

**Addressing new  
challenges of  
private military  
and security  
companies to  
Security Sector  
Governance  
and Reform**



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DCAF – Geneva Centre for Security Sector Governance is dedicated to improving the security of states and their people within a framework of democratic governance, the rule of law, respect for human rights, and gender equality. Since its founding in 2000, DCAF has contributed to making peace and development more sustainable by assisting partner states, and international actors supporting these states, to improve the governance of their security sector through inclusive and participatory reforms. It creates innovative knowledge products, promotes norms and good practices, provides legal and policy advice and supports capacity-building of both state and non-state security sector stakeholders.

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## ABOUT THE AUTHOR

Before the Wagner Group topped international headlines, DCAF had already been working on the regulation of private military and security companies (PMSCs) for a decade. DCAF's impartial mandate has given it access to a wide array of policymakers, partners and practitioners and allowed for extensive discussions on the Wagner Group and similar actors.

This policy brief presents key findings of this engagement, most of which have already been incorporated into active DCAF programming. It is important to underline the paper does not intend to track organisational mutations of or within PMSCs or human rights violations in detail. Rather, it draws systemic governance lessons learned in recent years, to point the way forward for greater engagement by national and international stakeholders in the regulation, oversight, and accountability of PMSCs. Given the systemic nature of the challenges presented by PMSCs, the paper is written in the present tense, even if actions of specific companies – such as the Wagner Group – already took place.

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# INTRODUCTION

It is not a new phenomenon for private actors to offer armed services for hire: mercenaries have existed for centuries, and private military and security companies (PMSCs) have proliferated in recent decades. Following human rights abuses committed by mercenaries during the Cold War and by PMSCs during the 1990s and 2000s, international and national actors were forced to reckon with the challenges that these armed actors posed to international and human security. Ensuing efforts resulted in a corpus of binding and soft law, as well as multi-stakeholder initiatives.<sup>1</sup> In addition, discussions about a binding international convention on private military and security companies have been ongoing for almost 15 years.

These (in themselves positive) developments and the declining visibility of PMSCs led to complacency among policymakers, who turned their attention away, even as the PMSC industry continued to adapt and diversify. By the end of the 2010s, newly created companies began committing human rights violations on a scale and intensity not seen before: acting as geopolitical proxies, exploiting armed conflict and weak governance to bolster illegitimate regimes, and aggressively extracting natural resources from the countries in which they operate. These developments – epitomised in popular perception by, but by no means limited to, the Wagner Group<sup>2</sup> – are now at the forefront of national and international security considerations. However, the lack of attention paid to PMSCs over the past decade and a half has led policymakers to believe that these violations are new phenomena, rather than recognising them as an evolution of well-known challenges.

At the same time, because most PMSCs globally worldwide continue to operate in what has been dubbed a ‘market for force’<sup>3</sup>, policymakers have not yet fully grasped the fundamental challenges posed by PMSCs like the Wagner Group. The Wagner Group and similar companies are not just for-profit actors – they fundamentally challenge good security sector governance (and related security sector reform programming) as understood by all multilateral and regional organisations for two decades.

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1 The International Convention against the Recruitment, Use, Financing and Training of Mercenaries (adopted in 1989 and entered into force in 2001) as well as the Convention for the Elimination of Mercenarism in Africa (signed in 1977 and entered into effect in 1985) are binding substantive texts. The Montreux Document on pertinent international legal obligations and good practices for States related to operations of private military and security companies during armed conflict (adopted in 2008) as well as the International Code of Conduct for Private Security Providers (adopted in 2010) are soft law substantive texts. The UN Working Group on the Use of Mercenaries (established in 2005) is part of the Special Procedures of the UN Human Rights Council; it was preceded by the UN Special Rapporteur on the use of mercenaries, established in 1987.

2 Other challenging PMSCs notably hail from Bulgaria, Romania, and Turkey. See Kadlec, Amanda, ‘In Africa, Wagner is not the Only Game in Town’, *New Lines Magazine* (17 July 2023)

3 See Deborah D. Avant, *The Market for Force. The Consequences of Privatizing Security*. Cambridge University Press, 2005.

The Wagner Group and similar companies are not just for-profit actors – they fundamentally challenge good security sector governance (and related security sector reform programming) as understood by all multilateral and regional organisations for two decades.

In Ukraine, the Wagner Group is linked to Russian military operations and most of its fighters are de facto part of the Russian armed forces. It is precisely for these reasons that it is important to separate the analysis of what the Wagner Group does and how it is addressed in the context of Ukraine (and Russia and Belarus) from other settings: it is likely that the Group – and successor structures – will continue to offer its services in Africa and the MENA region for the foreseeable future. This in turn means that security sector reform (SSR) programming should not only focus on countries where the Group and similar actors are currently present but preventively strengthen PMSCs regulation in other countries as well.

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With disjointed and ineffective responses, states – as well as international and regional organisations – struggle to react to the challenges posed by the Wagner Group and similar companies. This is often due to fundamental misconceptions about the nature of these actors and the legal and policy frameworks within which they operate. Yet, PMSCs (and related actors such as mercenaries) are a well-known phenomenon, and their contemporary use simply exhibits new characteristics, particularly in terms of their opaque relationships with states, predatory recruitment practices, and the scale of human rights violations committed. Given these misconceptions, international and national actors overlook existing international norms, good practices, and lessons learned that could provide them with significant guidance.

The present analysis sets out how the risks posed by the Wagner Group (and similar companies) arise from *systemic* challenges of security sector governance in fragile and conflict-affected countries and beyond.<sup>4</sup> It focuses on the Group's activities in Africa to demonstrate this in practical terms. This paper does not intend to provide a definitive legal assessment, or an overview of human rights violations committed by the Wagner Group and similar companies. Rather, it draws key lessons from the past years to point the way forward for greater engagement by national and international stakeholders in the regulation, oversight, and accountability of PMSCs. There is no need to reinvent the wheel; rather, stakeholders need to refocus on, and apply, the initiatives and tools developed over the past two decades.

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4 While PMSC activities are often associated with fragile and conflict affected states, it is important to keep in mind that those states are not the only ones with significant gaps regarding PMSC regulation, oversight, and accountability. In addition, demand for PMSCs in specific contexts is tightly intertwined with larger international governance structures and patterns – be they dynamics that perpetuate power imbalances, economic disparities, corruption fueled by natural resource rents, or geopolitical interests. To comprehensively address the systemic nature of the issue, it is essential to delve into the broader dynamics that drive the offer and the demand for PMSCs, transcending individual state contexts.

# DEFINING THE PROBLEM: WHAT CHALLENGES DO THE WAGNER GROUP AND SIMILAR COMPANIES POSE TO GOOD SECURITY SECTOR GOVERNANCE AND SECURITY SECTOR REFORM?

Good security sector governance (SSG) “describes how the principles of good governance apply to security provision, management and oversight by state and non-state actors.”<sup>5</sup> This approach has guided SSR programming for two decades. All major security sector governance and reform (SSG/R) frameworks have recognised private security actors as an integral part of the security sector and of reform processes: for the OECD<sup>6</sup> and ECOWAS<sup>7</sup>, private actors are a part of non-statutory security forces, and the AU<sup>8</sup>, UN<sup>9</sup> and the EU<sup>10</sup> qualify them as non-state security. The OAS<sup>11</sup> considers the possibility of specific security partnerships that include the private sector. The operations of PMSCs such as the Wagner Group now fundamentally challenges these principles – and the stability they bring. It is therefore imperative to understand the nature of the practical and political challenges these actors pose to good security sector governance.

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5 DCAF, *Security Sector Governance: Applying the Principles of Good Governance to the Security Sector* (Geneva: DCAF, 2015)

6 OECD, *OECD DAC Handbook on Security Sector Reform: Supporting Security and Justice* (Paris: OECD, 2007)

7 ECOWAS Policy Framework for Security Sector Reform and Governance (4 June 2016)

8 African Union Policy Framework on Security Sector Reform (SSR) (adopted at the 20th Ordinary Session of the Assembly of the Union, 27-28 January 2013)

9 UN Secretary-General, *Securing Peace and Development: The Role of the United Nations in Supporting Security Sector Reform*, A/62/659– S /2008/39 (New York: 23 January 2008)

10 European Commission, *Elements for an EU-Wide Strategic Framework to Support Security Sector Reform: Joint Communication to the European Parliament and the Council* (Brussels: 5 July 2016)

11 Organization of American States, Declaration on Security in the Americas (adopted at the third plenary session of the Organization of American States, 28 October 2003)



## Secrecy in public discourse

The operations of the Wagner Group and similar PMSCs remain shrouded in secrecy. The presence of PMSCs continues to constitute a major taboo in public discourse on security issues in areas such as the Sahel. Governments are reluctant to publicly acknowledge their presence or influence, for a number of reasons. On the one hand, reliance on PMSCs reflects significant weaknesses within the national security apparatus, as it implies that the national apparatus cannot adequately meet security needs. This is a sensitive issue, especially for government leaders with military backgrounds. On the other hand, PMSCs are sometimes hired by governments that actively advocate greater national leadership and capacity in security matters, and a simple switch from international security assistance to PMSC support may not appease their supporters. Finally, several PMSC contracts are paid for through opaque arrangements that directly implicate members of national elites – again, potentially damaging the elites' very image. Leaders will invoke 'national security' to maintain the veil of secrecy. Civil society and media actors investigating PMSCs operate in shrinking spaces; in one case, three Russian journalists were killed in the Central African Republic in 2018 while investigating the activities of the Wagner Group <sup>12</sup>. As a result, it is difficult to discuss issues related to PMSCs when their activities – or even their mere presence – are shrouded in secrecy.

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12 See, for example, Mudge, Lewis, 'The Murder of Three Russian Journalists Should Not Go Unsolved', Al Jazeera (10 August 2020)



## Disinformation

Disinformation is another important aspect of the Wagner Group's operations, including the management of troll farms. The Group disseminates disinformation through a variety of means, including conspiracy theories, distorted narratives, and misinformation about the roles and intentions of international actors. This disinformation is amplified through social media platforms, which enable it to quickly penetrate communities and shape public opinion without any form of control. Much of this disinformation occurs through shared messages on chat applications such as WhatsApp, making it difficult to capture the scale of disinformation operations. One example that surfaced in 2023 was a plot to blame France for allegedly ordering the murder of nine Chinese nationals at a gold mine in the Central African Republic, supposedly to be able to blame the Wagner Group for the killings.<sup>13</sup>

Disinformation undermines public trust in national and international actors and creates public perceptions of ineffectiveness, hidden agendas, or even hostility. It also jeopardises the right to participate in public affairs and elections without interference, another key aspect of good governance. Finally, disinformation exacerbates a fundamental problem in the regulation of PMSCs, namely the lack of quality data on the number of companies and employees, the state of national regulatory frameworks, and the extent of abuses – which in turn acts as a catalyst for here-says. This erosion of trust hampers SSG programming promoted by international actors as it becomes challenging to gain the necessary support and trust from national authorities and local communities.

## Undermined state sovereignty and rule of law

By choosing not to discuss the presence and influence of PMSCs, governments are effectively forfeiting the opportunity to control them. This inaction means that state sovereignty and the rule of law are not upheld by the very governments tasked to do so.

The activities of the Wagner Group and similar PMSCs encourage arbitrary, indiscriminate, and violent modes of operation. A recent Armed Conflict Location and Event Data (ACLED) report highlights the elevated levels of civilian targeting in CAR and Mali, even when compared to Ukraine. According to the report, 'The violence targeting civilians often takes place amongst identity groups suspected of collaborating with rebels or insurgents without distinguishing between combatants and noncombatants. The Wagner Group's use of explosives and remote violence often target civilians with indiscriminate violence, leading to fear amongst locals and increased displacement of the population. Local recruitment and training of other militias to operate alongside the Wagner Group create further long-term risks to civilians, even in the case of a Wagner Group withdrawal.'<sup>14</sup> In addition, Wagner operations may influence the modus

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<sup>13</sup> Irish, John, Elizabeth Pineau and Bate Felix, 'France Targets Russian and Wagner Disinformation in Africa', Reuters (21 June 2023)

<sup>14</sup> ACLED, *Moving Out of the Shadows. Shifts in Wagner Group Operations Around the World* (2 August 2023)

operandi within national security institutions themselves.<sup>15</sup> The OHCHR report on the Moura events in Mali in 2022 states that this *joint* operation between the Wagner Group and national armed forces violated international humanitarian law and international human rights law (IHRL). State-sanctioned and state violence undermines the rule of law, which is a key aspect of SSG.

## ‘Eviction effect’ on public resources

In the context of security and governance, transparency and accountability are paramount, and any attempts to circumvent these principles can have dire consequences. The Wagner Group’s presence reinforces the ‘eviction effect’ on public resources, diverted to security to the detriment of development and key governance structures, including the judiciary. In Mali, the group’s monthly fee is said to be USD 10 million, twice that of the Ministry of Justice and half that of the Ministry of Health<sup>16</sup>.

## Gendered impact of PMSCs

The Wagner Group has actively targeted women and girls through gender-based violence. In addition, its modus operandi – human rights violations committed by armed men with impunity – has also reinforced patriarchal norms and gender stereotypes within national security institutions, as evidenced by systematic gender-based violence that occurs in joint operations between the group and state security providers such as the military.<sup>17</sup> Not only is there a clear differential impact of PMSC operations on women and girls; the operations are also actively contributing to gender backsliding within security institutions that previously had been subject to SSR programming, including gender mainstreaming.

## PMSC engagement by national and international decision-makers

By engaging with the Wagner Group and promoting its undemocratic values, international and national decision-makers are fostering a model that directly competes with basic principles of good governance and is actively contributing to the shrinking of civic space on an unprecedented scale. The Wagner Group’s practices – particularly, the scale and systematicity of its human rights violations – not only challenge good security sector governance. By their very impact on national armed forces and public security forces, they actively undermine the core principles of security sector reform as practiced by the international community and national actors around the world over the last two decades.

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15 Office of the UN High Commissioner for Human Rights, *Rapport sur les Évènements de Moura du 27 au 31 Mars 2022* (Geneva: UN 2023). The UN Working Group on the use of mercenaries has in recent years also repeatedly published letters on such violations. ACLED, *Moving Out of the Shadows. Shifts in Wagner Group Operations Around the World* (2 August 2023)

16 Bos, Jean-Michel, ‘Wagner Coûte une Fortune aux Etats Africains’, Deutsche Welle (18 March 2023)

17 ‘The monitors (...) warned in their report to the U.N Security Council that the sexual violence by Mali’s troops and their foreign security partners is “systematic”. They said the foreign partners were “presumed to be elements of the Wagner Group”.’ Nichols, Michelle, ‘Mali’s troops, foreign partners target women to “spread terror” - UN report’ Reuters (8 August 2023)

## THE WAGNER GROUP'S INVOLVEMENT IN THE CENTRAL AFRICAN REPUBLIC

In 2017, President Touadéra signed several security agreements with the Russian government and requested military support in exchange for access to diamonds, gold, and uranium. In December 2017, the Russian Foreign Ministry successfully lobbied for an exemption to the United Nations' (UN) arms embargo,<sup>148</sup> and Russia was permitted to provide weapons and 'trainers' to support CAR forces. It announced that 170 instructors would be deployed to CAR.

Between 2018 and 2019, Wagner founder Yevgeny Prigozhin negotiated mining access in exchange for Wagner services to secure the President's re-election, which the Wagner Group achieved using a combination of bribery, intimidation and anti-Western and pro-Russian propaganda.<sup>18</sup> The network is now seeking to secure a third term for the President. A change to the country's constitution was recently adopted in a contested referendum. (The political strategy advisory provided by Wagner is widespread yet often underappreciated part of its portfolio of services).<sup>19</sup> Also in 2019, Wagner brought the government and 14 armed groups together to sign the 'Political Agreement for Peace and Reconciliation in the Central African Republic (Khartoum Accord)', which is still supported by the international community.<sup>20</sup>

In April 2022, it was estimated that up to 2,000 Wagner fighters were in CAR, although Russia maintained it was a lower number of 'instructors'. The departure of French stabilisation troops in late 2022 means that the CAR government is now more dependent on the Wagner Group for maintaining security.

The Wagner Group has protected President Touadéra against rebel forces, in addition to securing key economic locations such as Lobaye and Haute-Kotto (sites of exploration and mining). ACLED has recorded 17 battles over mining sites across the country between December 2020 and June 2023, with Wagner involved in 70% of these events.<sup>21</sup> Wagner operatives have also trained the national armed forces (FACA). The network has significant political influence in CAR and a key Wagner representative, Valery Zakharov, served as the President's security advisor in Wagner's first three years in the country.

The investigative and policy NGO The Sentry has said that Wagner is primarily financed and operated via security and mining activities, which are carried out via three CAR-registered companies that 'operate in total opacity'<sup>22</sup>. One of these, Midas Resources, has facilities in the gold mine of Ndassima in central CAR, to which Wagner operatives have prevented access by Central African mining authorities. US cables and internal documents from the Wagner Group suggested that it had at least 13 bases in the country in 2021 and revealed US concern over Wagner's dramatic expansion of the production area of Ndassima mine in the nine-month run-up to February 2023. US officials estimate that this mine could, in the long term, 'produce rewards upward of \$1 billion'<sup>23</sup>.

The Sentry has shown how 'Wagner's top command structure has diverted political and security processes sponsored by international donors (e.g., elections, peace agreements, disarmament programs, and UN-backed operations) to serve Russia's geostrategic objectives and the financial interests of the organization'<sup>24</sup>. Propaganda is key to how Wagner seeks to expand. For example, Prigozhin reportedly sponsored the film 'Tourist' (May 2021), which glorifies Wagner personnel in CAR.

Source: Case study by the UK House of Commons Foreign Affairs Committee<sup>25</sup> completed by DCAF research

18 Stanyard, Julia, Thierry Vircoulon, and Julian Rademeyer, 'The Grey Zone: Russia's Military, Mercenary and Criminal Engagement in Africa', Global Initiative Against Transnational Organized Crime (February 2023)

19 As explained in one report, 'Wagner has engaged politically in a greater number of countries in Africa than it has militarily. It has offered political strategy and advice for leaders engaging with Wagner; conducted politically biased election monitoring missions; run political influence and disinformation campaigns via social media; and interfered in elections.' Stanyard, Julia, Thierry Vircoulon, and Julian Rademeyer, 'The Grey Zone: Russia's Military, Mercenary and Criminal Engagement in Africa', Global Initiative Against Transnational Organized Crime (February 2023)

20 Lechner, John A. and Marat Gabidullin, 'Why the Wagner Group Won't Leave Africa', Foreign Policy (08 August 2023)

21 ACLED, *Moving Out of the Shadows. Shifts in Wagner Group Operations Around the World* (2 August 2023)

22 Written evidence submitted by the Sentry to the House of Commons Foreign Affairs Committee, 07 April 2022.

23 POLITICO, *Inside the stunning growth of Russia's Wagner Group*, 18 February 2023.

24 Written evidence submitted by the Sentry to the House of Commons Foreign Affairs Committee, 07 April 2022.

25 Text quoted from House of Commons Foreign Affairs Committee, *Guns for Gold: The Wagner Network Exposed* (London: UK House of Commons, 2023). Footnotes are included where DCAF has added additional information.

# ADEQUATELY DEFINING THE WAGNER GROUP AND SIMILAR COMPANIES – A PREREQUISITE

Strengthening the regulation, oversight, and accountability of actors such as the Wagner Group requires a better understanding of their legal status. Defining such actors is the prerequisite for adequate legal and policy responses.

To use an example, in the context of non-international armed conflicts (NIAC) in which the Wagner Group mostly operates,<sup>26</sup> its personnel could be considered as falling into one of the following categories defined in international humanitarian law (IHL): armed forces,<sup>27</sup> members of a non-State armed group, mercenaries,<sup>28</sup> or civilians. This is particularly relevant in contexts where IHL applies (i.e., situations of armed conflict or occupation). Outside of conflict or occupation, the accountability of these actors would be governed by international human rights law (usually translated into national legal systems), regardless of how they are defined.

Common Article 3 of the Geneva Conventions and Article 1 of Additional Protocol II refer to ‘armed forces’ and Additional Protocol II to ‘other organized armed groups’. To qualify as an **armed force**, the group would need to be (i) organized, (ii) under the command of one of the parties to the conflict and (iii) be subordinate to an internal disciplinary system.<sup>29</sup> In the case of Wagner Group personnel, in almost all situations it seems difficult to prove that they are *de jure* or *de facto* integrated into national armed forces<sup>30</sup>. Therefore, they do not qualify as state armed forces (incl. paramilitaries)<sup>31</sup>.

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26 Except for the case of Ukraine, which can be considered an international armed conflict (IAC) where reports show a different use and function of Wagner Group’s services.

27 ‘Combatant’ is to be understood as members of armed forces of the state combatants in both international and non-international armed conflicts for purposes of the distinction principle (ICRC, Customary IHL, Rule 3).

28 According to customary IHL, art. 47 Protocol I defining mercenaries can be applied by analogy to NIACs (ICRC, Customary IHL, Rule 108).

29 ‘State practice establishes this rule as a norm of customary international law applicable in international armed conflicts. For purposes of the principle of distinction, it may also apply to State armed forces in non-international armed conflicts’ (ICRC, Customary IHL, Rule 4).

30 Again, apart from the case of Ukraine.

31 Under international humanitarian law, no difference is made between militias and paramilitaries. For further information regarding the status of combatant and the distinction between IACs and NIACs, please refer to: [Customary IHL - Rule 4. Definition of Armed Forces](#). For further information of PMSCs’ personnel and the status of combatant also see: Cameron, Lindsey, ‘Private Military Companies and their Status under International Humanitarian Law’, *International Review of the Red Cross*, Vol. 88: No 863 (September 2006), 584-585.

The second option to consider is whether Wagner Group personnel qualify as members of a **non-state armed group**. According to Article 1 of Additional Protocol II, the Wagner Group would need a responsible chain of command-and-control over part of a given territory, allowing it to conduct military operations. While the Wagner Group has a structured organisation, there is currently insufficient evidence to suggest that it exercises effective control over any specific territory.

The third designation under IHL would be that of a **mercenary** (which applies only to individuals, whereas the PMSC definition applies to business entities). While the Protocols to the Geneva Conventions (Article 47 of Additional Protocol I) define mercenaries only in the context of international armed conflicts, customary IHL<sup>32</sup> and two international conventions cover mercenaries and extend their scope to NIACs – namely the United Nations International Convention against the Recruitment, Use, Financing and Training of Mercenaries (1989/2001)<sup>33</sup> and the OAU/AU Convention for the Elimination of Mercenarism in Africa (1977/1985). It is virtually impossible to prove that Wagner Group personnel meet the specific and cumulative definition of mercenaries in Article 1 of the UN Convention. To mention two of the six conditions, it would be necessary to prove that the personnel were recruited specifically to fight in a given conflict and to that they received ‘material compensation substantially in excess of that promised or paid to combatants of similar rank and functions in the armed forces’ of the party to the conflict employing them.<sup>34</sup> Wagner agents are not recruited for specific contexts and their material compensation – while attractive enough to motivate them to provide their services – cannot be considered “substantially in excess” of other compensation<sup>35</sup>. While the AU Convention does not include the specific requirement of material compensation for mercenaries<sup>36</sup> it has retained the other cumulative and specific elements of its definition; this means that it is still extremely difficult to define individual members of the Wagner Group as mercenaries. An exception might be Libya – the way in which Wagner personnel were used there as well as the ratification of the AU Convention by the Libyan state could potentially provide scope for the applicability of the definition in that convention.

The most appropriate general definition of the Wagner Group is that of a **private military and security company**.<sup>37</sup> *The Montreux Document on pertinent international legal obligations and good practices for States related to operations of private military and security*

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32 ICRC, Customary IHL, Rule 108.

33 In the definition offered by the International Convention against the Recruitment, Use, Financing and Training of Mercenaries (1989), a mercenary is according to Article 1, any person who: (i) is recruited to actively participate in hostilities, (ii) is motivated to participate in the armed conflict for private gain offered by one of parties to the conflict, (iii) is not an national, a resident, or a member of the armed forces of one of the parties to the conflict or an official in duty from another third State. Contrary to Article 47 of the Additional Protocol I, this definition does require the direct participation in the hostilities.

34 According to the definition of Article 1, private gain refers to a ‘material compensation substantially in excess of that promised or paid to combatants of similar rank and functions in the armed forces of that party’.

35 In August 2023, the research project All Eyes on Wagner reported Wagner offering a monthly salary of 150'000 Russian roubles (about 1'500 USD) for jobs in the Middle East and 195'000 to 250'000 Russian roubles (about 2'050 to 2'640 USD) for jobs in Africa. <https://x.com/alleyesonwagner/status/1693985960873378242?s=20>, accessed 10 July 2024

36 See Article 1 of the AU Convention for the Elimination of Mercenarism in Africa.

37 This does not mean that the employees of PMSCs such as Wagner cannot also sometimes qualify as mercenaries. Nevertheless, this classification would not change the applicable law – it would only change the protection of a specific individual under international humanitarian law.

Photo by shobakhul, Adobe Stock



*companies during armed conflict* – which, although of a soft law nature, is currently the sole international instrument on the obligations of states relating to the activities of PMSCs – defines PMSCs as ‘private business entities that provide military and/or security services’. (Part One of the Document reiterates existing international legal obligations (rather than creating new ones), while Part Two outlines good practices). The definition applies to both individual companies and to business entities that are made up of networks of companies. What matters is whether some or all the activities carried out by the entity or entities fall within the scope of the activities covered by the Document. In addition, the entities must be of a private commercial nature (as evidenced for example, by payments or royalties received from contracting states and salaries paid to employees).

Some argue that there are several factors that disqualify Wagner from being labelled as a PMSC. These include prohibition of private military contractors in Russia, the fact that the Wagner Group is not legally registered as a PMSC in Russia (or any other country), and the use of the Wagner Group for geopolitical purposes. However, the definition of PMSC in the Montreux Document makes it clear that the determining factor for identifying a home state is ‘the state where the PMSC has its principal place of management’.<sup>38</sup> Even if a PMSCs has no legal formal registration in a specific jurisdiction, that state still has the full range of obligations and responsibilities set out for home states in Part One of the Montreux Document.

38 “‘Home States’ are states of nationality of a PMSC, i.e. where a PMSC is registered or incorporated; if the State where the PMSC is incorporated is not the one where it has its principal place of management, then the State where the PMSC has its principal place of management is the “Home State”.’ Montreux Document, Preface.

In addition, the Montreux Document is very clear on assessing companies based on the services they provide, ‘irrespective of how they describe themselves.’ The Montreux Document specifically mentions the armed guarding and protection of persons and objects (such as convoys, buildings, and other places), the maintenance and operation of weapons systems, prisoner detention, and advisory or training services for local forces and security personnel. With the possible exception of the detention of prisoners, these are all services that have been by the Wagner Group.

The international legal obligations reaffirmed in the Montreux Document apply regardless of the status of PMSCs in domestic law; they also apply regardless of whether the state is a home, territorial or contracting state.<sup>39</sup> For example, the state has an obligation to prevent and repress violence against civilians by PMSCs. This responsibility arises from the state’s existing obligations under IHL, IHRL, and general international law.<sup>40</sup> The Montreux Document does not preclude states from simply prohibiting PMSCs. However, a State that chooses to outlaw PMSCs rather than enacting regulatory measures (such as those recommended in Part Two) must effectively enforce the prohibition in practice if it is to comply with its existing international legal obligations.

Finally, international norms and good practices do not consider the geopolitical purpose of a PMSC. Rather, they apply uniformly. If the relevant activities are carried out by a private business, and the type of activities it carries out fall within the scope of the Montreux Document’s concept of ‘military and security services’, then the Document and its definition of PMSCs are relevant.

Wagner does not operate as a single entity, but through a myriad of companies, which is why it has been referred to as the ‘Wagner Group’ and the ‘Wagner Network’, among other names.<sup>41</sup> This has contributed to confusion and the group ‘falling through the cracks’. At its core, however, the Group operates as an economic enterprise, funded by national budgets or economic royalties. It does so by providing services that are sought after by national clients (at least initially) as an alternative to ‘mainstream’ security assistance and security sector reform.<sup>42</sup>

The present paper therefore starts from the premise that the Wagner Group can be considered a PMSC in most contexts and that relevant existing international norms and good practices are applicable. We estimate that this is also broadly the case for similar actors. This in turn offers a number of entry points to address the challenges outlined above.

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39 The distinction between these states is explained in further depth later in this paper.

40 See also Article 27 of the Vienna Convention on the Law of Treaties

41 DCAF has chosen to use the term ‘Wagner Group’ as it better reflects the overarching strategic approach that binds all the involved companies together.

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# SECURITY SECTOR REFORM ENTRY POINTS TO ADDRESS THE CHALLENGES POSED BY THE WAGNER GROUP AND SIMILAR COMPANIES

Addressing PMSCs' human rights abuses, predatory economic behaviour, and/or assumption of core public security functions has become a question of national and international security. A major focus of the debate around the Wagner Group has been on their classification and whether international instruments are sufficient. While these are certainly important elements, from a security sector reform perspective, it is important to focus on the national and regional levels – because that is where that the systemic gaps are most glaring and where the main entry points lie.

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Over the past two decades, a significant number of states have drawn on international norms, good practices, and tools to update their legal and policy frameworks. This has had a positive, but limited, impact on human rights compliance by PMSCs.<sup>43</sup> However, political will and institutional capacity for regulation, oversight, and accountability remain insufficient, as human and financial resources for regulation are often lacking. In addition, external oversight over PMSCs and mercenaries, – for example by civil society and the media – has not been fostered. This is particularly acute in fragile and conflict contexts where PMSCs and mercenaries have the greatest impact on individual, national, and international security.

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43 See, for example, Penel, Charlotte and Ulrich Petersohn, 'Commercial Military Actors and Civilian Victimization in Africa, Middle East, Latin America, and Asia, 1980–2011', *Journal of Global Security Studies*, Vol. 7: No. 1 (2022), 15.





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Wagner’s activities would likely be much more curtailed if systemic gaps in private security governance were addressed.<sup>44</sup> Governance of PMSCs should therefore be a core element of SSG/R programming for the foreseeable future, particularly in conflict-affected and fragile settings. This work should not be limited to countries where Wagner and similar actors are already present. Indeed, a broader approach should ensure that PMSC regulation is improved across the board to prevent the entry of actors with a negative track record into additional countries.

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State efforts to regulate, monitor, and hold PMSCs accountable are key entry points for SSR programming. The Montreux Document outlines the obligations of three groups of states: the contracting state, which hires PMSC services in its territory or abroad; the territorial state, where the PMSC operates (which may be the same as the contracting state); and the home state, where the PMSC is registered or has its main place of management. To give a few examples, home states have a vital role in ensuring that PMSCs registered in their country follow a transparent vetting process. Contracting states are particularly well-placed to influence how PMSCs operate through the economic leverage they have as clients. Finally, territorial states have jurisdiction over PMSC operations in their territory.

<sup>44</sup> They would not disappear fully because even with an improved private security governance framework, the intricate dynamics of proxy governance – driven by geopolitical power plays and economic interests – might still endure.

## STATE OBLIGATIONS AND GOOD PRACTICES IN THE MONTREUX DOCUMENT

EXISTING OBLIGATIONS	GOOD PRACTICES
<b>NON-TRANSFERABLE RESPONSIBILITIES OF THE STATE</b>	
<p>The fact that PMSCs are privately owned businesses does not exempt territorial and contracting states from their duties under international law. Under IHL, certain governmental powers cannot be outsourced to PMSCs, such as management of detention facilities for civilians and prisoner of war camps.</p> <p>Furthermore, Common Article 1 of the four 1949 Geneva Conventions calls on the states to uphold IHL, and therefore ensure that PMSCs obey the law, despite their existence as entities distinct from the State.</p>	<p>States should specify the services that can be provided by PMSCs and carefully consider if such service would entail that the PMSC takes part in hostilities.</p> <p>Please refer to Good Practice (GP) 1, 24 and 53 (Part Two of the <a href="#">Montreux Document</a>)</p>
<b>OBLIGATION TO PROTECT HUMAN RIGHTS</b>	
<p>While PMSCs and their staff are not directly compelled to follow international human rights law (which is solely binding on states), states are required to protect persons from PMSC misconduct that may violate human rights. In other words, states must ensure internationally recognised human rights are protected, including in relation to PMSCs.</p> <p>States are obligated to exercise due diligence, or to do all reasonably possible to prevent or limit harm by PMSCs.</p>	<p>To avoid human rights violations, states should adopt good practices meant to assure compliance with IHL and IHRL, such as selecting companies and individuals with no criminal records, providing proper training, and establishing internal investigation and disciplinary systems.</p> <p>Please refer to GP 4, 6-12, 14, 16 and 19-23 (Part Two of the <a href="#">Montreux Document</a>)</p>
<b>OBLIGATION TO ENSURE CRIMINAL ACCOUNTABILITY</b>	
<p>States have a duty to hold PMSC personnel responsible for alleged grave violations of the 1949 Geneva Conventions and, for states that have signed it, Additional Protocol I.</p> <p>Any person who commits such a serious crime must face justice, whether at home, by extradition to another country, or through submission to an international tribunal. Grave violations include wilful killing of civilians or cruel treatment.</p>	<p>To prevent PMSC impunity, states should draft agreements on jurisdiction in such a manner that at least one of them can exercise jurisdiction over PMSCs; investigating authorities of contracting, territorial and home states should collaborate. Home states should have the ability to exert criminal jurisdiction over any serious crime committed by PMSCs abroad (i.e., apply extraterritoriality). Furthermore, states should enact corporate criminal liability so that companies can be held directly accountable for abuse.</p> <p>Please refer to GP 19a, 19b, 22, 23, 51, 52, 71a, 71b and 73 (Part Two of the <a href="#">Montreux Document</a>)</p>

This does not mean that all states will fulfil their obligations or implement international good practices. Fragility and ongoing armed conflict can severely limit what a territorial state can do to ensure respect for IHL and human rights. Some governments or political elites will contract PMSCs precisely in order to provide plausible deniability for human rights violations committed. It is therefore paramount to also support the work of different security sector stakeholders – civil society and the media, for example, can play a key role in raising awareness of the challenges associated with PMSCs and in demanding accountability. A multi-stakeholder approach is both a practical and necessary solution to the complex challenges posed by the activities of the Wagner Group and similar companies.

A multi-stakeholder approach is both a practical and necessary solution to the complex challenges posed by the activities of the Wagner Group and similar companies.

The following elements are based on DCAF’s decades of experience in operational SSR programming on PMSC governance. Not all of them can necessarily be applied in every setting in which the Wagner Group and similar companies operate: entry points might be obstructed, and it is important to adopt a strict “do-no-harm” approach given the dangers posed by these PMSCs. Rather, these points should be seen as a toolbox from which actors can flexibly select according to local specificities, needs, and demands. What follows is intended to provide key insights and food for thought on SSR programming, rather than an exhaustive list. In addition, specific approaches described may apply to more than one of the challenges identified.

## Addressing secrecy and disinformation

External oversight can help to lift the veil of secrecy surrounding PMSC activities, and national human rights institutions, civil society, researchers, and the media have a key role to play in this. These actors are crucial in documenting and raising awareness of the negative impacts that PMSCs have on human rights, democracy, and rule of law, and have the necessary credibility with the wider public. Civil society organisations are very effective in feeding research findings into public policy debates and building the capacity of other national stakeholders, generating some of the most significant changes in PMSC governance to date. The current wave of disinformation (particularly around the activities of the Wagner Group) increases the need for these actors to be active – they are likely to be the key element in countering disinformation in a democratic and inclusive way. (Such an approach will always require a strong do-no-harm component given the risks that these actors and their clients pose to local stakeholders).



## CONCRETE STEPS AND AVAILABLE TOOLS

- ➔ Discussions about the Wagner Group and similar companies in Africa and in the Middle East and North Africa are currently driven by researchers that do not hail from these regions. However, addressing the systemic issues – and credibly countering misinformation– requires a more granular discussion linked to local realities and their implications for security and human rights. For example, what are the security needs that drive local elites to contract the Group’s services; what are the perspectives of local populations; what are the concrete national economic costs of a state contracting PMSC services; and what is the actual effectiveness of doing so notably related to counterinsurgency? Initiatives by civil society organisations and regional researchers to work on SSG/R research should therefore be supported through several rounds of small research grants funded by international and regional actors.
- ➔ Local civil society and activists can help build the capacity of other stakeholders. This can be done through coalitions or joint projects, possibly supported by external expertise and resources. Across Africa, DCAF has supported its long-standing partner the Private Security Governance Observatory to develop a range of tools and studies for this very purpose.
- ➔ While each country is unique, it is important that policy insights and lessons are shared regionally, through face-to-face and virtual discussions and knowledge-sharing platforms. The Private Security Governance Observatory facilitates such regional exchanges in Africa.
- ➔ Given their constitutional mandate, national human rights institutions (NHRIs) can play a central role in monitoring security and human rights risks in the PMSC industry. NHRIs should ensure that they build and maintain the necessary capacity to investigate human rights violations related to PMSCs. They should also remind states of their responsibility to ensure that PMSCs respect human rights and humanitarian law. DCAF has several years of experience in supporting such institutions, in particular through an e-learning course for their staff.
- ➔ Media coverage of the Wagner Group and similar companies has increased in recent years. But it is usually linked to specific incidents and ignores longer-term systemic trends and challenges, often due to a lack of specific thematic knowledge on the issue. Training for media professionals should therefore: provide journalists and editors with a better understanding of the activities of PMSCs and their scope of action; shed light on existing regulatory frameworks and judicial mechanisms; and underline the responsibility of states (contracting and territorial) to ensure that PMSCs comply with applicable national and international legislation. DCAF has developed tools to strengthen the capacity of journalists to investigate security and human rights risks and violations by PMSCs (see the *Guide for civil society and media in Nigeria* and the *Toolkit for Security Sector Reporting - Media, Journalism and Security Sector Reform*)

## Addressing undermined state sovereignty and rule of law

States are free to authorize or prohibit private military and security services on their territory. However, any authorized service must be dutifully regulated and monitored. DCAF's experience shows that legal and policy frameworks for PMSCs are often of insufficient quality. PMSCs are treated like any other commercial enterprise, with little or no consideration for the potentially far-reaching impacts of their services. While the Wagner Group and similar companies might appear unrelated to a company guarding a shopping mall, the main challenge is not the absence of a 'Lex Wagner'. It is general systemic flaws that provide a fertile ground for their actions.



### CONCRETE STEPS AND AVAILABLE TOOLS

- ➔ National legal and regulatory frameworks for PMSCs need to be in line with international norms and good practices. DCAF's Legislative Guidance Tool for States to Regulate Private Military and Security Companies is designed to assist policymakers in reviewing and – where necessary – updating them. To ensure sustainable reforms, legislative and policy changes should be based on prior discussions among national stakeholders on the risks and current state of governance in the PMSC sector.
- ➔ There needs to be a dedicated PMSC regulatory agency with adequate financial and human resources to ensure that no PMSCs with human rights violations are allowed to operate in-country. Capacity-building for regulatory agencies is available, in particular, through the Montreux Document Forum's advisory services and e-learning modules.
- ➔ States should join international initiatives such as the Montreux Document. They should use the Montreux Document Forum for tailored thematic advice and promote the networking of their PMSC regulatory authority with counterparts in other countries, via the Forum.

Empowering public oversight actors – in particular, parliaments – is key to the effective management of public contracts with PMSCs, as well as to the effective governance of the PMSC industry as a whole. Ensuring that they have the mandate to exercise control over PMSCs is essential for maintaining transparency, accountability, and respect for the rule of law and international norms.



## CONCRETE STEPS AND AVAILABLE TOOLS

- While governments can authorize and contract the services of PMSCs, this practice must be subject to parliamentary oversight. Parliamentary commissions should be strengthened in their ability to question the executive on the reasons for contracting a particular PMSC. They should dispose of effective means to assess the performance of PMSCs as well as potential violations and ensure that risk mitigation and accountability procedures are in place both in contract and in criminal law. The [Legislative Guidance Tool for States to Regulate Private Military and Security Companies](#) can be a valuable tool for parliamentarians and their staff in this regard.
- Beyond specific procurement issues, parliamentary commissions should monitor security and human rights risks in the PMSC sector and table legislative reform proposals where necessary. Parliamentary commissions should also encourage national governments to support international texts such as the Montreux Document and the [International Code of Conduct for Private Security Service Providers](#).

Finally, the judiciary has a key role to play in holding PMSCs accountable for human rights violations and in providing effective remedies for victims and. In addition, when judicial mechanisms bring to light relevant information about violations, they can support a broader environment of transparency and accountability.



## CONCRETE STEPS AND AVAILABLE TOOLS

- Specific chapters on PMSC accountability should be included in capacity-building programmes for national and regional justice systems.
- The judiciary should ensure that judicial procedures are accessible to victims and that victims are not deterred by external factors such as excessive costs, excessive time requirements, or unwillingness of prosecutors.<sup>45</sup>
- International actors should financially support strategic litigation efforts by human rights organisations and law firms looking to bring cases against the Wagner Group and similar PMSCs before regional and international bodies. In addition to company personnel and management, this means in particular holding decision-makers of home, territorial and contracting states accountable.

45 UN Working Group on the Use of Mercenaries as a Means of Violating Human Rights and Impeding the Exercise of the Right of Peoples to Self-Determination, Access to Justice, Accountability and Remedies for Victims of Mercenaries, Mercenary-Related Actors and Private Military and Security Companies, A/HRC/51/25 (Geneva: UN, July 2022).

## Addressing the gendered impact of PMSCs

Gender is an important dimension in understanding and addressing misconduct and abuse by PMSCs and their personnel. Women, men, girls, and boys are differently vulnerable to and affected by the activities of PMSCs.



### CONCRETE STEPS AND AVAILABLE TOOLS

- As highlighted above, the privatisation of security services does not mean that the state can discharge its responsibilities. International and regional stakeholders should therefore make it abundantly clear to home, territorial and contracting states that when PMSCs resort to systematic gender-based violence, this is a serious violation of human rights and humanitarian law for which these states can be held accountable under international law.
- From a prevention perspective, there is now an extensive body of norms and good practices to ensure gender mainstreaming across all the regulatory and accountability entry points in the present document. DCAF's [Policy Brief on Gender and Private Security Regulation](#) provides a detailed set of steps to do so.
- When working with civil society and the media, it is crucial to focus not only on groups interested in PMSC governance, but also on those working on and with women and children directly affected by PMSC activities.

## Addressing the 'eviction effect' on public resources

States are free to contract private military and security services, irrespective of where a PMSC hails from. However, the procurement of such services must follow international norms and good practices to ensure that PMSCs comply with international humanitarian law and international human rights law, as well as national laws. A transparent procurement process is an important part of sound public financial management and ensures a public debate on the value for money provided by PMSCs to a given state (which is even more important in states with limited national budgets).



### CONCRETE STEPS AND AVAILABLE TOOLS

- States should ensure adequate public procurement processes for private military and security services, as set out in DCAF's [Contract Guidance Tool for States](#).
- Parliamentary committees should be supported in overseeing the public procurement of PMSC services. They should provide data on PMSCs to enable civil society, media, and public oversight (applying national security restrictions only where required).

## Policy responses by regional and international actors

Regional fora (such as the African Union) can provide a neutral platform not focused on activities in a particular country, thus helping to break the taboo surrounding PMSCs and overcome stakeholder resistance. In the specific case of Africa, these platforms provide an opportunity to highlight how the activities of PMSCs pose a fundamental risk to the African peace and security architecture developed over the past decades (including in response to previous cases of abuse by PMSCs).

A regional approach allows stakeholders from different countries to share their unique experiences and challenges in dealing with PMSCs. Regional discussions can also lead to the harmonization of policies and legislation relating to PMSCs.



### CONCRETE STEPS AND AVAILABLE TOOLS

- ➔ The *ECOWAS Policy Framework for Security Sector Reform and Governance*<sup>46</sup> already recognizes private security actors. DCAF has supported ECOWAS in recent years in its reflection on the governance of private security. In July 2023, the ECOWAS Head of States and Government mandated the Commission to propose a comprehensive response mechanism to the presence of ‘foreign private armies’ in the region. This mechanism is currently under development.<sup>47</sup>
- ➔ The first working draft for a possible update of the OAU/AU Convention for the Elimination of Mercenarism in Africa – circulated in late 2023 – has gone beyond a focus on individual mercenaries to include PMSCs. If enacted, this would constitute a consequential and useful extension of scope.

Discussions on PMSCs such as the Wagner Group should be driven primarily by national and regional stakeholders. However, international actors can make several crucial contributions.



### CONCRETE STEPS AND AVAILABLE TOOLS

- ➔ States and multilateral institutions should raise awareness on international norms, good practices, and tools, in particular with states that are likely to be involved with the Wagner Group and similar companies. In addition, the individual and collective responsibility of decision-makers for the actions of contracted PMSCs should be clearly emphasised. The notion that the outsourcing of violence inoculates contracting states from accountability – such as sanctions and regional and international courts – is a myth. With all the spotlights on Wagner, the same argument can be made for plausible deniability.

<sup>46</sup> ECOWAS Policy Framework for Security Sector Reform and Governance (4 June 2016)

<sup>47</sup> ECOWAS, Final Communiqué of the Sixty-Third Ordinary Session of the Authority of Heads of State and Government of the Economic Community of West African States (Bissau: ECOWAS, 9 July 2023)



- ➔ International actors should underline the relevance of these norms, good practices, and tools in their reports and communications, as has been done, for example, by the Office of the Office of the High Commissioner for Human Rights and the UN Working Group on Mercenaries.
- ➔ In several contexts, the activities of the Wagner Group and similar companies take place in the vicinity of UN peacekeeping operations and missions. More specific references to PMSCs and how to deal with them could be included in operation and mission mandates.
- ➔ Funding for SSR programming to systematically address gaps in PMSC governance remains surprisingly low, whether from bilateral or multilateral donors. Only meaningful funding will make it possible to implement the norms, good practices, and tools outlined above. Like-minded states could pool resources to ensure donor coordination and aid effectiveness.

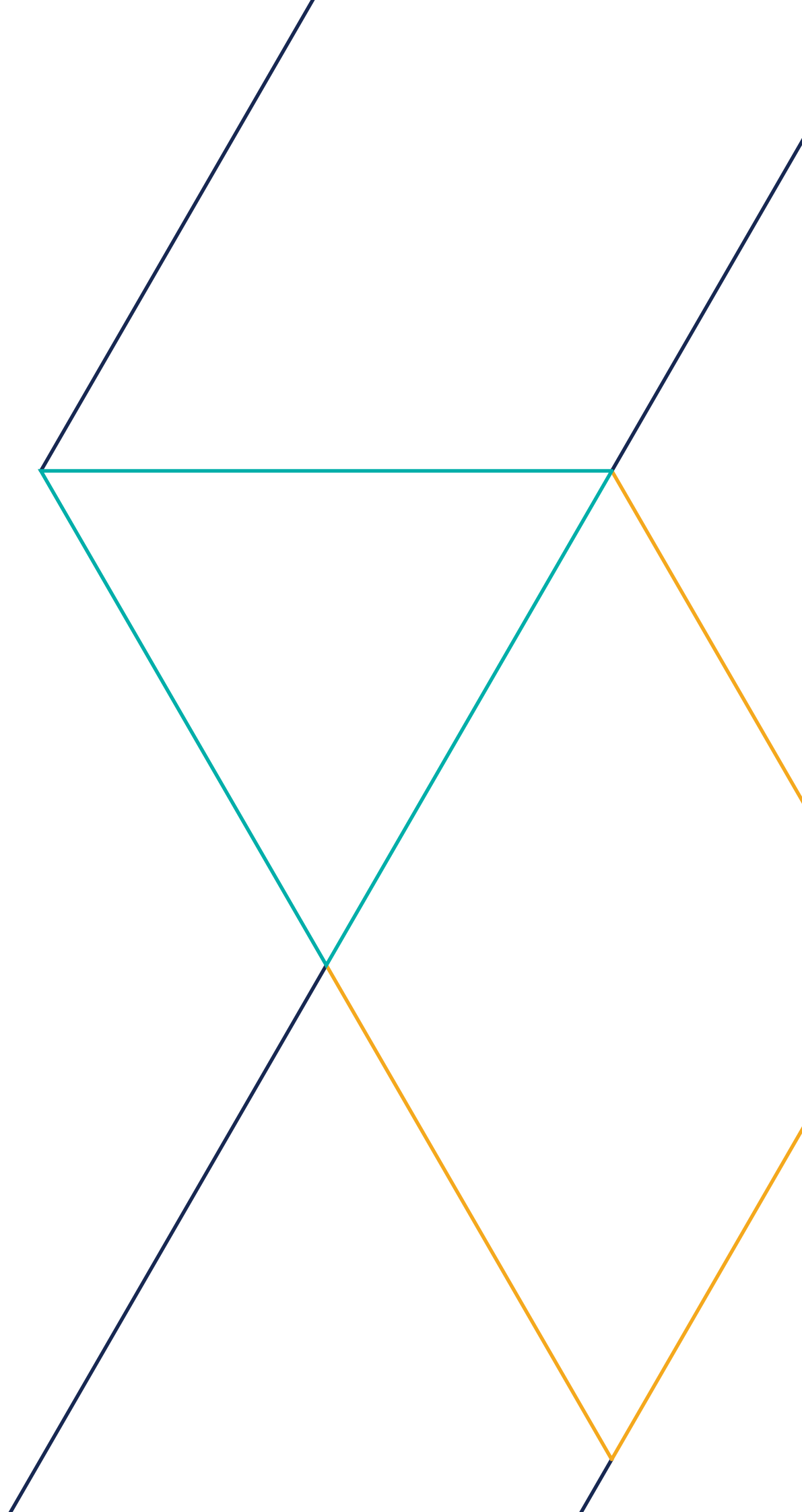
# CONCLUSION

PMSCs are a decades-old phenomenon, yet current discussions often portray the Wagner Group and similar companies as new and unique. This is not only incorrect, but also highly misleading. The Wagner Group is an *individual* construct whose activities are made possible by *systemic* governance failures in the security sector. Solutions must focus precisely on addressing these broader gaps, and they can be achieved by applying the considerable body of international norms and good practices, as well as the lessons learned over the past decade and a half.

The Wagner Group is an individual construct whose activities are made possible by systemic governance failures in the security sector. Solutions must focus precisely on addressing these broader gaps, and they can be achieved by applying the considerable body of international norms and good practices, as well as the lessons learned over the past decade and a half.

The current interest in the PMSC industry generated by the Wagner Group and similar companies should be leveraged to jump-start reform of the industry. This requires a push from actors in government, but also from civil society, media, the private security sector, regional organisations and the international community. Specifically, these actors must continue to generate knowledge on the industry that can then be used to update legal and policy frameworks; provide resources to regulatory bodies; and strengthen accountability mechanisms such as national judicial institutions, national human rights institutions, and regional and international courts. Such efforts should not be limited to countries where PMSCs are currently committing the most serious human rights violations, but – in a preventive approach – be much broader.

We have come a long way since the 1990s. It is now clear that PMSCs like the Wagner Group do not operate in a legal vacuum, and we have a wide range of international norms and tools that can be used to regulate them. The key missing piece is the political will at the national level – combined with sufficient regional and international pressure and resources – to make it happen.



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