



GLOBAL STAR SECURITY SERVICES

YOUR SHIELD OF SECURITY

ANTI BRIBERY & ANTI CORRUPTION POLICY

POLICIES & PROCEDURES

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1. PREAMBLE

At Global Star Security Services Company (GSS), we recognize that corruption in any form undermines lawful governance, disrupts fair business practices, and erodes public and client trust. As a licensed private security provider operating under the laws of the Islamic Emirate of Afghanistan—and in alignment with the International Code of Conduct for Private Security Providers (ICoCA) and global anti-corruption frameworks—GSS affirms its commitment to conducting all business and operational activities with the utmost integrity, transparency, and accountability.

This Anti-Corruption Policy forms a core pillar of GSS’s corporate governance and compliance system. It is designed to prevent, detect, and respond to bribery, nepotism, facilitation payments, kickbacks, abuse of power, and all forms of corrupt conduct that may arise in connection with our services, personnel, partners, or stakeholders.

GSS has instituted this policy to protect our organization, uphold our legal and ethical obligations, and ensure that all employees, contractors, and partners act in a manner consistent with our values of discipline, lawfulness, and professionalism. The implementation of this policy strengthens our contribution to national stability, international cooperation, and the long-term trust of those we are sworn to protect.

2. PURPOSE

This policy establishes Global Star Security Services Company’s commitment to preventing, detecting, and responding to any form of bribery or corruption in its global operations. It ensures compliance with all applicable national and international anti-corruption laws and promotes a culture of transparency, honesty, and accountability.

3. AIM

The primary aim of this anti-bribery and anti-corruption policy is to prevent and deter unethical practices like bribery and corruption within an organization and its dealings. This involves establishing clear guidelines, procedures, and controls to ensure compliance with



relevant laws and ethical standards, fostering transparency, fairness, and integrity in all business operations.

- **Preventing Bribery and Corruption:**

The core purpose is to eliminate or minimize the risk of bribery and corruption by implementing robust policies and controls.

- **Ensuring Compliance:**

Policies aim to ensure adherence to all applicable anti-bribery and anti-corruption laws and regulations, both domestic and international, according to some companies.

- **Promoting Ethical Standards:**

By setting clear expectations for ethical conduct, the policy fosters a culture of integrity and transparency within the organization.

- **Protecting Reputation and Financial Stability:**

Violations of anti-bribery laws can lead to severe consequences, including reputational damage and financial penalties. The policy aims to mitigate these risks.

- **Building Trust:**

Demonstrating a commitment to ethical business practices builds trust with stakeholders, including customers, partners, and the public.

- **Ensuring Fairness and Transparency:**

The policy ensures that all business dealings are conducted fairly and transparently, without any undue influence or preferential treatment.

- **Maintaining Integrity:**

By prohibiting bribery and corruption, the policy helps to maintain the integrity of the organization's operations and decision-making processes.

- **Promoting Sustainable Growth:**



Ethical business practices contribute to long-term, sustainable growth by fostering trust and positive relationships with stakeholders.

4. SCOPE

This policy applies to:

- All GSS employees, officers, and board members
 - Consultants, contractors, agents, suppliers, and third-party representatives
 - Vendors, suppliers, and clients in business with GSS
 - Any entity acting on behalf of GSS in any capacity or jurisdiction
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5. POLICY STATEMENT

GSS maintains **zero tolerance** for any act of bribery, kickback, facilitation payment, or corrupt activity. All personnel must uphold the highest standards of integrity and avoid any behavior that may be perceived as improper or unlawful.

6. DEFINITIONS

The following terms are defined to ensure clarity and consistency in the interpretation and application of this policy:

Corruption: Any act of abuse of entrusted power for private gain, including but not limited to bribery, extortion, embezzlement, fraud, nepotism, favoritism, or abuse of authority.

Bribery: Offering, giving, soliciting, or receiving anything of value (financial or non-financial) to influence the actions or decisions of an individual in a position of trust or authority.

Facilitation Payment: A small, unofficial payment made to secure or expedite the performance of a routine or necessary action to which the payer is legally entitled. These payments are strictly prohibited under this policy.



Kickback: A form of bribery in which a portion of income or contract payment is secretly returned to the person who awarded the contract or facilitated the deal.

Conflict of Interest: A situation in which personal, financial, or other interests could interfere with a staff member's ability to act objectively and in the best interest of GSS.

Embezzlement: Fraudulent taking, misuse, or theft of funds or property entrusted to an employee, typically belonging to GSS or a client.

Fraud: Any act of deception intended to result in personal or financial gain, including falsifying records, misrepresenting facts, or concealing information.

Whistle-blower: Any employee, contractor, or stakeholder who, in good faith, reports suspected or actual corrupt activity, unethical conduct, or policy violations.

Nepotism: Favoring relatives or friends in professional matters, particularly in hiring, promotions, or awarding of contracts, regardless of merit.

Extortion: The unlawful use of actual or threatened force, violence, or intimidation to obtain something of value from another person or entity.

Compliance Officer: The designated GSS official responsible for ensuring the enforcement of the Anti-Corruption Policy, investigating violations, and providing guidance to employees.

Due Diligence: A structured investigation or review process conducted to assess the integrity, reputation, and compliance history of potential partners, suppliers, or service providers.

7. PROHIBITED CONDUCT/ACTIVITIES

The following are strictly prohibited under this policy:

- Offering, giving, giving or receiving bribes in any form, including gifts, hospitality services or employment promises of any kind
- Making facilitation payments to speed up routine government or business functions
- Kickbacks or Commissions in exchange for awarding contracts or business advantages.



- Improper influence of public officials, clients or third parties.
- Ignoring or failing to report suspected corrupt activities by colleagues or third parties
- Falsifying records or concealing transactions to hide unethical behavior
- Misuse of company funds or resources for corrupt activities.

8. BRIBES AND KICKBACKS

The company prohibits employees from engaging in acts of corruption and from paying or accepting bribes or kickbacks from public officials and private individuals, such as the personnel of companies with which we do business. A typical example of indirect bribery would be a case where a company employs a commercial agent to help it win a government contract. A government official receives a portion of the agent's commission payment. The company does not tolerate such practices in any form. It is the responsibility of all employees who engage the services of subcontractors, external consultants, suppliers, or advisers to ensure that such individuals are made aware of the company's anti-bribery and anti-corruption policy at the outset of the relationship and on a regular basis thereafter.

9. FACILITATION PAYMENTS

The company and its employees will not make facilitation payments (small bribes to speed up routine official transactions) even if such payments are local practice or custom. The company accepts that refusal to make illicit payments may lead to delays, for example, in the processing of government papers, and that such delays may have an adverse commercial impact on our business. If company employees encounter a demand for a facilitation payment or think they are likely to do so, they should report the situation to their line manager without delay. Line managers will then ensure that the CEO is informed at the earliest possible opportunity. The company recognizes that demands for facilitation payments are often backed by a form of extortion and that in exceptional circumstances resistance may not be feasible. An extreme example would be a demand for payment to secure an emergency admission into a hospital. The Company acknowledges that employees must exercise their discretion in such situations. Employees must report any incident where they feel forced to make a facilitation payment to their line manager at the earliest opportunity. The Company will support employees who find themselves placed in



exceptional situations, provided that the employee has provided absolute transparency as to the circumstances surrounding a payment shortly after the incident has occurred.

10. PUBLIC OFFICIALS

Bribing or corrupting a public official is a serious offense, can carry severe penalties, and can cause significant reputational damage. GSS takes special care to comply rigorously with laws prohibiting bribery of public officials. In particular, the Company will not offer anything of value to a public official with the intention of influencing an official decision. Managers with the authority to approve Gifts and Hospitality (section 8) must consider the possibility that such offers could be incorrectly perceived as an attempt to influence. Detailed guidelines on offering—or receiving—gifts and hospitality are given below (section 8), and these shall apply to public officials, including employees of state-owned enterprises.

11. GIFTS, ENTERTAINMENT & HOSPITALITY

Employees are forbidden to offer—or accept—gifts and hospitality that could affect the impartiality of the giver or receiver, influence a business decision, or lead to the improper performance of an official duty. Similarly, they may not offer or accept donations in cash or cash equivalents such as vouchers. Company employees may offer and accept reasonable and proportionate gifts and hospitality, such as dinner, theater parties, or sporting events. In determining what is ‘reasonable and proportionate,’ employees and those managers with the authority to approve gifts and hospitality should consider the following: } the value of the gifts and hospitality as well as the frequency with which the same or similar gifts and hospitality are offered. } the circumstances and context of the situation. Even a low-value gift or event may be inappropriate if, for example, the recipient is about to decide whether to award a contract to the company. } Managers with approval responsibilities may consult the Ethics Committee at their discretion. In all cases employees must ensure that the gifts and hospitality answer to all of the following requirements: } are being given as an expression of goodwill and not in expectation of a return favor (a gift designed to secure a return favor could be considered a bribe); } are being provided openly and transparently, and are of a nature that will not cause the company embarrassment if publicly reported; } comply with local laws and regulations, including the recipient’s own rules (bearing in mind that government rules on offering and receiving gifts and hospitality are often particularly



tight); } meet the value limits set by the company and have all required approvals. In cases of uncertainty, employees must seek advice from their line managers or senior colleagues. Invitations to events like dinners or sporting events may include spouses or partners if it doesn't seem like a bribe.

You must provide all approvals in writing. Records of gifts and hospitality received—or offered—that require approval must be recorded in an office or department log. The logs will be open to inspection from the company auditor. If prior approval cannot be realistically obtained before the initial acceptance of gifts and hospitality, the employee must report and seek retrospective approval, or otherwise, at the required level as soon as possible after initial acceptance. If employees with approval responsibilities themselves receive or offer gifts and hospitality with a value of more than USD 50, they must obtain approval from their own line managers.

12. PERSONAL CONFLICT OF INTEREST

Employees must avoid situations or transactions in which their personal interests could conflict—or be seen to be in conflict—with the interests of the company. This includes acting on any client information gained through their employment with the company for personal gain, passing such information to a third party, or acting in any way that could be construed as insider trading. Conflicts of interest can arise if individuals have a personal interest in business dealings involving the company. Personal interest can be direct or indirect and refers not only to personal interests but also to those of family members and friends. If there is a potential for conflict, the interests of the company must take priority. Employees must disclose any personal conflict of interest or perceived conflict to their line manager. For company conflicts of interest, see the Conflict of Interest policy.

13. CHARITABLE DONATIONS

As part of its corporate citizenship activities, the company may support charitable organizations or provide sponsorship, for example, to sporting or cultural events. Any such support must be transparent, properly documented,, and given as an expression of goodwill, and not with any intention to induce the improper performance of official duties or influence



a business decision. The Charity and Volunteering Policy sets out criteria for the selection of eligible organizations and the relevant internal approval authorities.

14. POLITICAL ACTIVITIES

The company has a policy of strict political neutrality; it does not make donations to any political parties, organizations, or individuals engaged in politics. The Company will cooperate with governments and other official bodies in the development of policy and legislation that may affect its legitimate business interests or where it has specialist expertise. GSS will deliver services to governments and political parties. As with all client engagements, our acceptance of such work is in accordance with our commitment to maintaining ethical standards in our business relationships and in compliance with our Client and Project Risk Management Policy. Employees are entitled to their own political views and activities, but they may not use company premises or equipment to promote them or associate their views with those of the company. Employees engaging in political activities should recognize that their actions or statements may endanger their colleagues or the company in certain jurisdictions; where this involves social media, employees should refer to our Social Media Guidance.

15. BUSINESS RELATIONSHIPS

The company expects its business partners to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this policy. This requirement applies to agents, subcontractors, joint venture partners, and other business associates. In cases where the company is unable to ensure these standards, it will reconsider the business relationship. Agents, representatives, and subcontractors This policy applies with particular force to commercial agents, representatives, and subcontractors. In many reported international corruption cases, agents have passed on part of their commissions as bribes. The company prohibits such practices. In order to maintain the highest standards of integrity, employees must ensure that: } They are fully briefed on the background and reputation for integrity of agents, representatives, and subcontractors before hiring them. The Company will conduct due diligence inquiries to review the integrity records of agents, representatives, and subcontractors before entering a commercial relationship with them. } The engagement process is fully documented, and the final approval of the selection of



agents, representatives, and subcontractors is made by someone other than the person selecting or managing the company's relationship with them. } Agents, representatives, and subcontractors are fully briefed on the company's ethical standards and have made a formal commitment in writing to abide by them; using our own Terms and Conditions templates for these engagements will fulfil this requirement. } Fees and commissions agreed upon will be appropriate and justifiable remuneration for legitimate services rendered. Employees will notify the Legal, Risk & Compliance team via this form before initiating a relationship with an agent or representative. Procedures for managing relationships with subcontractors are set out in the Subcontractor Management policy and supplement the requirements set out in this policy.

- Once agreements have been signed, the company will continue to monitor its relationships with agents, representatives, and subcontractors to ensure that there are no infringements of its anti-bribery and anti-corruption policy. Contractual agreements will include appropriate wording making it possible to withdraw from the relationship if agents, representatives, or subcontractors fail to abide by this policy.
- Partnership relationships
- The need for documentation and careful reviews of the company's partners' integrity records applies equally to the process of setting up and managing joint ventures or other such partnerships (whether a legal partnership or a contractual arrangement). The Company will use its influence to ensure that partners meet high integrity standards. Where the company has majority control in a partnership arrangement, it will ensure that the partner adopts the concepts and approach to bribery and corruption as set out in this policy. Suppliers and contractors The Company will ensure that the procurement procedure for appointing suppliers and contractors is open, fair, and transparent. The selection of suppliers and contractors will be based on an evaluation of professional merit and not on personal recommendations only. Procedures for managing relationships with suppliers and contractors are set out in the Supplier Management policy and supplement the requirements set out in this policy. The Company will communicate its Anti-Bribery and Anti-Corruption policy to its suppliers and contractors, and it will expect them to abide by the principles set out in the policy when working on the Company's behalf. Should they violate these principles, the company reserves the right to terminate the contract.
- Expect them to abide by the principles set out in the policy when working on the company's behalf. If those principles are breached, the company will reserve the right to terminate the contract.



16. CLIENT AND PROJECT RISK ASSESSMENT

As set out in the Client and Project Risk Management Policy, GSS employees must assess, manage, and review the full range of risks, including ethical, legal, financial, and operational risks to the company, at every stage in the client project cycle. This includes corruption-related risks: we will not take on any assignment that requires us, the client, or a third party to pay bribes. Similarly, once an assignment is under way, the project manager must keep all risks, including ethical and legal risks, under constant review, together with associated mitigation measures. In no circumstances will GSS' companies keep parallel accounts unless required by local legislation and authorized by the Finance Director. GSS' regular auditing procedures will include a review of the local circumstances that may make particular offices, services, or projects vulnerable to corruption, and the defenses and strategies that are in place to mitigate such risks. In some countries, demands for facilitation payments are a particular hazard. An assessment of the frequency of such demands and the strategies to counter them will be a regular part of the audit review.

17. REPORTING AND WHISTLEBLOWING

All personnel have a duty to report known or suspected violations through either:

- The Compliance Officer, or
- A confidential whistleblower hotline/email (anonymity guaranteed)

GSS strictly prohibits retaliation against anyone who raises concerns in **good faith**.

18. TRAINING AND AWARENESS

- Mandatory training on anti-bribery and corruption will be conducted during onboarding.
- Annual refresher training is required for all employees and relevant contractors.
- Periodic reminders and awareness campaigns will reinforce policy expectations.



19. DISCIPLINARY MEASURES

Violations of this policy may result in:

- **Immediate disciplinary action**, including suspension or termination
- **Civil or criminal liability**, including fines or imprisonment
- **Termination of contracts** with third-party partners involved in corruption

