferred to PSF.
- Select and contract PSP in accordance with Procurement and Compliance processes⁷. Require contracts to be reviewed by the Country General Counsel and to include a specific termination clause for non-compliance with the *International Code of Conduct for Private Security Service Providers (ICoC)*.
- Manage PSP and evaluate their performance against the ICoC, including internal HRts training and use of a grievance mechanism.

... with Public Security Forces (PSFs)

- Engage PSF as a secondary option (where allowed by law) after PSP engagement fails to adequately address security risks.
- Select PSF with set expectations for the respect of HRts. In high- and medium-risk countries¹³, jointly sign a Memorandum of Understanding (MoU)¹⁴ with PSF actively engaged⁹ to guide the provision of security for Holcim operations and reaffirm respect for the *Voluntary Principles on Security and HRts (VPSHR)*.

⁸ As defined in the *SSI Handbook*.

⁹ Active engagement means PSF have a relationship with Holcim beyond short-lived interventions following a specific incident (e.g. emergency response or legal investigation). This includes activities like extended deployment on site, provision of support, transport partnerships, etc. Distinguish between public forces being actively engaged/deployed to protect Holcim people and assets and public forces reacting to security incidents on Holcim sites.

¹⁰ As required per *S&R Policy* and in accordance with the *SSI Handbook*, a formal waiver is requested by the CCEO following the procedure outlined in the *Lethal Weapons/Firearms Site Waiver Request Form* and approved by the Region General Counsel and finally the Region Head in consultation with GS&R (1-year validity).

¹¹ See the specific section: [We do not engage armed NSAs](#).

¹² Referred to as countries being "in-scope for the SSI programme", cf. the *SSI Quick Checklist*.

¹³ Refer to the Human Rights related indices - Business Environment Risk Level outlined in the *Human Rights Directive* from the SD function.

¹⁴ If this proves impossible, follow the *SSI Handbook* and design a documented action plan with the ultimate aim of obtaining an MoU signature.

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- In case of any need to support PSF, consult the Legal & Compliance function and require a specific signed MoU, verifying that the provided support is nearly impossible to be used to directly violate HRts, time limited, and reversible.
- Manage PSF and evaluate their performance via regular consultative meetings with an identified and documented point of contact while monitoring PSF alignment with the VPSHR, including internal HRts training and use of a grievance mechanism.

... with armed Non-State Actors (NSAs)

- We do not engage armed non state actors.
- In the unlikely event of the need for any deviation from this rule, obtain the relevant time-bound formal exception approval from the Group General Counsel and the Region Head, after approval by GS&R, Region General Counsel, and any other required Group functions.

Reporting

- Countries must formally report via email within 24 hours any of the following situations to the Region Head, GS&R, and other relevant functions:
 - Presence of armed NSAs / Terror and Organised Crime¹⁵ within Holcim operating areas,
 - Use of force on Holcim premises and/or allegations of HRts abuses / violations committed by Security Services.
- Countries must formally report via email within 48 hours any of the following situations to the Region Head, GS&R, and other relevant functions:
 - Significant changes¹⁶ in a country's security context or the impact of security arrangements on people,
 - Significant changes in the deployment, activities or available equipment of PSPs and PSFs likely to change the risk profile of the relationship,
 - PSF misuse of provided equipment in violation of an MoU or use of Holcim equipment without consent.
- Countries must report incidents in the Security Incident Notification Tool (SINT) within a week.

Cross-Functional Response

- Collect, verify, and investigate all allegations of HRts abuses / violations by Security Services as per the *Human Rights and Social Policy* and the *Human Rights Directive*.
- Countries must share any allegation of a breach of the *Holcim Code of Business Conduct* immediately to Group Investigations via the *Integrity Line*, who will then supervise any investigation and follow-up actions.
- Countries must formally share substantiated allegations not involving a breach of the *Code of Business Conduct* via email (within a maximum of three months following all investigation of allegations) to Legal & Compliance, SD/HRts, GS&R, security service points of contact, and relevant authorities.
- Implement remedial action plans and ensure access to remedies for victims.

¹⁵ Refer to the *Terrorist & Organised Crime Monitoring Programme Directive*.

¹⁶ Two risk levels up in the Security risk matrix from the SRA tool or if deemed necessary.

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Country CEO Checklist

1. Implement control measures to protect our PEAR.
2. Consistently promote respect for fundamental HRts in communications with all stakeholders.
3. Adopt a cross-functional and community-based approach that respects and safeguards communities' HRts.
4. Assign and direct Country and Site Security Representatives to apply and promote the SSI programme.
5. Review all decisions to engage Security Services and provide approval only if there is a risk-based need with low risk of negative HRts impacts; seek the required next approvals at Group Level.
6. Do not engage armed NSAs.
7. Review and approve submitted *Lethal Weapons/Firearms Site Waiver Request Forms*.
8. Ensure all PSP contracts and PSF MoUs have been approved by the Legal Team.
9. Ensure that PSPs and PSFs are managed and their performance evaluated.
10. Inform (via email within 24 / 48 hours) the Region Head, GS&R and all other relevant functions regarding any matter requiring reporting and response; plan further steps and follow up on progress.
11. Ensure any allegation of a breach of the *Code of Business Conduct* is immediately communicated to GS&R and Group Investigations so that they can be properly investigated and remedial action plans implemented.
12. Ensure any allegations of HRts abuses / violations are investigated and remedial action plans implemented.
13. Ensure victims of HRts abuses / violations by Security Services engaged by Holcim can access remedies.
14. Constantly reassess the risks and mitigations. Adapt the engagement in order to avoid unacceptable HRts impacts, and request new approvals accordingly.
15. Ensure all relevant documentation can be provided upon request by a relevant internal or external agent.

Document Control

Approved by	Group Security & Resilience
Related Policy, Directives and MCS	Holcim Code of Business Conduct, Holcim Code of Business Conduct for Suppliers Holcim Human Rights and Social Policy, Human Rights Directive Sustainable Procurement Policy Security & Resilience Policy, Security & Resilience Management System, Terrorist & Organised Crime Monitoring Programme Directive Security Services with Integrity Quick Checklist, Security Services with Integrity Handbook, GLMR Human rights & force abuse Fiche and SOPs TPDD, fiches ITP 1/2/3/4, Third Party evaluation Scoring Criteria tool, Security Company Contract Award Handbook, Supplier audit protocol & checklist SSI eLearning Minimum Control Standard #1 - Communication and promotion of the Code of Business Conduct Minimum Control Standard #7 - Mitigation of business risks – Security Minimum Control Standard #30 – Supplier qualification

Version control

Version Number	Date Issued	Author	Update information
Initial version	December 18 2019	GS&R	
Update one	November 27 2020	GS&R	<ul style="list-style-type: none"> • Clarifying weapons free environment.
Update two	February 28 2022	GS&R	<ul style="list-style-type: none"> • Overarching Principles reshaped and aligned with the new HRts and social policy and the new HRts directive, • Alignment with new or updated processes, training material and tools linked to the SSI programme (e.g. ICoC and VPSHR, Lethal Weapons Waiver form, SSI sub-RA, MoU guidance, SSI eLearning...), • Section on armed Non-State Actors updated, • Training added (Engaging Security Services section), • Reporting and Response sections clarified.