

2022-2023 ANNUAL REPORT





The International Code of Conduct for Private Security Service Providers' Association (ICoCA)

As we mark the 10th Anniversary of ICoCA and the last year of implementation of the 2019-2023 ICoCA Strategic Plan, it is worth pausing to take stock of the evolution of the Association. We have come a long way since the early days of the establishment of ICoCA in 2013.

It seems like only yesterday that we were drafting and approving key procedures and policies to implement ICoCA's core monitoring, certification and complaints functions, hiring the first staff and securing seed funding to enable the Association to start delivering on its mandate. Over the years, with strong foundations in place, ICoCA has grown its global footprint. At the cross section of private security, Human Rights and International Humanitarian Law, ICoCA is now recognised as a key reference organisation. ICoCA provides stakeholders with the assurances that any security provider that has joined ICoCA is committed to operating to the highest international standards.

As a multi-stakeholder organisation, ICoCA continues to demonstrate that impact is greatest when all relevant parties, cooperate, exchange good practices and work together. ICoCA Members, Affiliates and Observers, by virtue of the variety of backgrounds and skillsets, offer different perspectives and interests. This diversity brings with it a richness in expertise and experience which have been instrumental to ICoCA successfully meeting its strategic goals.

Today, ICoCA has undertaken missions in numerous high-risk or otherwise complex environments, seeing first-hand what responsible private security looks like. An honest and objective approach to engaging with all relevant actors in country, has expanded ICoCA's sphere of influence and bearing. Behavioural change for the better, where sub-standard private security practices previously prevailed, has been shaped by ICoCA's hands on method and professionalism. Improvement may at times have been incremental, but progress is undeniable.

It is good to reminisce and recognise achievements. However, as we know, the journey has just begun. The private security sector today and in the future will continue to evolve and give rise to challenges and opportunities. The next 10 years should prove to be exciting and rewarding, with much that can still be accomplished.

We look forward then to continue working with all of you to strengthen ICoCA and to raise private security industry standards and practices that respect human rights and international humanitarian law.

Yours,

Jamie Williamson

Executive Director

Frédéric Chenais Chairman of the Board of Directors

2022-2023 Annual Report

The Board of Directors of the International Code of Conduct for Private Security Service Providers' Association ("ICoCA"), in accordance with Article 8.1.2 of the Articles of Association of the ICoCA ("Articles of Association"), submits the following Annual Report to the Association General Assembly covering the time period from 1 November 2022 to 31 October 2023.

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1. Objectives of the Association

The purpose of the Association is to promote, govern and oversee implementation of the International Code of Conduct for Private Security Service Providers (the "Code") and to promote the responsible provision of private security services and respect for human rights and national and international law in accordance with the Code.

2. Governance

2.1 Legal Status and Organisation of ICoCA

ICoCA is an international multi-stakeholder not for profit initiative established under Swiss Association Law and headquartered in Geneva. ICoCA's membership is made up of three pillars: government, industry and civil society. In addition to the Members and Affiliates, ICoCA can also grant non-voting Observer status to parties which have demonstrated support for the principles of the Code and the Association. The Federal Council of Switzerland approved an agreement on the privileges and immunities accorded to the Association on July 3, 2019. Pursuant to this agreement, the confidentiality of ICoCA documents and information are protected, which strengthens ICoCA's independence.

2.2 ICoCA Board of Directors

The ICoCA Board of Directors is composed of 12 Members who equally represent the three pillars of the Association. The composition of the ICoCA Board of Directors at the end of the covered period was as follows:

| Name | Seat Representing | Pillar | Term expiry |
|----------------------------------|----------------------------------|---------------|-------------|
| Frédéric Chenais | Switzerland | Government | 2025 |
| Susan R. Benda | US | Government | 2024 |
| Paul Smith | UK | Government | 2026 |
| Vacant | Vacant | Government | |
| Jo Anthoine | Middle East, Asia & Australia | Industry | 2023 |
| Michelle Quinn | The Americas | Industry | 2023 |
| Frank P Amoyaw | Africa | Industry | 2025 |
| Crispin Kennedy | UK/Europe | Industry | 2025 |
| Joel Bisina | Civil Society | Civil Society | 2023 |
| Carmen Rosa de Léon-Escribano | Civil Society | Civil Society | 2023 |
| Caleb Wanga | Civil Society | Civil Society | 2025 |
| Vicky Bowman | Civil Society | Civil Society | 2026 |

2.3 Board Committees

During the 2022-2023 year, five committees were charged with managing and making recommendations to the Board in different areas of activity.

| Committee | Members |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Executive and Finance | Frédéric Chenais Vicky Bowman replacing Béatrice Godefroy Michelle Quinn |
| Standing Committee Compliance (Arts. 11, 12 & 13) | Paul Smith replacing Joan Fontaine Joel Bisina Jo Anthoine |
| Business Development & Partnerships | Carmen Rosa Crispin Kennedy Frédéric Chenais Frank P Amoyaw |
| Strategic Plan 2024-2028 | Jo Anthoine Vicky Bowman replacing Béatrice Godefroy Frank P Amoyaw Susan Benda |
| Membership | Paul Smith replacing Joan Fontaine Susan Benda Michelle Quinn Caleb Wanga |

2.4 The Secretariat

The Secretariat, headed by the Executive Director, Jamie Williamson, is responsible for the development and implementation of the core functions of the Association as detailed in the Articles of Association, namely: certification; reporting, monitoring and assessing performance; and the complaints process.

2.5 Members and Affiliates

ICoCA is a membership driven and supported organisation. During the reporting period, 36 new Members and Affiliates joined the Association (7 CSOs and 29 Industry Members and Affiliates). A current list of Members and Affiliates can be found on the ICoCA website.¹

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¹ www.icoca.ch

2.6 Revision of the Code of Conduct

Following the recommendation of the ICoCA Board of Directors, Members voted to amend Article 3.3.2 (Membership) of the Articles of Association. The revised text reads as follows:

"3.3.2. States and intergovernmental organisations that have communicated their support of the Montreux Document or have otherwise committed to promoting compliance with international humanitarian law and respect for human rights regarding of the use of private military and security companies and who communicate their intent to support the principles of the ICoC and participate in the activities of the Association as specified in these Articles are eligible for membership."

The amendment was proposed following consultations with States and inter-governmental organisations, non-signatory as well as signatory to 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. The amendment removes mandatory reporting requirement of States on their implementation of the Montreux Document and the Code. States and inter-governmental organisations are from henceforth eligible for ICoCA membership, independent of their Montreux Document status, if they commit to promoting compliance with international humanitarian law and respect for human rights regarding of the use of private military and security companies. The amendment reflects the diversity of the current Members and Affiliates of the PSC and CSO pillars. It also aligns with the geographical reach of ICoCA activities.

3. Membership

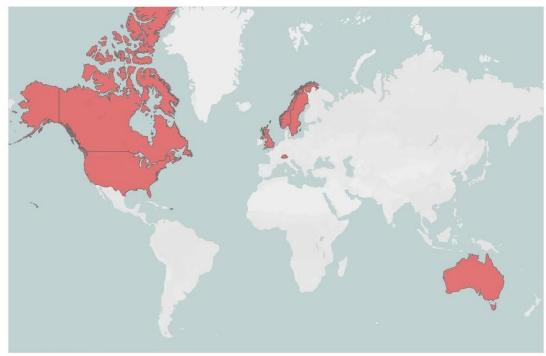
3.1 Government Membership

Seven governments are currently Members of the Association: Australia, Canada, Norway, Sweden, Switzerland, the United Kingdom and the United States.

As Members, and also as clients, regulators and donors, these governments have enabled ICoCA to increase its sphere of influence globally, and to raise security standards through the implementation of the Code in all environments where private security providers operate and where there is a risk of human rights abuses and/or violations of international humanitarian law and/or civilian harm.

ICoCA is particularly grateful to the governments of Switzerland, the United Kingdom and the United States for their financial contributions to the Association during this reporting period.

The Association welcomes the efforts of Member governments to encourage ICoCA's membership and recognition, in particular with those countries which are part of the Montreux Document Forum (MDF) and those committed to strengthening human rights due diligence in line with the 2011 United Nations Guiding Principles on Business and Human Rights (UNGPs). The Association looks forward to continuing to work with Members and other governments to help support and promote the role of ICoCA worldwide.

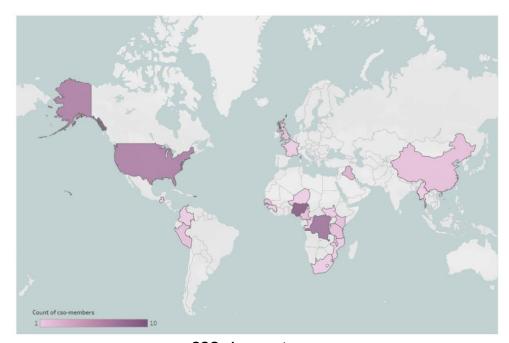


ICoCA Member Governments

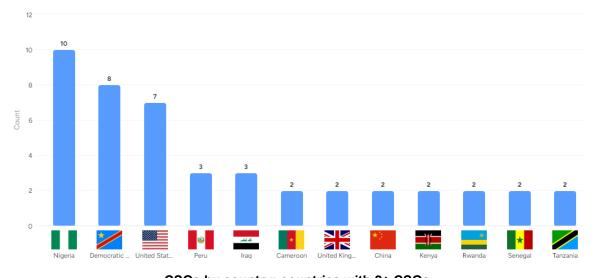
3.2 Civil Society Organisations Membership

Fifty-six civil society organisations (CSO) were Members of ICoCA as at the end of the reporting period, with seven CSOs from seven different countries (Malawi, Rwanda, Mozambique, Tanzania, Nigeria, Iraq, Peru) joining during the year. The 56 CSO Members represent 22 countries and operate in five main languages (Arabic, Chinese, English, French, and Spanish). A number of CSO Members also participate in other related initiatives, such as the Private Security Governance Observatory established by DCAF and/or the Voluntary Principles Initiative (VPI).

The Association continues to support the role of CSOs in the promotion of the provision of responsible private security services, and works towards expanding the involvement of both regional and international civil society organisations in the Association.



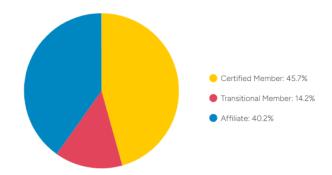
CSOs by country



CSOs by country: countries with 2+ CSOs

3.3 Industry Membership

By the end of the reporting period, 127² private security companies (PSCs) made up the Industry pillar, 58 Certified Members, 18 Transitional Members and 51 Affiliates. With Certified Members now constituting the largest group, it demonstrates the commitment by companies joining ICoCA to continually improve and operate to the highest standards.



ICoCA PSCs by Membership Status as at 31 October 2023

Twenty-nine companies joined during the year: 6 Certified Members, 8 Transitional Members and 15 Affiliates. The 29 companies which joined during the last year come from 17 different countries (Bolivia, Democratic Republic of the Congo, Iraq, Italy, Malta, Nigeria, Peru, the Philippines, Poland, Romania, Senegal, Somalia, South Africa, Tunisia, Uganda, the United Kingdom and the United States). Diversification in Industry pillar membership continues to grow, with, for the first-time, companies joining from Bolivia, Malta, Poland, Romania, Senegal, South Africa and Tunisia. Member and Affiliate companies range from small locally owned companies to large international companies with transnational operations, providing land as well as maritime security services and consultancy.

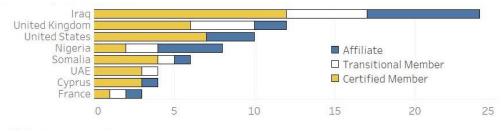
Further growth is expected in 2024 and beyond. The pipeline of companies that have demonstrated an interest in ICoCA remains strong, which demonstrates an upward trend of credibility and relevance of the Code for private security providers.



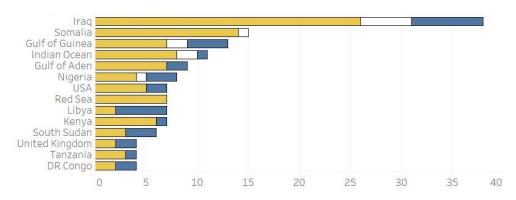
New ICoCA PSCs in 2023

² This number is expected to rise to 143 by the end of 2023, representing an annual increase of 30%.

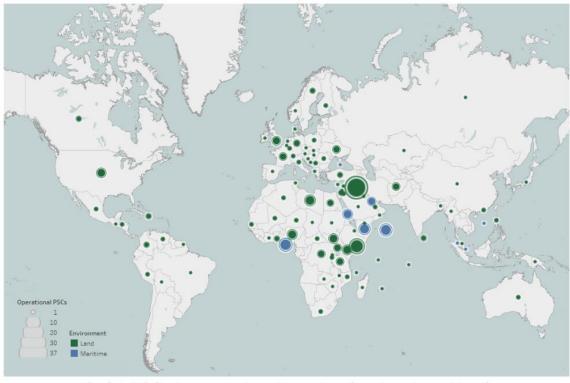
Iraq has more operational Member companies than any other country. This reflects a general trend in growth in Membership from outside of western Europe and North America. The Secretariat continues receiving applications for membership and affiliation on a regular basis, from an increasingly diverse and global reach. This is reflected by the fact that industry Members and Affiliates have operations in 100+ countries and maritime areas, and are headquartered in 52+ countries.



ICoCA PSCs by HQ location



ICoCA PSCs by operational area

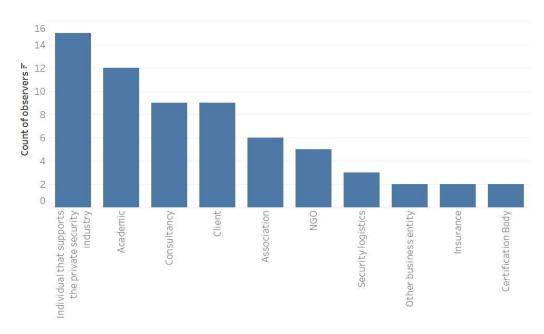


ICoCA PSCs by operational location (land and maritime)

3.4 Observers

The Association also benefits from the engagement of 73 Observers, representing a diverse range of organisations and perspectives. Observers include clients of security companies, accredited certification bodies, consultancies, academic institutions, industry associations, non-governmental organisations and individual experts. This brings unique expertise and valuable insights to ICoCA's work.

Ten observers joined ICoCA during the reporting period, and the Secretariat continues receiving applications on a regular basis.



ICoCA Observers by organisation/affiliation type



ICoCA Observers by location

4. Implementation Report of the Strategic Plan 2019-2023

The Strategic Plan 2019-2023 was adopted by the Board of Directors in May 2019. As outlined in the plan, the level of implementation of the respective objectives will be reviewed and reported annually. This Annual Report therefore includes the final substantive annual report back on the Strategic Plan 2019-2023.

Goal 1: Build the capacity of private security companies to implement the Code of Conduct and become certified Member of ICoCA

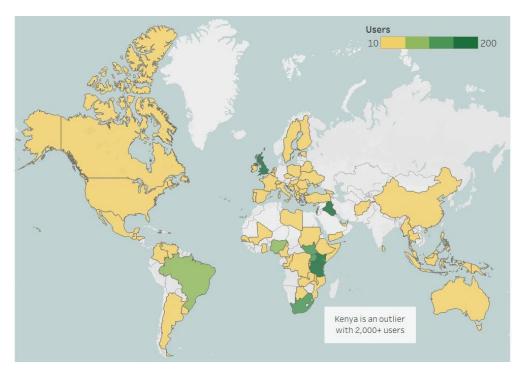
Objective 1.A. Develop training, guidance and development tools for ICoCA Member Companies to integrate provisions of the International Code of Conduct in their policies and practices

- Produce guidance and training materials for 1-3 Code provisions annually
- Make available training resources to Member Companies on issues specifically related to the content of and compliance with the Code
- Design and establish mechanisms and platforms to enable the exchange of best practices and cooperation between PSC ICoCA Members

4.1 Online Training Courses

ICoCA extended and deepened its online training offerings for Member and Affiliate companies during the reporting period with the launch of the online training on the Use of Force in April 2023. This course, available in English, has been completed by approximately 500 security personnel across 26 security companies over 25 countries. The course is currently undergoing translations and will be released in eight further languages (Arabic, Chinese, French, Portuguese, Russian, Somali, Spanish, and Swahili) by end of January 2024.

The training on the Use of Force supplements existing offerings on the Prevention of Sexual Exploitation and Abuse (PSEA), and on the International Code of Conduct. These courses are generally available in Arabic, Chinese, English, French, Portuguese, Russian, Somali, Spanish, and Swahili. An additional training in Bribery and Corruption will be released in 2024. The PSEA course has been completed by 2,000+ personnel from over 60 companies in 75 countries. The courses on the Code have been completed more than 1,400 times in over 50 countries.



Use of ICoCA trainings, all courses

Objective 1.B. Ensure all Member Companies achieve or work towards achieving ICoCA Certification

- Clearly communicate the process and benefits of ICoCA Certification
- Cooperate with accredited Certification Bodies to reinforce complementarity between ICoCA and external certification processes
- Utilise the Company Self-Assessment and Indicators to measure the progress of Members towards certification
- Provide tailored feedback and recommendations to Members, where appropriate, to support their progression towards ICoCA Certification

4.2 ICoCA Certification

The overall objective of the ICoCA Certification procedure is to ensure that PSCs meet their obligations under the Code and engage with the Association in a constructive and transparent manner. Currently there are three standards which are accepted for ICoCA Certification, PSC.1, ISO 18788, and ISO 28007. However, as per the ICoCA Board approved Certification procedures, PSCs certified to standards not currently recognised are invited to approach the Association for consideration of these standards for recognition by the Board.³ These standards can be national or international. To have a new standard recognised by ICoCA a PSC should contact the ICoCA Secretariat. Separately, if a PSC wishes to work with a Certification Body not currently recognised by ICoCA then they should contact the ICoCA Secretariat. A review will then be undertaken to see if an approval is possible.

³Article 11 Procedures: https://icoca.ch/wp-content/uploads/2022/11/Art-11-Procedures.pdf



Accepted Certification Bodies

During the last year, 11 companies achieved ICoCA Certification for the first time. This includes six companies which moved from Transitional Member to Certified Member status, and two companies which moved from Affiliate directly to Certified Member status. A total of 10 companies also obtained ICoCA recertification. At the end of the reporting period, there were a total of 58 ICoCA Certified companies, representing the largest grouping of corporate Member or Affiliate companies.



Objective 1.C. Establish mechanisms for ICoCA to expand its influence and oversight over the provision of private security services globally

- Develop a formal participatory structure that expands the number of private security companies adhering to the International Code of Conduct, taking into account the characteristics of the local private security landscape
- Engage with all stakeholders to explore and receive feedback in relation to the evolution of the formal participatory structure

4.3 Affiliate Status

Fifty-one companies finished the reporting period as Affiliates, an increase of 19 from the year before. The Affiliate category remains an important first step for companies to join ICoCA. It is also a key entry route for companies which wish to demonstrate a commitment to human rights but may lack the resources to pursue or access external certifications required for ICoCA membership. As with Member companies, Affiliate companies are monitored by ICoCA with continual improvement being expected and encouraged. The due diligence on Affiliate companies was strengthened during the period. Affiliates now have to report on the same areas as Member companies, including:

- Operate legally
- Liability insurance (employers and public)
- Human Rights Commitment
- Bribery and Corruption
- Use of Force
- Detention
- Apprehension of persons
- Child Labour
- Identification and Registration
- Personnel Screening and Vetting Programme
- Company Policies and Personnel Contracts
- Training of Personnel
- Management of Weapons
- Weapons Training
- Management of Material of War
- Incident Reporting
- Safe and Healthy Working Environment
- Grievance Mechanism Procedures

The main differentiator between Affiliate and Transitional Member companies is now that Transitional Members are able to demonstrate plans to obtain third party certification from an accepted certification body within two years to PSC.1, ISO 18788 or ISO 28007 or other recognised international or national standards submitted for recognition by the security company⁴. Transitional Members are also able to demonstrate that the company considers human rights risks in advance of operations.

⁴ Article 11 Procedures: https://icoca.ch/wp-content/uploads/2022/11/Art-11-Procedures.pdf

Goal 2: Build upon and continue to develop effective systems for evaluating compliance with the Code of Conduct and addressing non-compliance

Objective 2.A. Build an evidence-based system that supports routine monitoring and evaluation of Code compliance for all ICoCA Member Companies and a system to identify and address non-compliance question

- Continue to strengthen the Association's oversight and accountability functions through in-person and remote dialogue with Member Companies; company self-assessments; field-based reviews and exchanges with other relevant stakeholders
- Continue to develop and enhance company self-assessments to reflect the evolving security environment and any revisions in the Association's implementation guidance
- Conduct field-based reviews and other periodic in-country evaluation missions of Member Companies' operations
- Solicit information from civil society organisations, open-source media, security experts and others pertaining to the particular characteristics of each operating environment, and potential factors that could increase the risk of abuses

4.4 Field Missions

ICoCA carried out field operations to a number of contexts, including Nigeria, Iraq, Uganda, Kenya, Tanzania, Colombia, Peru and Uruguay. Field missions had the following objectives:

- To meet with ICoCA Member and Affiliate companies to discuss their efforts to implement the Code and the associated challenges, the evolution of the private security market, as well as gain input into the strategic planning for the decade ahead;
- 2. To meet with prospective ICoCA Member and Affiliate companies to discuss their interest in the Association and its added value for PSCs;
- To deepen ICoCA's understanding of the local context by meeting with clients of PSCs and raise awareness on their due diligence responsibilities to ensure that contracted providers meet relevant standards, potentially by referencing ICoCA Membership or Affiliation in tenders and procurement policies;
- 4. To meet with civil society organisations, both Members and non-Members to raise awareness about the Association and to solicit input on how to foster deeper engagement, including with governments;
- To meet with regulators and other relevant government agencies and actors, to encourage better oversight of the sector and to advocate for governments to join ICoCA.

Nigeria, November 2022

ICoCA's second mission to Nigeria, held between 13-18 November 2022, was focused on Lagos, Abuja, and Port Harcourt. Given security challenges in Nigeria, private security has become an increasingly crucial actor. Despite the critical role it plays, a range of human rights challenges have emerged in Nigeria's growing private security industry. Notably, poor working conditions are the main human rights issue facing the industry and posing higher risks for clients. The government-mandated minimum wage barely covers an individual's basic needs, and due to legal violations, especially by unlicensed PSCs, guards are reportedly often paid even less. The lack of systematic human rights training for PSC personnel is also of concern, with only a few companies having such training in place.

Civil society engagement has played a crucial role in advocating for policy reforms to address human rights-related issues within the private security sector. During the period, ICoCA worked with Nigeria's well-developed civil society network, with groups like AfriLaw leading training sessions for non-Member PSCs, including executives from the Association of Licensed Private Security Practitioners of Nigeria. Through meetings facilitated by civil society, ICoCA can engage and outline opportunities for collaboration. Notably, AfriLaw organised a meeting in Abuja that brought together representatives from ICoCA and the Nigeria Security and Civil Defence Corps (NSCDC), chaired by NSCDC Commandant General, Dr. Ahmed Abubakar Audi. The NSCDC, serving as the PSC licensing and regulatory authority in Nigeria under the Ministry of Interior (MoI), collaborates with the Department of State Security (DSS) to vet PSCs. The NSCDC also provides training to personnel. During the meeting, Dr. Abubakar outlined collaboration opportunities between NSCDC and ICoCA, particularly in training, and committed to recommending to relevant government departments that Nigeria join the Association.



Chris Galvin, Giuseppe Scirocco (ICoCA) & Okereke Chinwike (AfriLaw) meeting with NSCDC Commandant General, Dr Ahmed Abubakar Audi, Abuja (Nigeria), November 2022

Iraq, March 2023

Between 11 and 17 March 2023, ICoCA visited Baghdad, Iraq, where there has been a significant expansion in the number of ICoCA Member and Affiliate PSCs. As of June 2022, ICoCA included 12 PSCs headquartered in Iraq, whereas at the end of the reporting period this number had grown to 22. With an additional 16 foreign-based PSCs, there were 38 ICoCA Member and Affiliate companies operating in Iraq by the end of the reporting period. The unprecedented growth in ICoCA Member and Affiliate companies in Iraq underscores the increasing value of ICoCA's commitment to human rights for both PSCs and their clients, as evidenced by the rise in tendering requirements for ICoCA. As Iraq's very mature private security industry seeks further improvements and as international private security standards continue to spread in the country, ICoCA and ICoCA certification remain the gold standard for the industry.



Chris Galvin, Jamie Williamson (ICoCA) & Frédéric Chenais (Swiss Department of Foreign Affairs) at an ICoCA
Civil Society Workshop, Baghdad (Iraq), March 2023

Colombia, March 2023

ICoCA visited Colombia from 20-29 March 2023 conducting a series of meetings and events and engaging various actors on the current challenges facing the private security sector. As the new Colombian government has expressed interest in reforming the nation's private security industry, ICoCA met with representatives from the Ministry of Defence and the Ministry of the Interior to explore the possibility of supporting the government in restructuring Colombia's private security laws. In order to have a holistic understanding of potential reforms, ICoCA met with former United States Institute for Peace, and Open Society Foundations' representatives and high-level military, United Nations and US embassy representatives.

To develop a better understanding of clients' need for private security, ICoCA visited Zijin Continental Gold, the country's largest gold mining plant located in Buritica, Antioquia, Colombia. The company's security team explained the various challenges they face when working to protect their operation, and the particular need for coordination between public forces (law enforcement and military), their contracted private security provider, and their inhouse security team.

East Africa, March 2023

From March 21 to 31 2023, ICoCA conducted two missions to East Africa: the first to Kenya and Tanzania, and the second, a shorter trip to Uganda—ICoCA's first visit to the country. The missions also provided the opportunity to share initial findings from ICoCA's research on working conditions in the private security in the region⁵. In Nairobi, this included co-organising two high-level dialogue sessions in partnership with Global Compact Kenya Network (GCNK) on advancing decent work and economic growth in the sector. Workshops also took place in Dodoma and Nairobi, organised by two ICoCA CSO Members, Women Action Towards Economic Development (WATED) and Usalama Reforms Forum. Participants at these workshops included representatives from government departments and the regulatory authorities.



Juliette Jourde & Antoine Perret (ICoCA) at Zijin Continental Gold Mine, Buritica (Colombia), March 2023



Florie Barbotte, Vincent Bernard, Chris Galvin & Anne Lauder (ICoCA) at Member Company SGA Security Head Offices in Dar es Salaam (Tanzania), March 2023

⁵ In March 2023, surveys were conducted for the first time in Kenya, Tanzania, and Uganda, gathering hard data on the state of working conditions in the East African Private Security Market. In collaboration with Consumer Options, ICoCA conducted surveys on approximately 1,000 private security officers in each of the three countries.

Peru & Uruguay, July 2023

The private security landscape in Latin America is characterised by a dynamic interplay of economic, social, and political factors, shaping diverse practices across the region. Private security companies play a pivotal role in safeguarding assets and individuals. However, challenges related to regulations, standards, and responsible practices underscore the need for a comprehensive and nuanced understanding of the sector.

To introduce and strengthen Latin American private security actors' knowledge of ICoCA and help raise awareness of their due diligence responsibilities, ICoCA visited locations in Peru and Uruguay from 20 to 30 July 2023. The Instituto de Criminología y Estudios sobre la Violencia (ICEV) hosted a dialogue in Lima, Peru, to discuss current and future challenges in the industry, as well as explore new opportunities for collaboration and growth. In Uruguay, the ICoCA team partnered with the Government of Uruguay to carry out training sessions for the regulatory authorities and the private security sector. The event was attended by the President of Federación Panamericana de Seguridad Privada, Prof. Edgardo Ruben Frigo, and representatives of the Ministry of the Interior of Uruguay.

ICoCA is committed to sustained engagement in the Latin America and Caribbean region, as demonstrated through this year's trips to Colombia, Peru and Uruguay, and the launch of our Spanish website.



Antoine Perret & Valentina Potapova (ICoCA) at a Technical Meeting on Private Security in Lima (Peru), July 2023

Democratic Republic of the Congo (DRC), October 2023

ICoCA visited the DRC from 22 to 27 October 2023, with the Geneva Centre for the Democratic Control of Armed Forces (DCAF) and in collaboration with two CSOs: Justicia Asbl and Observatoire d'Etudes et d'Appui à la Responsabilité Sociale et Environnementale (OEARSE). This mission's primary objective was to engage with key stakeholders in the extractive industries.

ICoCA participated in the Working Group on the Voluntary Principles on Security and Human Rights for the Province of Haut-Katanga, and Lualaba. This direct interaction with both multinational and local extractive industries players, provided an ideal platform for the communication of the importance of responsible private security practices in the extractives sector along with the identification and examination of the challenges confronting private security companies in this domain. These challenges ranged from operational complexities to ensuring compliance with international standards and upholding human rights commitments. ICoCA's mission to the DRC provided a unique perspective on the benefits of in-country working groups and knowledge sharing within the framework of The Voluntary Principles on Security and Human Rights, highlighting their complementarity.



Vicinity of a mining site, Lualaba (DRC), October 2023

Tanzania, October 2023

From 17 to 28 October 2023, ICoCA travelled to Tanzania to engage with various stakeholders in the extractive industry. The team had three main objectives: 1) documenting a security collaboration model for a best-case study in the mining sector, 2) engaging with clients of private security companies in the extractive sectors, and 3) studying the use of technology in private security, particularly in remote locations.

Over the years, there have been numerous reports and cases against mining companies in Tanzania, and ICoCA believes that a collective effort is necessary to address these challenges while ensuring the well-being of all stakeholders. Because of Tanzania's richness in critical minerals, it is positioning itself as a key player in the energy transition. ICoCA accordingly brings its expertise in promoting the highest standards of human rights, labour conditions,

and security practices to the forefront of discussions on energy transition, including, the need for a just transition. ICoCA was a supporting partner in the Tanzanian Mining and Investment Forum 2023 in Dar Es Salaam, which included an exhibition stand and giving a technical presentation. The event provided an opportunity to connect with industry experts, exchange valuable perspectives and cultivate partnerships.

ICoCA staff spent three days on site at the Geita Gold Mine in Tanzania, owned and run by AngloGold Ashanti. This provided the team the opportunity to explore and document an innovative, integrated security model that has been developed at the mine site, involving community police, local law enforcement, in-house security and private security services provided by SGA Security, an ICoCA Certified Member. The model safeguards the mine's operations and additionally enhances the well-being and prosperity of the surrounding communities. This visit allowed the ICoCA team to actively engage with numerous stakeholders, including the police and local communities, conducting in-depth interviews and documenting their findings for the development of a comprehensive case study. Prior to travelling to Geita, ICoCA staff had in-depth discussions with the country management team at SGA Security.

The mission concluded with a visit to ICoCA Observer Holcim's cement plant in Mbeya, where WS Insight, an ICoCA Certified company, provides security. WS Insight currently uses innovative technologies to complement physical guarding across the entire cement production process, from quarries to bagging. Having met WS Insight's country leadership team first in Dar es Salaam, the visit further emphasised the value of collaboration between ICoCA, its Members and corporate Observers in remote locations. It provided a unique learning opportunity for the Association as well as an opportunity to share practical feedback on the ground with the security company and their client.

ICoCA also met with the Tanzania Bureau of Standards and discussed the maturity of private security standards in the country and the role of ICoCA certification.



Chris Galvin, Florie Barbotte & Jamie Williamson (ICoCA) at Geita Gold Mine, Geita (Tanzania), October 2023

Field Missions Insights and Impact

Presence in-country through missions is essential for raising awareness about the Association and issues relevant to the private security sector and Code implementation. It also contributes significantly to cementing the credibility of the organisation. Feedback from the vast majority of Member and Affiliate companies ICoCA met with during strategic planning engagement sessions was appreciation for the opportunity to meet in person. There was also a common request to increase the in-country presence and footprint of the organisation. This extends to asking for more regular compliance checks and even company audits. For companies, this builds the credibility and value proposition of the ICoCA brand. The opportunity to engage in country also benefits the Association, building the organisation's institutional knowledge of the issues at play and of the commonalities and differences across different regions and contexts. ICoCA's development of thematic focal areas, particularly focusing on working conditions in the private security sector during this period, will be instrumental in providing hard data to inform deeper, more meaningful discussions. It also helps advocacy efforts for raising industry standards and the critical role played by both clients and regulators in this regard. This is another clear value-add of the organisation, again contributing significantly to the organisations credibility as thought leader and convener.

As ICoCA builds out its 2024-28 strategic plan, how ICoCA might most efficiently and effectively increase its in-country footprint needs serious consideration. In which regions and countries this focus would be best placed, also needs careful thought.

4.5 Company Self-Assessment

The 2023 Company Self-Assessment (CSA) was launched in September 2023. The CSA is a mandatory annual requirement for ICoCA Member and Affiliate companies, which is central to monitoring. It allows ICoCA to understand the gaps that a company faces in their compliance with the Code, and the improvements which have been made over the last year. As part of the CSA process, each company will receive detailed feedback on how to close these gaps. In the aggregate, ICoCA can see the strengths and weaknesses across all Member and Affiliate companies, helping to focus efforts related to guidance and training for the year ahead.

Each completed CSA is compared to the approximately 550 established ICoCA indicators, which are structured along the key principles of the Code. Given the wide-ranging nature of the Code—and by extension the indicators—the focus of the CSA covers all aspects of private security operations which relate to human rights. This meticulous, highly detailed approach, allows a company's operations to be directly compared from one year to the next, providing visibility on whether a company is improving (or not) with its approach to respecting human rights through its policies and procedures.

Although the deadline for the CSA was still open at the end of the reporting period, approximately 25% of all CSAs had already been submitted. Preliminary indications have confirmed the value of this process. Broadly, Member and Affiliate companies are improving with their alignment to the Code. In addition, following dialogue with the Secretariat, a number of companies have introduced key policies which were absent or inadequate. These have been particularly focused on the assessment human rights risks, the prevention of sexual

exploitation and abuse, incident reporting, and bribery and corruption. Gaps which are identified—and improvements which are suggested—are not evidence of non-compliance with the Code, but rather they highlight that the human rights approach is one of continuous improvement and that all ICoCA member and affiliate companies will be able to improve their policies and procedures in some manner. A full report will be released during Q1 2024.

The 2022 CSA demonstrated that ICoCA Member and Affiliate companies, in aggregate, had improved their policies and procedures as they relate to human rights from what was found in 2021. In particular, companies had improved their assessment of human rights risks prior to operations taking place, although there was still room for improvement. Progress on key areas of human rights concerns, such as sexual exploitation and abuse, was also being made. Much more training however can be undertaken.

Objective 2.B. Identify and build the capacity of civil society organisations that can highlight human rights issues resulting from the operations of private security companies

- Strengthen cooperation with other organisations linked to the private security industry and involving a civil society organisation component, such as the Voluntary Principles Initiative and the Private Security Governance Observatory
- Explore, through CSO Members and their respective networks, the opportunity of conducting capacity-building exercises at the national and regional levels
- Facilitate the exchange of good practices and lessons learned from civil society organisations and their experiences of highlighting human rights issues resulting from the operations of private security companies

4.6 Strengthening the Civil Society Pillar

Over the past year, ICoCA has structured, implemented and piloted a strategy within the CSOs pillar, aiming to strengthen it.

Firstly, by growing the CSO pillar and adding seven additional organisations during the reporting period, namely:

- Peoples Federation for National Peace and Development (PEFENAP), Malawi
- Action Pour l'Éducation et la Défense des Droits Humains (APEDDH), Rwanda
- Centre for Democracy and Human Rights (CDD), Mozambique
- PRISEP, Tanzania
- PRAWA, Nigeria
- Iraqi Human Rights Defenders and Activists Consortium, Iraq
- Instituto de Criminología y Estudios sobre la Violencia, Peru
- Justicia Asbl, Democratic Republique of Congo

Secondly, ICoCA has engaged with its Members with the aim pf developing a a long-term CSO strategy. Three lines of work have been prioritised: 1) monitoring, 2) training, and 3) advocacy. ICoCA has supported several Members of the CSO pillar in pursuing these lines of work, as follows:

1. Monitoring and Independent oversight:

- a. <u>Nigeria</u>: AfriLaw, ICoCA, and DCAF collaborated on a pilot project to monitor the role of private security companies during elections. ICoCA provided training on monitoring PSCs to CSOs, and subsequently, a network of CSOs monitored PSC activities during the election period in 10 different states in Nigeria. AfriLaw engaged with regulators and political parties to discuss the role PSCs are playing and how to address their unrecognized participation in election security
- b. <u>Democratic Republic of Congo</u>: ICoCA participated in training and supported the preparation of a pilot project on monitoring PSC activities in extractive contexts. Subsequently, it participated in multi-stakeholder discussions on the findings of these monitoring missions.

c. <u>Rwanda</u>: ICoCA supported another pilot project by a CSO Member on monitoring PSCs activities in extractive contexts in Rwanda.

2. Training:

a. CSOs training PSCs:

i. Nigeria – ICoCA continues to focus attention on the private security sector in Nigeria through close collaboration and support of CSOs on the ground. The AfriLaw Foundation and ICoCA hosted a series of training workshops on responsible private security. The first meeting took place in October 2022 in Abuja, and a series of further workshops took place until March 2023. The goal of this project was to provide capacity building and training to Nigeria private security companies on existing obligation and best practices for improved standards of operations.

b. Strengthening CSOs' capacity:

- i. ICoCA has developed an online training for CSOs, exploring various forms of potential collaboration between CSOs and ICoCA.
- ii. ICoCA has conducted both in-person and online training sessions for CSOs on monitoring, human rights due diligence, and international norms in various contexts, including Kenya, Nigeria and DRC.
- iii. ICoCA organised an in-person training session in Geneva for a group of CSO Members, aiming to enhance their capacity in advocacy, monitoring, and documenting human rights violations. The training included an extensive discussion on the ICoCA Complaint Mechanism.
- 3. **Advocacy**: ICoCA and several CSOs have engaged into multilevel advocacy locally, regionally, and internationally.
 - a. ICoCA and its Members have engaged in multi-stakeholder discussions in a national context in the following countries: in Nigeria, DRC, Kenya, Iraq, Colombia, Tanzania and Peru.
 - b. Following the development of a national roadmap to strengthen private security regulation in the Democratic Republic of the Congo, ICoCA and its partners have participated in several consultations on a new draft law on PSC. The draft is now ready and CSOs have started the advocacy to include the law into the political agenda of the government.
 - c. ICoCA and its partners in Latin America have prepared a submission to the regional system of human rights (The Inter-American Court on Human Rights) on the state responsibilities to protect human rights defenders.

4.7 Complaints

During the past year, no Member Companies reported registering complaints or incidents.

| Active Complian | Status | | |
|----------------------|--------|---|--------|
| Personnel Misconduct | Other | | |
| Governance | | | Active |
| 0 | 0 | 0 | |

| Compliance concerns | Status | | |
|-------------------------------------|------------|-------|--------------|
| Personnel Misconduct Management and | | Other | 16 closed; 0 |
| | Governance | | active |
| 3 | 10 | 3 | |

| Com | Status | | |
|-------|--------------------------------|----------|--|
| Total | Against Member Companies | 2 closed | |
| 2 | 2 | 1 | |

| Complaints Received | Status | | |
|---------------------|-------------------------------------------|--------|--------------|
| Total | Total Alleging a Violation of the Against | | |
| Code Mer | | Member | 44 closed, 0 |
| | | | Active |
| 44 4 12 | | 12 | |

| Terminations of Company Membership or Affiliate status in 2023 | | | | | |
|----------------------------------------------------------------|-----------------------------------------------------------------|-------|--|--|--|
| Total | Total Non-Submission of Annual Company Self- Cooperation in Bad | | | | |
| Assessment | | Faith | | | |
| 0 | 0 0 | | | | |

The ICoCA complaints process is currently under review, with a view to increasing accountability and strengthening the overall procedure. The first step is to update and complete the standard of procedure to make the mechanism more accessible and in line with international standards. Then ICoCA and its Members will work on advertising it.

Goal 3: Diversify and expand ICoCA's Membership among companies, governments and civil society, and ICoCA's engagement with other relevant stakeholders

Objective 3.A. Increase awareness and buy-in of ICoCA by governments in different regions and intergovernmental organisations

- Participate in meetings of the Montreux Document Forum and engage with relevant UN Working Groups and other international and regional bodies to increase awareness of ICoCA as a key actor to raise standards in the private security industry
- Broaden outreach to non-member governments and intergovernmental organisations to improve their understanding of the role and purpose of ICoCA and encourage participation in the activities of the Association, where appropriate
- Encourage the development and implementation of regulations or policies by governments and intergovernmental organisations related to the private security industry, including procurement regulations, which refer to ICoCA
- Encourage governments to integrate ICoCA into National Action Plans on business and human rights

4.8 Engagement with Governments and Intergovernmental Organisations

ICoCA continues to participate to high level regional and multilateral meetings to engage on the critical role played by private security globally. The Association emphasised the importance for all stakeholders to commit to the respect of human rights and humanitarian law whenever private security providers are relied upon and wherever they are operating. ICoCA regularly engaged with the Montreux Document Forum (MDF), the UN Working Group on Mercenaries, the UN Open-ended Intergovernmental Working Group to consider the possibility of elaborating an international regulatory framework on the regulation, monitoring and oversight of the activities of private military and security companies, the UN Working Group on Business and Human Rights, and the Voluntary Principles on Security and Human Rights Initiative (VPIs). Meetings included:

- Engagement with the Mozambican government during Jamie Williamson's trip to Mozambique week of 7 November 2022.
- Engagement with Nigerian NSCDC during ICoCA mission week of 14 November 2022.
- Convening and hosting a roundtable discussion at the Munich Security Conference, 17 February 2023.
- Representative of the Swiss Embassy in Nairobi participated in roundtable discussion on International Frameworks on Private Security Governance in Kenya, 28 February 2023 in Kenya, also attended by Kenyan National Police Service's Internal Affairs Unit (IAU).
- In-person meetings with the Austrian, Dutch, EU, French, German, Norwegian, Swedish, Swiss, UK and US representatives held during visit to Iraq in March 2023.
- In-person meeting with the Canadian and US embassies in Colombia, March 2023.

- Meetings with UK Missions in Tanzania and Kenya and EU Mission in Kenya during East Africa mission, March 2023.
- Presentations at VPI Plenary in London, May 2023.
- Engagement with EU officials from various DGs (DG Just, DG Grow, DG Trade, DG INTPA, EEAS) and multi-stakeholder workshop at Swiss Mission, Brussels including CSOs, Corporates and others to discuss EU Corporate Sustainability Due Diligence Directive, 1 June 2023.
- Meeting with the Swiss Mission in Peru and Uruguay in July 2023.
- Several meetings and working sessions with the regulatory authority in Uruguay: DI.GE.F.E. (Dirección General de Fiscalización de Empresas), July 2023.
- Planning of Geneva missions event hosted by the government of Canada which took place just after the close of the reporting period on 8 November 2023.

Objective 3.B. Increase the number of private security clients encouraging or requiring ICoCA membership in contracting for security services

- Engage with clients to increase their awareness of ICoCA and encourage them to reference it in relevant procurement language and policies
- Provide advice on clients' procurement policies and generate model clauses in relation to private security standards and compliance with the Code of Conduct
- Engage with other entities that have a vested interest in the mitigation of risks by clients, e.g. investors, insurers, banks and trade associations

4.9 Client Engagement

The extractive sector continues to be a focus of engagement of the Association, particularly through continued engagement with the Voluntary Principles Initiative. As mentioned, ICoCA attended the VPI annual plenary in London in May. Bilateral meetings were held with a number of extractive and diplomatic clients throughout the year, both remotely and in-person, including during visits to Geita Gold Mine, the Tanzania Mining and Investment Forum and the Grupo de Dialogo sobre Mineria (GDIAM) in Colombia. Meetings in Peru included with Glencore and PanAmerican Silver, along with the Mining Association in Peru. Meetings in Bogota and Medellin, Colombia, with several extractive companies (Mineros S.A, Zijin, Royal Gold, Drummond) also took place to discuss the interest of the ICoCA certification for their security. In DRC, participation in the VPSHR working group in Lubumbashi and Kolwezi along with bilateral meetings with ERG in Lubumbashi. Other client engagement, highlighted elsewhere in this report included:

- In-person participation in the TV Industry Human Rights Forum workshop "inclusive security practices in TV production" held in London, attended by TV production crews from ITV, Sky, BBC, Channel Four and NBC.
- A number of virtual presentations throughout the year, including: regional security manager meeting of Glencore personnel in South Africa; Glencore's European

smelters workshop; International Petroleum Industry Environmental Conservation Association (IPIECA) Social Responsibility Group Autumn meeting in Malaysia; International Association of Oil and Gas Producers (IOGP); Security Group meeting in Bucharest; Mining Association of Canada International Social Responsibility Committee meeting.

- One in-person and one virtual workshop with 30+ members of UN Global Compact Kenya during East Africa mission.
- Launch of a client focused social media campaign in East Africa to complement awareness raising during mission: 1,000+ people were sent ICoCA's procurement guide as a result of the campaign and were added to the ICoCA mailing list.
- Presentation at OECD 2023 Forum on Responsible Mineral Supply Chains, Paris, France.
- Bi-lateral meetings with TotalEnergies Kenya and Tanzania, Association of Tanzania Oil and Gas Service Providers, AngloGold Ashanti, Lafarge/Holcim Tanzania and Kenya, Worley (East Africa Crude Oil Pipeline).
- Presentation at the Geneva Center for Security Policy on "Multi-stakeholder meeting Non-State Actors and the Future of International Security and the Implementation of International Disarmament Agreements".

4.10 Humanitarian Sector

Building on its collaboration with the Global Interagency Security Forum (GISF) in 2021 and the research conducted on humanitarian agencies contracting of PSCs, ICoCA developed an online procurement training course designed specifically for humanitarian organisations. The training was released in November 2022 and was officially launched at the East Africa Humanitarian and Partnership Summit (EAHS) held in Nairobi, Kenya the first week of December, 2022. As one of the lead sponsors of this event (along with the African Union, Africa CDC and the World Health Organisation), ICoCA convened a panel discussion to highlight the need for humanitarian organisations to conduct human rights due diligence on their private security providers.

Objective 3.C. See Objective 2.B.

Goal 4: Develop and protect a distinct and credible worldwide brand reflecting ICoCA's leadership role

Objective 4.A. Promote the activities and visibility of the Association by establishing new and strengthening existing relationships with international and national organisations through strategic cooperation and partnerships

- Consistently use recognised branding and identify in all outreach efforts communicated in the relevant languages
- Ensure regular representation at international and regional fora and events such as the UN Forum
 on Business and Human Rights, the Montreux Document Forum and other relevant meetings in
 order to achieve broad acceptance of ICoCA
- Strengthen engagement with international and multilateral organisations, such as the Organisation for Economic Co-operation and Development (OECD), the European Union (EU), the Organisation for Security and Co-operation in Europe (OSCE) and the Organisation of American States (OAS)
- Use state and non-state clients as "ambassadors" of the Association

4.11 Research & Policy

ICoCA is conducting research projects on selected critical issues for the industry, developing partnerships with academic institutions and engaging with expert audiences and policy makers with a view to producing guidance for the industry and making the case for responsible security. The ICoCA Advisory Group formed in 2022 provides the secretariat with guidance on themes, networks and research methodology.

Research & partnerships

Working conditions: In October 2023 ICoCA published the results of a two-year research project on working conditions in private security in a report entitled "When the Abused becomes the Abuser". The ICoCA secretariat developed partnerships with UNI Global Union and Denver University to conduct interviews of experts and circulate surveys among private security guards around the world. Three country surveys were conducted in Kenya, Tanzania and Uganda reaching 1000 guards in each country (funded by the UK FCDO). The research describes the poor conditions prevailing in many countries in the sector and highlights the link between these conditions and the risks of abuses by poorly treated security workers. It makes a series of recommendations for civil society, governments and security companies and particularly highlights the responsibility of clients of security providers in ensuring decent working conditions for guards by ensuring human rights due diligence and paying fair prices. The research will serve as a basis for the development of guidance documents, a training module as well as a series of blog posts on working conditions.

The findings of the research are being presented in several fora (including a webinar, the 2022 and 2023 General Assembly of ICoCA, the OECD 2023 Forum on Responsible Mineral Supply Chains in Paris, a side event at the Human Rights Council, the 2023 Swiss Business and Human Rights Forum and the 2023 Geneva Peace Week). The country surveys were presented in two workshops in Kenya and Tanzania.

Gender diversity: For the second year in a row ICoCA's research proposal was selected for an Advanced Applied Research Project (ARP) by the Graduate Institute of International and Development Studies. The 2023 ARP report examines the efforts that have been undertaken by private security companies, and what more could be done by bridging the gap between the need for better gender diversity and the realities of the market. This research, combined with the findings of the research on working conditions is paving the way for the development of a guidance document & advocacy materials.

Responsible use of ICTs in private security: Information communication technologies (ICTs) are changing the private security sector in ways never seen before. Security companies are increasingly employing informatic tools useful to enhance their operational capacities while tech companies are entering and transforming the market of private security services. In 2023, ICoCA entered into a research partnership with ICT4Peace, a Geneva based think tank, with a view to develop a toolbox and guidance document on the responsible use of ICTs (funded by the Swiss FDFA). This guidance document will be critical in operationalising Human Rights for private security companies when using ICTs in a fast evolving technological and regulatory environment.

Migration & Border Management. Recent rises in migratory flows have led States to contract PSCs to help them manage borders and migration. Private security engagement in migration management comes with substantial human rights risks, as a number of documented abuses show, such as the incidents in the Australian immigration detention centre on Manus Island or, more recently, at the Brook House Immigration removal center in the UK. In 2022 ICoCA and an ARP team of the Graduate Institute conducted desk research supplemented by interviews, and organised a debate at the 2022 AGA to map the current state of affairs concerning PSCs' involvement in this field, and to identify best practices and compliance mechanisms. ICoCA drafted a Policy Brief on *Fostering Responsible Private Security in Migration Management* (to be published in 2024). This policy brief identifies key aspects and trends which characterise migration management by private security providers with a view to strengthening respect for human rights.

Accountability: As part of an ongoing research project on accountability, ICoCA published in November 2023 its research on a series of cases on a new database of incidents related to private security operations, the ICoCA Case Map. It provides a selection of real-life case studies which illustrate contemporary challenges and opportunities in the application of human rights and international humanitarian law by private security companies. The selected cases highlight the importance of adhering to the regulatory framework of human rights law and international humanitarian law, including the International Code of Conduct for Private Security Providers. ICoCA is looking to complement the Case Map by including a selection of best-practice cases that showcase how responsible security respects human rights and international humanitarian law.

Policy Outreach

Private Security Conversations: In September 2023 ICoCA launched <u>Private Security</u> Conversations, the first blog devoted to research and debate on responsible security. The blog

publishes posts and podcasts on a weekly basis and aims at providing a platform for experts and practitioners to exchange on a broad range of topics (such as business & human rights, new technologies, migration and detention, working conditions, maritime security, gender, PSCs & humanitarian action etc.). *Private Security Conversations* aims at becoming the focal point for current research and debates, positioning ICoCA as the convener of a global conversation on responsible security.

Responsible Security Forum: ICoCA organised a day of public debates on the side of its 2022 annual general assembly. Based on the success of this first experience, ICoCA decided to create an annual conference in Geneva, the *Responsible Security Forum*, on the occasion of the 10th anniversary of the Association. A call for panels was launched and several partners were selected to host panel discussions on key topics (including the impact of Wagner and other malign private security actors, just transition, corruption & transparency, humanitarian engagement with PMSCs).

4.12 Communications Efforts

At the beginning of 2023, the ICoCA team laid the ground for a new communication strategy, focusing on (1) brand consistency, (2) content creation and (3) online presence. Actions included:

- Creation of new artwork and material to improve brand image (brochures, document templates, etc.);
- Creation of new content formats on a regular basis: videos, LinkedIn carousels, articles, PDF documents, photos, etc.;
- Collaboration with Members, Affiliates and Observers to create content (International Women Day video, profiles on the ICoCA website, stand design at International exhibitions);
- Implementation of a social media calendar, establishing clear goals and types of content to push, and facilitating planning and collaboration for regular posts (average target of twice a week);
- Redaction of a Communications and Outreach Strategy to define goals for the department for the next 3 years, considering bandwidth and budget challenges.

This resulted in positive feedback and strong engagement from Members, Affiliates and Observers, a growing social media presence (LinkedIn audience grew by over 50% YoY, reaching 5,100+ followers) and more online engagement (LinkedIn average engagement rate for the reporting period of 9.5% vs. 6.9% last year).

Objective 4.B. Promote the activities and added value of the Association within the business community across relevant industry sectors

- Develop relationships with key trade and industry organisations to increase awareness of the importance of ICoCA in raising private security standards
- Raise the visibility of IcoCA Members' good practices and activities that advance respect for the International Code of Conduct and the UNGPs

4.13 Conferences & Exhibitions

ICoCA exhibited for the second time at the International Security Exposition held in London, United Kingdom, in September. Additionally, ICoCA participated in the Tanzania Mining and Investment Forum held in Dar es Salaam, Tanzania, in October 2023. This marked the Association's inaugural involvement in such an event, and it signals a new strategy to arrange missions around similar events for closer and more effective engagement with clients of PSCs. ICoCA actively documents its participation in events and exhibitions, to share on its website and social media platform.





4.14 ESG and the Investment Community

ICoCA has dedicated special focus during the year on developing tools to engage the investor community, with the goal to inform investors about the human rights risks associated with hiring private security providers. This, in turn, empowers them to leverage their influence over portfolio companies, encouraging rigorous human rights due diligence on security providers, ideally through ICoCA membership.

Two projects were initiated during the period. ICoCA submitted a successful proposal to the University of Geneva, Business and Human Rights Clinic to develop an <u>ESG Methodology for assessing security-related human rights risks for ESG rating agencies</u>. The clinic, involving a group of seven Masters students, ran from January 2023 and concluded in April 2023.

The second project was launched at the 2022 AGA and was conducted in partnership with the Investor Alliance for Human Rights and Enact, a sustainability consultancy. This project has seen the development of an Investor ESG Guide on Business and Human Rights. The guide was launched during a webinar just after the reporting period on 2 November 2023. A campaign will run throughout the remainder of 2023 and 2024 to promote the ESG Investor Guide to the investor community. The guide and the campaign were made possible thanks to support from UK FCDO.

Objective 4.C. Strengthen the role of Observers in contributing to the realisation of ICoCA's mission

- Continue to develop partnerships with Observers and potential Observers in order to increase awareness of the importance of ICoCA in raising private security standards and to address their needs and expectations
- Increase the opportunities for the Observer Advisory Group to provide advice and guidance to the Association in the implementation of its strategic directions and the accomplishment of its mission

4.15 Observers

ICoCA focused on developing stronger relationships particularly with those Observer members which are clients of PSCs. This group is considered to be particularly important. Ultimately, it is through client contracting that private security industry standards and practices are driven up in pursuit of responsible security provision that respects human rights and international humanitarian law, or down, with all the human rights risks this entails (see 4.9 for more details on client engagement throughout the year). A first meeting of the Client Working Group, comprising of a handful of large, multi-national companies who contract private security companies, who are all Observers of ICoCA, took place on September 12, 2023.

ICoCA would like to extend a special thanks to ICoCA Observer Rebecca DeWinter Schmitt, at the Investor Alliance for Human Rights for partnering with ICoCA throughout the reporting period on the development of the ESG Investor Guide on Private Security and Human Rights. This partnership is continuing as ICoCA seeks to raise awareness with investors about the guide and both the salient human rights risks as well as the material risks from contracting private security providers.

ICoCA is grateful for the support of ICoCA Observer and Advisory Group Member, Dr Deborah Avant, Director, Sié Chéou-Kang Center for International Security and Diplomacy, Distinguished University Professor and Sié Chéou-Kang Chair, Josef Korbel School of International Studies, University of Denver for providing research support to ICoCA's new research priorities outlined in 4.11.

5. Financials

5.1 Income by Source

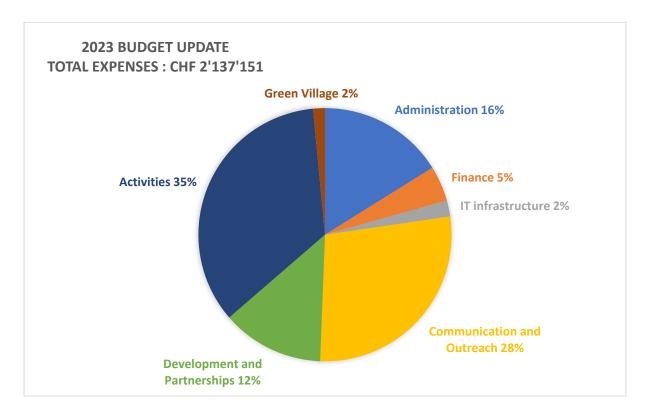
The Association received financial support from three principal sources: contributions from Member Governments (the United Kingdom, the United States and Switzerland), annual Membership Dues from Industry Members and Affiliates, and one-time joining fees from companies applying for Industry membership and affiliation (largely covering the cost of administering the application and associated due diligence process by the Secretariat and the Board). Additional modest revenue has come from Observers' annual fees.

Membership contributions came at 65% from small companies, 14% from medium companies and 21% from large companies. The current fee structure, as adopted and unchanged since 2017, is set out in the table below:

| Level | Revenue | Dues (USD) |
|----------|-------------|---------------|
| Small 1 | \$ 0-3M | USD 3.500 |
| Small 2 | \$ 3-10M | USD 6.000 |
| Small 3 | \$ 10-20M | USD 7.000 |
| Medium 1 | \$ 20-50M | USD 11.000 |
| Medium 2 | \$ 50-100M | USD 12.000 |
| Large 1 | \$ 100-300M | USD 14.000 |
| Large 2 | \$ 300-500M | USD 16.000 |
| Large 3 | \$ 500M+ | USD 18.000 |

In 2023 ICoCA consolidated its strategy to diversify the Association's funding structure. The growth of communications team with the creation of a Communications and Marketing Officer has helped raised the profile of ICoCA across industry sectors, leading to an increase in ICoCA references and requirements in tenders, driving more companies to the Association. The creation of a dedicated Membership Officer role within the compliance team means ICoCA is able to shepherd this larger pool of interested companies through to closure, bringing more Member and Affiliate companies on board resulting in additional dues to support the organisation's activities. Membership is projected to grow 30% in 2023 compared to 2022. The creation of a dedicated Civil Society Organisation (CSO) Development Manager position has also increased ICoCA's capacity for targeted fundraising in response to calls for proposals from new funding sources primarily focused on raising support for the civil society pillar. A number of funding proposals for new funding streams are currently in active development. A 2-year MOU has also been signed with the UK government in order to enable the Association plan its financial strategy, field missions and other project beyond an annual cycle.

5.2 Expenditures by Category



5.3 2022 Audit and Financial Statements

In accordance with Article 8.1.6 of the Articles of Association, and the applicable Swiss Association Law, ICoCA's finances for the period from 01 January until 31 December 2022 were audited in March 2023. Berney Associés Audit SA, were appointed. A copy of the audit letter and the audited financials is attached as an Annex. The final budget for 2022 was CHF 1'674'620 and the approved initial budget for 2023 was CHF 1'978'722.

5.4 2023 Budget

The ICoCA Board of Directors approved the core budget for 2023 at its Q1 Virtual Meeting in March 2023. The Board of Directors then reviewed the Association's performance against the approved budget on a quarterly basis, and adjusted it based on the Association's priorities, activities and available funding. 2023 updated budget amounts to CHF 2'137'151, including the creation of 2 new positions to reinforce the Secretariat.

6. Closing Remarks

This report was submitted for approval to Members of the Association at the Tenth Annual General Assembly, on 5 December 2023.

7. Annex - Audited Financial Accounts 2022

Berney Associés

Geneva, June 9, 2023

Report of the statutory auditor on the limited statutory examination for the year 2022 to the general meeting of International Code of Conduct for Private Security Service Providers' Association, Geneva

As statutory auditor, we have examined the financial statements (balance sheet, profit and loss statement and notes) of International Code of Conduct for Private Security Service Providers' Association for the financial year ended December 31, 2022.

These financial statements are the responsibility of the Board of Directors. Our responsibility is to perform a limited statutory examination on these financial statements. We confirm that we meet the licensing and independence requirements as stipulated by Swiss law.

We conducted our examination in accordance with the Swiss Standard on the Limited Statutory Examination. This standard requires that we plan and perform a limited statutory examination to identify material misstatements in the financial statements. A limited statutory examination consists primarily of inquiries of company personnel and analytical procedures as well as detailed tests of company documents as considered necessary in the circumstances. However, the testing of operational processes and the internal control system, as well as inquiries and further testing procedures to detect fraud or other legal violations, are not within the scope of this examination.

Based on our limited statutory examination, nothing has come to our attention that causes us to believe that the financial statements, disclosing total Funds of the association of <u>CHF 789'875</u>, do not comply with Swiss law and the association's articles of incorporation.

Berney Associés Audit SA



BA Qualified electronic signature

Sandra AMARI Licensed Audit Expert Auditor in charge Marina CHRISTE Licensed Audit Expert

Enclosures : - financial statements (balance sheet, profit and loss statement and notes)

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BALANCE SHEET AS AT 31 DECEMBER 2022

| | Notes | 31.12.2022 CHF | 31.12.2021 CHF |
|------------------------------------------------------------------------------|-------|-------------------|-------------------|
| ASSETS | | | |
| Current assets | | | |
| Cash at bank | 6.1 | 594'108 | 738'536 |
| Petty Cash | | 2'866 | - |
| Membership dues to be received | | 40'972 | 10'462 |
| Provision for membership dues to be received Restricted funds to be received | 7 | - 136'820 | (4'700) 22'224 |
| Unrestricted funds to be received | 8.1 | 78'000 | 78'000 |
| Other current assets | 0.1 | 12'835 | 9'188 |
| Accrued income and prepaid expenses | | 55'784 | 35'831 |
| Total current assets | | 921'385 | 889'541 |
| Non current Assets | | | |
| Financial asset (rent guarantee) | 4 | 17'278 | 17'278 |
| Total non current assets | | 17'278 | 17'278 |
| TOTAL ASSETS | | 938'663 | 906'819 |
| LIABILITIES AND EQUITY | | | |
| Current liabilities | | | |
| Bank overdraft bearing interest | 6.1 | 18'058 | _ |
| Deferred income | 6.2 | - | 84'281 |
| Creditors | | 113'904 | 79'516 |
| Accrued expenses | | 16'826 | 36'979 |
| Total current liabilities | | 148'788 | 200'776 |
| Funds of the association | 6.3 | | |
| Operating reserve | | 706'043 | 375'867 |
| Profit/(Loss) for the year | | 83'832 | 330'176 |
| Total funds of the association | | 789'875 | 706'043 |
| TOTAL LIABILITIES AND EQUITY | | 938'663 | 906'819 |

PROFIT AND LOSS STATEMENT FROM 01.01.2022 TO 31.12.2022

| | Notes | 2022 | 2021 |
|-----------------------------------|-------|-------------|-------------|
| | | CHF | CHF |
| REVENUES | | | |
| Restricted funds | 7 | 342'739 | 306'404 |
| Government Contributions | | 341'477 | 299'963 |
| - UK | | 340'821 | 271'963 |
| - Switzerland | | 533 | - |
| - DCAF | | 123 | 28'000 |
| Other contributions | | 1'262 | 6'441 |
| - GISF | | 1'262 | 6'441 |
| Unrestricted funds | 8 | 1'415'713 | 1'323'211 |
| Government Contributions | 8.1 | 821'297 | 767'485 |
| - Switzerland | | 378'000 | 378'000 |
| - Sweden | | 90'644 | 103'360 |
| - USA | | 352'653 | 286'125 |
| Membership Dues | 8.2 | 594'986 | 554'307 |
| -Joining Fees | | 39'463 | 24'023 |
| -Annual Fees small | | 338'604 | 332'326 |
| -Annual Fees medium | | 98'108 | 99'149 |
| -Annual Fees large | | 112'962 | 89'269 |
| -Observer Fees | | 5'849 | 9'540 |
| Non operating revenues | | -570 | 1'419 |
| Total revenues | | 1'758'452 | 1'629'615 |
| EXPENSES | | | |
| Staff Costs | | (916'729) | (788'933) |
| Administration Costs | | (126'819) | (127'320) |
| Rental and office costs | | (114'326) | (94'520) |
| Information management | | (9'000) | (45'000) |
| Communication and Marketing Costs | | (161'301) | (186'459) |
| Operating expenses | 9 | (217'568) | (39'750) |
| Travel expenses | | (98'632) | (8'888) |
| Financial expenses | | (4'172) | (2'397) |
| Loss on foreign exchange | | (26'073) | (6'172) |
| Total Expenses | | (1'674'620) | (1'299'439) |
| Profit/(Loss) for the year | 6.3 | 83'832 | 330'176 |

NOTE TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2022

1. INTRODUCTION

The International Code of Conduct for Private Security Service Providers Association (ICoCA) is the multistakeholder oversight and governance mechanism for the International Code of Conduct for Private Security Providers ("the Code" ¹). The ICoCA was established in 2013 as an Association under Swiss Association Law. Its members fall into three pillars: the private security industry, civil society organizations, and governments. Each pillar is represented equally in the ICoCA's twelve-member Board of Directors. The operational oversight and administrative functions of the ICoCA are housed in its Secretariat, located in Geneva and led by the Association's Executive Director.

The purpose of the Association is to promote, govern and oversee implementation of the Code by its member and affiliate private security companies, and to ensure that they are accountable for their performance to the Code when working in complex environments. Oversight is enabled through three principal functions: (1) certification of member companies' management systems and policies, (2) monitoring and assessment of company operations, (3) handling of complaints alleging violations of the Code.

2. ACCOUNTING PRINCIPLES

2.1 Basis of preparation

These financial statements are prepared in accordance with the provisions of commercial accounting as set out in the Swiss Code of Obligations (Art. 957 to 963b CO, effective since 1 January 2013). The reporting period corresponds to the calendar year.

2.2 Revenue recognition

Core fund contributions, which are not project specific, are considered as unrestricted funds and are recognized on an accrual basis: the part of the grant related to the year is recognized as revenue; those committed to subsequent years are not presented in the balance sheet.

Earmarked fund donations, which are project specific or include a specific restriction, are considered as restricted funds. Restricted funds are recognized on an accrual basis based on the utilization of these funds during the year.

¹ The Code was developed through a multi-stakeholder process and executed by numerous members of the private security service industry between 2010 and 2013. Reflecting its focus on implementation of the Code, the ICoCA is also frequently referred to by its shortened name, the "International Code of Conduct Association".

NOTE TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2022

2.3 Conversion in foreign currency

Assets and liabilities in foreign currencies are converted into Swiss Francs at the exchange rate prevailing on the balance sheet date.

Revenues and expenses in foreign currencies are converted to the current rate when they are received or expensed.

2.4 Taxes

The Association was granted a cantonal and communal tax (ICC) exemption on 22 November 2013. This exemption was valid for 10 years. On 10 January 2023, this exemption was extended for an indefinite period.

The Association was granted a direct federal tax (IFD) exemption on 22 November 2013. This exemption is valid for an indefinite period.

The Association was granted a VAT exemption on 18 November 2019 for amounts exceeding CHF 100. This exemption is valid for an indefinite period.

3. LIABILITY TOWARD PENSION INSTITUTIONS

As at 31st December 2022, the liability to the pension fund amounts to CHF 13'335 (31st December 2021: CHF 8'611).

4. TOTAL ASSETS UNDER RESERVATION OF OWNERSHIP/DEBTS ARISING FROM RENTAL COMMITMENTS

On November 22nd, 2019, the Association signed a rental contract with Regus lasting from March 1st, 2020 to February 28th, 2022 for 3 offices. A guarantee of CHF 13'404 has been paid, corresponding to 2 months' rent. This rent has been renewed from March 1st, 2022 to February 28th, 2023. An additional office has been rented for the same period of time, and a guarantee of CHF 3'874 has been paid for this additional office, corresponding to 2 months' rent. Both guarantees are refundable and held as security for performance of all ICoCAs' obligations under the agreement signed. The rent has been renewed until August 31st, 2023.

In CHF

| | 31.12.2022 | 31.12.2021 |
|-------------------|------------|------------|
| Rental commitment | 190'410 | 124'433 |
| TOTAL | 190'410 | 124'433 |

NOTE TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2022

5. NUMBER OF FULL-TIME POSITIONS ON ANNUAL AVERAGE

The number of full-time employees did not exceed 10 people during the year (same as 2021).

6. DETAIL OF CERTAIN BALANCE SHEET POSITIONS

6.1 Cash at bank, net

As at 31st December, ICoCA's cash position at bank is as follows:

In CHF

| | 31.12.2022 | 31.12.2021 |
|------------------|------------|------------|
| UBS SA CHF | (18,038) | 146,087 |
| UBS SA YPF (CHF) | (20) | (21) |
| UBS SA USD | 589,283 | 442,759 |
| UBS SA GBP | 4,825 | 149,711 |
| TOTAL | 576,050 | 738,536 |

In original currency

| | 31.12.2022 | 31.12.2021 |
|------------------|------------|------------|
| UBS SA CHF | (18,038) | 146,087 |
| UBS SA YPF (CHF) | (21) | (21) |
| UBS SA USD | 636,906 | 485,939 |
| UBS SA GBP | 4,336 | 121,312 |

6.2 Deferred income

As at 31st December 2022, the accounts of ICoCA show no income received in advance (2021: CHF 84'281). 2023 membership dues have indeed been invoiced in March 2023.

In CHF

| | 31.12.2022 | 31.12.2021 |
|--------------------------------------------|------------|------------|
| Income received in advance-Membership dues | - | 84,281 |
| TOTAL | - | 84,281 |

NOTE TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2022

6. DETAIL OF CERTAIN BALANCE SHEET POSITIONS (CONTINUED)

6.3 Funds of the association

| in CHF | Profit (-loss) for the year | Result brought forward | Operating reserve |
|--------------------------------------|--------------------------------|------------------------|-------------------|
| As at 31.12.2021 | 330,176 | ı | 375,867 |
| Allocation of Y-1 result | (330,176) | - | 330,176 |
| Allocation of result brought forward | 1 | 1 | - |
| Result of the year | 83,832 | • | - |
| As at 31.12.2022 | 83,832 | - | 706,043 |

7. RESTRICTED FUNDS

In 2022, the Association received restricted funding from governments and one non-profit organizations:

| | Balance | Contributions paid | Use of funds | Balance |
|--------------------------|------------------|--------------------|-------------------|------------------|
| | as at 01.01.2022 | during 2022 | ind exchange rate | as at 31.12.2022 |
| | CHF | CHF | CHF | CHF |
| UK Foreign & | | | | |
| Commonwealth Office | (22.224) | 226.276 | (204.052) | - |
| 01.08.2021 to 31.03.2022 | | | | |
| UK Foreign & | | | | |
| Commonwealth Office | - | | (136.820) | (136.820) |
| 01.08.2022 to 31.03.2023 | | | | |
| Swiss Federal | | | | |
| Department of Foreign | | 533 | (522) | |
| Affairs | - | 333 | (533) | - |
| 01.12.2022 to 31.12.2022 | | | | |
| GISF* | | 1.262 | (1.262) | |
| 01.05.2022 to 31.12.2022 | ' | 1.202 | (1.202) | , |
| DCAF** | | 123 | (123) | |
| 01.01.2022 to 31.12.2022 | 1 | 125 | (125) | • |
| NETTOTAL | (22.224) | 228.194 | (342.790) | (136.820) |

^{*} The Global Interagency Security Forum

^{**} The Geneva Centre for the Democratic Control of Armed Forces

NOTE TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED DECEMBER 31, 2022

7. RESTRICTED FUNDS (CONTINUED)

<u>Restricted funds to be received:</u> CHF 136'820 correspond to the amount of the 2022-2023 UK contribution that was spent between August 1, 2022 until December 31, 2022 and received in February and March 2023. It includes an exchange rate loss of CHF 51 linked to ICoCA's accounts reevaluation as at 31st December 2022 and covered through ICoCA membership dues revenue.

8. UNRESTRICTED FUNDS

8.1 Government contributions

In 2022, ICoCA received unrestricted government contributions from the Swiss government, the Swedish government and the US department of State for a total amount of CHF 821'297 (2021: CHF 767'485).

<u>Unrestricted funds to be received:</u> CHF 78'000 correspond to the amount of the 2022 Swiss contribution to be received in April 2023, as mentioned in the contribution's contract.

8.2 Joining fees, Observer fees and Membership dues

Joining fees correspond to a one-time fee paid by private security companies who express an interest in becoming an ICoCA member at the same time they send their membership application.

On becoming members of the ICoCA, private security companies are expected to pay an **annual Membership due** which is determined according to the company's revenue, based on a fee structure approved by the Board of Directors and the General Assembly. Membership dues for the year 2023 were invoiced in March 2023, therefore, no deferred income has been recognized in 2022 accounts.

ICoCA may grant non-voting observer status to persons or entities that are interested in participating in the work of the Association. An **annual Observer fee** is charged according to a fee structure approved by the Board of Directors.

A total revenue of CHF 594'986 was accounted for 2022 membership dues (2021: CHF 554'307).

9. BOARD OF DIRECTORS MEETINGS EXPENSES AND ANNUAL GENERAL ASSEMBLY COSTS

In 2022, Board of Directors meeting expenses amounted to CHF 73 (2021: CHF 21) and Annual General Assembly costs amounted to CHF 69'782 (2021: CHF 3'551). Thanks to the end of COVID-19 pandemic, the Annual General Assembly has been held in person, over 3 days, for the first time since December 2019. This explains the higher level of expenses compared to previous years.

10. SIGNIFICANT EVENTS OCCURING AFTER THE BALANCE SHEET DATE

There has not been any significant subsequent event that has had an impact on 2022 financial statements.