

STATEMENT OF CONFORMANCE

PAL commits to and conformance with its responsibility to respect human rights as reflected in the provisions of its SOMS and the following:

- International code of conduct for private security service providers
- Montreux Document on pertinent international legal obligations and good practices for states related to operations of private military and security companies during armed conflict
- Human rights prompt list and links
- Pilgrims Africa shall not comply with clause 8.3.2.,8.4 of ISO18788: 2015 as staff are not permitted to carry firearms in compliance with Nigeria constitution laws.

Pilgrims provide security services in circumstances where weakened governance creates complex, fragile and hostile environments, our clients, host nation governments, the communities within which we operate, our Partners, and our suppliers all rely on us to operate in a responsible manner that enhances human safety and security and which protect assets (both tangible and intangible) while conforming to international law, local laws and human rights.

Every aspect of our business practice and service delivery is governed by our Code of Business Conduct and Code of Conduct and our corporate Business Management System (BMS). These are founded upon our commitment to respecting human rights and following the principles of 'protect, respect and remedy. In order to demonstrate our credibility in applying these principles, we ensure that our entire way of doing business is externally accredited, on a global basis to the ANSI-ASIS PSC.1- 2012 Standard and fully aligned with a series of international standards which encompass the full scope of our business functions and services in addition and ISO 18788.

In complex operating environments a country's own ability to protect human rights may be diminished. Other countries and parties may also be known or suspected of acting in a way that has an adverse impact on human rights. In these circumstances, our rigorous application of the principles enshrined in our Code of Business Ethics and Standards of Conduct assist us in minimizing the use of our own actions causing adverse impacts on human rights.

We respect our people, clients, and the communities within which we operate by acting upon firmly held, communicated, and administered principles of fairness, equality, integrity, and dignity. All responsible approach, to operating our BMS within our robust Legal Operating Framework includes:

- Using a formal, enterprise-wide procedure for the management of internal and external risk, applied to all aspects of our business processes and decision-making at all levels.
- Applying a rigorous fair and risk-based process for the selection, recruitment, and vetting of our people, our partners, our suppliers, and where appropriate our clients.
- Providing the healthiest and safest working environment possible for all of our people

wherever they are and whatever duties and responsibilities are assigned to them.

- Promoting and maintaining the Assurance of quality of service across all of our business processes and services (Fully compliant with ISO 9001 - 2015 working towards ISO 9001 - 2015, covering all of our operations globally).
- Managing and reducing potential impacts of our business operations on the human, built, and natural environment around us.
- When risks are realized and disruptions occur, protecting our stakeholders by ensuring that we are prepared, rehearsed, and ready to respond rapidly and coherently to resolve the impacts and restore stability, regardless of the levels of scale or complexity.
- Embedding a culture of professional excellence through coherence and progressive programs of training, education, and talent management for all of our people, across all business disciplines and at all levels.
- Diligently assessing and demanding compliance with the International Code of Conduct for Private Security Providers and the UN's Guiding Principles when selecting potential clients, associates, suppliers, partners, and contractors.
- Employing, contracting, and fairly reimbursing all of our personnel and suppliers in accordance with the laws, regulations, and standards applicable in each and every country of operation.
- Monitoring and auditing our business transactions and activities in accordance with strict rules and processes to ensure prudence and probity in all of our business relationships.
- Family rejecting and condemning all forms of bribery and corrupt practices at all levels and in all countries of operation
- Adhering to applicable rules and regulations pertaining to the procurement, import, and export of goods required for the delivery of our services
- Ensuring and respecting freedom of expression in matters of faith, gender, culture, and heritage in all aspects of our business
- Through Our service delivery, facilitating freedom of movement for our clients and other key stakeholders within the countries, regions, communities and wherein we operate
- Through the employment, professional development, and contracting of services of individuals and groups within our local communities, we shall contribute to the growth, stability, and sustainability of these communities.
- Enhancing the quality of lives in the communities around us by providing social assistance programs, cognizant of social, faith, and cultural sensitivities and associated risks.

In the event that a disruptive or undesirable event occurs, we manage the full range of resulting impacts, minimizing adverse effects and restoring our services, rapidly and seamlessly. Where these incidents involve an adverse impact on human rights, we will take all steps to remedy these through both judicial and non- judicial processes, specifically:

- We operate a formal process for receiving and responding to internal and external grievances. Where confidentiality is needed, a whistleblower procedure is employed.
- The company maintains a fair and robust formal disciplinary process which is employed when the company code of business ethics and standard of conduct is contravened.
- We submit to the due legal process where a judicial solution is required.

We learn lessons from these events and continually improve our performance through performance evaluation processes that have been certified as effective by external auditors.

All of our personnel and tiers of management are formally allocated responsibility and accountability for the management of risk, assurance of quality, and adherence to the values and standards covered within this statement.

The Pilgrims Business Management Team, supported by subordinate committees, is responsible for providing top management direction, guidance, and the moral and physical resources to enable this level of responsible governance and compliance to be met and sustained.

If you wish to express a grievance of any kind, confidentially or otherwise, please contact hr@pilgrimsafrica.com.



Daniel Lemmer
Commercial Director: