

CPHRM GROUP'S PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY

CPHRM GROUP is committed to strengthening protection from sexual exploitation and sexual abuse (SEA). All CPHRM GROUP personnel (consultants and employees) must adhere to the highest standards of professional and ethical conduct at all times.

CPHRM GROUP has a "Zero Tolerance" approach to Sexual Exploitation and Abuse and Sexual harassment and does not allow any partner, supplier, sub-contractor, agent, or any individual engaged by CPHRM GROUP to engage in any form of sexual abuse or exploitation against vulnerable or other adults associated with its work. All adults have the equal right to protection regardless of any personal characteristic, including their age, gender, ability, culture, racial origin, religious belief, and sexual identity.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives, suppliers, and business partners. It applies during or outside of working hours, every day of the year.

What is Sexual Exploitation and Sexual Abuse SEA and sexual harassment? It constitutes acts of gross misconduct and grounds for disciplinary action, including termination of employment. Depending on the violation, these cases may also, upon consultation with our legal advisors, be referred to national authorities for criminal prosecution.

What is sexual abuse? The accrual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes inappropriate touching, by force or under unequal or coercive conditions, sexual assault, and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.)

What is sexual exploitation? Any actual or attempted abuse of 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. This includes the offer or promise of monetary, social, job positions benefits as an incentive or form of coercion.

What is sexual harassment? Any unwelcome verbal, non-verbal, or physical conduct of a sexual nature, or any other behaviour of a sexual nature, that might reasonably be expected or perceived to cause offense or humiliation to a person. It occurs when such conduct or behaviour interferes with an individual's work performance, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

What is a sexual favour? Any sexual or sexualised acts, in exchange for something such as money, goods, services, opportunities and so on also includes demands for inappropriate photographs, filming, and exposure to pornography and so on.

Grooming: The cultivation of emotional relationships with those in positions of vulnerability or inequitable power, with the intention of manipulating these relationships into sexualized dynamics in the future

Sexual exploitation and abuse are a violation of fundamental human rights. It can also be criminal act. CPHRM GROUP is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the exploitation and abuse of adults is not taking place anywhere in our own business or in any of our supply chains or partnerships. CPHRM GROUP is committed to ensuring there is transparency in our own business and in our approach to preventing and responding to any safeguarding violations against adults throughout our supply chains, and relationship with third parties. In addition, we are committed to ensuring our approach is consistent with our national and international

disclosure obligations, and shall comply with all applicable laws, statutes, regulations, and codes from time to time in force.

SIX CORE PRINCIPLES

All CPHRM personnel (Employees and consultants) are:

1. **Strictly prohibited to have sexual activity with a child:** A mistaken belief that the child is over 18 is no defense. Even if age of consent is under 18, all CPHRM GROUP personnel are forbidden to have sexual activity with anyone under the age of 18 whether at work or off-duty, and wherever our staff are in the world.
2. **Strictly prohibited to exchange anything for sex/sexual Favors:** Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. Sex with prostitutes is strictly prohibited even if legal in the country.
3. **Sexual relationships between CPHRM GROUP personnel and beneficiaries is strongly discouraged:** These relationships are based on inherent unequal power dynamics and undermine the credibility and integrity of our work. Beneficiaries of assistance include job seekers, refugees, migrants, displaced persons, etc.
4. **SEA constitutes an act of serious misconduct and is grounds for disciplinary measures including termination**
5. **Personnel must report concerns regarding SEA by fellow workers**
6. **CPHRM GROUP personnel, especially managers, are required to create and maintain an environment that prevents SEA.**
7. **Cooperation:** You will cooperate with CPHRM GROUP in any investigations of concerns reported under this Agreement and keep CPHRM Group promptly updated on any concerns reported under this Agreement, including but not limited to actions taken by you in response.
8. **Gifts:** You agree that you shall not, directly, or indirectly solicit and/or receive and/or accept to be offered any illegal or improper bribe, kickback, gift or thing of value in the course of this assignment. If you learn of any violation of this restriction, you will use reasonable efforts to promptly notify CPHRM.

SIGNED by CPHRM GROUP Representative)

REBECCA NJUE)

SIGNED by CONSULTANT/EMPLOYEE)

NAME:

SIGNATURE: