



BlackOak Energy LLC

Voluntary Principles of Security and Human Rights Policy

Approved by: Executive Leadership Team

Effective Date: January 1, 2025

1. Purpose

BlackOak Energy LLC ("the Company") is committed to implementing the Voluntary Principles on Security and Human Rights (VPSHR) to ensure that our security practices respect human rights, promote safety, and align with international standards. This policy establishes a framework to guide our interactions with public and private security providers, communities, and stakeholders in a manner that upholds human rights and operational integrity.

2. Scope

This policy applies to all BlackOak Energy LLC employees, contractors, subcontractors, and security providers involved in or supporting Company operations globally. It extends to all regions where the Company operates, particularly in areas with complex security or human rights challenges.

3. Our Commitment

BlackOak Energy LLC pledges to:

- **Respect Human Rights:** Conduct security operations in alignment with the VPSHR, the Universal Declaration of Human Rights, and applicable local and international laws.
- **Promote Safe and Ethical Security Practices:** Ensure security measures protect Company personnel, assets, and operations without compromising the rights or safety of employees, contractors, or local communities.
- **Foster Stakeholder Engagement:** Engage transparently with communities, governments, and other stakeholders to address security and human rights concerns collaboratively.

4. Voluntary Principles on Security and Human Rights Framework

Our commitment is operationalized through a structured framework aligned with the VPSHR, incorporating these core elements:

a. Leadership and Accountability

- Senior leaders champion the integration of VPSHR into security practices, ensuring resources and oversight are in place.
- Accountability for human rights and security performance is embedded at all levels of the organization.

b. Risk Assessment

- Conduct regular risk assessments to identify potential human rights and security risks associated with Company operations, particularly in high-risk or conflict-affected areas.
- Use findings to inform security planning and mitigation strategies.

c. Engagement with Public and Private Security Providers

- Ensure all security providers (public or private) are vetted, trained, and contractually obligated to adhere to VPSHR and human rights standards.
- Prohibit the use of excessive force and ensure security personnel operate within legal and ethical boundaries.

d. Training and Awareness

- Provide ongoing training for employees, contractors, and security personnel on VPSHR, human rights, and conflict de-escalation techniques.
- Foster awareness of local cultural, social, and human rights contexts.

e. Community Engagement

- Build trust through open dialogue with local communities, addressing concerns about security practices and their impacts.
- Establish grievance mechanisms to allow communities to report issues related to security or human rights.

f. Incident Management and Response

- Maintain clear protocols for responding to security incidents, including allegations of human rights abuses.

- Investigate incidents promptly, transparently, and in coordination with relevant authorities, ensuring accountability and corrective actions.

g. Monitoring and Reporting

- Regularly monitor and audit security practices to ensure compliance with VPSHR.
 - Report internally and, where appropriate, externally on security and human rights performance.
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5. Key Focus Areas

Respecting Human Rights

- Prohibit security practices that violate human rights, including arbitrary detention, excessive force, or discrimination.
- Ensure security operations respect the rights to freedom of expression, assembly, and association.

Promoting Safe and Ethical Security Practices

- Implement clear rules of engagement for security providers, emphasizing proportionality and restraint.
- Deploy security measures that prioritize de-escalation and non-violent conflict resolution.

Fostering Stakeholder Engagement

- Engage with local communities, NGOs, and governments to understand and address security-related concerns.
 - Support initiatives that promote human rights and community development in operational areas.
 - Roles and Responsibilities
 - Executive Leadership: Set strategic priorities for VPSHR implementation, allocate resources, and model commitment to human rights.
 - Managers and Supervisors: Oversee compliance with this policy, ensure security providers adhere to VPSHR, and foster community engagement.
 - Employees and Contractors: Follow security and human rights protocols, report concerns, and participate in relevant training.
 - Security and Compliance Teams: Monitor adherence to VPSHR, conduct risk assessments, facilitate training, and manage incident investigations.
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6. Reporting and Accountability

- All security incidents, human rights concerns, or policy violations must be reported promptly through established channels.
- BlackOak Energy LLC enforces a non-retaliation policy to encourage open reporting of concerns.
- Violations of this policy may result in disciplinary action, including termination, and termination of contracts with non-compliant security providers.
- Policy Review

This policy will be reviewed at least annually or as needed to reflect updates to the VPSHR, regulatory changes, operational shifts, or lessons learned from incidents or audits.
