



GLOBAL STAR SECURITY SERVICES

YOUR SHIELD OF SECURITY

HUMAN RIGHTS DUE DILIGENCE POLICY

POLICIES & PROCEDURES

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1. PREAMBLE

Global Star Security Services Company (GSS) recognizes that the protection and promotion of human rights are fundamental responsibilities of all private security providers, particularly those operating in fragile, conflict-affected, and high-risk environments. As a company licensed under the laws and regulations of the Islamic Emirate of Afghanistan, and committed to the principles of the International Code of Conduct for Private Security Providers (ICoCA), GSS integrates respect for human dignity, lawfulness, and accountability into every aspect of its operations.

This Human Rights Due Diligence Policy is a formal expression of GSS's commitment to identify, prevent, mitigate, and account for adverse human rights impacts arising from our activities, services, and business relationships. We recognize that our personnel, clients, and communities we serve have the right to live and work in safety, without fear of discrimination, abuse, or unlawful harm.

Through this policy, GSS affirms its dedication to embedding human rights considerations into operational planning, employee training, project implementation, and third-party partnerships. Our approach is rooted in proactive risk assessment, ongoing stakeholder engagement, transparent grievance mechanisms, and continuous improvement based on national legal requirements, client standards, and global norms such as the UN Guiding Principles on Business and Human Rights.

Upholding human rights is not only a moral and legal obligation, but a vital component of our operational excellence, trustworthiness, and long-term success in supporting stability and security across Afghanistan and other complex regions. This policy shall be observed by all GSS personnel, contractors, subcontractors, and service partners without exception.

2. PURPOSE

This policy outlines the framework for identifying, preventing, mitigating, and addressing adverse human rights impacts that may arise from GSS's security operations, partnerships, and supply chains.

3. AIM

Human rights due diligence (HRDD) refers to an actionable step for businesses to proactively manage and mitigate adverse human rights risks across their entire value chain. For businesses worldwide, operating ethically is becoming essential. Companies are increasingly required to adopt measures to identify, cease, prevent, mitigate, and publicly



account for negative actual and potential human rights impacts within the complete value chain, including indirect suppliers.

Existing and emerging laws share a common approach based on the UN Guiding Principles on Business and Human Rights, aiming to create transparency across global supply chains and ultimately protect human beings.

4. SCOPE

This policy applies to all GSS personnel, including employees, contractors, subcontractors, and third-party vendors operating under or on behalf of GSS globally.

5. POLICY STATEMENT

Global Star Security Services (GSS) unequivocally commits to upholding and respecting internationally recognized human rights, as enshrined in the Universal Declaration of Human Rights, the core conventions of the International Labour Organization (ILO), the International Code of Conduct for Private Security Providers (ICoC), and the laws and regulations of the Islamic Emirate of Afghanistan.

As a provider of private security services in post-conflict and high-risk environments, GSS recognizes that our operations—whether in guarding, patrolling, access control, or advisory services—can have a direct and indirect impact on the rights of individuals and communities. Accordingly, GSS integrates human rights considerations into all aspects of planning, implementation, supervision, and review of its services.

Through this policy, GSS establishes a structured due diligence process aimed at identifying, assessing, preventing, mitigating, and accounting for human rights risks and impacts throughout our operational activities and business relationships. This includes clear internal procedures, staff training, stakeholder engagement, monitoring mechanisms, and access to remedy where appropriate.

All employees, subcontractors, and service partners of GSS are expected to fully adhere to this policy. Compliance is mandatory and non-negotiable. Any violation of human rights by GSS personnel or affiliates shall be investigated and addressed in accordance with internal disciplinary protocols, client agreements, Afghan law, and where applicable, international legal obligations.

GSS is committed to continual improvement and transparency in its human rights practices, and to fostering a workplace and operational culture grounded in respect, fairness, non-discrimination, and accountability.



6. DEFINITIONS

The following definitions are provided to enhance clarity and consistency in the interpretation and implementation of this policy:

Human Rights: Fundamental rights and freedoms to which all individuals are entitled, regardless of nationality, ethnicity, religion, gender, or any other status. These rights include the right to life, dignity, security, freedom from torture, non-discrimination, fair treatment, and freedom of expression.

Due Diligence: An ongoing, proactive process through which GSS identifies, assesses, prevents, mitigates, and accounts for potential or actual human rights impacts connected to its operations, services, or business relationships.

Adverse Human Rights Impact: Any act or omission that causes, contributes to, or is directly linked to the infringement of a recognized human right, whether through operational conduct, employee behavior, or third-party association.

High-Risk Environment: A geographic or operational setting characterized by conflict, instability, weak governance, or heightened risk of human rights abuses. Afghanistan is currently recognized as a high-risk environment under various international frameworks.

Stakeholders: Individuals or groups who may be affected by GSS's operations or have an interest in the company's human rights performance, including employees, clients, local communities, government institutions, and civil society organizations.

Grievance Mechanism: A formal channel established by GSS that allows employees, clients, partners, and third parties to report concerns, complaints, or violations of human rights in a safe, confidential, and non-retaliatory manner.

Remediation: Actions taken by GSS to address and resolve negative effects on human rights, which may include punishment, compensation, retraining, and changes to prevent similar issues in the future.

International Code of Conduct (ICoC): A voluntary set of principles and standards for private security providers that outlines commitments to lawful, ethical, and rights-respecting behavior in all operations. GSS aligns its policies with ICoC requirements.

United Nations Guiding Principles on Business and Human Rights (UNGPs): A global standard affirming the duty of states to protect human rights, the responsibility of



businesses to respect human rights, and the need for access to remedy for victims of abuse. GSS employs the UNGPs as a guiding framework.

Risk Assessment: The process of identifying and analyzing potential human rights risks associated with a particular operation, location, client, or third-party relationship to ensure that appropriate mitigation measures are in place.

7. HUMAN RIGHTS DUE DILIGENCE CORE COMPONENTS

The following are Core Components of a Human Rights Due Diligence Process for Security Services:

#1. Assessing Human Rights Risks:

- **Identify potential human rights impacts:** This involves analyzing the specific context of operations, including potential conflicts and the types of security providers used (public or private).
- **Understand the root causes of risks:** Go beyond surface-level issues to understand the underlying factors that contribute to human rights abuses.
- **Consider the severity and likelihood of impacts:** Prioritize efforts based on the potential severity and likelihood of negative human rights consequences.
- **Engage with stakeholders:** Consult with affected communities, workers, and other relevant parties to gather diverse perspectives on potential impacts.

#2. Implementing Preventative and Remedial Measures:

- **Develop clear policies and procedures:** Establish and communicate clear guidelines for security personnel on respecting human rights.
- **Incorporate human rights into contracts:** Include clauses in contracts with security providers that outline expectations for human rights conduct.
- **Provide training and capacity building:** Equip security personnel with the knowledge and skills to identify and address human rights risks.
- **Establish grievance mechanisms:** Create accessible and effective channels for affected individuals to report human rights violations and seek redress.
- **Monitor and evaluate effectiveness:** Continuously track the implementation and effectiveness of human rights safeguards and adjust strategies as needed.

#3. Tracking and Communication:



- **Monitor the implementation of human rights policies and procedures:** Track whether security personnel are adhering to established guidelines.
- **Evaluate the effectiveness of preventative measures:** Assess whether implemented measures are successfully mitigating human rights impacts.
- **Communicate on human rights performance:** Regularly report on the company's efforts to respect human rights and address any identified impacts.

Key Considerations for Security Services in Conflict Zones:

- Conflict-sensitive approach:

In conflict-affected environments, due diligence should incorporate a conflict analysis and mapping of all relevant actors.

- Understanding the operating environment:

Thoroughly analyze the dynamics of the conflict and related risks to inform security strategies.

- Collaboration with local actors:

Engage with local communities, civil society organizations, and other stakeholders to ensure security measures are appropriate and aligned with local needs.

By implementing a robust HRDD process, companies can demonstrate their commitment to respecting human rights and contribute to a safer and more just operating environment. Companies can leverage a digital approach to establish appropriate preventative measures for identified risks, design a remediation action plan, and support continuous monitoring.

8. HUMAN RIGHTS DUE DILIGENCE PROCESS

GSS will implement a structured and continuous due diligence process, consisting of the following steps:

#1: Embedding Responsible Business Conduct into Policies and Management Systems

Examples of GSS efforts to fully integrate responsible business conduct into the company's operations include the Sustainability and HSSE Policy, the Code of Conduct, the Supplier



Code of Conduct, the Procurement Policy, and the People, Leadership, and Organization Policy, along with other relevant operational requirements.

#2: Identifying and Assessing Adverse Impacts in Operations, Supply Chains, and Business Relationships

GSS continues to refine its impact assessment processes, which focus on both environmental impacts on ecosystems and social impacts on communities resulting from the company's projects and operations. These assessments are often conducted by external consulting firms or other independent third parties and are closely monitored by qualified experts and national authorities.

The process examines technical, economic, social, and environmental issues, which may include considerations of threatened species in the area, potential conflicts with the rights of indigenous peoples, the interests of the local population, the necessity of relocating people due to factors such as flooding, and damage to flora and fauna caused by dams, technical installations, and power grids.

GSS is currently working to develop a robust framework to identify and assess potential human rights risks and impacts for its employees, as well as for the workforce of its suppliers and contractors.

Conduct risk identification by

- Conduct regular assessments to identify human rights risks in operational areas, project sites, and supply chains.
- Prioritize high-risk environments (e.g., conflict zones, unstable political regions).

#3: Ceasing, Preventing, Or Mitigating Adverse Impacts

GSS views this as a crucial step to ensure that the company's stated commitments are actualized and that respect for human rights is embedded in daily operations. In this regard, GSS strives to integrate the previously mentioned efforts to effectively identify potential and actual impacts with the company's operational practices.

A comprehensive array of policies, processes, and procedures is established or in development to advance GSS's human rights due diligence systems. These include Environmental and Social Management Plans (ESMPs) for various projects, human rights action plans for operations, an independent reporting (whistleblowing) channel, and HSSE reports and investigations.



Conduct an impact assessment by

- Evaluate the likelihood and severity of potential human rights impacts GSS might cause, contribute to, or be directly linked to through business activities.
- Include perspectives of potentially affected communities and stakeholders.

#4: Tracking Implementation And Results

GSS recognizes the need for additional efforts to systematically track and monitor related initiatives. The company is actively working to enhance its approach to reviewing, following up on, and auditing human rights practices.

Monitoring and reviewing the process by Implementing measures to eliminate or reduce identified risks, including:

- Internal policy changes
- Training programs
- Changes in operations or partnerships

#5: Communicating How Impacts Are Addressed

GSS gathers information annually for its Annual Report and also completes the Modern Slavery disclosure.

#6: Providing for or Cooperating in Remediation When Appropriate

While GSS makes every effort to avoid potential negative impacts, it acknowledges that there are instances where these impacts have occurred. In such cases, GSS engages in both judicial and non-judicial grievance processes to provide appropriate and mutually acceptable remedies.

Where GSS has caused or contributed to adverse human rights impacts, the company will:

- Provide or cooperate in the provision of remedy
- Record and review all remedial actions taken
- Prevent recurrence through system updates and additional training



The company is committed to learning from these experiences to enhance its management of human rights issues.

GSS has established a strategy based on the principle that remedial measures should, whenever possible, restore environmental and social conditions to their original state or even improve them.

9. KEY ROLES AND RESPONSIBILITIES

Effective policies require clearly defined roles and responsibilities for their development, implementation, and ongoing management.

- **Policy Owner:**

The CEO of GSS is the policy owner and is ultimately responsible for the policy, ensuring it is relevant, up-to-date, and effectively implemented. They may also be accountable for compliance and communication.

- **Policy Author/Drafting Team:**

Outsourced

- **Policy Review Committee:**

Senior Management GSS

- **Implementation Team:**

HR & Operations bears the responsibility of disseminating the policy to pertinent stakeholders, offering training, and guaranteeing its practical application.

- **Compliance Officer/Team:**

The Compliance Officer/Team of GSS is responsible for monitoring adherence to the policy, identifying any non-compliance issues, and recommending corrective actions. Lead the human rights due diligence process, maintain records, and oversee corrective actions.

- **Subject Matter Experts:**



Outsourced.

- **Users of the Policy:**

All individuals or groups of GSS affected by the policy are responsible for understanding and complying with its requirements. Participate in training, identify human rights risks, and report concerns through approved channels.

10. TRAINING AND AWARENESS

- All relevant employees shall receive **mandatory annual training** on:
 - Human rights and international humanitarian law.
 - Cultural Sensitivity,
 - Gender Awareness, And
 - Anti-Discrimination Practices.
 - Risk Indicators, And
 - Reporting Obligations.
 - New hires will be oriented on this policy during onboarding.
 - Special training is provided for operations in conflict zones or around civilian populations.

11. MONITORING AND EVALUATION

- Ongoing monitoring is conducted through internal compliance teams, site visits, and employee/client feedback.
- Quarterly human rights compliance reviews are submitted to GSS senior leadership.
- Field Commanders and Site Managers are held accountable for ensuring adherence to this policy.



12. REPORTING MECHANISM

- GSS has a transparent, confidential, and accessible complaints and grievance procedure for employees, clients, and third parties.
- All complaints related to human rights are promptly investigated and resolved without retaliation.
- Records are securely maintained and reviewed for systemic issues.
- Suspected or confirmed human rights concerns must be reported via GSS's internal reporting mechanism or through the designated Compliance Officer.
- Anonymous reporting is available and retaliation is strictly prohibited.

13. REPORTING AND ACCOUNTABILITY

- GSS reports annually on human rights performance, lessons learned, and future improvement actions.
- GSS management ensures full cooperation with ICoC Association oversight bodies and Afghan regulatory authorities.
- Violations of human rights obligations may lead to disciplinary action, up to and including termination and legal prosecution.

14. PROHIBITED CONDUCT

GSS enforces a zero-tolerance policy on:

- Torture, inhumane or degrading treatment.
 - Arbitrary detention or use of force outside legal limits.
 - Sexual exploitation, abuse, or harassment.
 - Child labor, forced labor, or trafficking.
 - Discrimination based on ethnicity, gender, religion, language, or political belief.
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15. ALIGNMENT WITH ICOCA AND AFGHAN LAW

GSS affirms its ongoing commitment to:

- The **ICoCA principles** on lawful behavior, humane treatment, accountability, and transparency.
- Respecting Afghan cultural values while promoting non-discrimination, fair employment practices, and peaceful coexistence.

16. POLICY REVIEW AND UPDATES

This policy will be reviewed **annually** or immediately following significant changes in company operations, legislation, or identified human rights risks.

ALL UPDATES ARE APPROVED BY THE GSS EXECUTIVE MANAGEMENT.