CORPORATE POLICY

Sexual Exploitation, Abuse and Harassment (SEAH) Prevention Policy

EFFECTIVE DATE	VERSION	NEXT REVIEW
11 August 2026	1.0	12 months after approval

POLICY OWNER	APPROVED BY
Managing Director (operated by the SEAH focal point)	Board of Directors, [date]

APPLIES TO

All Boafo Nsa personnel, subcontractors, suppliers, drivers and security staff, on and off duty, on and off site

01 Policy statement

Boafo Nsa has zero tolerance for sexual exploitation, abuse and harassment. Construction projects bring an influx of mostly male workers with cash wages into communities, which creates real risks for women and children nearby and for women working on site. We take responsibility for preventing harm and for responding properly if it happens.

02 Definitions

- **Sexual exploitation:** abuse of a position of power or trust for sexual purposes, including offering jobs, wages, lifts, materials or money in exchange for sex.
- **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, by force or under unequal or coercive conditions.
- **Sexual harassment:** unwelcome sexual advances, requests for sexual favours, comments, gestures or images that make a person feel offended, humiliated or intimidated.
- **Child:** any person under 18.

03 Rules of conduct

Everyone covered by this policy must not:

01 Engage in any sexual activity with a person under 18, whatever the local age of consent or belief about the person's age

02 Exchange money, employment, goods, services or favours for sex

03 Sexually harass colleagues, workers or community members

04 Use their position at Boafo Nsa to pressure anyone into a sexual or romantic relationship

05 Bring unauthorised persons into worker camps

06 View or share sexual images on company devices or at work

All workers are briefed on these rules at induction. Breach is gross misconduct and grounds for dismissal and referral to the police.

04 Prevention

- Risk assessment for each project considering labour influx, camps, nearby schools and markets
- Induction and refresher toolbox talks on SEAH for all workers, in local languages
- Separate, lockable toilets, changing rooms and accommodation for women, with lighting
- Recruitment checks and references for supervisors and drivers
- Awareness sessions with communities, explaining the rules and how to report
- Women's representation in community liaison and grievance roles

05 Reporting

Concerns can be raised with the SEAH focal point [phone], any supervisor, the community liaison officer, or anonymously through the channels in BN-POL-04. Any staff member who learns of a SEAH concern must report it to the focal point within 24 hours. Reports are handled confidentially.

06 Survivor-centred response

The safety, wishes, dignity and confidentiality of the survivor come first. With the survivor's consent, Boafo Nsa will refer them to medical, psychosocial and legal support, including the Domestic Violence and Victim Support Unit (DOVVSU) of the Ghana Police Service. Investigations are carried out by trained people, never by someone connected to the alleged perpetrator. Cases involving children are referred to the authorities.

07 Client and lender notification

Where the contract or lender requires it, serious SEAH allegations are notified to the client within the required time, without identifying the survivor.

08 Review

The SEAH focal point reports anonymised case numbers and training data to the Board twice a year. This policy is reviewed at least every 12 months.

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