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INTEGRATED MANAGEMENT SYSTEMS

Based on ISO 9001, ISO 45001, ISO14001, &ISO18788

Human Rights Impact Assessment Framework (HRIA)

	DESIGNATION	SIGN	DATE
Prepared by	Head Of Risk & Compliance		15/09/2025
Reviewed by	Chief Operating Officer		15/09/2025
Approved by	Group Chief Executive Officer		15/09/2025



AMENDMENT SHEET

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OUR VISION

Our vision is to become the leading protection and security service provider in Eastern Africa. We aspire to set the industry standard for excellence, innovation, and reliability, delivering unparalleled security solutions to our clients across the region.

As the preferred choice for protection and security services, we aim to be recognized for our unwavering commitment to customer satisfaction, our uncompromising adherence to the highest professional and ethical standards, and our ability to consistently exceed expectations.

OUR MISSION

Our mission is to become the preferred supplier of domestic, corporate, and banking security and protection solutions in Kenya. We are committed to achieving this objective by continuously investing in and developing our resources, including our people, processes, and technology.

We recognize that the security landscape is ever-evolving, and our customers' needs are diverse and dynamic. Therefore, we strive to stay at the forefront of the industry by constantly enhancing our capabilities and adapting to emerging trends and challenges.

OUR CORE VALUES

❖ Focus

We prioritize our clients' security needs by creating tailor-made security solutions to ensure that their assets and personnel are protected. We are dedicated to providing unparalleled security services that meet and exceed our client's expectations.

❖ Accountability

We believe in taking responsibility for our actions, decisions, and results. Therefore, operating with transparency, honesty, and integrity in all our interactions with our clients, employees, and stakeholders. Our commitment to accountability ensures that our clients can trust us to always act in their best interests.

❖ Reliability

We are committed to delivering reliable security services to our clients. Our experienced and trained security personnel are equipped with the latest technology and techniques to provide comprehensive security solutions that meet and exceed our client's expectations.

❖ Growth

We are committed to growing our business by continually improving our security services and expanding our reach. We embrace innovation and adapt to new challenges to achieve our mission and stay ahead of our competitors.

❖ Organized

We are a well-organized security company that utilizes a structured approach to manage our clients' security needs. We ensure that our personnel, technology, and processes are coordinated and aligned to deliver the best possible security services to our clients.



WELLS FARGO LIMITED HUMAN RIGHTS POLICY STATEMENT

Wells Fargo Limited is committed to respecting, protecting, and promoting human rights in all aspects of its operations. We recognize our responsibility to prevent and mitigate adverse human rights impacts and to provide access to remedy when impacts occur. This policy is informed by the UN Guiding Principles on Business and Human Rights, the International Code of Conduct Association (ICoCA) Code, ISO 18788:2015, the UN Basic Principles on the Use of Force and Firearms, the Voluntary Principles on Security and Human Rights, and Kenyan laws including the Constitution and the Private Security Regulation Act, 2016.

We apply this policy across all our services, including guarding, cash-in-transit, investigations, monitoring, event security, and subcontracted activities. We also extend these commitments to our employees, contractors, suppliers, and public security partners.

We act with zero tolerance for excessive use of force, torture, unlawful detention, discrimination, harassment, gender-based violence, and breaches of privacy. We ensure that all use of force complies with principles of legality, necessity, proportionality, and precaution. We uphold fair labour practices, provide safe working conditions, respect freedom of association, and protect vulnerable groups such as women, children, migrant workers, and persons with disabilities.

We integrate human rights due diligence into our management system by identifying, assessing, and addressing risks before they cause harm. We monitor our performance using clear indicators, such as completion of Human Rights Impact Assessments, training coverage, grievance outcomes, and incident trends. We engage regularly with workers, clients, communities, and other stakeholders to understand their concerns and to improve our practices.

We provide accessible grievance channels, including hotlines, email, anonymous boxes, and community liaison officers. We ensure that complaints are handled confidentially, fairly, and without retaliation. When harm occurs, we provide remedies that are survivor-centred, rights-compatible, and aligned with international best practice.

We expect all staff, contractors, and partners to comply with this policy and to uphold the highest standards of conduct. We provide training, guidance, and oversight to ensure consistent understanding and application. Failure to comply may result in disciplinary or contractual consequences.

This policy demonstrates Wells Fargo Limited's active commitment to human rights and accountability. By implementing this framework, we assure our clients, employees, communities, and oversight bodies that our operations are conducted with integrity, respect, and continuous improvement.

GROUP CEO

SIGNATURE

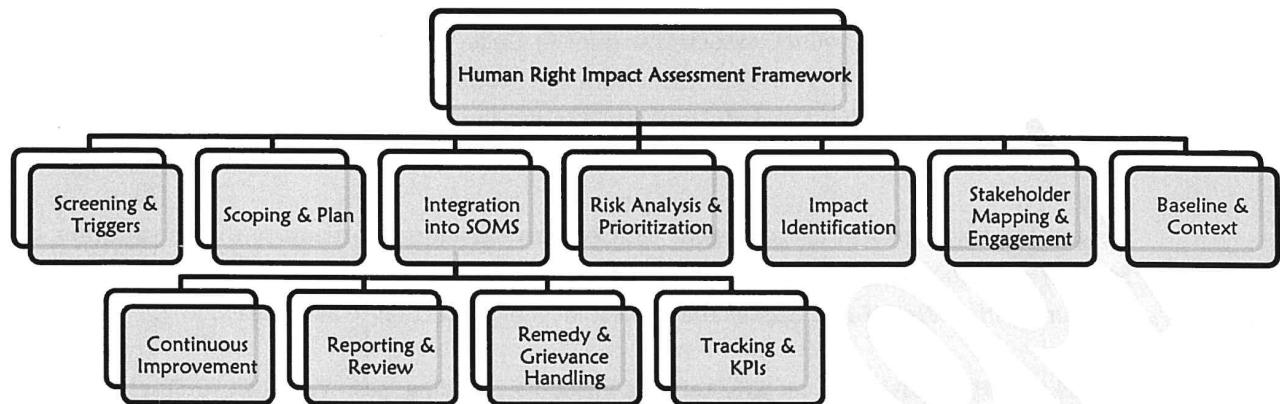
Date

1.1. PROCESSES

1.2. Description Of Processes

1.2.1. HRIA Process Overview (UNGP-aligned)

S/N	Element	Description
1	Screening & Triggers	New client/contract, new geography, service change, incident trend, stakeholder concerns.
2	Scoping & Plan	define boundaries, stakeholders, methods, languages, timeframes
3	Baseline & Context	Legal mapping, security context, conflict sensitivity, workforce profile, community dynamics, gender lens.
4	Stakeholder Mapping & Engagement	rights-holders (workers, communities), duty-bearers (state), clients, NGOs; safe and inclusive consultation
5	Impact Identification	Map activities to potential rights impacts (cause/contribute/linked).
6	Risk Analysis & Prioritization	Apply criteria (Section 7) to produce a Salient Impact Register.
7	Prevention & Mitigation Planning	define controls, SOPs, training, resourcing, and performance indicators
8	Integration into SOMS	Embed controls into ISO 18788 processes (operations, supplier control, emergency response).
9	Tracking & KPIs	monitor indicators and verify effectiveness with workers/communities
10	Remedy & Grievance Handling	enable State/judicial and non-judicial mechanisms; ensure UNGP effectiveness criteri
11	Reporting & Review	Management review, client/ICoCA reporting, public disclosure as appropriate.
12	Continuous Improvement	Lessons learned, CAPAs, training updates.



1.2.2. Main step for Human Right Impact Framework

2.3.1.1. Wells Fargo Limited has established a Human Rights Impact Assessment (HRIA) framework to embed respect for human rights into all its operations.

2.3.1.2. The framework integrates the UN Guiding Principles on Business and Human Rights (UNGPs), the International Code of Conduct Association (ICoCA) Code, and the ISO 18788:2015 Security Operations Management System (SOMS). It also draws from the UN Basic Principles on the Use of Force and Firearms, the UN Code of Conduct for Law Enforcement Officials, and the Voluntary Principles on Security and Human Rights (VPSHR).

2.3.1.3. The HRIA ensures full alignment with Kenyan legislation, particularly the Constitution, the Private Security Regulation Act (PSRA) 2016, labour, occupational health and safety, and data protection laws. Where standards differ, Wells Fargo applies the highest level of protection to individuals.

2.3.1.4. The HRIA covers all security services including guarding, cash-in-transit (CIT), escort, control room monitoring, K9 units, investigations, event security, and mobile response. It applies to all facilities, vehicles, equipment, and technology systems such as CCTV, body-worn cameras, access control, and alarms under Wells Fargo's control or influence.

2.3.1.5. The framework extends to contractors, subcontractors, labour brokers, training providers, and any public security entities engaged in client operations.

2.3.1.6. The HRIA defines adverse human rights impacts as any action or omission that undermines the ability of individuals or groups to enjoy internationally recognized rights.

2.3.1.7. Wells Fargo identifies salient human rights risks as the most severe potential negative impacts it could cause, contribute to, or be directly linked to through business relationships.

2.3.1.8. The organization emphasizes accountability across leadership, compliance, operations, HR, training, legal, SHE/Q, procurement, and site management. It assigns responsibility through a clear RACI model and integrates human rights due diligence into all operational processes.

2.3.1.9. Wells Fargo conducts HRAs whenever it takes on new clients or contracts, expands to new geographies, modifies services, identifies incident trends, or responds to stakeholder concerns. Each HRIA begins with screening and scoping to establish boundaries, stakeholders, methods, and timelines.

2.3.1.10. The company then establishes a baseline by mapping applicable legal and regulatory frameworks, analyzing security contexts, assessing workforce and community dynamics, and applying a gender-sensitive lens.

2.3.1.11. Wells Fargo engages rights-holders such as employees, communities, and vulnerable groups, as well as duty-bearers such as the state, clients, and civil society organizations, ensuring inclusive and safe consultation.

2.3.1.12. The company identifies potential and actual human rights impacts by mapping activities against risks, analyzing severity, scope, irremediability, likelihood, vulnerability, and business connection. Severity carries greater weight than likelihood in prioritizing risks. Wells Fargo assigns each risk a score, categorizes it into critical, high, medium, or low priority, and develops prevention and mitigation plans. It integrates these plans into ISO 18788 management processes, monitors implementation through key performance indicators, and evaluates effectiveness through audits, feedback, and stakeholder dialogue.

2.3.1.14. Wells Fargo recognizes common human rights risks in private security operations. These include risks of excessive or unlawful use of force, torture, unlawful detention, invasion of privacy through misuse of surveillance, discrimination in recruitment or deployment, denial of freedom of association, poor working conditions, child labour, health and safety violations, gender-based violence and harassment, negative community impacts, retaliation against whistleblowers, and complicity risks in interactions with public security forces. The company maintains a catalogue of such risks and continuously reviews them.

2.3.1.15. To address these risks, Wells Fargo adopts robust controls. It enforces lawful, necessary, proportionate, and precautionary use-of-force rules; ensures immediate handover of detainees to the police; maintains fair recruitment and equal opportunity policies; implements strict data protection measures; upholds workers' rights; engages communities constructively; and ensures written agreements with public security forces. The company enforces a zero-tolerance policy on gender-based violence and sexual exploitation and adopts survivor-centred response protocols.

2.3.1.16. The HRIA framework integrates fully into the ISO 18788 system. It informs the organization's context analysis, leadership commitments, planning, operational controls, supplier management, emergency preparedness, monitoring, and continual improvement. Wells Fargo measures performance through leading and lagging indicators. These include the percentage of sites with completed HRAs and functioning grievance mechanisms, training completion rates, subcontractor compliance levels, incident rates, and timeframes for acknowledging, investigating, and remedying allegations.

2.3.1.17. The company operates a grievance mechanism that aligns with UNGP effectiveness criteria. This mechanism is legitimate, accessible, predictable, equitable, transparent, rights-compatible, and based on engagement and learning. Channels include hotlines, SMS platforms, email, anonymous boxes, community liaison officers, union representatives, client channels, and the ICoCA complaints process. Wells Fargo safeguards whistleblowers, ensures non-retaliation, and provides survivor-centred handling of gender-based violence complaints.

2.3.1.18. Training and competence form a critical pillar of the HRIA. Wells Fargo provides induction and role-specific training covering human rights, UN standards, ICoCA, VPSHR, and data protection. It conducts scenario-based exercises such as crowd control, CIT ambush, strikes, and use-of-force events. Staff undergo annual recertification, targeted refreshers after incidents, and joint training sessions with public security partners.

2.3.1.19. Wells Fargo applies stringent due diligence to suppliers and subcontractors. It requires proof of licensing, human rights policies, training records, and compliance with ICoCA standards. Contracts include



human rights clauses, audit rights, incident reporting requirements, and termination provisions for breaches. The company monitors subcontractors through audits and corrective action plans.

2.3.1.20. All HRIA documentation, including reports, stakeholder engagement logs, incident files, training records, audits, and management reviews, are securely maintained according to retention schedules and data protection principles. Wells Fargo reports findings internally to the Executive Committee, externally to clients and ICoCA, and discloses salient risks publicly where safe to do so.

2.3.1.21. The company commits to continual improvement. It reviews salient risks annually, conducts after-action reviews, audits, and stakeholder consultations, and adjusts practices in response to changes in law and operating context. The HRIA framework includes practical tools such as screening and scoping forms, stakeholder engagement logs, impact matrices, use-of-force checklists, investigation protocols, grievance self-assessments, KPI dashboards, and legal mapping. These tools guide consistent and rigorous application across all operations.

2.3.1.22. Wells Fargo has adopted a 12-month implementation roadmap. In the first quarter, the company establishes policy, appoints an HRIA lead, pilots the framework at high-risk contracts, and strengthens grievance mechanisms. In the second quarter, it completes HRAs at all critical sites, rolls out training, and formalizes agreements with public security. In the third quarter, it expands supplier due diligence, integrates KPIs into dashboards, and undergoes its first internal audit. In the fourth quarter, it reviews salient risks at management level, publishes an external summary, and plans further improvements.

2.3.1.23. Through this HRIA framework, Wells Fargo Limited actively respects human rights, prevents and mitigates risks, provides remedy where impacts occur, and demonstrates accountability to clients, workers, communities, regulators, and oversight bodies.

2.3.1.24. Human Rights Impact Assessment

We conduct Human Rights Impact Assessments (HRIA) for all new contracts, service expansions, high-risk sites, and when incidents or stakeholder concerns arise. Each HRIA identifies actual and potential risks, evaluates their severity, scope, likelihood, and irremediability, and prioritizes them according to their salience. We focus on risks to the right to life, security of person, dignity, privacy, fair working conditions, equality, and access to remedy. Preventive and corrective measures are integrated into operations, with monitoring and review cycles to ensure effectiveness.

2.3.1.25. RACI Responsibility Matrix

To ensure accountability and clarity, Wells Fargo Limited applies the following RACI framework:

Function/Role	Responsible (R)	Accountable (A)	Consulted (C)	Informed (I)
Executive Committee		A	C	I
Compliance	R		C	I
Operations	R		C	I
HR	R		C	I
Legal			C	I
SHE/Q	R		C	I
Procurement	R		C	I
Site Managers	R			I
Employees/Subcontractors	R			I

2.3.1.26. Criteria for Evaluation

We evaluate human rights impacts using criteria that prioritize severity over likelihood. Severity is assessed by scale of harm, number of people affected, and how remediable the harm is. Likelihood considers the probability of occurrence. Additional weight is given where vulnerable groups are disproportionately affected. Each risk is scored, categorized as critical, high, medium, or low, and prioritized for action.

2.3.1.27. Key Performance Indicators (KPIs)

We measure and monitor performance using the following KPI framework:

S/No	Process Step	KPI	Evidence	M&E Method	Responsibility
1	Conduct HRIA for new contracts	% of new contracts with completed HRIA	HRIA Reports	Quarterly review of HRIA completion	Compliance, Operations
2	Staff training on human rights	% of staff trained annually	Training Registers	Training attendance analysis	HR, Compliance
3	Integration of human rights clauses	% of contracts with HR clauses	Contract Records	Contract review audit	Legal, Procurement
4	Grievance resolution	Average time to resolve grievances	Grievance Case Files	Monthly grievance tracker review	Compliance, HR
5	Incident management	Recurrence rate of human rights incidents	Incident Investigation Reports	Root cause analysis, trend monitoring	SHE/Q, Site Managers
6	Stakeholder engagement	Community/stakeholder satisfaction level	Consultation Logs, Surveys	Annual stakeholder feedback analysis	Compliance, Operations

2.3.1.28. Attachments and Records

We maintain the following records to demonstrate compliance and accountability:

S/No	Reference	Documented Information Generated	Location	Retention Period
1	HRIA	Human Rights Impact Assessment Reports	Compliance Department	7 years
2	Stakeholder Engagement	Consultation Logs, Feedback Records	Operations/Compliance	5 years
3	Risk Management	Risk Registers	SHE/Q Office	7 years
4	Incident Reporting	Incident Investigation Reports	SHE/Q Department	7 years
5	Grievance Management	Grievance Case Files	Compliance Department	7 years
6	Training & Awareness	Training Registers, Materials	HR Department	5 years
7	Supplier/Subcontractor Management	Due Diligence Files	Procurement Department	Duration of engagement +5
8	Performance Monitoring	KPI Dashboards, Reports	Compliance/Management	5 years

All records are securely stored, accessible only to authorized personnel, and retained according to legal and data protection requirements. These attachments form part of our management system and are available for review by clients, regulators, auditors, and ICoCA as appropriate.

This policy demonstrates Wells Fargo Limited's active commitment to human rights and accountability. By embedding HRIA processes, assigning clear responsibilities, applying rigorous evaluation criteria, monitoring performance through KPIs, and maintaining robust documentation, we assure our clients, employees, communities, and oversight bodies that our operations are conducted with integrity, respect, and continuous improvement.



5.2. Impact Management Plan

Impact Area	Mitigation / Management Measure	Responsible Unit / Personnel	Timeline	Budget Allocation	Monitoring & Reporting Mechanism
Use of Force	Disseminate Rules on the Use of Force (RUF) pocket cards, posters, digital SOPs.	Compliance & Training Department	Immediate (0–3 months)	Printing, training material costs	Quarterly compliance audits; incident reporting reviews.
	Conduct quarterly scenario-based refresher training on lawful apprehension and de-escalation.	Training Academy; Regional Supervisors	Ongoing (every quarter)	Training program budget	Training attendance records; evaluation tests.
	Establish an internal review panel for all use-of-force incidents.	Compliance Office; HR; Legal Advisor	6 months	Staff time, case review resources	Panel reports annual summary to Board & clients
Labour Rights	Implement digital rostering to prevent excessive hours.	HR & ICT Department	6–12 months	Software procurement & licensing	Monthly HR reports; staff feedback surveys.
	Guarantee timely wage payments via mobile banking platforms.	Finance Department	3–6 months	System upgrade costs	Payroll compliance checks; worker grievance data
	Improve welfare facilities (rest areas,	Operations & Logistics Department	12–18 months	CAPEX/Operations budget	Site inspections;

	sanitation, PPE) in remote postings.				staff welfare reports.
Gender Equality & GBV Prevention	Confidential grievance and reporting mechanism (hotline, digital app, HR desk).	HR & Compliance Department	Existing	IT support, hotline operations	Quarterly grievance statistics; anonymous staff surveys.
	Mandatory training on GBV/PSEA prevention for all personnel.	Training Academy	Annual (starting 6 months)	Training module budget	Training completion records; post training evaluation.
Privacy & Data Protection	Update SOPs on data protection in line with the Data Protection Act (2019).	ICT & Legal Compliance	6 months	Legal consultancy; IT policy updates	Annual compliance audits; Data Protection Officer reports
	Introduce access controls & secure data retention/deletion protocols.	ICT Security Team	Implemented	IT infrastructure budget	System audit logs; quarterly reviews.
	Train all surveillance staff on responsible data use.	Training Academy	Annually	Training budget	Pre- and post training test monitoring reports.
Community Relations	Formalize community	CSR/Community Liaison Unit	Ongoing (bi-annual)	Meeting facilitation costs	Community meeting



	engagement forums twice yearly.				minutes; grievance logs.
	Deploy community liaison officers in high-risk areas.	Operations & CSR Unit	6–12 months	Staffing budget	Regular stakeholder feedback reports.
	Establish early-warning system for community grievances.	CSR & Compliance Department	12 months	IT/communications budget	Grievance response statistics; independent community assessments.
Subcontractors & Recruitment Practices	Mandatory human rights due diligence (HRDD) for subcontractors.	Procurement & Compliance	6–12 months	Audit costs	Supplier audit reports; compliance scores.
	Revise contracts to include human rights clauses (wages, working conditions).	Legal & Procurement	Immediate (0–3 months)	Legal review costs	Contract compliance checks; supplier monitoring.
	Monitor recruitment agencies to prohibit recruitment fees and bonded labour.	HR & Compliance	Ongoing	Monitoring budget	Recruitment audit reports worker feedback.



6. Monitoring and Evaluation

6.1 Monitoring and Evaluation of Mitigation Measures

Wells Fargo will adopt a structured monitoring and evaluation (M&E) framework to ensure mitigation measures are not only implemented but also effective. This framework will operate on three levels:

Operational Monitoring: Daily supervision and reporting by site managers and supervisors will track compliance with Standard Operating Procedures (SOPs), particularly around use-of-force protocols, welfare standards, and grievance handling. This level ensures immediate oversight and corrective action where breaches are detected.

Internal Audits and Compliance Reviews: Quarterly audits led by the **Compliance and Human Rights Office** will review training records, payroll compliance, subcontractor due diligence, and incident logs. These reviews will include random spot checks and interviews with frontline personnel to validate reported data.

Independent Oversight: For sensitive impact areas such as allegations of excessive force, gender-based violence, or privacy breaches, Wells Fargo will invite independent human rights experts or civil society partners to provide third-party verification. This external layer ensures impartiality and strengthens the credibility of monitoring results.

Evaluation findings will be synthesized into quarterly and annual reports, highlighting both compliance rates and qualitative insights from stakeholders. Lessons learned will feed back into training curricula, policy updates, and operational planning, ensuring a continuous learning cycle.



6.2. Tracking Key Performance Indicators (KPIs)

A set of **quantitative and qualitative KPIs** will be tracked to evaluate progress

Impact Area	Key Performance Indicator (KPI)	Measurement Method	Target / Benchmark	Reporting Frequency
Use of Force	Number and type of use-of-force incidents reported	Incident logs, review panel reports	100% incidents logged and reviewed within 14 days	Quarterly
	Percentage of personnel trained on RUF	Training attendance records	≥ 95% completion annually	Annual
Grievance Handling	Number of grievances received and resolved	Grievance register	≥ 80% resolved within 30 days	Quarterly
	Satisfaction of complainants with resolution	Anonymous surveys	≥ 70% satisfaction rating	Annual
Subcontractor Compliance	Percentage of subcontractors passing HRDD	Supplier audits	≥ 90% compliance	Annual
	Number of corrective actions implemented by suppliers	Corrective action logs	100% follow-up on non-compliance	Quarterly
Training & Awareness	Percentage of employees completing human rights and GBV/PSEA training	LMS records	≥ 95% completion annually	Annual
	Frequency of refresher courses	Training schedules	Quarterly refreshers	Quarterly
Gender Equality	Female workforce representation in leadership roles	HR statistics	≥ 30% leadership positions held by women	Annual
	Number of GBV/PSEA cases reported and addressed	HR/Grievance reports	100% of cases investigated promptly	Quarterly
Community Engagement	Number of community forums held	Meeting records	Minimum 2 per year per region	Bi-annual



	Stakeholder perception of company impact	Perception surveys, focus groups	≥ 75% positive trust rating	Annual

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RACI Matrix for Monitoring and Evaluation

KPI Area	Responsible (R)	Accountable (A)	Consulted (C)	Informed (I)
Use of Force Incidents Reviewed	Compliance Officer; Training Department	Head of Compliance	HR, Legal Advisor	Senior Management; Clients
% of personnel trained on RUF	Training Academy	Head of Training & Development	Compliance, Regional Supervisors	Senior Management, Clients
Labor Rights & Working Conditions	HR Department	Head of HR	Finance, Operations	Senior Management Employee Reps, Labo Ministry (if audited)
% of wages paid on time	Finance Department	CFO	HR, Payroll System Provider	Staff, Clients
Gender Equality & GBV Prevention	HR (Gender Focal Point)	HR Director	Legal, Training Dept., External GBV Experts	Senior Management Employee Reps
% of staff trained on GBV/PSEA	Training Academy	Head of Training	HR, Compliance	Senior Management, Clients
Number of GBV/PSEA cases resolved	HR, Compliance Officer	HR Director	Legal Advisor, External Survivor Support NGOs	Senior Management, Client (summary)
Privacy & Data Protection	ICT Security Team	Head of IT	Legal, Compliance	Senior Management, ODP (Kenya regulator), Clients
% of staff trained on Data Protection Act	Training Academy	Head of Training	ICT, Compliance	Senior Management



Subcontractor & Recruitment Practices	Procurement Department	Head of Procurement	Legal, Compliance, HR	Senior Management, Clients
% of subcontractors passing HRDD	Procurement Compliance Officer	Head of Procurement	HR, External Auditors	Senior Management, Clients
Ethical recruitment audits (no-fee policy)	HR Department	Head of HR	Recruitment Agencies, Compliance	Senior Management Employee Reps
Community Relations & Grievances	CSR/Community Liaison Officers	CSR Manager	Compliance, Local Leaders, NGOs	Senior Management Community Representative Clients
Stakeholder trust level	Independent Surveyor / CSR Unit	Head of CSR	Local NGOs, Community Leaders	Senior Management, Client Communities

6.3 Review of the HRIA

The HRIA will be a **living framework** that evolves alongside the company's operating environment. Wells Fargo commits to reviewing the HRIA at **critical decision points** to ensure that it remains relevant and effective. Such review points include:

- **New Contracts and Expansions:** Prior to signing major new service contracts, especially in high-risk industries (e.g., extractives, logistics, critical infrastructure), Wells Fargo will reassess potential human rights risks.
- **Geographical Expansion:** Entering new counties or conflict-sensitive regions will trigger a context-specific HRIA review, focusing on community dynamics, security risks, and legal frameworks.
- **Regulatory or Political Changes:** Significant changes in Kenyan law (e.g., labor reforms, data protection rules) or shifts in the political/security landscape (e.g., elections, unrest) will prompt an HRIA update.
- **Serious Incidents:** Any systemic violation—such as a major excessive force incident, widespread wage dispute, or a breach of client/community trust—will trigger an immediate reassessment of HRIA priorities and mitigation measures.

These reviews will ensure that the HRIA is **dynamic, responsive, and forward-looking**, rather than static or outdated.

6.4 Reporting to Stakeholders

Wells Fargo recognizes that transparency is a cornerstone of accountability. Accordingly, the company will report HRIA findings and progress through a **multi-layered reporting strategy**:

Internal Reporting: Detailed quarterly reports will be submitted to the Board of Directors, senior management, and the Human Rights Steering Committee. These reports will track KPIs, identify emerging risks, and propose corrective actions.

Client Reporting: Clients will receive tailored summaries of HRIA implementation relevant to their contracts, reassuring them of compliance with international standards such as ICoCA and ISO 18788.

Public Reporting: An **Annual Human Rights and Sustainability Report** will be published on Wells Fargo's website, providing an overview of risks, actions taken, and progress achieved. This report will be written in accessible language to reach employees, clients, civil society, and the general public.

Community Engagement Reporting: In regions where Wells Fargo operates, local community forums will include feedback sessions on human rights performance. Findings will be shared in plain language and local dialects to foster trust.

External Assurance: Where feasible, Wells Fargo will engage independent auditors or civil society organizations to review and verify HRIA findings. External assurance will strengthen stakeholder confidence and credibility.

6.5 Commitment to Continuous Improvement

Wells Fargo acknowledges that human rights risk management is not a one-off exercise but a process of **continuous improvement**. The company will embed a culture of learning by:

- **Policy Evolution:** Regularly updating policies and SOPs to reflect new lessons, legal changes, or stakeholder concerns.
- **Feedback Loops:** Ensuring that grievances, audits, and community feedback directly inform training content, operational adjustments, and resource allocation.
- **Capacity Building:** Investing in the professional development of staff on human rights, gender sensitivity, conflict awareness, and community relations.
- **Benchmarking and Learning from Others:** Comparing Wells Fargo's practices with international peers and participating in ICoCA and other human rights platforms to adopt emerging best practices.
- **Innovation in Monitoring:** Exploring technology-driven solutions such as digital grievance apps, anonymized surveys, and AI-based incident tracking to strengthen responsiveness.

Through this approach, Wells Fargo positions itself not only to **prevent and mitigate harm** but also to **set an industry benchmark in human rights stewardship** within Kenya's private security sector.



WELLS FARGO LIMITED — HUMAN RIGHTS IMPACT ASSESSMENT (HRIA) FRAMEWORK

Version: 1.0

Effective Date: 25 August 2025

Owner: Head of Compliance & Risk

Approved by: Executive Director

Applies to: All Wells Fargo Limited operations (Kenya and any cross-border deployments), contractors and subcontractors

6. HRIA Process Overview (UNGPs-aligned)

1. **Screening & Triggers** — new client/contract, new geography, service change, incident trend, stakeholder concerns.
2. **Scoping & Plan** — define boundaries, stakeholders, methods, languages, timeframes.
3. **Baseline & Context** — legal mapping, security context, conflict sensitivity, workforce profile, community dynamics, gender lens.
4. **Stakeholder Mapping & Engagement** — rights-holders (workers, communities), duty-bearers (state), clients, NGOs; safe and inclusive consultation.
5. **Impact Identification** — map activities to potential rights impacts (cause/contribute/linked).
6. **Risk Analysis & Prioritization** — apply criteria (Section 7) to produce a **Salient Impact Register**.
7. **Prevention & Mitigation Planning** — define controls, SOPs, training, resourcing, and performance indicators.
8. **Integration into SOMS** — embed controls into ISO 18788 processes (operations, supplier control, emergency response).
9. **Tracking & KPIs** — monitor indicators and verify effectiveness with workers/communities.
10. **Remedy & Grievance Handling** — enable State/judicial and non-judicial mechanisms; ensure UNGP effectiveness criteria.

11. **Reporting & Review** — management review, client/ICoCA reporting, public disclosure as appropriate.

12. **Continuous Improvement** — lessons learned, CAPAs, training updates.

7. Impact Assessment Criteria & Scoring

Use the following weighted criteria to score each identified impact (actual or potential):

7.1 Severity Dimensions (weight 60%)

- **Scale (0–5):** Seriousness of harm to the individual/group (life, bodily integrity, liberty, privacy, livelihood).
- **Scope (0–5):** Number/proportion of rights-holders affected.
- **Irremediability (0–5):** Degree to which harm cannot be restored or compensated.

7.2 Likelihood (weight 20%)

- **Probability (0–5):** Chance the impact will occur given context and controls.

7.3 Vulnerability & Differential Impacts (weight 10%)

- **Vulnerability (0–5):** Extent to which at-risk groups are disproportionately affected (e.g., GBV/SEA risks to women/girls).

7.3 Business Connection & Leverage (weight 10%)

- **Connection (0–5):** Cause/Contribute/Linked (5/3/1).
- **Leverage (modifier -2 to +2):** Ability of Wells Fargo to prevent/mitigate through influence/contracting.

7.4 Scoring Formula

Severity Score = (Scale + Scope + Irremediability) / 15 * 60

Risk Score = Severity Score + (Likelihood/5*20) + (Vulnerability/5*10) + (Connection/5*10) + Leverage

Prioritization bands:

- **≥75** Critical (salient) — immediate action and senior oversight.
- **50–74** High — action plan with deadlines and owner.
- **25–49** Medium — monitor, integrate into routine controls.
- **<25** Low — track, no special action unless trend worsens.

Note: Severity outranks likelihood when ranking salience, per UNGP guidance.

8. Typical Human Rights Risk Catalogue (Private Security)

1. **Right to life & security of person** — excessive or unlawful use of force/firearms, unsafe vehicle pursuit.
2. **Freedom from torture, cruel, inhuman or degrading treatment** — abusive handling of suspects/detainees.
3. **Liberty & due process** — unlawful arrest/detention, extortion.

4. **Privacy & data protection** — misuse of CCTV/BWC/biometrics, intrusive searches.
5. **Non-discrimination & equality** — discriminatory recruitment, deployment, or community interactions.
6. **Freedom of association & collective bargaining** — interference with unions or worker committees.
7. **Just & favourable conditions of work** — wages, hours, excessive overtime, rest, safe working conditions.
8. **Child labour & young workers** — improper recruitment/age verification gaps.
9. **Health & safety** — unsafe equipment/armoury/vehicles; fatigue.
10. **GBV/SEA & harassment** — towards workers, clients, or community members.
11. **Community impacts & conflict sensitivity** — intimidation, displacement, access restrictions.
12. **Rights of human rights defenders & whistleblowers** — retaliation risks.
13. **Indigenous/community cultural rights** — where relevant at client sites.
14. **Access to remedy** — ineffective or unsafe grievance channels.
15. **Public security interface** — complicity risks when co-operating with police/armed forces.

9. Methodology & Tools

9.1 Screening & Scoping Checklist

- Contract type (guarding/CIT/events/investigations).
- Geography & conflict/insecurity indicators.
- Weapons authorisation/use of force profile.
- Workforce composition (gender, migrants, vulnerable workers).
- Community proximity and previous grievances/incidents.
- Third-party involvement (subcontractors, public security).
- Data processing/monitoring technologies used.

9.2 Baseline Data Sources

- Legal & regulatory mapping (Kenya Constitution; PSRA 2016; labour, OHS, Data Protection Act; firearms regulations).
- Client safeguards; IFC/World Bank ES standards where applicable.
- Incident logs, HR records, past audits, union/worker committee minutes.
- Media and civil society reports; community liaison notes.

9.3 Rights-Holder Engagement Protocol

- Separate, safe consultations for women, minorities, and vulnerable groups.
- Use trusted facilitators and local languages; ensure voluntary informed consent.
- Avoid re-traumatization; provide referral pathways for GBV/SEA.
- Record non-attributable summaries to protect identities.

9.4 Impact Identification Techniques

- **Process mapping** of service delivery (e.g., gate control, patrol, arrest, handover).
- **Use-of-force continuum review** vs SOP and training.
- **Scenario analysis** (e.g., crowd control, theft apprehension, cash ambush, strike/picket lines).
- **Value chain mapping** for recruitment, uniforms/equipment, and subcontractors.
- **Cause-Contribute-Linked** analysis with leverage assessment.

9.5 Salient Impact Register (Template)

ID	Activity/Country	Rights Impacted	Affect	Concern	Severity (0–15)	Likelihood (0–5)	Vulnerability (0–5)	Connection (1–5)	Leverage (–2..+2)	Risk Score	Priority	Owner	Controls /Mitigation	KPIs

9.6 Control & Mitigation Library (examples)

- **Use of Force & Firearms:** lawful, necessary, proportionate, precautionary; de-escalation first; reporting and medical aid; weapon controls; periodic competence checks; scenario-based drills.

- **Arrest/Detention:** last resort; immediate police handover; dignity; no incommunicado detention; incident documentation.
- **Non-discrimination & Equal Opportunity:** fair recruitment, reasonable accommodation, anti-harassment policy, gender-responsive rostering.
- **Privacy/Data:** purpose limitation; retention schedules; consent/notice at monitored areas; secure storage; DPIAs for new tech.
- **Worker Rights:** contracts, wages, hours, PPE, fatigue management, freedom of association, channel for concerns without retaliation.
- **Community:** do-no-harm engagement, grievance channels accessible to communities, community liaison officer for high-impact sites.
- **Public Security Interface:** written MOUs; alignment to UN standards; joint training; immediate reporting of alleged abuses; suspend cooperation where risks cannot be mitigated.
- **GBV/SEA:** code of conduct, zero tolerance, survivor-centred response, safe reporting pathways, supervision at high-risk posts.

10. Integration with ISO 18788 SOMS

- **Context of the Organization (4):** map stakeholders & rights expectations; HRIA informs issues and interested parties.
- **Leadership (5):** human rights policy commitment; roles; accountability; consultation.
- **Planning (6):** risk/opportunity processes include human rights; objectives/KPIs for salient risks.
- **Support (7):** competence, awareness, communication, documented information (privacy by design).
- **Operation (8):** operational planning & control, supply chain controls, incident management and emergency preparedness incorporate human rights safeguards.
- **Performance Evaluation (9):** monitoring, audits (internal/external), stakeholder feedback, compliance evaluation.
- **Improvement (10):** nonconformities, corrective action, continual improvement.

11. KPIs & Monitoring

Leading indicators

- % of high-risk sites with completed HRIA and action plan.
- % workforce trained & competent in use-of-force and human-rights modules (initial & refresher).
- % subcontractors screened and contracted with human-rights clauses & audit rights.
- % sites with functioning rights-compatible grievance mechanism (meets UNGP effectiveness criteria).

Lagging indicators

- # and rate of alleged human rights incidents by category (excessive force, privacy breach, discrimination, GBV/SEA, unlawful detention).
- Time to acknowledge/investigate/close allegations; % resulting in remedy.
- Repeat grievances; community sentiment scores; worker survey results.

12. Grievance & Remedy (UNGP-compatible)

Mechanisms must be **legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement/dialogue.**

Channels: hotline/SMS, email, anonymous boxes, community liaison, union/worker committees, client lines, ICoCA complaints.

Process: intake → triage → secure fact-finding → fair outcomes → remedy (apology, restitution, rehabilitation, compensation, disciplinary action, policy change) → feedback → closure → lessons learned.

Safeguards: anti-retaliation; protection of whistleblowers and HR defenders; survivor-centred GBV/SEA handling; data privacy.

13. Training & Competence

- Induction & role-specific modules (human rights, UN standards, ICoCA, VPSHR, privacy).
- Scenario-based exercises (de-escalation, arrest/handover, crowd events, CIT ambush, strikes).
- Annual recertification; targeted refreshers after incidents.
- Public security joint sessions on UN standards and client/site rules.

14. Supplier & Subcontractor Due Diligence

- Pre-qualification checklist (licensing, background checks, human-rights policy, training records).
- Contract clauses (ICoCA compliance, UN standards, audit rights, incident reporting, termination for breach).
- Performance monitoring and audits; corrective action plans.



15. Documentation & Records

- HRIA reports, stakeholder logs, incident case files, investigation reports, training logs, CAPAs, audit reports, management review minutes.
- Retention periods per legal requirements and data protection schedules.
- Controls for secure storage and controlled access.

16. Reporting & Disclosure

- Internal dashboards to ExCo; periodic client reporting; ICoCA/assurance reporting; public summary of salient risks and actions (where appropriate and safe).

17. Review & Continual Improvement

- Annual review of salient risks; post-incident and after-action reviews; audit findings; stakeholder feedback; changes in law/context.

ANNEXES (PRACTICAL TOOLS)

Annex A — HRIA Screening Form (Rapid)

- Trigger, service, geography, weapons authorisation, vulnerable groups, tech in use, public security interface, known grievances, decision (full HRIA required? Y/N).

Annex B — HRIA Scoping & Plan Template

- Objectives, team & RACI, timeline, sites & stakeholders, engagement plan, data sources, ethics & safeguarding, logistics, deliverables.

Annex C — Stakeholder Engagement Log (Rights-Holders)

Date | Group | Method | Key concerns/impacts | Vulnerabilities | Commitments | Follow-up | Confidentiality notes |

Annex D — Impact Matrix (Activities → Rights)

Activity | Rights potentially affected | Impact description | Groups | Existing controls | Score | Priority |

Example activities: access control & searches; patrols; arrest/handover; CIT convoy & pursuits; crowd control; investigations & evidence handling; surveillance/CCTV/BWC; data processing; interactions with public security; subcontractor labour.

Annex E — Use-of-Force & Firearms Safeguard Checklist

- Lawful, necessary, proportionate, precautionary; de-escalation steps; warnings; medical aid; reporting; review board; weapons storage & issuance; fitness & psychological screening; competency testing; body-worn camera policy; after-action learning.

Annex F — Investigation Protocol (Human Rights Allegations)

- Case intake & preservation; survivor-centred approach; informed consent; impartial investigators; interview and evidence standards; interaction with police/oversight bodies; outcome classification; remedy decision matrix; recordkeeping.

Annex G — Grievance Mechanism Self-Assessment (UNGP Criteria)

Score each criterion 1–5 with evidence and corrective actions.

Annex H — KPI Dashboard (Sample Metrics & Queries)

- HRIA completion rate; training coverage; incident rates; time-to-remedy; community sentiment; subcontractor audit scores.

Annex I — Legal & Standards Mapping (Kenya)

- PSRA 2016 core duties (registration, reporting of force, cooperation with NPS, code of conduct).
- Data Protection Act: lawful basis, DPIA triggers, security of processing, rights of data subjects.

- Labour statutes: wages, hours, freedom of association, non-discrimination.

- Interface with public security: MOUs, incident reporting, accountability.

Annex J — Documented Information Index

- Forms, SOPs, and records mapped to ISO 18788 clauses and ICoCA Code provisions.

controlled



Implementation Roadmap (12 Months)

1. **Q1:** Policy adoption; appoint HRIA Lead; pilot at two high-risk contracts; establish grievance upgrades.
2. **Q2:** Complete HRIA for all Critical sites; roll out training; execute public-security MOUs at high-risk locations.
3. **Q3:** Supplier due-diligence rollout; integrate KPIs into SOMS dashboards; first internal audit.
4. **Q4:** Management review of salient risks; publish external summary; plan next-year improvements.