



LANFORCE ENERGY PSEAH POLICY

Summary

This Policy sets out Lanforce's approach to preventing and addressing sexual exploitation, abuse, and harassment (PSEAH).

This includes:

- Our commitments to prevent SEAH and to ensure effective action is taken when problems occur;
- Principles upon which we will base our decision making and actions; and
- Our expectations of all those who work on behalf of Lanforce.

Scope

The Policy applies to all Lanforce Employees and Related Personnel as well as visitors both during and outside normal working hours.

Policy

Lanforce has a zero-tolerance policy towards inaction against sexual harassment, exploitation, and abuse. At Lanforce, we believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion, or ethnic origin. We recognize that there are unequal power dynamics across

the organization and in relation to those we serve, and that we face risk of some people exploiting their position of power for personal gain. Lanforce will not tolerate its employees, volunteers, consultants, partners, or any other representative associated with the delivery of its work carrying out any form of sexual harassment, sexual exploitation, or sexual abuse. Lanforce commits to supporting survivors, improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse. Lanforce will use this Policy in conjunction with relevant laws (including criminal, employment, and privacy for example), duty of care and to make decisions about how to respond to any complaints and concerns raised.

Definitions and Application of Terms

"Chief Executive Officer" - means the Lanforce Chief Executive Officer established in terms of the Company's constitution.

"Company" - means Lanforce and is used interchangeably with the term "Lanforce".

"Employee" - means an employee who has entered a contract of employment with Lanforce and whose employment is subject to the terms and conditions of service specified herein.

"Employee Representative" - means an employee elected by members of staff who are not managerial employees to represent them in the Workers Committee.

"Senior Management" - means an employee who is Head of a Division and/or reports directly to the Chief Executive Officer.

"He/ His" - includes "she or her" and are used interchangeably.

"Management" - means employees in Grade D and higher.

"Contract Employee" - means an employee whose engagement is for a specific period of time and subject to terms and conditions specified in his Contract.

"Child" - In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18 unless under applicable law, the age of a child is defined as being younger. For the purposes of this policy, Lanforce considers a child to be a person under the age of 18 years.

"PSEAH" - Prevention of Sexual Exploitation, Sexual Abuse, and Sexual Harassment

"Retaliation" - Any direct or indirect detrimental action recommended, threatened, or taken because an individual has been the victim of or reported suspicion of alleged misconduct in good faith, such as sexual exploitation or abuse, or participated in an authorized audit or investigation. Retaliation may include denial of aid or inequitable allocation of assistance, adverse administrative actions, such as, but not limited to, unwarranted poor performance evaluations, changes in job duties, a hostile work climate, or other negative decisions affecting the individual's terms and conditions of employment. Retaliation may also take the form of verbal abuse or harassment.

"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 Lanforce business and projects. Sexual harassment may occur between or amongst 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.

“Lanforce Employees” - and Related Personnel: The term “Lanforce Employees and Related Personnel” includes all employees of Lanforce Head Office, Lanforce Affiliates and Lanforce District Offices. The term also includes board members, volunteers, interns, and international and local consultants, day labourer, in addition to individual and corporate contractors of these entities and related personnel. This includes non-Lanforce entities and their employees and individuals who have entered partnership, sub-grant or sub-recipient agreements with Lanforce.

“Sexual Exploitation” - Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Lanforce recognizes that the terms sexual abuse and exploitation represent a wide spectrum of behaviors and is not limited to the act of sexual intercourse.

“Sexual Abuse” - The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include forced marriage and sexual slavery and includes sexual activity with a child (any person under the age of 18), Sexual Relationship: Includes but is not limited to staff member or related personnel having a physically intimate relationship, or an online sexually related relationship via social media, text or telephone.

“Child Sexual Abuse” - When a child is used by another child, adolescent, or adult for his or her own sexual stimulation or gratification. Sexual abuse involves contact and non-contact activities which encompasses all forms of sexual activity involving children, including exposing a child to online child sexual exploitation material, or taking sexually exploitative images of children.

“Survivor” - The person who it is alleged has been the subject of sexual harassment, abuse, or exploitation.

“Complainant” - The person who raises a complaint (this may or may not be the survivor).

“Subject of Complaint/Subject of Concern/SoC” - The person against whom the allegation, complaint or concern has been raised.

“Suspicion of misconduct” - A concern that has been raised through any of the reporting pathways. This suspicion is assessed at an initial case conference / stakeholder panel.

“Allegation of misconduct” - If, at case conference / stakeholder panel stage there is a decision to investigate the suspicion of misconduct then it is treated as an 'allegation of misconduct'.

“Outcome of Investigation” - Once an allegation is investigated and the investigation report is reviewed, the resulting recommendations are referred to as the ‘outcome of investigation’.

1. Sexual Harassment

- a. Sexual harassment occurs when a person is subjected to unwanted sexual conduct and which makes a person feel offended, humiliated and/or intimidated where that reaction is reasonable in the circumstances.
- b. It is essential to emphasize that sexual harassment refers to conduct which is unwanted and unwelcome to the recipient. As this is the key factor that distinguishes it from other relations that are freely and mutually entered.
- c. Sexual Harassment can take various forms such as:
 - unwelcome touching, hugging or kissing; staring or leering or suggestive comments,
 - sending sexual material online or via email
 - unwanted and persistent invitations to go out on dates or requests for sex after prior refusal.
 - insults and taunts based on a person's gender.
 - persistent questions or insinuations about a person's private life; and
 - any behaviour that creates a sexually hostile work environment.
 - behaviour which would also be an offence under the criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

a. Procedures for the resolution of sexual harassment related grievances

i. Informal resolution

Informal resolution is usually encouraged in all cases of harassment, generally:

- Individuals who believe that they have or are being subjected to sexual harassment are encouraged to seek dialogue with the presumed harasser or raise their concerns informally with any applicable supervisor or manager or divisional human resources official to assist with the informal resolution of the matter through dialogue.
- A person who believes that she or he is the victim of sexual harassment

should clearly communicate this (either directly or through a third party) to the 'perpetrator' that his or her behavior is unwanted, unwelcome, and unacceptable.

- In many instances, such simplistic measures are a success as:
- It allows the matter to be addressed quietly and without labels being attached to anyone. This is particularly important where the behavior was unintentional or misguided or when what has been regarded as 'normal' behavior in the work area is perceived as discrimination by someone new to the area.
- It allows for positive action to be taken to correct or alter behavior.
- It focuses effort on putting future working relationships onto a proper basis by clarifying what is regarded as acceptable behavior and what is not.

ii. formal resolution

- In order to initiate a formal grievance procedure, the employee shall lodge a written grievance to the HR Manager as early as is practicable.
- The HRM shall review the matter within 14 days and notify the individual of the measures to be applied, which may include referring the matter for investigation and disciplinary proceedings.
- Formal resolution is advised where:
 - The relative power or status of the persons involved, or other considerations make direct discussions difficult or,
 - In cases of continued offensive behavior where informal dialogue has failed to cease the harassment.
- Employees can also use the Deloitte Tip-offs Anonymous which provides an anonymous reporting channel for unethical behavior in the workplace to report the harassment.
- The parties to a harassment complaint are required, at all stages of resolution to maintain confidentiality in relation to the concern or complaint. The parties must not disclose, by any form of communication, either the fact or the substance of the matter to anyone other than, as relevant, the staff representative, the Divisional Head, and the CEO.

2. General Provisions

- Employees who believe they are being harassed SHOULD NOT KEEP QUIET but bring this matter to the attention of the perpetrator, departmental heads, workers committee representative or use laid down grievance procedures.
- Proven cases of harassment constitute a disciplinary offence.
- Any proven false and malicious or vexatious accusations of harassment will be deemed to constitute a violation of the above standards of conduct and disciplinary sanctions will be applied, as appropriate.
- All employees are expected to comply with this policy.

3. Lanforce's Core Principles on PSEAH

- a) Sexual exploitation and abuse by Lanforce Employees and Related Personnel constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Sexual harassment by Lanforce Employees and Related Personnel is grounds for disciplinary action up to and including dismissal.

- b) Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not an excuse.
- c) Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by Lanforce Employees and Related Personnel is always prohibited. This includes buying sex or the exchange of assistance that is due to program participants.
- d) Sexual relationships between Lanforce Employees or Related Personnel and community members we work with are forbidden. Given the contexts where Lanforce operates, such relationships may be based on inherently unequal power dynamics and may undermine the credibility and integrity of Lanforce's development work. Lanforce Employees and Related Personnel must declare any previously existing relationships with community members we work with to their line managers or HR focal point.
- e) Where a Lanforce Employee or Related Personnel develops concerns or suspicions regarding sexual abuse or exploitation or sexual harassment by a fellow worker, whether in Lanforce or not, they must immediately report such concerns via the established reporting mechanisms.
- f) Lanforce Employees and Related Personnel are obliged to create and maintain an environment that prevents sexual exploitation, abuse and harassment and any form of child abuse and promotes the implementation of this Policy. Lanforce Managers at all levels have responsibilities to support and develop systems, which maintain this environment.

4. Lanforce's Commitments

Lanforce is dedicated to fulfilling the following commitments to prevent and respond to sexual exploitation, abuse, and harassment (SEAH) as highlighted in the six Core Principles above.

a) Safe, Respectful and Inclusive Organizational Culture:

Lanforce will make every effort to create and maintain a safe, equitable, and inclusive organizational culture where all those who work for and with Lanforce as well as those in the communities where Lanforce operates are treated with dignity and their rights and voices are heard and respected. This entails applying Lanforce's gender justice and feminist working principles that include power sharing. This will present us with opportunities to discuss and reflect on emerging themes with a diverse pool of stakeholders ("nothing about us without us"), that will lead to robust prevention and response work to SEAH, offering support to survivors, and holding those responsible for sexual exploitation abuse or harassment, to account.

b) Reporting SEAH:

Ensure that we have multiple channels for Lanforce Employees, Related Personnel, community members we work with, and others to safely report sexual exploitation and abuse and sexual harassment. These channels should be designed in consultation with local communities and staff to ensure that they are safe and accessible. • Ensure that everyone who works on behalf of Lanforce and those we serve have information about how to access these safe reporting channels, including messaging that is suitable for children and people of other diversities. This should include posting reporting procedures in local languages and regularly explaining these

channels. • Provide training and information to all Lanforce Employees and Related Personnel, particularly focal points for receiving complaints, to ensure they understand their obligations and how to discharge their duties should they receive a complaint. A particular emphasis should be made on confidentiality. • Abide by the external reporting requirement of the Standard Operating Procedure for Misconduct Reporting. Only staff with delegated authority can report to external donor and regulatory authorities. Survivors/Victims have the right to report directly to regulatory authorities within their country. Lanforce will assist survivors/victims in making a report if they request this.

c) Responding to SEAH Reports:

Lanforce will respond in a professional and timely manner to all concerns or allegations of sexual exploitation, abuse, or harassment. All concerns or allegations will always be taken seriously, and investigated and acted upon where appropriate, in line with our safeguarding principles listed below.

• **Survivor Centered Approach:** A survivor-centered approach creates a supportive environment in which the survivor's rights and wishes are respected, prioritized, their safety is ensured, and they are treated with dignity and respect. A survivor-centered approach is based on the following guiding principles:

Safety: The safety and security of the survivor and her/his children is the primary consideration.

Confidentiality: Survivors have the right to choose to whom they will or will not tell their story, and information should only be shared with the informed consent of the survivor. Although there may be instances where an imminent threat of harm to a child or someone else may override confidentiality.

Respect: All actions taken should be guided by respect for the choices, wishes, rights and dignity of the survivor. The role of safeguarding teams is to facilitate recovery and provide resources to aid the survivor.

Non-discrimination: Survivors should receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation, or any other characteristic.

• **Robust and accountable case management:** All allegations of SEAH, and subsequent follow-up, will be documented in a secure and confidential database to ensure accountability. The report will be officially acknowledged within 24 hours, and a safeguarding team will convene a case conference to assess immediate risks and next steps within 72 hours.

• **Investigations:** Lanforce will carry out independent, safe, and discreet investigations, through trained investigators working with Lanforce's Safeguarding Teams, recognizing the rights of and duty of care to everyone involved, including complainant and/or survivor, witnesses, and subject of complaint (SoC).

• **Accountable decision-making:** Lanforce will take swift and appropriate action against Lanforce Employees and Related Personnel who are found to have committed SEAH. This may include administrative or disciplinary action, and/or referral to the relevant local authorities if appropriate and safe to do so. An independent and gender representative decision-making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability. The decision-making process will be subject to scrutiny by relevant leads and/or advisors.

• **Survivor Support:** Survivors of SEAH are entitled to specialized support services. Lanforce commits to refer survivors to competent support services as appropriate and available and according to the wants and the needs of the survivor. Support may include specialist psychosocial support such as counselling, medical assistance, legal counselling, and access to

Lanforce's Employee Assistance Programs (where available). Assistance will be made available regardless of whether a formal internal response is carried out (such as an internal investigation). d) Embedding PSEAH into Lanforce work

- **Safer Recruitment:** In compliance with applicable laws, Lanforce is committed to prevent perpetrators of SEAH from being hired, (re)hired or (re)deployed. People and Culture and Human Resources will ensure robust recruitment screening processes (e.g., pre-screening using Criminal History Checks or similar) for all personnel, including employees, volunteers, consultants, and other representatives. As part of this, all application forms, interviews, and references must address safeguarding and equality requirements and attitudes.

- **Safe Partnership Agreements:** Lanforce will ensure that, when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements: (i) incorporate this Policy as an attachment; (ii) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide by a Code of Conduct that is pursuant to the standards of this Policy; and (iii) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and sexual harassment, to investigate and report allegations thereof, or to take corrective actions when SEAH has occurred, shall constitute grounds for Lanforce to terminate such agreements. (iv) Lanforce will include assessments on partner capacity including existing Safeguarding policies, procedures, and training and where not in place, will provide the capacity building and support as part of entering any new partnership.

- **Staff and partner training:** Lanforce Employees and Related Personnel must receive as part of their induction trainings on safeguarding when they join Lanforce, including a briefing on Lanforce's policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about safeguarding and safer practices across the organization. Anyone working directly with community members on behalf of Lanforce must receive additional training on how to receive complaints and handle them in a safe and confidential manner.

- **Accountability to the Communities we work with:** Lanforce commits to promoting accountability towards individuals and the communities where we work by: (i) being transparent about Lanforce programming, activities, and services they are entitled to; (ii) raising awareness about Lanforce's Code of Conduct, safeguarding policies, and reporting channels; (iii) actively seeking feedback from communities on Lanforce's work, individual behaviors, and complaints; and (iv) presenting feedback to communities on what changes have been made resulting from community feedback – ideally by a senior Lanforce representative. The above steps should occur regularly throughout the lifecycle of the program or activity.

- **Safe Programming:** Lanforce Employees and Related Personnel are required to take proactive measures to avoid causing inadvertent harm to civilians, contribute to actively reduce existing threats and ensure program are conflict sensitive. This includes embedding good practice and SEAH prevention measures throughout the program and project cycle, including project design, grant proposals, assessments, complaints and feedback mechanisms, and monitoring and evaluation.

- **All Lanforce Employees and Related-Personnel:** Everyone who works on behalf of Lanforce is required to report any suspicions or incidences of SEAH of others (see section 5 below). Failure to report to a relevant person suspicion of SEAH relating to someone else is a breach of Lanforce's policy and could lead to disciplinary action being taken against employees and the

termination of Lanforce's relationship with non-employees. There is no obligation for an individual to report any incident that has happened to them.

- Trustees and Directors: Lanforce Directors and Board Members hold overall accountability for this policy and its implementation.
- Lanforce Affiliate's Executive Director: Lanforce's CEO is responsible for the application of this policy within Lanforce.
- Safeguarding (SG) Focal Points: Provide support to prevent and respond to SEAH alongside their substantive roles. Raising awareness and promoting best practices by receiving concerns, supporting survivors and reporting concerns in a confidential manner within Lanforce's Affiliate channel.
- SG Advisors: Provide support to Focal Points, staff, and programmes to prevent and respond to SEAH. Raising awareness, conducting training, and promoting best practices, as well as receiving concerns, conducting referrals Roles and Responsibilities: to specialized services and supporting investigations. SG Advisors and senior management should offer further support to help implement this, Policy.
- Managers: Responsible for promoting awareness of this Policy with people they manage and for supporting/developing systems that create and maintain a safe working environment. This also includes the responsibility for ensuring that all staff and Related Personnel receive regular PSEAH trainings, with a particular emphasis on staff who are in direct contact with the people we serve. Managers should prioritize PSEAH awareness raising for themselves and their divisions, individual departments, or teams, and provide budget lines for some activities.
- Program Teams: Consult with communities with whom we work (in a safe, accessible, and culturally appropriate way), to ensure that community members and those working on behalf of Lanforce are familiar with Lanforce's Code of Conduct, how to raise complaints and concerns, and that Lanforce will act when this happens. Program Teams should also clearly explain what goods and/or services the community members are entitled to and how they are selected. SG leads from Lanforce affiliates and OI Safeguarding Director are responsible for reviewing and updating this policy annually. This will be in line with legislative and organizational developments, feedback and lessons learned.

TO REPORT A SAFEGUARDING CONCERN, YOU CAN EMAIL ethics@lanforce.co.zw or phone +263788259728

Lanforce Employees and Related Personnel have a responsibility to report any suspicion or concern of SEAH. Any individual can raise a concern/complaint to Lanforce about an incident they have experienced, witnessed, or heard about concerning an Lanforce staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution. The relevant Affiliate's Safeguarding Lead will then take the complaint forward, in line with the One Lanforce Case Management SOP. Unless specifically requested to confidentially support investigations led by qualified Safeguarding investigators, Lanforce Employees and Related Personnel must not investigate allegations or suspicions themselves. Investigations are carried out by professional / trained investigators with experience in the field of SEAH. Decisions about a case concerning a child should be made in conjunction with their parent/ guardian wherever possible.

a) Reporting Channels:

Anyone (including members of the community Lanforce works with) can raise a Complaint or Concern: concern or make a complaint to Lanforce about something they have experienced or witnessed without fear of retribution. You can do this verbally or in writing to your country team or Executing/Home Affiliate's Safeguarding Focal Point, Safeguarding Team or using the whistle-blowing helpline service. If your Employing Affiliate does not have a Safeguarding Team, a dedicated whistle-blowing helpline, if you do not wish to use the online webform for reporting, or if you simply prefer, you can write to ethics@lanforce.co.zw which is available to all Lanforce Affiliates and country teams. Employees can also choose to raise concerns with their Line Manager or Human Resources team member.

b) Confidentiality:

Complaints can be made anonymously. Every effort will be made to maintain confidentiality throughout the complaints process. Information that identifies individuals involved in a complaint will be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the informed consent of the survivor, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information will be shared as per donor and regulatory body reporting requirements. Staff involved in the complaints process will be made aware of the importance of maintaining confidentiality and may be asked to sign a confidentiality agreement. Employees who breach confidentiality may be subject to disciplinary action up to and including termination of employment, and others who work with Lanforce may have their relationship with Lanforce terminated. In some cases, such breaches may constitute breaking the law.

d) Retaliation against Complainants, Survivors, and Witnesses:

Lanforce will act against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, survivors, other witnesses, or the subject of complaint. Employees may be subject to disciplinary action, up to and including termination of employment. Others who work with Lanforce may have their relationship with Lanforce terminated.

e) Complaints about Lanforce's Partners:

Where Lanforce receives a complaint about a partner organization, Lanforce will expect the partner to respond safely, quickly, and appropriately. Lanforce will assist the partner to ascertain its reporting obligations. Where appropriate, Lanforce will work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner, then they risk withdrawal of funding or ending the relationship (including networks and consortia).

f) Receiving Complaints about External Organizations/Bodies:

Safeguarding complaints raised to Lanforce about other organizations/bodies should be referred to the affiliate safeguarding teams, who will report cases to the relevant organizations involved where safe to do so. Referrals will need to consider circumstances that could indicate a potential risk of Annex I: harm to an individual or others in the future. Complaints should be referred to local PSEAH working groups, networks, and/or the charity commission/police/donors

where appropriate and safe to do so and/or in circumstances that could indicate a potential risk of harm to an individual or others in the future. Lanforce will not investigate cases related to other organizations but does have an obligation to report.