



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

HR DEPARTMENT

PAGE NO

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DOC. NO.

RFL/EHS/PR/84

REV. NO.

00

EFFECTIVE DATE

20/08/2024

REVIEW DATE

19/08/2025

SUPERSEDES

NIL

TITLE: Security Practices Policy

1. Purpose

Raviraj Foils Ltd. is committed to ensuring the safety and security of its operations while respecting human rights. This policy outlines our approach to managing security providers, both private and public, in a manner consistent with recognized standards and good practices. It aims to prevent and address any potential human rights abuses associated with security operations.

2. Policy Statements

2.1 Risk Assessment and Planning

a. Conduct regular risk assessments that consider:

Political, economic, civil, or social factors that may affect security.

The potential for violence and the human rights records of security forces.

The capacity of local authorities to ensure accountability.

Risks associated with the transfer of lethal and non-lethal equipment to security providers.

Analysis of conflicts and adherence to human rights standards.

2.2 Engagement of Security Personnel

b. Screen all in-house, contracted, and public security personnel for any history of human rights violations. c. Prioritize the hiring of unarmed security personnel wherever possible. d. Ensure all security personnel, both private and public, receive training on de-escalation techniques and human rights-respectful security practices. e. Prohibit the use of deadly force except in situations where it is necessary to prevent the immediate loss of life.

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APPROVED BY:

Imayandi

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Safety Officer

Sr. EHS Officer

HR - Head

DATE: 20/08/2024

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2.3 Grievance Mechanism and Accountability

f. Establish a clear grievance mechanism for receiving and addressing complaints related to security practices and personnel conduct. g. Investigate all allegations of human rights abuses by security personnel promptly and thoroughly, and take appropriate disciplinary actions where necessary.

2.4 Public and Private Security Providers

h. Develop a written policy or agreement outlining the conduct of security personnel, emphasizing the importance of respecting human rights. This policy should include:

Boundaries of security activities.

Procedures for managing security issues and conflicts.

Consequences for any human rights abuses. i. Regularly review and update security policies and agreements, ensuring that they align with recognized standards and good practices.

2.5 Monitoring and Reporting

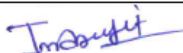
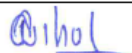
j. Make the security practices policy public and communicate it to security providers, stakeholders, and relevant authorities. k. Implement monitoring arrangements to ensure compliance with the policy, including performance reviews, investigations, and reporting to relevant authorities.

2.6 Training and Awareness

l. Provide ongoing training to security personnel on relevant principles, including the Voluntary Principles on Security and Human Rights, and the company's policies on appropriate conduct and use of force.

2.7 Specific Considerations

m. Address the presence of security providers in Human Rights Impact

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Assessments, particularly focusing on the potential impacts on women and Indigenous Peoples. n. Any new or expanded presence of armed security or military in Indigenous Peoples' territories must be addressed through Free, Prior, and Informed Consent (FPIC) processes.

3. Application

3.1 Project Scope

This policy applies to all facilities and operations of Raviraj Foils Ltd., including those involving private and public security providers.

4. Background

4.1 Understanding Security Practices

Security providers are primarily responsible for protecting people, property, and assets. However, their involvement can pose risks if not managed appropriately, particularly in contexts where there is potential for human rights abuses.

5. Points to Consider in Implementing Criterion 9.9

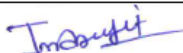
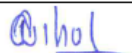
5.1 Risk Mitigation

Consider the local context, including political, economic, and social factors, when developing security plans.

Ensure that security measures are proportional to the identified risks and that they do not exacerbate tensions or conflicts.

5.2 Community Engagement

Engage local communities in discussions about security practices and address any concerns they may have.

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Ensure that security arrangements respect the rights and dignity of all affected populations.

6. Resources and Training

6.1 Guidance and References

Voluntary Principles on Security and Human Rights.

International Code of Conduct for Private Security Service Providers (ICoCA).

7. Revision History:

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

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