



IDG Group DMCC

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PREVENTING SEXUAL EXPLOITATION AND ABUSE (PSEA) POLICY

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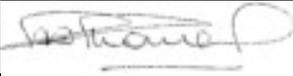
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1. International Code of Conduct Association (2019). Guidelines for Private Security Providers on Preventing and Addressing Sexual Exploitation and Abuse.



PSEA POLICY

1. Scope

This policy refers to all personnel within IDG – employees, job candidates, contractors. Furthermore, our duty of care extends to all those who work with us or alongside us.

It is paramount that all staff take individual responsibility its prevention and/or for reporting of any example of sexual exploitation or abuse (SEA).

2. IDG Approach to Preventing Sexual Exploitation and Abuse

IDG has zero tolerance of any form of SEA. SEA is a serious abuse of human rights, and often a criminal activity.

SEA may occur at any stage in IDGs day-to-day business, from recruiting through to normal duties. IDG is, because of our client's requirements to provide male guards, a very male dominated organisation. This gender imbalance is identified as a risk within the company and is to be monitored by all managers at all levels.

2.1. ICoCA Statement

IDG, as a member of the international Code of Conduct Association (ICoCA) confirms its adherence to Paragraph 38 of the International Code of Conduct for Private Security Service providers:

Signatory Companies will not benefit from, nor allow their personnel to engage in or benefit from, sexual exploitation (including for these purposes, prostitution) and abuse of gender-based violence or crimes, either within the company or externally including rape, sexual harassment, or any other form of sexual abuse or violence. Signatory companies will require their personnel to remain vigilant for all instances of sexual or gender-based violence and, where discovered, report all such instances to competent authorities.

3. Recruitment

IDG's Recruitment Policy sets out how potential personnel are assessed, vetted, and selected. This applies to both international and nationally recruited personnel.

As part of the recruitment process IDG employees should bear in mind the principles of PSEA and screen out candidates who might not abide by the expected standards of conduct.

Systems and controls are in place to ensure that sexual favours are not requested of applicants in exchange for employment throughout the recruitment process. This includes our own employees and staff, as well as any agents or external HR staff that may be involved in the process.





All selected personnel, as per normal procedures, are to be briefed on IDG's Code of Conduct which includes specific guidelines on PSEA.

4. Discipline

A failure to adhere to the Code of Conduct and this PSEA Policy, constitutes a serious disciplinary failure which may result in immediate termination of contract.

5. Training

Personnel are to be trained in PSEA as part of their induction training program. This is to include training staff in how to report and deal with SEA incidents that they may suspect or witness.

6. SEA Risk Assessment

Country Managers, and Head Office managers, are to make periodic risk assessments of SEA. The risk assessments should consider at a minimum:

- Specific SEA risk factors in the operating environment
- Likely occurrence of SEA
- Who is most at risk
- Mitigation measures
- Monitoring measures, and responsibility for these measures
- Incident management procedures
- Support and assistance requirements in the event of an incident (including any local services).

7. Managing SEA Complaints and Investigation

7.1. Reporting an Abuse

SEA abuses may still occur within IDG, in the areas we work, or to one of our staff. If an incident occurs, any individual should immediately report it to their line manager, or the nearest senior manager. In addition:

- IDG's Grievance Policy sets out how an individual can report any abuse they feel they have suffered
- IDG's Whistleblowing Policy sets out how an individual can report any abuse they may suspect or have witnessed, should they not feel able to report such an incident to their immediate line manager.

7.2. Managing an Incident

Once reported, the Country Manager is to assume control. It is essential that a survivor-centered



approach is adopted from the outset to:

- Prioritise the rights, needs and wishes of the victim
- Respect the victim's privacy and confidentiality needs
- Keep the victim informed throughout
- Allow the victim to provide input

7.3. Managing an Investigation

The Country Manager should conduct a value-led investigation (or delegated to a Project Manager) which is timely, thorough, impartial, documented and safe.

The team should be led by the IDG manager who should appoint at least two investigators. Any investigator should have received specific SEA training. All investigators should be confirmed as trusted by the victim, and able to meaningfully engage with them.

All reporting by the investigators back into the business is to be treated as highly sensitive and highly confidential and should only be reporting on a 'need to know' basis.

Disciplinary action should be taken, if required, upon conclusion of the investigation.

8. Survivor Assistance

IDG prioritizes the needs of the survivor. All help is to be offered, and should consider the following:

- Medical assistance
- Psychological assistance
- Safety assistance
- Material assistance
- Legal support

A specific assistance strategy to meet the needs of the individual must be designed and implemented. This strategy is to be monitored by the Country Managers, and its effectiveness and appropriateness assessed.

The survivor's rights are to be respected and they are to be treated with dignity throughout.