

## **ICoCA Summary Report of Field-Based Review:** **SGA Tanzania, at Barrick's North Mara Gold Mine, Tanzania** **December 2024**

ICoCA Observer, Barrick Mining Corporation (Barrick), operates the North Mara Gold Mine (North Mara) in northern Tanzania. The area presents significant security challenges, including organised crime and organised incursions onto the mine site. Private security is managed by SGA Tanzania, a subsidiary of SGA Security Group, an ICoCA Certified Member.<sup>1</sup> ICoCA conducted its first field-based review of SGA Tanzania's operations at the North Mara Gold Mine from December 11-13, 2024, as part of its ongoing due diligence. The visit came after a Joint Communication by special rapporteurs and issued by the United Nations (AL OTH/44/2024, 22 April 2024)<sup>2</sup> which alleged human rights violations at the mine, including by SGA Tanzania. Specific allegations against SGA were unclear in the report however. Prior to visiting the site, ICoCA conducted interviews with civil society organisations with detailed local knowledge about the site and context. ICoCA has agreed to carry out a follow-up mission to the site to document in more detail steps Barrick and SGA Tanzania are taking to ensure responsible security provision that respects the rights of all stakeholders around the site.

In visiting North Mara, ICoCA's primary goal was to understand if SGA Tanzania, a certified ICoCA member company, was operating in line with the [International Code of Conduct for Private Security Service Providers](#) (the Code). Alignment with sections F and G of the Code, which detail the requirements for the conduct of personnel and specific commitments regarding management and governance of a private security company, was a particular focus of ICoCA's review. In addition, ICoCA intended to verify if SGA Security was adhering to para. 20 of the Code which requires that private security companies "not knowingly enter into contracts where performance would directly and materially conflict with the principles of this Code, applicable national or international law, or applicable local, regional and international human rights law".<sup>3</sup> As part of the visit, ICoCA shared lessons learned from other contexts that could be tailored and applied to the North Mara site.

ICoCA's remit was restricted to assessing the private security arrangements and how it is integrated into Barrick's broader approach to security management; the assessment did not extend to an investigation of public security. The visit was limited in both scope and time, with ICoCA staff on-site for three days.

ICoCA did not find evidence that SGA Tanzania, and by extension SGA Security Group, is operating in violation of the Code. ICoCA found that the performance of security services by SGA Tanzania does not violate para. 20 of the Code, specifically that performance of this contract does not "directly and materially conflict with the principles of this Code, applicable national or international law, or applicable local, regional and international human rights law". The behaviour of personnel and commitments by management are in line with what would be

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<sup>1</sup> Accordingly, SGA Tanzania is ICoCA Certified.

<sup>2</sup> AL OTH/44/2024 was produced by the Working Group on the use of mercenaries as a means of violating human rights and impeding the exercise of the right of peoples to self-determination; the Working Group on the issue of human rights and transnational corporations and other business enterprises; the Working Group on Enforced or Involuntary Disappearances; the Special Rapporteur on extrajudicial, summary or arbitrary executions; the Special Rapporteur on the sale, sexual exploitation and sexual abuse of children and the Special Rapporteur on violence against women and girls, its causes and consequences.

<sup>3</sup> International Code of Conduct for Private Security Providers (2021), para. 20.

expected of an ICoCA Certified member, in that they are operating in line with human rights best practice in private security. **No credible evidence was found implicating SGA in human rights abuses.**

As per SGA Tanzania policy at the site, SGA guards are not armed with either lethal or less-lethal weapons. Based on ICoCA's observations and interviews, SGA guards at the mine do not carry or use weapons of any kind - neither lethal nor less-lethal firearms, batons, etc. In addition, SGA Tanzania has a policy of disengagement at the site. This policy of disengagement resulted in no private security personnel being injured in 2024. In cases where intruders do not comply with SGA's instructions, or in cases where there is credible threat of violence that places security or mining personnel' safety at risk, the police are called. Once the police intervene, the matter is handed over to the police to manage. Interaction between the SGA and the police is thus limited to expulsion of intruders SGA are unable to remove themselves. Police are controlled through their own hierarchy with what appears to be clear demarcation of command and control.

SGA guards are trained on the Voluntary Principles, use of force continuum (graduated use of force) and respect for human rights. SGA Security are audited by an ICoCA approved certification body, certified and monitored by ICoCA including through an annual company self-assessment. Barrick considers SGA Tanzania to be performing well on their contract.

Obtaining and maintaining community acceptance for the mine is a key component of the mine's security. Through discussions with key individuals at the site as well as the Regional Police Commander in Tarime, engaging in a community meeting and limited observation traveling through adjacent villages to North Mara, Barrick's work to build better relations with the local community appears to be improving the situation. Its multi-pronged approach, involving corporate social responsibility programming, community engagement and a highly professional private security provider, based on our observations, are having a positive impact. The fact that mine personnel are now able to mix freely within the town, something that was not possible only a few years ago, is a positive indication that the strategy is working. The security environment remains complex and dynamic at the North Mara site, made especially so by the presence of external actors and criminal syndicates operating in the area. Context is critical and the under-resourced police are challenged. Security personnel are often placed in situations of risk and their all-too-often forgotten rights also need to be taken into account.

A more detailed report compiled by ICoCA, along with a set of recommendations was shared with SGA Tanzania, SGA Security and Barrick. ICoCA is confident that given the arrangements in place, there is a strong likelihood that the number of security incidents will continue to decrease over the coming years. This assumes that the integrated security setup is maintained and that the recommendations provided are given due consideration within the operating context.