



GLF

SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH) POLICY

Policy Control	
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1. PURPOSE

This policy defines the Galápagos Life Fund's (GLF) guiding principles with respect to Sexual Exploitation, Abuse and Harassment (SEAH) and outlines procedures for preventing and responding to allegations of sexual exploitation, abuse, and harassment. The policy is aimed at providing our employees and project partners with an environment and culture free of harassment and discrimination in which individuals respect one another's integrity, dignity, privacy, and right to equality. The policy outlines acceptable workplace behavior and processes for supporting employees and project partners who believe they have been harassed, abused, bullied, discriminated against, and victimized.

2. POLICY STATEMENT

GLF values diversity and recognizes that different backgrounds, lifestyles, opinions, personalities, and thinking styles contribute to our company's innovative and progressive nature. GLF values employee safety and fosters a culture of trust and respect. Discrimination, intimidation, and harassment, including of a sexual nature, are not tolerated. This policy also applies to the protection of children against any form of abuse and expands on GLF's Code of Ethics, which outlines ethical standards and acceptable behaviour applicable to GLF operations and project partners. Any allegations of abuse, bullying, discrimination, harassment, and/or violent behaviour will be taken seriously and handled with dignity and confidentiality. No one will be victimized or retaliated against for making such a complaint.

3. SCOPE

All GLF employees and project partners, including GLF's grantees, contractors, suppliers, consultants, and their employees, sub-grantees, and representatives, are required to comply with this policy.

4. DEFINITIONS

- **SEAH:** Sexual Exploitation, Abuse and Harassment.
- **Child:** In accordance with the United Nations Convention on the Rights of the Child and the applicable local law, 'Child' means every human being under the age of 18. GLF considers a child to be a person under the age of 18 years.
- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially, or politically from the sexual exploitation of another.
- **Sexual Harassment:** Any unwelcome sexual advance, request for sexual favor, or other verbal, non-verbal, or physical conduct of a sexual nature that interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive environment in connection with the delivery of GLF business and projects. Sexual harassment may occur between or among persons of different sexes or genders or of the same sex or gender and may be initiated by any gender or sex. Even if an individual voluntarily participates in activities or discussions of a sexual nature, the actions may constitute sexual harassment if the individual indicates that the conduct was unwelcome. Moreover, even consensual sexual relations can constitute sexual harassment if

they are so pervasive in the office as to interfere with the work environment or the work performance of others not part of these consensual relationships.

5. PRINCIPLES

The SEAH Policy is guided by the following principles:

- **Zero Tolerance:** GLF does not condone, encourage, or tolerate participation or engagement in SEAH, or any conduct substantially equivalent to SEAH. GLF considers sexual exploitation, abuse, and harassment by employees and project partners as serious misconduct, which may lead to termination.
- **Acknowledgement of Awareness:** All employees and project partners are mandated to acknowledge their understanding of and compliance with GLF's SEAH policy and Code of Ethics in grant agreements and contracts. GLF will ensure that employees and project partners understand their shared responsibility for preventing and addressing any SEAH-related concerns.
- **Prevention:** The GLF strongly discourages any involvement in sexual relationships among its employees, project partners, and beneficiaries due to the inherent power dynamics that exist. These relationships pose a risk to the credibility and integrity of the GLF. GLF will take all reasonable steps to prevent, minimize, investigate, and rectify SEAH in GLF-related operations. The GLF and its project partners have a duty to establish and uphold an environment that prevents sexual exploitation, abuse, and harassment and encourages the enforcement of the Code of Ethics. The management team is specifically tasked with supporting and implementing systems to sustain this environment.
- **Reporting:** If individuals have any suspicions or concerns regarding sexual abuse, harassment, or exploitation, it is essential that they report them without delay. All concerns, reports, and investigations will be handled on a need-to-know basis, with all records kept securely. Communication about complaints, reports, and investigations will be kept private and secure.
- **Protecting the Victim/Survivor:** Victims who report, attempt to report, or are believed to have reported suspected or actual SEAH (including concerns about suspected SEAH) in GLF-related activities will receive all the protections, such as anonymity, confidentiality, and safeguarding from retaliation and victimization.

6. REPORTING REQUIREMENTS AND PROCEDURE

Reporting any SEAH and safeguarding concerns or policy violations to GLF is mandatory for employees and project partners of the organization.

GLF views any non-compliance with this policy and its obligations in terms of legislation in a serious light and encourages employees, grantees, other project partners and otherwise project affected people to report any act of Sexual Exploitation, Abuse and Harassment (SEAH) confidentially (and anonymously, if desired) through the following channels:

- GLF's Ethics Hotline
- Online Contact Form (found on the GLF website's contact page)
- Accountability and Grievance Mechanism

All GLF employees who receive a report or hear a concern from another person must immediately communicate any relevant information with the Human Resources Department. GLF will promptly and thoroughly investigate all SEAH complaints in accordance with its established investigation procedures. The reporting process could include informally or formally reporting to the Line Manager or the Human Resources Department, or any other reporting method that the employee feels comfortable with.

All complainants, reporters, and subjects of a complaint will have their privacy protected to the greatest extent possible. While GLF cannot guarantee complete confidentiality, information about the complaint and investigation will be limited to individuals on a need-to-know basis.

GLF will notify donors of any complaints or suspicions about SEAH in accordance with applicable donor policies and regulations and assist with donor investigations while also maintaining privacy and confidentiality in line with a survivor-centred approach that prioritizes the rights, wishes, needs, safety, dignity, and overall well-being of the victim or survivor as the focal point of all preventive and responsive actions related to sexual exploitation, abuse, and sexual harassment. .

7. CONSEQUENCES OF POLICY VIOLATIONS

Should an investigation reveal a breach of policy by GLF employees, GLF will take disciplinary action, including termination, in accordance with its policies and applicable laws. Any breach of this policy, failure to adhere to contractual requirements, or noncompliance with the SEAH Policy by a project partner will result in corrective action, such as contract termination and potential exclusion from future contracts or grants with GLF.

8. IMPLEMENTATION

The implementation of the policy will be led by the Board of Directors, supported by the Executive Director.

9. POLICY REVIEW

This policy will be reviewed annually and updated if necessary, and thereafter endorsed by the GLF Board of Directors.