



GLOBAL STAR SECURITY SERVICES

YOUR SHIELD OF SECURITY

PREVENT SLAVERY AND FORCED LABOUR POLICY

POLICIES & PROCEDURES

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1. PREAMBLE

Global Star Security Services Company (GSS) affirms its commitment to upholding the fundamental rights of all individuals and to ensuring that slavery, servitude, and forced or compulsory labor have no place in any part of its operations. As a licensed private security company operating under the license from the Ministry of Commerce & Industry and Ministry of Interior of Afghanistan and in alignment with international human rights and labor frameworks, GSS enforces a strict zero-tolerance policy toward all forms of modern slavery.

This policy reflects our responsibility to ensure that employment relationships are based on free and informed consent, that all work is performed voluntarily, and that individuals working with or for GSS are treated with dignity, fairness, and respect.

2. PURPOSE

The purpose of this policy is to affirm Global Star Security Services Company's (GSS) commitment to preventing slavery, servitude, and all forms of forced or compulsory labor within its operations and supply chains, in line with international human rights standards and ILO requirements.

3. AIM

The aim of this slavery and forced labor policy for GSS, like any business, **is to prevent and address the use of forced labor or any form of slavery within its operations and supply chains**. This policy ensures the company complies with human rights laws and ethical standards, safeguarding workers and promoting fair labor practices.

Here's a breakdown of the key aspects and purposes:

Compliance and Legal Framework:

- **Human Rights Laws:**
 - The policy ensures adherence to international human rights laws and conventions prohibiting slavery and forced labor.
- **National Legislation:**
 - It also aligns with relevant national laws, such as the Modern Slavery Act in Australia, which requires companies to report on their efforts to address modern slavery risks.
- **Due Diligence:**



- The policy includes procedures for conducting due diligence to identify and address potential risks of forced labor in the company's operations and supply chains.

Protecting Workers:

- **Freedom from Coercion:**
 - The policy ensures that no worker is subjected to forced or compulsory labor, meaning they are not forced to work under threat of penalty or without their consent.
- **Ethical Workplace:**
 - It aims to create a workplace environment where all employees are treated with respect and dignity, free from exploitation.
- **Vulnerable Groups:**
 - The policy specifically addresses the vulnerability of certain groups, such as migrants, children, and minority communities, who are often targeted for forced labor.

Preventing Modern Slavery:

- **Supply Chain Monitoring:**
 - The policy requires monitoring supply chains to identify and address any instances of forced labor or trafficking.
- **Risk Assessment:**
 - It includes assessing the risk of modern slavery in different parts of the business and taking appropriate measures to mitigate those risks.
- **Training and Awareness:**
 - The policy may include training for employees and partners on the signs of forced labor and how to report concerns.

Promoting Ethical Practices:

- **Transparency:**
 - The policy promotes transparency in the company's operations and supply chains, making it clear that it does not tolerate forced labor.
- **Accountability:**
 - It establishes mechanisms for reporting and addressing concerns about forced labor and ensuring accountability for violations.
- **Fair Competition:**
 - By eliminating forced labor, the policy promotes fair competition among businesses.

Corporate Responsibility:

- **Reputation:**



- A robust slavery and forced labor policy enhances the company's reputation as a responsible and ethical business.
- **Investment:**
- It can also attract and retain investors who are increasingly focused on environmental, social, and governance (ESG) factors.
- **Business Sense:**
- Preventing forced labor makes good business sense by protecting the company from legal and reputational risks.
- In the context of a security company, the policy would also address the specific risks associated with security work, such as potential exploitation of security personnel or the use of forced labor in security-related services or supply chains. The policy would outline procedures for ensuring that all security personnel are treated ethically and that their rights are protected.

4. SCOPE

This policy is applicable to:

- This policy is applicable to all GSS employees, including management, guards, administrative staff, and support personnel.
- This policy also applies to all contractors, subcontractors, service providers, and suppliers.
- All clients and business partners engaged in operations with or in partnership with GSS projects.

5. POLICY STATEMENT

Global Star Security Services Company (GSS) enforces a zero-tolerance policy against slavery and forced labor in all its operations and contractual relationships. All work must be voluntary, and all individuals engaged in GSS services—whether directly or through contractors—must be free from coercion, deception, or exploitation.

GSS will not tolerate the retention of passports or identity documents, non-payment or withholding of wages, involuntary overtime, or any practice that restricts freedom of movement or personal autonomy. All employees must be hired through ethical, transparent procedures and they must be treated with fairness and dignity.



Violations of this policy will result in immediate investigation, disciplinary action, and, where applicable, reporting to legal authorities. GSS is committed to ensuring full compliance with Afghan labor law, the ICoCA, and international anti-slavery conventions.

6. DEFINITIONS

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

Modern Slavery: An umbrella term that encompasses practices such as forced labor, human trafficking, debt bondage, and involuntary servitude.

Forced Labor: Any work or service that a person is compelled to perform against their will, under threat of penalty or harm, including circumstances involving coercion, deception, or abuse of power.

Slavery: The condition in which one individual is treated as the property of another, including the exercise of ownership rights over a person for labor or exploitation.

Debt Bondage: A specific form of forced labor in which an individual is obligated to work to repay a debt under unfair or exploitative conditions, which restrict their freedom to leave.

Involuntary Work: Employment or service from which an individual is unable to escape without fear of punishment, loss of rights, or retaliation.

Recruitment Fees: Any fees or costs imposed on a worker in connection with employment, including payments to agencies. GSS strictly prohibits such charges.

Child Labor: The employment of children in work that deprives them of their childhood, education, or dignity and is detrimental to their physical or mental development. GSS does not employ anyone under the age of 18 in any capacity.

Voluntary Employment: Work that is freely chosen and consented to by the employee, without any form of threat, deception, or coercion.



6. VERIFICATION, AUDITS, AND INVESTIGATIONS

As a private security company, GSS recognizes the risks associated with modern slavery and human trafficking. To address these issues, we implement the following measures to verify, evaluate, and mitigate risks in both our employee-run operations and those of our suppliers:

- Employees certify their adherence to the Code of Ethics and Business Conduct, which includes prohibitions on modern slavery and trafficking. Similarly, suppliers certify compliance with the Business Partner Code of Conduct, which includes requirements for information disclosure and reporting changed circumstances.
- Key supplier contracts include provisions that specifically address anti-slavery and human trafficking.
- We conduct risk assessments focused on modern slavery and human trafficking.
- Site visits and audits are performed for operations and suppliers identified as high-risk.
- A corrective action plan is required for any nonconformities that are identified.

All GSS employees, suppliers, and third parties conducting business with GSS are obligated to cooperate fully and promptly with both internal and external auditors and investigators. They must respond truthfully and completely to all questions, requests for information, and document submissions.

7. RED FLAGS AND INDICATORS OF LABOR-RELATED HUMAN TRAFFICKING AND MODERN SLAVERY REPORTING

The following is a list of potential red flags and indicators of forced labor and human trafficking designed to assist employees in observing TTI or supplier operations:

Work and Living Conditions:

- Not free to leave or come and go as he/she wishes.
- Is unpaid, paid very little, or compensated solely through tips.
- Works excessively long and/or unusual hours.
- Is not allowed breaks or endures unusual restrictions at work.
- Owes a large debt and appears unable to repay it.
- Was recruited through false promises regarding the work.
- High security measures are in place where none should be necessary (e.g., opaque or boarded-up windows, bars on windows, barbed wire, etc.).



- Working hour data does not align with worker accounts.

Poor Health or Abnormal Worker Behavior:

- Appears fearful, anxious, depressed, submissive, tense, or paranoid.
- Exhibits unusual behavior when the topic of law enforcement is mentioned.
- Avoids eye contact, even when requested.
- Lacks access to medical care and/or has been denied medical services by the employer.
- Appears malnourished or shows signs of exposure to harmful chemicals.
- Displays signs of physical and/or sexual abuse, restraint, confinement, or torture.
- Lacks a sense of time—unable to identify what day it is.

Lack of Control:

- Has few or no personal possessions, or all possessions seem to be at the workplace.
- Is not in control of his/her own money and lacks financial records or a bank account.
- Is not in possession of his/her own identification documents (ID or passport).
- Is not allowed to speak for himself/herself (a third party insists on being present to translate).
- Claims to be just visiting and cannot specify a residential address.
- Lacks knowledge of his/her location.

8. PROHIBITED PRACTICES

GSS prohibits and actively prevents:

- Any form of slavery, servitude, or forced labor is strictly prohibited by GSS.
- The employment of individuals through coercion, threats, or manipulation is strictly prohibited.
- Passports, ID cards, or personal documents may be confiscated.
- The practice of unlawful recruitment fees or withholding of wages is also prevalent.
- The practice of debt bondage, contract substitution, or deception regarding job terms is also prevalent.
- Child labor, particularly those under 19, is utilized in security or hazardous positions.
- Any form of compulsory overtime without consent or additional pay is also a concern.



- The use of forced, bonded, indentured, or involuntary prison labor is also prevalent.
- The practice of withholding identity documents or wages to compel work is also prevalent.
- Threats, coercion, or physical punishment are used to enforce work.
- Exploitative working conditions that violate basic human rights.

9. PREVENTION MEASURES

Key prevention measures for slavery and forced labor include:

Develop and Implement a Robust Policy:

Establish a clear policy against forced labor and modern slavery that outlines expectations for employees, suppliers, and business partners.

Conduct Risk Assessments:

Identify potential risks of forced labor within the company's operations and supply chain, focusing on factors such as recruitment practices, worker treatment, and vulnerabilities.

Ensure Fair Recruitment:

Implement recruitment processes that are fair, ensuring that workers are not charged excessive fees, their passports are not withheld, and they fully understand their rights and responsibilities.

Provide Training:

Train employees and management to identify and prevent forced labor by recognizing its indicators and understanding the reporting procedures.

Monitor Supply Chains:

Regularly assess suppliers to ensure compliance with the company's forced labor policy and that they enact measures to prevent forced labor.

Establish Reporting Mechanisms:



Create confidential and accessible channels for employees and others to report suspected cases of forced labor without fear of retaliation.

Remediation:

Establish procedures to address identified instances of forced labor, including providing support to victims and implementing corrective actions.

Collaboration:

Engage with stakeholders, including governments, NGOs, and other companies, to share best practices and tackle systemic issues related to forced labor.

10. RESPONSE AND SUPPORT

For the purpose of reporting, all staff members are kindly requested to report suspected cases of slavery or forced labor through:

- GSS confidential complaint mechanisms.
- Please ensure direct communication with supervisors, HR, or the Compliance Office.
- Use anonymous channels like suggestion boxes or helplines.

GSS HR and operations team members must ensure:

- Protection against retaliation for whistle-blowers.
- Immediate investigation of credible allegations.
- Support and referral services for affected individuals, including shelter, medical care, and legal aid.

Investigate any reports promptly and take corrective action.

Provide support to affected individuals, including assistance with legal, medical, and psychological needs as necessary.

Collaborate with authorities in enforcement and remediation efforts.



11. TRAINING AND AWARENESS

- All personnel will receive **regular training** on recognizing and preventing slavery and forced labor.
- GSS promotes a culture of respect, dignity, and compliance with labor standards.

12. DISCIPLINARY MEASURES

- Violations of this policy will lead to **immediate dismissal** and potential legal action.
- GSS will review contracts with any supplier or contractor involved in such practices and terminate relationships if necessary.

13. MONITORING AND REVIEW

- The Compliance Officer will monitor compliance and update this policy annually or after any incident.
- Continuous improvement measures will be implemented to mitigate risks.