



# GLOBAL STAR SECURITY SERVICES

YOUR SHIELD OF SECURITY

## ANTI HUMAN TRAFFICKING POLICY

### POLICIES & PROCEDURES

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## 1. PREAMBLE

Global Star Security Services Company (GSS) acknowledges that human trafficking is a serious violation of fundamental human rights and constitutes a criminal act under both Afghan law and international law. As a private security provider operating in complex environments, GSS understands its responsibility to ensure that its operations, recruitment practices, supply chains, and business relationships are devoid of any form of human trafficking, forced labor, or exploitation.

This policy reaffirms GSS's commitment to uphold human dignity and to take decisive action to prevent, detect, and respond to any instance or suspicion of human trafficking. GSS adopts a zero-tolerance approach to trafficking in individuals, whether for labor, sexual exploitation, or any other unlawful purpose, and fosters awareness, accountability, and ethical conduct at all levels of the organization.

## 2. PURPOSE

This policy is a component of the Global Star Security Services (GSS) Safeguarding Framework, which includes GSS's Preventing Sexual Exploitation and Abuse (PSEA) Policy, Anti-Human Trafficking Policy, Child Safeguarding Policy, and Sexual Harassment Policy. The Anti-Human Trafficking Policy aims to ensure that employees, agents, consultants, sub-recipients, subcontractors, and suppliers understand the prohibited conduct outlined in anti-trafficking regulations and laws, as well as the potential consequences of violations. Additionally, this document establishes GSS's policies and procedures for:

- Informing GSS employees about the conduct prohibited under GSS's Anti-Human Trafficking Policy, the U.S. Government's Trafficking in Persons Standard Provision, and the potential actions that may be taken against employees for violations.
- Highlighting GSS's recruitment and remuneration policies, underscoring the significance of fair processes that are consistent with local conditions.
- Preventing prohibited human trafficking activities by employees, agents, consultants, sub-recipients, subcontractors, and suppliers, while monitoring, detecting, and terminating individuals who engage in such activities.



### 3. AIM

The primary aim of this anti-human trafficking policy is to prevent trafficking, protect victims, and prosecute traffickers. This involves a multi-faceted approach that includes reducing the demand for trafficked individuals, dismantling criminal networks, and strengthening international cooperation.

Here's a more detailed overview of the key objectives:

#### Prevention:

- **Raising Awareness:** Educating the public, especially young people, about the risks of trafficking and exploitation is essential.
- **Addressing Root Causes:** This involves identifying and mitigating factors such as poverty, lack of education, and social inequalities that make individuals vulnerable to trafficking.
- **Strengthening Legal Frameworks:** Establishing strong laws and regulations is critical to deter traffickers and safeguard potential victims.
- **Promoting Ethical Business Practices:** Encouraging businesses to operate responsibly and avoid complicity in trafficking activities is vital.

#### Protection and Support:

- **Identifying Victims:** We are developing mechanisms to identify and refer victims of trafficking to appropriate support and assistance.
- **Providing Services:** Ensuring that victims have access to medical care, psychological support, safe housing, legal aid, and other essential services is a priority.
- **Protecting Vulnerable Groups:** We prioritize the protection of children, who are particularly at risk of trafficking, ensuring their unconditional safety.
- **Strengthening Referral Mechanisms:** Establishing clear procedures for referring victims to appropriate services is necessary.
- **Sharing Best Practices:** Exchanging information and expertise on effective anti-trafficking strategies and interventions is essential.

In summary, anti-human trafficking policies aim to create a world free from exploitation, where traffickers are held accountable for their crimes.



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## 4. SCOPE

This policy applies to all GSS employees, and representatives. In this policy the word “employees” includes temporary and contract employees. The policy also encompasses GSS board members, agents, consultants, suppliers, contractors, subcontractors, sub-recipients, fellows, interns, volunteers, and representatives from partner agencies that maintain a formal relationship with GSS.

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## 5. POLICY STATEMENT

Global Star Security Services (GSS) is firmly committed to a zero-tolerance approach to all forms of human trafficking, including forced labor, debt bondage, child exploitation, and sexual trafficking. As a responsible provider of security and risk management services operating under Afghan law and adhering to international human rights standards, GSS maintains the highest ethical standards and respects human dignity throughout its value chain.

GSS enforces a strict policy of zero tolerance toward human trafficking in any form. This encompasses labor trafficking, sexual exploitation, and any unlawful exploitation of vulnerable individuals. GSS explicitly prohibits the recruitment, use, or support of trafficked labor across all operations, contracts, and supply chains.

GSS requires full compliance with this policy from all its employees, subcontractors, and business partners. Any suspicions or reports of trafficking must be escalated immediately through designated reporting channels. GSS will promptly investigate all allegations, take necessary disciplinary or legal action, and cooperate fully with Afghan authorities and relevant oversight bodies.

This policy is binding and applies at all levels of the organization. It underscores GSS’s commitment to human dignity, legal compliance, and operational integrity.

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## 6. DEFINITION

**Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of individuals through means such as threat, force, coercion, fraud, deception, or abuse of power for the purpose of exploitation.

**Exploitation:** This includes forced labor, slavery or practices similar to slavery, sexual exploitation, child labor, organ removal, or servitude.

**Forced Labor:** Work that is performed involuntarily and under threat of penalty, which may include the withholding of wages, restrictions on movement, or the retention of identity documents.

**Coercion:** This refers to (1) threats of serious harm or physical restraint against any person; (2) any scheme, plan, or pattern intended to instill a belief in a person that failure to perform an act would result in serious harm or physical restraint against any person; or (3) the abuse or threatened abuse of the legal process.

**Recruitment Fees:** Any fees or costs charged to workers during the recruitment or hiring processes. GSS prohibits the imposition of such fees on employees.

**Victim:** A person who has been subjected to trafficking or exploitation, regardless of their legal status, age, gender, or consent, especially in deceptive or coercive circumstances.

**Zero Tolerance:** GSS maintains a strict policy of not tolerating any form of human trafficking or related abuse within its operations or supply chains.

**Due Diligence:** The steps taken to identify, assess, and mitigate risks related to human trafficking in business operations and third-party engagements.

**Grievance Mechanism:** Confidential reporting channels through which staff or third parties can raise concerns about suspected human trafficking or exploitation.

**Involuntary Servitude:** This includes a condition of servitude induced by means of (1) any scheme, plan, or pattern designed to cause a person to believe that if they did not enter into or continue in such a condition, they or another person would suffer serious harm or physical restraint; or (2) the abuse or threatened abuse of the legal process.



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## 7. EMPLOYEES AWARENESS PROGRAM

GSS will ensure that employees are aware of the Anti-Human Trafficking Policy by:

- Ensuring that all new and current GSS employees read and acknowledge this policy through their acceptance and signature of GSS's Code of Ethics and Conduct.
- Conducting training and awareness workshops.
- Posting useful and relevant content from the Anti-Human Trafficking Compliance Plan and related materials on its website and at the workplace.
- Posting the Anti-Human Trafficking Policy and the Code of Ethics and Conduct on GSS's Policy Library and StartingPoint, where GSS employees can access them at any time.

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## 8. RECRUITMENT AND WAGE PLAN

- GSS will not engage in any form of fraudulent recruitment practices during the recruitment of employees or the offering of employment.
- GSS will issue all employees employment contracts that clearly indicate their terms and conditions in Dari, Pashto, and English.
- GSS will not charge any recruitment fees to candidates.
- GSS will pay all employees' salaries in accordance with in-country statutory requirements and the GSS Remuneration Policy or will explain any variance.
- GSS shall not destroy, conceal, confiscate, or otherwise deny any employee access to their identity or immigration documents.
- If an employee needs to relocate for work with GSS, we will offer a one-time relocation allowance in accordance with the GSS Relocation Policy.
- GSS will pay the contractually agreed-upon return transportation costs for certain employees who have completed employment outside their nation of residence.
- If an employee must relocate to perform work, GSS shall provide proof of employment or a similar work document in writing at least five (5) days prior to the employee's departure from their country of origin.



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## 9. HOUSING PLAN

In situations where GSS provides an employee with temporary housing, GSS shall ensure that the housing meets the housing and safety standards of the country in which the employee resides.

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## 10. SUPPLIER COMPLIANCE

All GSS consultants, vendors, suppliers, subcontractors, and sub-recipients (hereafter referred to as Suppliers) must agree to comply with the policy and all applicable anti-trafficking provisions. All GSS suppliers must have a compliance plan to prevent trafficking in persons and to monitor, detect, and terminate any agents, sub-recipients, or subcontractors engaged in such activities. The supplier's compliance plan must meet minimum requirements and be appropriate to the size and complexity of the subcontract or sub-agreement with GSS and the nature of the activities performed under it.

If any supplier fails to comply with the policy or applicable anti-trafficking provisions, GSS will take appropriate action to remediate the violation and prevent future violations, including but not limited to:

- Requiring suppliers to remove an employee or agent from a project.
- Requiring suppliers to terminate their relationship with any consultant, subcontractor, or sub-recipient.
- Suspending payments to suppliers until the violation(s) are remedied.
- Immediately terminating the supplier's contract.

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## 11. HOW TO REPORT HUMAN TRAFFICKING

All GSS employees or third parties working on behalf of GSS are required to report any information or knowledge regarding actual or potential human trafficking violations. This report must be made in writing and submitted to the GSS Managing Director and Human Resources (HR).



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## 12. PREVENTION AND DUE DILIGENCE

- GSS will conduct thorough **vetting of personnel, contractors, and subcontractors** to ensure no involvement in trafficking.
- Employment practices will be transparent, fair, and in compliance with labor laws to prevent forced labor.
- GSS will educate personnel on trafficking risks and indicators through regular training.

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## 13. IDENTIFICATION AND REPORTING

- Personnel must be alert to signs of trafficking, including but not limited to:
  - Individuals being unable to freely leave work or accommodation
  - Withholding of identification or travel documents
  - Signs of physical or psychological abuse
- Suspected cases must be reported immediately to the designated Compliance Officer or Safeguarding Officer through confidential channels.
- GSS will protect whistleblowers and victims from retaliation.

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## 14. RESPONSE AND COOPERATION

- Upon credible reports, GSS will take immediate action to safeguard victims, including access to medical, legal, and psychological support.
- GSS will cooperate fully with law enforcement and relevant authorities in investigations and prosecutions.
- GSS will review relationships with subcontractors or partners found complicit and take appropriate action, including termination of contracts.

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## 15. TRAINING AND AWARENESS

All GSS employees and contractors are required to undergo mandatory anti-human trafficking training, which includes:



- Identification of signs of trafficking and exploitation.
- Safe reporting mechanisms and the responsibilities outlined under Afghan and international law.
- Responsibilities that pertain to both Afghan and international law.
- Specialized training for site supervisors, HR staff, and recruitment teams.

Additionally, GSS will implement awareness campaigns to enhance understanding of trafficking risks.

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## 15. LEGAL FRAMEWORK

All apprehension actions must adhere to the following regulations:

- The regulations include the Penal Code of Afghanistan and any applicable labor and employment laws.
- The Law on Countering Abduction and Human Trafficking (Afghanistan).
- The International Code of Conduct (ICoCA) for Private Security Providers.
- The UN Palermo Protocol to Prevent, Suppress, and Punish Trafficking in Persons.
- The ILO Conventions address the issues of forced labor and child labor.

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## 16. CONSEQUENCES

GSS employees who take part in any of the banned activities in this policy, do not follow the required compliance plan, fail to report suspected trafficking-related activity, ignore reports of suspected trafficking-related activity, or break this policy or any part of the GSS Safeguarding Framework may face disciplinary action, which could include being fired right away. This may include immediate termination of employment.

The company reserves the right to terminate employment without prior notice.

If any supplier or their staff break the rules in this policy, do not follow important contract terms, fail to report suspected trafficking activities, or violate this policy or any other GSS Safeguarding Framework Policy, GSS will take action. This action may include the immediate termination of any supplier contract or agreement with GSS.



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## 17. MONITORING AND REVIEW

- The compliance officer will monitor adherence to this policy and review it annually or as needed following incidents.
- GSS will implement continuous improvement measures based on lessons learned.

