



# GLOBAL STAR SECURITY SERVICES

YOUR SHIELD OF SECURITY

## WHISTLEBLOWING POLICY

### POLICIES & PROCEDURES

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## 1. PREAMBLE

Global Star Security Services (GSS) is committed to the highest standards of integrity, accountability, and transparency. As a security company entrusted with protecting people, assets, and sensitive environments, GSS recognizes that safeguarding ethical conduct is essential to maintaining trust and operational excellence.

This Whistleblowing Policy provides a safe, confidential, and transparent mechanism for employees, contractors, and stakeholders to report wrongdoing without fear of reprisal. GSS encourages anyone with legitimate concerns to speak up so that issues can be addressed promptly, fairly, and responsibly.

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## 2. AIM OF THE POLICY

The aim of this policy is to:

- Encourage the reporting of unethical, illegal, or harmful practices.
- Protect whistleblowers from retaliation and ensure confidentiality.
- Establish clear reporting procedures for misconduct.
- Promote accountability and good governance within GSS.
- Ensure concerns are investigated promptly, fairly, and independently.

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## 3. SCOPE

This policy applies to:

- All employees of GSS
- Contractors, consultants, temporary staff, and suppliers
- Volunteers, interns, and external stakeholders who interact with GSS

It covers reporting of any wrongdoing, including:

- Fraud, corruption, and bribery
- Theft, misuse of company assets, or financial misconduct
- Breaches of laws, regulations, or company policies



- Human rights violations or unethical security practices
- Sexual exploitation, abuse, or harassment
- Health and safety violations
- Conflict of interest
- Retaliation against individuals who report concerns
- Any conduct that undermines GSS's integrity or reputation

#### 4. DEFINITIONS

**Whistleblowing:** Reporting suspected wrongdoing or misconduct in good faith.

**Whistleblower:** Any person who makes such a report.

**Retaliation:** Any adverse action taken against a whistleblower, including dismissal, threats, harassment, demotion, or discrimination.

**Good Faith Report:** A genuine concern made with honest belief, even if later unproven.

#### 5. PRINCIPLES

GSS is committed to:

- **Confidentiality:** Identities and information are protected.
- **Non-retaliation:** Whistleblowers are protected from adverse consequences.
- **Impartiality:** Reports are investigated fairly and independently.
- **Transparency:** Processes and outcomes (where appropriate) are communicated.
- **Good faith:** Whistleblowers acting honestly will not face discipline.
- **Accountability:** Confirmed violations lead to corrective and disciplinary action.

#### 6. WHAT SHOULD BE REPORTED?

Any conduct that is:

- Illegal
- Unethical
- Dangerous



- Fraudulent
- Abusive
- Corrupt
- In violation of company policy

This includes:

- Bribery or corruption
- Fraud or financial misconduct
- Abuse of authority
- SEA (Sexual Exploitation and Abuse)
- Human rights violations
- Safety risks or concealed incidents
- Manipulation of reports, records, or security documentation
- Client-related misconduct
- Misuse of confidential information

## 7. REPORTING CHANNELS

Whistleblowers may report concerns through any of the following safe and confidential mechanisms:

### Internal Reporting

1. **Line Manager or Supervisor**
2. **Human Resources Department**
3. **Compliance & Integrity Office / Whistleblowing Focal Point**
4. **Senior Management**

### Confidential Channels

- **Whistleblowing Email:** (Insert dedicated address)
- **Whistleblowing Hotline:** (Insert number)
- **Anonymous reporting boxes** at GSS facilities



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## External Reporting

When internal reporting is not safe or appropriate, whistleblowers may contact:

- Regulatory authorities
- Donor or client whistleblowing mechanisms
- Law enforcement (where required)

Anonymous reports are accepted and investigated.

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## 8. REPORTING REQUIREMENTS

Where possible, reports should include:

- Description of the issue
- Individuals involved
- Date, time, and location
- Evidence or witnesses (if available)
- Any steps already taken

A lack of evidence should **not** prevent reporting.

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## 9. INVESTIGATION PROCESS

**Acknowledgment:** Report acknowledged within **3–5 working days**.

**Assessment:** Initial review to determine next steps and urgency.

**Investigation:** Conducted confidentially by a qualified team or external investigator.

**Findings:** Investigation findings documented with supporting evidence.

**Action:** Disciplinary or corrective actions implemented where misconduct is confirmed.

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**Feedback:** Whistleblower receives confirmation that the case has been reviewed (details may be limited to protect confidentiality).

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## 10. PROTECTION AGAINST RETALIATION

GSS strictly prohibits retaliation in any form.

This includes:

- Termination or demotion
- Threats or intimidation
- Harassment
- Negative performance actions
- Loss of benefits
- Blacklisting or professional damage

Any retaliation will itself result in disciplinary action.

Whistleblowers who believe they are facing retaliation may file an immediate complaint through any reporting channel.

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## 11. FALSE OR MALICIOUS ALLEGATIONS

GSS distinguishes between:

- **Good faith reports** – ALWAYS protected
- **Knowingly false allegations** – Considered misconduct and subject to disciplinary action

Employees will not be punished for mistakes made in good faith.

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## 12. CONFIDENTIALITY AND DATA SECURITY

- All reports are handled confidentially; identities are disclosed strictly on a need-to-know basis.
- Information is stored securely and protected under GSS data protection standards.
- Anonymous reporting options remain available.

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## 13. RESPONSIBILITIES

### Management

- Foster a culture of integrity and safety.
- Protect whistleblowers from reprisals.
- Ensure investigations are fair and independent.

### HR and Compliance Units

- Manage reporting channels and documentation.
- Coordinate investigations.
- Provide support and guidance to whistleblowers.

### All Personnel

- Report concerns honestly.
- Cooperate with investigations.
- Maintain confidentiality.

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## 14. POLICY REVIEW

This policy will be reviewed annually or earlier if:

- Legal or regulatory changes occur
- Client or donor requirements change
- Internal audits or risk assessments identify gaps