

P-COR-015

Night Bird Security Statement of applicability and conformance	Document No:	P-COR-015
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	Approval:	Corporate Management

Date	Names	Position	Signature
07/08/2025	Shawn Perez	Executive Manager	

Document Approval

1. Statement of Conformance

Night Bird Security (NBS) is committed to continually improving the effectiveness of its Security Operations Management System (SOMS) in accordance with the requirements of:

- ISO 18788:2015 – Management System for Private Security Operations – Requirements with Guidance for Use
- ANSI/ASIS PSC.1-2022 – Management System for Quality of Private Security Company Operations – Requirements with Guidance

Our Quality and Security Management System (QAMS/SOMS) incorporates and adopts the legal obligations and recommended good practices articulated in the Montreux Document, the International Code of Conduct for Private Security Providers (ICoCA), and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Respect for human rights is embedded in all security operations and is a core value of our organization's culture. NBS Security formally establishes, as a company-wide policy, its commitment—and the commitment of all persons working on its behalf—to uphold the duty to respect human rights, as reflected in the provisions of its SOMS and the following international frameworks:

1. The International Code of Conduct for Private Security Service Providers (ICoCA)
2. The Montreux Document on Pertinent International Legal Obligations and Good Practices for States
3. The United Nations Guiding Principles on Business and Human Rights (2011)
4. The Voluntary Principles on Security and Human Rights

All NBS employees, contractors, and representatives receive training to understand and adhere to these obligations. Top management ensures continuous compliance and performance monitoring through routine reviews, audits, and management meetings. This conformance is integrated across our operational planning, risk assessment, client engagement, and community relations strategies.

2. Referenced International Frameworks

Night Bird Security aligns its operations and SOMS obligations with the following internationally recognized standards and human rights instruments:

- a) International Code of Conduct for Private Security Service Providers (ICoCA)
- b) Montreux Document on Pertinent International Legal Obligations and Good Practices for States related to the Operations of Private Military and Security Companies during Armed Conflict
- c) Guiding Principles on Business and Human Rights (2011): Implementing the United Nations “Protect, Respect and Remedy” Framework
- d) Voluntary Principles on Security and Human Rights (VPSHR)

All personnel and representatives working on behalf of Night Bird Security (NBS) shall receive appropriate training to ensure they fully understand and comply with the operational and human rights expectations outlined in the above frameworks.

Top Management at NBS recognizes that respect for human rights is a core organizational value. As such, human rights compliance forms part of the agenda for regular operational reviews and management meetings. Through these reviews, NBS ensures that its Security Operations Management System (SOMS) continues to meet international best practices and reflects our ethical commitment in high-risk operational environments.

3. Security Operations Policy

Night Bird Security is committed to upholding the highest standards in the conduct of security operations—defined as the protection of people, assets (tangible and intangible), and infrastructure in complex, high-risk environments.

This Security Operations Policy outlines the intentions, principles, and strategic direction guiding all NBS officers, employees, contractors, consultants, and agents (collectively referred to as “Representatives”) involved directly or indirectly in operational duties. It applies across all static, mobile, protective, and advisory security services provided by NBS in Iraq.

While this policy focuses specifically on security operations, it should be read in conjunction with the following governing frameworks and internal codes:

- NBS Code of Business Conduct and Ethics
- ISO 18788:2015 – Management System for Private Security Operations
- ANSI/ASIS PSC.1-2022
- Applicable Iraqi legal and regulatory obligations
- Human rights commitments, including the ICoCA, Montreux Document, UNGPs, and VPSHR

NBS recognizes that its operational success is directly tied to lawful conduct, respect for human rights, and ethical behavior at every level. Therefore, we are committed to:

- Ensuring that all Representatives understand and uphold legal, contractual, and ethical responsibilities
- Training all operational personnel in the use of force, rules of engagement, human rights compliance, and incident reporting
- Maintaining transparency, accountability, and oversight through a documented Security Operations Management System (SOMS)
- Promoting a culture of professionalism, integrity, and continuous improvement

This policy is enforced by NBS senior leadership, regularly reviewed for relevance and effectiveness, and integrated across all layers of operational planning and execution.

4. Definition and Scope of Security Operations

Security operations at Night Bird Security are defined as the activities and functions aimed at protecting people, property, infrastructure, and both tangible and intangible assets from harm, disruption, or loss. These operations may include armed or unarmed protection, and may involve the lawful carrying and use of weapons in accordance with Iraqi legislation, client contracts, and international best practices.

This definition aligns with the International Code of Conduct (ICoCA), which outlines security services as:

“The guarding and protection of persons and objects, such as convoys, facilities, designated sites, property or other places (whether armed or unarmed), or any other

activity for which the personnel of companies are required to carry or operate a weapon in the performance of their duties.”

5. Operational Commitment to Safety and Proactive Risk Management

NBS is committed to providing a safe and secure working environment for all employees, contractors, clients, and third-party stakeholders. This commitment is operationalized through the implementation of proactive and layered security measures designed to mitigate threats including:

- Criminal activity
- Hostile engagements
- Malicious acts
- Sabotage, vandalism, or theft
- Civil unrest or conflict-zone hazards

NBS integrates risk-based planning, training, supervision, and performance monitoring as core components of its Security Operations Management System (SOMS). Our goal is not only to respond to threats, but to prevent, deter, and neutralize risks through ethical, lawful, and professionally executed protective services.

Statement of Applicability – ISO 9001:2015, ISO 18788:2015 & PSC.1- 2022

1. Introduction

Night Bird Security (NBS) operates in complex and high-risk environments throughout Iraq, providing static and mobile security services to clients across commercial, diplomatic, infrastructure, and humanitarian sectors. This Statement of Applicability (SoA) outlines how the company conforms to the requirements of ISO 9001:2015, ISO 18788:2015, and PSC.1-2022, and identifies the clauses deemed not applicable based on our operational scope and the nature of our services.

2. Scope of the Quality and Security Operations Management System (QAMS/SOMS)

The scope of NBS's QAMS/SOMS encompasses the provision of protective security services, including:

- Manned guarding (static and mobile)
- Risk management and consultancy
- Secure transportation and convoy security
- Journey and route management
- Personal protection services

These activities are conducted across operational bases, client sites, and mobile deployments in Iraq.

3. Intent of the Management System

The purpose of the management system is to ensure effective control of our operations and continual improvement across all processes, with an emphasis on:

- Enhancing customer satisfaction
- Meeting applicable legal and contractual obligations
- Operating with transparency, accountability, and respect for human rights
- Ensuring compliance with the requirements of ISO 9001:2015, ISO 18788:2015, and PSC.1-2022

4. Applicable Standards and Governance Frameworks

The management system of NBS is based on the following standards:

- ISO 9001:2015 – Quality Management Systems
- ISO 18788:2015 – Management System for Private Security Operations
- ANSI/ASIS PSC.1-2022 – Quality of Private Security Company Operations

In addition, it incorporates human rights frameworks such as:

- The International Code of Conduct for Private Security Service Providers (ICoCA)
- The Montreux Document on International Legal Obligations and Good Practices
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The Voluntary Principles on Security and Human Rights (VPSHR)

5. Non-Applicable Clauses

5.1 ISO 9001:2015

****Clause 8.3 – Design and Development of Products and Services****

***Justification:** * NBS does not engage in product design or the development of new services outside the scope of protective security operations. All services are delivered based on pre-defined operational requirements, client specifications, and regulatory constraints. Thus, this clause is not applicable.

5.2 ISO 18788:2015

5.3 **Clause 8.3.6 – Use of Force in Support of Law Enforcement**

***Justification:** * NBS does not provide support services to official law enforcement bodies. All use of force is governed strictly by client contracts, operational SOPs, and applicable Iraqi law. Our activities remain within the scope of private security services.

****Clause 8.5.1 – Law Enforcement Support****

***Justification:** * NBS is not contracted to support public law enforcement or military authorities. Therefore, this clause is not relevant.

****Clause 8.5.2 – Detention Operations****

***Justification:** * NBS does not engage in or manage any detention operations. This is beyond our operational mandate and outside our service delivery model.

6. Conformance Statement

Night Bird Security confirms that all applicable clauses of ISO 9001:2015, ISO 18788:2015, and ANSI/ASIS PSC.1-2022 are implemented within its QAMS/SOMS framework, excluding only the clauses explicitly identified as not applicable. The system is audited internally and externally, subject to continual improvement, and aligned with stakeholder expectations, legal requirements, and international best practices.

7. Review and Approval

This Statement of Applicability is reviewed annually or following major organizational, operational, or regulatory changes. It is approved by NBS executive management as part of the SOMS management review process.

 