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SECURITY POLICY

BioTherm Energy (Pty) Ltd's overriding objective is to protect people and assets in a way that minimises conflict and respects the human rights of its diverse stakeholders, avoids creating or worsening conflict, and addresses security threats in as peaceful a way as possible.

As potential security impacts were outside the scope of the facility EIA, BioTherm Energy (Pty) Ltd will jointly develop a site security approach in collaboration with EPC Contractor that sets out the minimum requirements and expectations for all personnel, contractors and sub-contractors in relation to security arrangements and any possible use of force. Any security contractor(s) must be registered with the Private Security Industry Regulatory Authority (PSIRA).

Furthermore, BioTherm Energy (Pty) Ltd has adopted the IFC Performance Standards and supporting World Bank Group Environmental, Health and Safety Guidelines as the overarching standards associated with human rights, labour force management, vulnerable groups and stakeholder engagement to guide it towards achievement of appropriately high levels of environmental and social performance throughout the Project's life cycle.

The 2012 versions of the IFC Performance Standards set out a range of requirements with regard to managing social and environmental impacts, including those potentially associated with influx. Performance Standard 4: Community Health, Safety and Security is directly applicable to this Plan and sets out the following requirements:


- The EPC Contractor will assess any risks posed by its security arrangements to people within and outside the Project site. In addition to satisfying applicable host country law, the Project's security arrangements must take account of the

principles of proportionality and good international practice in relation to hiring, rules of conduct, training, equipping, and monitoring of security;

- The proponent is required to make reasonable inquiries to ensure that those providing security are not implicated in past abuses; they are adequately trained in the use of force and appropriate conduct, and they act within the applicable law. No use of force is to be sanctioned unless used for preventive and defensive purposes and in proportion to the nature and extent of the threat;
- A grievance mechanism for affected communities shall be provided to express any concerns about security arrangements and/or the acts by security personnel;
- The proponent will seek to ensure that security personnel will act in a manner consistent with international standards; and
- The EPC Contractor will investigate all allegations of unlawful or abusive acts by security personnel, take appropriate actions to prevent recurrence, and report unlawful and abusive acts to the relevant public authorities.

BioTherm Energy (Pty) Ltd has similarly adopted the United Nations Basic Principles on the Use of Force and Firearms and Voluntary Principles on Security and Human Rights, which provide guidance to extractive and energy companies on maintaining the security of operations in a manner that respects human rights and fundamental freedoms. The Voluntary Principles fall into three main categories:

- Risk assessment;
- Relations with public security; and
- Relations with private security.



 Jasandra Nyker

16/07/2019

Date:

Chief Executive Officer