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Accountability Gap of Private Military Companies: A Multi-Level Responsibility Mode

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Abstract: The proliferation of Private Military Companies (PMCs) in contemporary armed conflict has produced an accountability vacuum that the existing international legal architecture struggles to address. This article argues that the gap is structural, arising from three interlocking deficiencies: a personality gap (PMCs correspond to no recognized category of international legal subject), a jurisdictional gap (international criminal law excludes corporate entities from its personal jurisdiction), and a contractual gap (status-of-forces and procurement arrangements neutralize host-state jurisdiction). Using a normative-prescriptive method integrating statutory, case-based, and conceptual analysis, the study examines four representative cases Blackwater at Nisour Square, Al-Shimari v. CACI, Executive Outcomes, and the Wagner Group to show how each dimension operates in practice. It then advances a multi-level responsibility model integrating state responsibility under the respect–protect–fulfil doctrine and heightened due diligence, individual criminal responsibility under Article 28(b) of the Rome Statute, and binding corporate due diligence operationalized through procurement contracts. The framework relies entirely on existing international legal materials and requires no new treaty-making. The principal finding is that the accountability gap, though structural, is addressable through the integrated deployment of normative resources already present within the international legal order. The novelty of this study lies in its integration of three previously siloed strands of PMC accountability scholarship like the doctrine of international legal personality, the jurisdictional architecture of international criminal law, and the due diligence framework of business and human rights law, into a single multi-level responsibility model derived entirely from existing international legal materials, with an original extension of that model to the Indonesian domestic legal order.

Keywords: Private Military Companies, Accountability Gap, Corporate Due Diligence, State Responsibility, Command Responsibility

INTRODUCTION

Contemporary armed conflict is no longer conducted by state armed forces alone. Private Military Companies (PMCs) now perform functions once reserved for sovereign militaries armed security, logistics, interrogation support, and even direct combat turning warfare into a multibillion-dollar commercial enterprise (Singer, 2003; Avant, 2005). Their operational indispensability has grown in tandem with a persistent capacity to evade legal accountability, producing a paradox in which the cast of actors in hostilities has been transformed while the normative framework governing them remains resolutely state-centric (Cameron & Chetail, 2013).

The core problem is the indeterminate legal status of PMCs. They are not lawful combatants entitled to belligerent privilege, they rarely satisfy the cumulative definition of mercenaries under Article 47 of Additional Protocol I, they are not pure civilians, and they are not subjects of international law (Gómez del Prado, 2011; UN Working Group, 2010). This indeterminacy generates what this article terms an accountability gap a structural condition, not a mere failure of enforcement.

The gap rests on three interlocking deficiencies. First, a personality gap as corporate entities, PMCs fall outside the recognized categories of international legal subjecthood and therefore bear no direct obligations under international law (Clapham, 2006). Second, a jurisdictional gap where international criminal law, centred on the Rome Statute, confines personal jurisdiction to natural persons and excludes corporate defendants (Stoitchkova, 2010). Third, a contractual gap. Status-of-forces agreements and procurement arrangements routinely neutralize host-state jurisdiction, insulating PMCs from local prosecution (Dickinson, 2011).

This article argues that these deficiencies can be addressed without new treaty-making, by integrating normative resources already embedded in the international legal order. It proposes a multi-level responsibility model combining state responsibility, individual criminal responsibility, and binding corporate due diligence, and considers its implications for the Indonesian legal order.

METHODS

This study employs a normative (doctrinal) legal research design with a prescriptive orientation, aimed not merely at describing the existing law but at reconstructing an integrated accountability framework from resources already available within the international legal order (Marzuki, 2017). The normative character is appropriate because the research object is a body of legal norms treaties, customary international law, and judicial decisions rather than empirical social behaviour.

Three complementary approaches are combined. First, the statute approach (statutory analysis) examines the relevant instruments, including Additional Protocol I to the Geneva Conventions (notably Article 47), the Rome Statute of the International Criminal Court (notably Article 28), the Articles on State Responsibility, and the UN Guiding Principles on Business and Human Rights. Second, the case approach analyses four representative cases Blackwater at Nisour Square (2007), Al-Shimari v. CACI (2024), Executive Outcomes in Sierra Leone and Angola (1995–1999), and the Wagner Group (2014–present) selected because each illustrates a distinct dimension of the accountability gap. Third, the conceptual approach draws on established doctrines, international legal personality, command responsibility, and due diligence to construct the analytical framework and the proposed model (Cameron & Chetail, 2013).

The legal materials are organised into primary sources (treaties, statutes, and judicial decisions) and secondary sources (scholarly writings and authoritative reports). Analysis proceeds in two stages: a diagnostic stage, which maps how the personality, jurisdictional, and contractual gaps operate across the four cases; and a prescriptive stage, which synthesises state, individual, and corporate responsibility into a single multi-level model and evaluates its feasibility under existing law, including its implications for the Indonesian legal order. The materials are interpreted using systematic, teleological, and comparative techniques to ensure internal coherence of the proposed framework.

RESULTS AND DISCUSSION

The Conceptual Foundation: PMCs and the Limits of International Legal Personality

The classical doctrine of international legal personality recognizes only a limited inventory of subjects: states as primary and full subjects, intergovernmental organizations as derivative subjects, individuals as bearers of rights and duties within restricted domains, and belligerent or insurgent groups under specified conditions (Crawford, 2019). The International Court of Justice's *Reparation for Injuries* opinion ties legal subjectivity not to form but to the capacity to bear rights and duties under international law and to vindicate them by international claim (*Reparation for Injuries*, 1949). Private Military Companies (PMCs) fit none of the established categories. They are not states, not intergovernmental organizations, and not non-state armed groups in the technical sense developed within international humanitarian law (IHL), because their organizational character is corporate-commercial rather than politico-military, and their relationship with states is typically contractual rather than oppositional (Tonkin, 2011). Their employees may, in particular circumstances, bear individual criminal responsibility, but the corporate entity itself possesses no direct international legal personality. The result is a paradox of capacity without status: PMCs perform functions historically associated with states while remaining outside the categories through which international law exercises regulatory reach.

Nor does the mercenary definition in Article 47 of Additional Protocol I supply a remedy. Its six cumulative criteria are easily circumvented: nationality of the contracting state, formal incorporation into host-state armed forces, corporate rather than combat-linked remuneration, or activity short of direct participation in hostilities each place a PMC employee outside the definition (Additional Protocol I, 1977, art. 47(2)). Best (1980) observed, with characteristic acerbity, that any mercenary who escapes Article 47 “deserves to be shot, and his lawyer with him” (p. 328). Subsequent instruments directed specifically at the PMC context the 2008 Montreux Document and the 2010 International Code of Conduct (ICoC) are better tailored to the problem but remain non-binding, the former a restatement of existing obligations and the latter a multistakeholder code enforced through industry oversight rather than adjudication (Montreux Document, 2008; ICoC, 2010). Over four decades, the international legal order has neither extended the doctrine of subjects to PMCs nor produced a binding regime capable of capturing their corporate form. This personality gap is the doctrinal source from which the wider accountability vacuum flows.

The Structural Accountability Gap: Empirical Manifestation

Article 25(1) of the Rome Statute confines the International Criminal Court's personal jurisdiction to natural persons (Rome Statute, 1998). The exclusion of corporate liability was a deliberate drafting choice: the French delegation's 1998 proposal to extend jurisdiction to legal persons was withdrawn amid opposition from delegations whose domestic systems did not recognize corporate criminal liability, and amid doubts about complementarity and corporate *mens rea* (Saland, 1999; Clapham, 2000). No ad hoc or hybrid tribunal departs from this natural-person limitation, and the Malabo Protocol's provision for criminal jurisdiction over juridical persons the sole contemporary instrument to attempt this and has not attracted the ratifications necessary to enter into force (Malabo Protocol, 2014). Corporate PMCs therefore sit entirely outside the personal jurisdiction of every operational international and hybrid tribunal, transferring the full weight of accountability onto individual contractors and contracting states even where the corporate entity possesses the operational knowledge and control that generated the harm.

Each case discloses a distinct mechanism through which corporate accountability dissolves. At Nisour Square in Baghdad (2007), Blackwater contractors under a US diplomatic security contract killed seventeen Iraqi civilians; four individual contractors were eventually convicted, yet received presidential pardons in December 2020, while the corporate principal successively rebranded as Xe Services and Academi faced no criminal proceedings under US, international, or Iraqi law (*United States v. Slatten*, 2017; Executive Grant of Clemency, 2020). This is individual displacement: liability is channeled exclusively toward natural persons while the corporate locus of decision-making remains legally invisible. In *Al-Shimari v. CACI* (2024), a US jury awarded USD 42 million to three Iraqi torture victims of Abu Ghraib, the first Alien Tort Statute verdict against a private military contractor (Center for Constitutional Rights, 2024) yet the remedy is civil, domestic, and dependent on an Alien Tort Statute jurisdiction progressively narrowed by the US Supreme Court (*Kiobel v. Royal Dutch Petroleum*, 2013; *Jesner v. Arab Bank*, 2018; *Nestlé USA v. Doe*, 2021). Executive Outcomes, contracted by Angola and Sierra Leone through the 1990s to conduct combat operations, dissolved itself in January 1999 without any corporate officer facing trial under international, South African, Angolan, or Sierra Leonean jurisdiction (O'Brien, 2000) corporate dissolution as a second escape route. The Wagner Group, linked credibly to extrajudicial killings, torture, and indiscriminate attacks across Ukraine, Mali, the Central African Republic, and Sudan, operates through a deliberately opaque constellation of shell entities that the Russian state disclaims as legally non-existent (Bowen, 2024; UN Panel of Experts on the Central African Republic, 2021; UN Panel of Experts on Mali, 2022) engineered opacity as a third mechanism. Together, the four cases record recurring routes by which accountability is dissolved: displacement onto individuals, civil-only domestic remedies, dissolution of the corporate vehicle, and deliberate legal opacity.

Status-of-forces instruments compound the gap by removing the host state from the jurisdictional equation altogether. Coalition Provisional Authority Order Number 17 (2004) conferred on Iraq-based contractors immunity from Iraqi legal process for acts performed under contract, shielding Blackwater personnel from Iraqi prosecution after Nisour Square. Where the host state is excluded and the contracting state's own political incentives are compromised, the corporate PMC enjoys triple insulation from international criminal jurisdiction, from host-state jurisdiction, and from the contracting state's political will. Taken together, the jurisdictional, operational, and contractual deficiencies are mutually reinforcing rather than independent: the accountability gap is structural, an artefact of the international legal architecture itself rather than a contingent failure of enforcement.

Reconstructing Multi-Level Accountability: A Normative Proposal

Under Articles 5 and 8 of the International Law Commission's Articles on State Responsibility, the conduct of a PMC may be attributed to a state where it exercises delegated governmental authority or acts under state direction or control, with the effective-control threshold subsequently confirmed as governing state responsibility in the Bosnian Genocide judgment (International Law Commission, 2001; *Application of the Genocide Convention*, 2007). Attribution alone is insufficient: the respect–protect–fulfil doctrine imposes a further, more demanding duty (Eide, 1989; UN Committee on Economic, Social and Cultural Rights, 1999), operationalized in the PMC context through the standard of heightened due diligence that applies to intrinsically high-risk activity such as the deployment of armed corporate personnel (International Law Association, 2016), a standard articulated clearly in the Inter-American Court's *Mapiripán Massacre* (2005) and *Pueblo Bello Massacre* (2006) judgments. Outsourcing alters the modality of state action; it does not diminish its substantive obligations under IHL and international human rights law, and a state's failure to exercise heightened due diligence is itself an internationally wrongful act.

Article 28(b) of the Rome Statute extends the doctrine of command responsibility beyond military commanders to civilian and quasi-civilian superiors who exercise effective authority and control over subordinates, as elaborated by the ICC in *Prosecutor v. Bemba Gombo* (2016, 2018). This mechanism reaches the corporate executive personally, redirecting prosecutorial attention to an available individual respondent even where the corporate vehicle itself remains beyond the Court's jurisdiction.

The UN Guiding Principles on Business and Human Rights and the ICoC already supply substantive due diligence content; the third level of the framework transposes that soft-law content into binding contractual conditions within PMC procurement and licensing arrangements a hard-law translation of existing standards that requires no new international instrument (UN Human Rights Council, 2011; ICoC, 2010; White, 2019). The three levels reinforce one another: contracting states are incentivized to enforce due diligence clauses because non-enforcement engages their own state responsibility; PMCs are incentivized to comply because breach triggers debarment and exposes their executives; and executives are incentivized to maintain compliance systems because failure exposes them to individual criminal liability. The framework's principal limitation is that it does not establish direct ICC jurisdiction over the corporate entity itself an objective that awaits either Rome Statute amendment or the Malabo Protocol's entry into force and its purchase diminishes where the contracting state is itself the beneficiary of deniable PMC conduct, as the Wagner case illustrates.

Within the Indonesian legal order, each level finds a domestic counterpart. Article 28I(4) of the 1945 Constitution and Article 71 of Law Number 39 of 1999 on Human Rights anchor the state's protective duty (Constitution of the Republic of Indonesia, 1945; Law No. 39/1999); Article 42 of Law Number 26 of 2000 on the Human Rights Court mirrors Rome Statute Article 28 for domestic command-responsibility prosecutions (Law No. 26/2000); and Law Number 1 of 2023 on the Criminal Code, together with the government procurement regime under Presidential Regulation Number 16 of 2018, as amended, supply the corporate-liability and contractual vehicles required to operationalize all three levels domestically (Law No. 1/2023; Presidential Regulation No. 16/2018).

Taken together, the novelty of this study is threefold. First, whereas existing scholarship treats the personality gap, the jurisdictional gap, and the contractual gap as separate objects of inquiry, this article demonstrates that the three deficiencies are structurally interlocking rather than independent, such that closing one gap without addressing the others leaves the accountability vacuum substantially intact. Second, the article departs from proposals that call for new treaty instruments is a route that has been attempted, without success, since the 1989 International Convention against the Recruitment, Use, Financing and Training of Mercenaries by reconstructing a multi-level responsibility model exclusively from materials already binding within the existing international legal order: the ILC Articles on State Responsibility, Article 28(b) of the Rome Statute, and the UN Guiding Principles on Business and Human Rights. Third, the article extends this reconstruction to the Indonesian domestic legal order, identifying the statutory and regulatory counterparts through which the three-level framework could be operationalized by Indonesian courts and procurement authorities, an extension not undertaken in the existing literature, which remains oriented toward Western contracting states and international fora.

CONCLUSIONS AND RECOMMENDATIONS

Conclusion

The accountability vacuum surrounding Private Military Companies (PMCs) is the cumulative product of three structural deficiencies embedded in the architecture of international law itself, and not a mere failure of political will. Conceptually, PMCs occupy an indeterminate position within the doctrine of subjects of international law: they are neither states, intergovernmental organizations, non-state armed groups in the classical sense, nor mercenaries within the cumulative definition of Article 47 of Additional Protocol I. This personality gap is the doctrinal source from which the wider accountability gap flows.

Empirically, this indeterminacy operates through a jurisdictional gap the exclusion of corporate entities from the Rome Statute and from every operational international and hybrid tribunal and a contractual gap typified by Coalition Provisional Authority Order 17. The four cases examined (Blackwater at Nisour Square, Al-Shimari v. CACI , Executive Outcomes, and the Wagner Group) reveal four mechanisms by which corporate accountability dissolves: displacement onto natural persons, civil-only domestic remedies, dissolution of the corporate vehicle, and engineered legal opacity. Together they insulate the corporate form from international, host-state, and contracting-state jurisdiction.

The proposed multi-level responsibility model demonstrates that this architecture, while structural, is not impermeable. State responsibility under the respect–protect–fulfil doctrine, operationalized through heightened due diligence, anchors the contracting state's substantive obligations; individual criminal responsibility under Article 28(b) of the Rome Statute redirects prosecution from the unavailable corporate respondent to the available individual superior; and binding corporate due diligence, transposed from the UN Guiding Principles and the ICoC into enforceable contractual conditions, reaches the corporate actor itself. Integrated rather than parallel, the three levels reinforce one another and require no new treaty-making.

Three policy implications follow: contracting states should systematically embed and enforce human rights due diligence clauses in PMC procurement; the ICC's Office of the Prosecutor should apply Article 28(b) to corporate executives; and negotiation of the UN draft binding instrument should proceed alongside the integrated deployment of existing resources. The framework's limits its inability to reach the corporate entity directly under international criminal law, and its reduced purchase where the contracting state itself benefits from deniable conduct bound the model rather than disable it. For the Indonesian legal order, Article 28I(4) of the 1945 Constitution, Law No. 39/1999, Law No. 26/2000, Law No. 1/2023, and Presidential Regulation No. 16/2018 supply sufficient footholds to operationalize each level domestically. The accountability gap is structural, but it is not destiny.

Limitations

This study has several limitations. First, the analysis is confined to a specific set of representative cases: Blackwater at Nisour Square, Al-Shimari v. CACI, Executive Outcomes, and the Wagner Group, so its findings, while illustrative of the structural accountability gap, cannot be generalised to the full universe of Private Military Company operations across all conflict theatres. Second, the reconstruction relies on existing international legal materials and a defined set of doctrinal instruments (the Rome Statute, the Geneva Conventions and their Additional Protocols, the Montreux Document, the ICoC, and the UNGPs), while other normative, political, and economic factors may also shape accountability outcomes in practice. Third, the normative-prescriptive approach does not fully capture the long-term behavioural and institutional changes that the proposed framework might produce once operationalised. The findings should therefore be interpreted within the scope of this study.

Recommendations

Building upon the findings of this study, several avenues for further scholarly inquiry and normative development merit consideration. First, future research should extend the empirical foundation beyond the four illustrative cases examined here, undertaking a systematic and comparative analysis of a broader corpus of Private Military Company operations across diverse conflict theatres and legal traditions. Such an expanded evidentiary base would permit more robust generalisation regarding the mechanisms through which corporate accountability dissolves and would strengthen the external validity of the structural diagnosis advanced in this article.

Second, subsequent studies would benefit from a comparative examination of the domestic implementation practices of leading contracting states like Switzerland, the United States, and the United Kingdom in particular with specific attention to the design, drafting, and judicial enforcement of contractual human rights due diligence clauses A comparative-institutional inquiry of this kind would illuminate the conditions under which the proposed multi-level responsibility model can be operationalised in practice and would clarify the institutional preconditions upon which its effectiveness depends.

Third, further research should investigate the capacity of independent oversight mechanisms, such as the International Code of Conduct Association, to induce meaningful behavioural change within the industry, thereby testing the compliance-incentive assumptions underlying the framework proposed here. Complementary interdisciplinary approaches including longitudinal case tracking, comparative empirical analysis, and quantitative examination of contractual and jurisprudential datasets may yield a more granular understanding of the accountability gap and of the practical efficacy of the reconstructive model.

Finally, scholarly attention should remain directed toward the ongoing negotiation of the United Nations draft binding instrument on Private Military and Security Companies, assessing the extent to which incremental normative consolidation through existing legal materials may inform, and be reconciled with, the eventual adoption of a dedicated treaty regime. Sustained doctrinal and empirical engagement along these lines would contribute to the progressive development of a coherent and enforceable framework of corporate accountability under international law.

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REFERENCES

Additional Protocol I to the Geneva Conventions of 12 August 1949. https://www.icrc.org/en/document/protocol-additional-geneva-conventions-12-august-1949-protocol-i

Adriano. (2016). Karakteristik pertanggungjawaban pidana korporasi. Jurnal Hukum dan Peradilan. https://doi.org/10.25216/jhp.5.2.2016.233-250

Allied Market Research. (2022). Private military security services market: Global opportunity analysis and industry forecast 2021–2030. https://www.alliedmarketresearch.com/private-military-security-services-market
Al-Shimari v. CACI Premier Technology, Inc. (US federal court case). https://ccrjustice.org/home/court-cases/al-shimari-v-caci
Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro) (ICJ case). https://www.icj-cij.org/case/91
Best, G. (1980). Humanity in warfare. Oxford University Press.
Bowen, A. S. (2024). Russia's Wagner private military company (PMC) (CRS Report No. IF12344). Congressional Research Service. https://www.everycrsreport.com/reports/IF12344.html
Cameron, L., & Chetail, V. (2013). Privatizing war: Private military and security companies under international humanitarian law. Cambridge University Press. https://doi.org/10.1017/CBO9781139030809
Center for Constitutional Rights. (2024). Al-Shimari v. CACI: Case background and verdict summary. https://ccrjustice.org/
Coalition Provisional Authority Order No. 17 (Revised) (Iraq). https://www.duo.uio.no/
Congressional Research Service. (2008). Private security contractors in Iraq: Background, legal status, and other issues (Report No. R40835). https://www.everycrsreport.com/reports/R40835.html
Constitution of the Republic of Indonesia 1945. https://www.mahkamahkonstitusi.go.id/
Crawford, J. (2019). Brownlie's principles of public international law (9th ed.). Oxford University Press. https://doi.org/10.1093/he/9780198825845.001.0001
Directive (EU) 2024/1760 on Corporate Sustainability Due Diligence. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024L1760
Eide, A. (1989). Realization of social and economic rights and the minimum threshold approach. Human Rights Law Journal.
International Code of Conduct for Private Security Service Providers. https://icoca.ch/en/international-code-of-conduct
International Convention against the Recruitment, Use, Financing and Training of Mercenaries. https://treaties.un.org/doc/Treaties/2001/10/20011025%2001-52%20PM/Ch_X_11p.pdf
International Law Association. (2016). Study group on due diligence in international law: Second report. https://www.ila-hq.org/
International Law Commission. (2001). Draft articles on responsibility of states for internationally wrongful acts, with commentaries. Yearbook of the International Law Commission, Vol. II, Part Two. https://legal.un.org/ilc/texts/instruments/english/commentaries/9_6_2001.pdf
Jesner v. Arab Bank, PLC (US Supreme Court case). https://www.oyez.org/cases/2017/16-499
Kiobel v. Royal Dutch Petroleum Co. (US Supreme Court case). https://www.oyez.org/cases/2012/10-1491
Lieferkettensorgfaltspflichtengesetz (Supply Chain Due Diligence Act) (Germany). https://www.gesetze-im-internet.de/lksg/
Loi n° 2017-399 relative au devoir de vigilance (France). https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000034290626/
MacLeod, S. (2022). The Wagner Group and others: The need for an EU approach to regulate private military and security companies (European Parliament Briefing No. PE 702.557). European Parliamentary Research Service. https://www.europarl.europa.eu/thinktank/en/document/EPRS_BR(2022)702557

Mapiripán Massacre v. Colombia (Inter-American Court of Human Rights case). https://www.corteidh.or.cr/
Military and Paramilitary Activities in and against Nicaragua (Nicaragua v. United States) (ICJ case). https://www.icj-cij.org/case/70
O'Brien, K. A. (2000). Private military companies and African security 1990–98. In A.-F. Musah & J. K. Fayemi (Eds.), Mercenaries: An African security dilemma. Pluto Press.
Peraturan Presiden Nomor 16 Tahun 2018 tentang Pengadaan Barang/Jasa Pemerintah. https://peraturan.bpk.go.id/Details/77626/perpres-no-16-tahun-2018
Prosecutor v. Bemba Gombo (ICC case). https://www.icc-cpi.int/
Prosecutor v. Tadić (ICTY case). https://www.irmct.org/
Protocol on Amendments to the Protocol on the Statute of the African Court of Justice and Human Rights (Malabo Protocol). https://au.int/
Pueblo Bello Massacre v. Colombia (Inter-American Court of Human Rights case). https://www.corteidh.or.cr/
Reparation for Injuries Suffered in the Service of the United Nations (ICJ advisory opinion). https://www.icj-cij.org/
Rome Statute of the International Criminal Court. https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf
Saland, P. (1999). International criminal law principles. In R. S. Lee (Ed.), The International Criminal Court: The making of the Rome Statute. Kluwer Law International.
Singer, P. W. (2008). Corporate warriors: The rise of the privatized military industry (updated ed.). Cornell University Press.
The Montreux Document. https://www.dfae.ch/montreuxdocument
Tonkin, H. (2011). State control over private military and security companies in armed conflict. Cambridge University Press. https://doi.org/10.1017/CBO9780511977793
Transparency International Defence & Security. (2022). Hidden costs: US private military and security companies and the risks of corruption and conflict. Transparency International UK. https://ti-defence.org/
UN Committee on Economic, Social and Cultural Rights. (1999). General comment No. 12: The right to adequate food. https://www.ohchr.org/
UN Human Rights Council. (2010). Report of the Working Group on the use of mercenaries. https://undocs.org/
UN Human Rights Council. (2011). Guiding principles on business and human rights. https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
UN Human Rights Council. (2024). Updated draft of a possible legally binding instrument on the regulation, monitoring and oversight of the activities of private military and security companies. https://www.ohchr.org/
UN Office of the High Commissioner for Human Rights. (2014). Frequently asked questions about the Guiding Principles on Business and Human Rights. https://www.ohchr.org/
UN Panel of Experts on Mali. (2022). Final report. https://www.un.org/securitycouncil/
UN Panel of Experts on the Central African Republic. (2021). Final report. https://www.un.org/securitycouncil/
Undang-Undang Nomor 1 Tahun 2023 tentang Kitab Undang-Undang Hukum Pidana. https://peraturan.bpk.go.id/Details/234256/uu-no-1-tahun-2023
Undang-Undang Nomor 26 Tahun 2000 tentang Pengadilan Hak Asasi Manusia. https://peraturan.bpk.go.id/Details/45366/uu-no-26-tahun-2000
Undang-Undang Nomor 39 Tahun 1999 tentang Hak Asasi Manusia. https://peraturan.bpk.go.id/Details/45362/uu-no-39-tahun-1999
United States v. Slatten (US federal court case).

United States v. Slough (US federal court case).
Wachjoe P., S. (2016). Pertanggungjawaban pidana terhadap korporasi. Jurnal Hukum dan Peradilan. https://doi.org/10.25216/jhp.5.2.2016.217-232
White, N. D. (2019). Due diligence obligations of conduct: Developing a responsibility regime for PMSCs. In S. MacLeod & N. D. White (Eds.), Private military and security companies (PMSCs) and the quest for accountability. Routledge.