

Human Rights and ICoC Statement

EPM Global Ltd – EPM-GOV-HR-01 – Version 1.0 – June 2026 – Public

Our work and why this matters

EPM Global Ltd provides security advisory, risk consultancy, journey management and unarmed close protection to clients operating in complex and conflict-affected environments. We work alongside humanitarian organisations, NGOs, private clients and corporate entities in areas where human rights conditions are often severe and where the conduct of security providers can directly affect the people around them.

That context shapes everything in this statement. Human rights obligations are not a compliance exercise for us — they are a practical reality in every environment where we operate.

Our commitment

We respect internationally recognised human rights, including those set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

We are committed to the International Code of Conduct for Private Security Service Providers (ICoC). The ICoC defines the standards of conduct expected of private security companies and their personnel, and ISO 18788 — the standard to which our management system is certified — is structured to operationalise those principles in practice. We conduct our business accordingly.

We follow the UN Guiding Principles on Business and Human Rights. We respect human rights. We seek to avoid causing or contributing to human rights abuses through our activities. We exercise human rights due diligence appropriate to the environments in which we work.

What this means in practice

EPM operates in an unarmed and advisory capacity. We do not arm personnel, conduct guarding operations, or hold powers of apprehension, detention or search. Our work centres on situational awareness, conflict avoidance, de-escalation, duty of care and the safe movement of people in difficult environments.

Our personnel are required to:

- Act with integrity, proportionality and restraint at all times
- Treat all individuals with dignity and respect regardless of background, nationality, religion, gender or any other characteristic
- Cooperate with lawful investigations and with competent authorities
- Report any conduct by EPM personnel or subcontractors that may constitute a human rights concern
- Refuse any instruction that would require them to act in a manner inconsistent with this statement

We provide training appropriate to each operating environment. Personnel deployed to conflict-affected areas receive specific awareness of international humanitarian law, civilian protection principles, and the particular obligations that apply when operating alongside humanitarian actors.

Conflict zones and international humanitarian law

A significant part of EPM's work takes place in or near active conflict zones, including in Ukraine. In these environments we respect applicable international humanitarian law — including the Geneva Conventions and their Additional Protocols — and we plan and deliver our services in ways that support, and do not impede, the safe delivery of humanitarian assistance.

We respect the protection of humanitarian space. We observe the distinction between civilian and military actors. We do not conduct or facilitate activities that could compromise the neutrality, impartiality or independence of humanitarian operations.

Absolute prohibitions

The following are prohibited absolutely. No instruction, commercial pressure or operational circumstance justifies any of them.

- Human trafficking, slavery, or any form of forced or compulsory labour
- Sexual exploitation, abuse or harassment
- Torture, cruel, inhuman or degrading treatment
- Unlawful detention or arbitrary deprivation of liberty
- Complicity in any of the above, whether direct or indirect

Any EPM personnel or subcontractor who becomes aware of such conduct — whether by EPM, by a client, by a partner organisation or by any other actor in the areas where we work — is required to report it. We protect those who report in good faith from retaliation.

Our subcontractors and supply chain

Our human rights obligations extend to those who work with us. All subcontractors engaged by EPM are required to acknowledge and operate in accordance with this statement as a condition of engagement. We conduct due diligence on subcontractors before deployment, including identity verification, vetting, and screening against sanctions and watchlists. We assess their conduct and hold them accountable.

We do not knowingly engage subcontractors who have been involved in human rights abuses, who are under investigation for such conduct, or who are unable to demonstrate a credible commitment to the standards described here.

Due diligence

Before accepting any engagement, EPM assesses whether the client, the end client and the nature of the work are consistent with our human rights obligations. An engagement that would require us to act contrary to this statement, or that carries a credible risk of contributing to human rights abuses, will be declined.

This assessment is part of our Go/No-Go process for every engagement, as set out in SOP-BD-01.

Grievance and accountability

Anyone affected by our work — employees, subcontractors, clients, or members of communities in the areas where we operate — can raise a concern with us directly, confidentially and without fear of retaliation. Our grievance mechanism is described in our Grievance Notice (EPM-GOV-PUB-01), available on our website.

We investigate every concern impartially and act on what we find. Where we have caused or contributed to an adverse human rights impact, we will acknowledge it and seek to remedy it.

We cooperate with lawful investigations by competent authorities.

Review and accountability

This statement is approved by the CEO, communicated to all EPM personnel and subcontractors, and published publicly. It is reviewed at least annually and whenever significant changes to our operations or obligations require it.

Responsibility for the implementation and monitoring of this statement rests with top management. Specific incidents or concerns are escalated directly to the CEO.

Approved by: Damian Zielinski — Founder & Chief Executive Officer, EPM Global Ltd

Document reference: EPM-GOV-HR-01 | Version 1.0 | June 2026 | Public

Standards addressed: ISO 18788:2015 §5.1.2 / §6.2; ANSI/ASIS PSC.1-2022 §6.2; ICoC (2010, amended 2021); UN Guiding Principles on Business and Human Rights (2011)