



# GLOBAL STAR SECURITY SERVICES

YOUR SHIELD OF SECURITY

## GRIEVANCE MECHANISM OPEN TO THIRD PARTIES POLICY

### POLICIES & PROCEDURES

<b>Author:</b> Human Resource Dept	<b>Policy Code:</b> GSS/HR 001/25	<b>Source:</b>
<b>Version:</b> Version 1	<b>Effective Date:</b> November 2025	<b>Revision Date:</b> November 2026
<b>Policy Type:</b> Workplace Policy	<b>Policy Owner:</b> Global Star Security Services	<b>Ref No:</b>
<b>Prepared By:</b> HR Dept	<b>Reviewed By:</b> Managing Director	<b>Authorized By:</b> Chief Executive Officer



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## 1. PREAMBLE

Global Star Security Services operates within the private security industry, where professionalism, accountability, and respect for human rights are fundamental to maintaining trust and credibility. The nature of security operations often places personnel in complex environments and high-risk situations, making it essential that all stakeholders—employees, clients, community members, and partner organizations—have a reliable and transparent channel to raise concerns or report misconduct.

This Grievance Mechanism Policy establishes a structured process for submitting, addressing, and resolving complaints related to operational conduct, workplace conditions, unethical behavior, harassment, abuse of authority, human rights violations, or any action that may compromise compliance with company policies, contractual obligations, industry regulations, or international standards. It ensures that every grievance is handled promptly, fairly, confidentially, and without fear of retaliation.

Through this mechanism, Global Star Security Services affirms its commitment to high ethical standards, the protection of fundamental rights, continuous improvement in service delivery, and adherence to recognized frameworks such as the International Code of Conduct for Private Security Service Providers (ICoC), the Montreux Document, and applicable national legislation. This policy reinforces our responsibility to foster a culture of transparency, integrity, and respect in every aspect of our operations.

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## 2. PURPOSE

This Grievance Mechanism Policy establishes a clear, transparent, and accessible process for reporting, addressing, and resolving concerns or complaints raised by employees, contractors, suppliers, customers, community members, or any other stakeholders affected by the organization's operations. The policy aims to promote fairness, accountability, and continuous improvement across all areas of the organization.

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## 3. AIM

The aim of this Grievance Mechanism Policy is to provide Global Star Security Services personnel, clients, partners, and external stakeholders with a formal, accessible, and transparent process for raising concerns or reporting misconduct without fear of retaliation.



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The mechanism guarantees the fair, confidential, and timely receipt, documentation, investigation, and resolution of all grievances.

It seeks to:

- Promote accountability, integrity, professionalism, and respect for human rights across all Global Star Security Services operations.
- Strengthen trust and constructive relationships between the company, its workforce, clients, and the communities in which it operates.
- Ensure compliance with Global Star Security Services policies, contractual commitments, national legislation, and relevant international standards and frameworks.
- Support continuous improvement by identifying and addressing operational weaknesses, systemic challenges, or policy gaps.
- Reinforce a corporate culture where all individuals feel safe, respected, and empowered to speak up.

Through this policy, Global Star Security Services demonstrates its commitment to responsible conduct and the highest professional standards within the private security industry.

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## 4. SCOPE

This policy applies to all employees, contractors, suppliers, business partners, and external stakeholders who wish to raise a concern related to:

- Workplace conduct, discrimination, harassment, or unfair treatment
- Violations of company policies, ethical standards, or legal obligations
- Health, safety, environmental, or community impacts
- Human rights concerns within the organization or its supply chain
- Any other issue that may adversely affect individuals or the organization

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## 5. POLICY STATEMENT

The organization is committed to fostering a culture of openness and integrity. All stakeholders have the right to raise legitimate concerns without fear of reprisal, retaliation, or discrimination. Grievances will be handled objectively, confidentially, and in a timely manner. The organization ensures that each grievance:



- Is acknowledged promptly.
- Is assessed and investigated impartially
- Receives a fair resolution based on evidence
- Is documented for transparency and improvement purposes

We uphold the principles of fairness, due process, and respect throughout the grievance-handling process.

## 6. DEFINITIONS

### **Grievance**

A concern, complaint, claim, or report raised by an employee, client, partner, community member, or other stakeholder regarding conduct, decisions, or operational impacts that are believed to violate company policies, legal requirements, contractual obligations, human rights standards, or ethical expectations.

### **Complainant**

The individual, group, or representative submitting a grievance, which may include employees, contractors, clients, community members, or other stakeholders affected by the company's operations.

### **Respondent**

The respondent refers to the individual, department, or organizational unit whose actions or decisions are the subject of a grievance.

### **Grievance**

The structured process established by the company to receive, document, evaluate, investigate, and resolve grievances fairly, confidentially, and in a timely manner.

### **Mechanism**

### **Investigation**

A formal fact-finding process conducted to assess the validity of a grievance, determine its causes, and identify corrective actions. Investigations may be conducted internally or supported by external independent parties, depending on the nature and seriousness of the complaint.

### **Resolution**

The final decision, action, or corrective measure taken in response to a grievance, which may involve disciplinary action, policy changes, training, compensation, or other remedies.

### **Confidentiality**

The commitment is to protect the identity of the complainant and the details of the grievance to the fullest extent possible, unless disclosure is legally required or necessary for a fair investigation.

### **Retaliation**

Retaliation refers to any adverse action, threat, intimidation, discrimination, or negative treatment



directed towards a complainant or participant in the grievance process for the purpose of submitting or supporting a grievance. Retaliation is strictly prohibited.

### **Stakeholder**

The term "stakeholder" refers to any individual or group that the company's activities affect or have an interest in, including employees, contractors, clients, suppliers, partner

organizations, regulatory bodies, and local communities.

### **Human Rights Violation**

Any act or omission by company personnel that infringes upon internationally recognized human rights, national laws, or standards, such as the International Code of Conduct for Private Security Service Providers (ICoC) or the Montreux Document.

## **7. GUIDING PRINCIPLES**

The grievance mechanism is built on the following principles:

- **Accessibility:** The process is easy to understand and available to all stakeholders.
- **Confidentiality:** All concerns are handled with sensitivity and privacy.
- **Non-retaliation:** Stakeholders are protected from any negative consequences for raising concerns in excellent faith.
- **Transparency:** Complainants receive information about how their concerns are processed and resolved.
- **Impartiality:** Investigations are unbiased and conducted by qualified personnel.
- **Timeliness:** Grievances are addressed and resolved as quickly as reasonably possible.
- **Continuous Improvement:** Data from grievances is used to strengthen systems, policies, and practices.

## **8. REPORTING CHANNELS**

Stakeholders may submit grievances through any of the following channels:

- Dedicated grievance email or hotline
- Online reporting form



- Direct communication with supervisors, HR, or designated grievance officers
- Community liaison officers or stakeholder engagement channels
- Anonymous reporting channels (where permitted)

All channels are monitored regularly to ensure prompt response.

## 9. GRIEVANCE SUBMISSION PROCEDURES

Global Star Security Services provides multiple accessible channels for stakeholders to submit grievances. All complaints will be treated seriously, handled confidentially, and processed without discrimination or retaliation.

### Who May Submit a Grievance

A grievance may be submitted by:

- Employees or contractors
- Clients or partner organizations
- Community members affected by company operations
- Any other stakeholder with a legitimate concern

### What Can Be Reported

Grievances may relate to, but are not limited to:

- Misconduct or unprofessional behavior
- Harassment, discrimination, or workplace abuse
- Human rights violations
- Breaches of company policies or contractual obligations
- Corruption, fraud, or unethical conduct
- Safety concerns or operational risks
- Environmental or community impact issues

### Submission Channels

Grievances may be submitted through any of the following channels:



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**Direct Supervisor or Manager**

Verbally or in writing.

**Designated Grievance Officer / HR Department**

Via written statement, phone, or in-person meeting.

**Grievance Submission Form**

Available internally and through field locations.

**Email Submission**

Sent to the official grievance or HR email address.

**Telephone Hotline**

Where available, staffed confidentially.

**Suggestion / Grievance Box**

Located at company or site offices.

**Third-Party Representative**

Submitted on behalf of complainants who cannot or prefer not to come forward directly.

Anonymous grievances will be accepted and investigated to the extent possible.

**Information to Include (Where Possible)**

Complainants are encouraged to provide:

- Name and contact details (unless submitted anonymously)
- Date, time, and location of the incident or issue
- Persons involved or responsible
- Description of the concern
- Any witnesses or supporting evidence
- Desired outcome or expectations (optional)

Lack of full details does not prevent a grievance from being reviewed. 



### **Acknowledgment of Receipt**

- All written grievances will be acknowledged within **3–7 working days**, depending on operational context.
- Verbal complaints will be documented by the receiving staff member and processed in the same manner as written submissions.

### **Protection from Retaliation**

No complainant, witness, or participant in the process will face punishment, discrimination, or negative consequences for submitting a grievance in good faith.

### **Tracking and Recordkeeping**

All grievances will be logged in a secure grievance register, including:

- Name of complainant (if provided)
- Date received
- Nature of complaint
- Responsible investigator
- Decisions and actions taken
- Date of resolution

Records will be kept confidential and stored securely.

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## **10. GRIEVANCE HANDLING PROCESS**

**Submission:** A grievance is submitted through an approved channel.

**Acknowledgment:** The organization confirms receipt within a specified timeframe (e.g., 5 working days).

**Assessment:** The grievance is reviewed to determine the appropriate investigation process.

**Investigation:** An impartial investigation is conducted, including interviews and review of evidence.



**Resolution:** A response is issued to the complainant with findings and corrective actions, where applicable.

**Appeal:** The complainant may request a review if they are not satisfied with the outcome.

**Closure:** The case is formally closed and documented.

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## 11. RESPONSIBILITIES

- **Management:** Ensures resources and support for the effective implementation of this policy.
- **Grievance Officers / HR:** Oversees the process, conducts investigations, and maintains records.
- **Employees and Stakeholders:** Act in excellent faith when raising grievances and cooperate with investigations.

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## 12. NON-RETALIATION COMMITMENT

The organization strictly prohibits retaliation against any individual who raises a concern in good faith. Any form of intimidation, harassment, or adverse action will be considered a serious violation of this policy and will result in appropriate disciplinary measures.

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## 13. REPORTING AND ACCOUNTABILITY

Global Star Security Services is dedicated to maintaining transparent tracking, monitoring, and reporting of grievances to uphold the integrity and effectiveness of the grievance mechanism. All grievances will be documented, reviewed, and managed in a manner that fosters accountability, continuous improvement, and responsible conduct.

### **Recording and documentation.**



All grievances received—whether verbal, written, or anonymous—must be:

- All grievances must be registered in the official grievance register.
- Assigned a unique reference number.
- Details such as the date of receipt, the nature of the complaint, the source, and the responsible investigator are all documented.
- The information is continuously updated throughout the investigation and resolution process.
- The information is securely stored to maintain confidentiality and protect personal information.

### **Internal Reporting**

The Grievance Officer or designated responsible staff shall:

- Provide regular internal updates to management on the status and progress of open cases.
- Immediately escalate high-risk or serious allegations (such as human rights violations, corruption, or criminal matters) to senior leadership.
- Ensure that decisions and corrective actions are properly recorded and implemented.

### **Responsibility and Oversight**

Responsibility for grievance management is shared across the organization:

- **The Grievance Officer and HR Department are accountable for the daily** management, documentation, tracking, and facilitation of investigations.
- **Line Managers and Supervisors**—responsible for the initial reception of complaints and immediate actions to prevent further harm or risk.
- **Senior Management** bears the responsibility of supervising the grievance system, authorizing significant decisions, and guaranteeing sufficient resources and impartiality.

If necessary, external specialists or independent bodies may be appointed to assist with or conduct investigations.

### **Feedback to Complainants**

Where the complainant has provided contact information:



- They will receive acknowledgment of receipt within the defined timeframe.
- They will be informed of progress during the investigation.
- They will receive written communication of the final outcome, within the limits of confidentiality and legal requirements.
- Anonymous complainants will receive feedback only when contact information or secure communication channels are available.

### **Periodic Review and Performance Monitoring**

The grievance system will be reviewed periodically to evaluate:

- We will assess both the quantity and variety of grievances that have been filed.
- We will also assess the promptness with which grievances are resolved.
- There may be recurring issues or systemic risks.
- The effectiveness of corrective actions is also a crucial consideration.
- Adherence to policy and legal requirements.

Findings may be utilized to update policies, enhance operational procedures, or provide additional training.

### **External Reporting**

Where appropriate and permissible:

- Summary reports may be shared with clients, regulatory bodies, certification systems, or stakeholders.
- Reporting will ensure the protection of confidentiality and personal data.
- For serious legal or regulatory violations, reporting will adhere to applicable national laws and international obligations.

### **Accountability for Misconduct**

Any employee, contractor, or representative found responsible for violations or misconduct may face:

- Disciplinary action.
- Reassignment or suspension may also be imposed.
- The disciplinary action may also involve the termination of employment or contract.
- There may also be a requirement for legal or regulatory reporting.



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Failure by managers to respond appropriately to grievances may also result in disciplinary action.

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#### **14. POLICY REVIEW AND UPDATES**

The organization will review this policy and the grievance mechanism annually, or as needed, to ensure effectiveness, relevance, and alignment with best practices and legal requirements.

