

Due South Group

Protection from Sexual Exploitation, Abuse & Harassment (PSEAH) Policy

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Foreword from the Chief Executive

Due South Group is committed to providing a professional, respectful and safe environment for everyone affected by our work.

We believe that every individual has the right to be treated with dignity, respect and fairness, regardless of their role, background or circumstances. Sexual exploitation, sexual abuse and sexual harassment are wholly incompatible with our values and will not be tolerated under any circumstances.

As an international infrastructure development and project management company, we recognise that our projects may involve working with governments, healthcare providers, humanitarian organisations and local communities, including individuals who may be particularly vulnerable. We therefore have a responsibility to ensure that our conduct reflects the highest ethical standards.

This Policy establishes our commitment to preventing sexual exploitation, abuse and harassment, promoting awareness and ensuring that concerns are reported, investigated and addressed appropriately.

Steven Edwards

Chief Executive Officer

1. Purpose

The purpose of this Policy is to:

- Prevent sexual exploitation, abuse and harassment.
- Promote a culture of dignity and respect.
- Protect employees, contractors, partners and members of the public.
- Establish clear behavioural expectations.
- Encourage reporting of concerns.
- Support prompt, fair and confidential investigations.
- Reinforce the Company's safeguarding commitments.

2. Scope

This Policy applies to:

- Directors.
- Employees.
- Consultants.
- Contractors.
- Temporary personnel.
- Volunteers where applicable.
- Suppliers and partners acting on behalf of Due South Group where contractual obligations apply.

The Policy applies in offices, project locations, meetings, travel, accommodation associated with Company business, humanitarian operations and all other activities undertaken on behalf of Due South Group.

3. Our Commitment

Due South Group is committed to:

- Maintaining workplaces free from sexual exploitation, abuse and harassment.

- Treating every individual with dignity and respect.
- Protecting vulnerable people.
- Promoting professional conduct at all times.
- Responding promptly to concerns.
- Supporting individuals affected by inappropriate behaviour.
- Taking appropriate action where misconduct is identified.

4. Definitions

For the purposes of this Policy:

Sexual Exploitation means any actual or attempted abuse of a position of trust, power or vulnerability for sexual purposes, including where a person benefits financially, socially or politically from such conduct.

Sexual Abuse means any actual or threatened sexual activity carried out through force, coercion, manipulation or where a person cannot give informed consent.

Sexual Harassment means unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

5. Expected Standards of Behaviour

Everyone acting on behalf of Due South Group shall:

- Behave professionally.
- Respect personal boundaries.
- Treat others courteously.
- Exercise good judgement.
- Maintain appropriate relationships.
- Avoid behaviour that could be perceived as exploitative, abusive or harassing.

Professional conduct is expected at all times, including during travel, social events and activities connected with Company business.

6. Prohibited Conduct

The following conduct is strictly prohibited:

- Sexual exploitation.
- Sexual abuse.
- Sexual harassment.
- Unwanted sexual advances.
- Inappropriate physical contact.
- Requests for sexual favours.
- Sexual activity involving coercion or abuse of power.
- Any form of retaliation against individuals reporting concerns.

Any breach of this Policy will be treated as serious misconduct.

7. Protection of Vulnerable People

Particular care must be exercised when working in humanitarian, healthcare or community settings where individuals may be especially vulnerable.

Personnel shall never abuse positions of trust or authority.

All interactions must be conducted professionally, respectfully and with due regard for safeguarding principles.

8. Reporting Concerns

Every individual working on behalf of Due South Group has a responsibility to report suspected sexual exploitation, abuse or harassment.

Concerns may be raised by:

- Employees.
- Contractors.
- Community members.
- Project beneficiaries.

- Suppliers.
- Business partners.

Reports should be made as soon as reasonably practicable and will be treated seriously and confidentially.

9. Responding to Reports

The Company will:

- Take all concerns seriously.
- Protect individuals who may be at risk.
- Maintain confidentiality where appropriate.
- Conduct fair and impartial investigations.
- Cooperate with relevant authorities where required by law.
- Take appropriate corrective or disciplinary action.

The safety and wellbeing of affected individuals will always be the primary consideration.

10. Protection from Retaliation

No person who raises a genuine concern in good faith will suffer retaliation or victimisation.

Retaliation against individuals reporting concerns is itself a breach of this Policy and may result in disciplinary action.

11. Training and Awareness

Due South Group will promote awareness of this Policy through:

- Staff induction.
- Periodic refresher training.
- Safeguarding briefings.
- Project-specific guidance where appropriate.
- Communication with contractors and business partners.

Personnel working on healthcare or humanitarian programmes may receive additional role-specific guidance.

12. Responsibilities

The Chief Executive has overall responsibility for ensuring that appropriate arrangements are in place to prevent sexual exploitation, abuse and harassment.

Managers are responsible for:

- Promoting awareness.
- Leading by example.
- Responding appropriately to concerns.
- Supporting investigations.
- Maintaining professional standards.

Every individual acting on behalf of Due South Group has a responsibility to uphold this Policy and contribute to a safe, respectful working environment.

13. Relationship with Other Policies

This Policy should be read alongside the Company's:

- Corporate Governance Charter.
- Code of Business Conduct & Ethics.
- Safeguarding Policy.
- Human Rights Policy.
- Health, Safety & Wellbeing Policy.
- Equality, Diversity & Inclusion Policy.
- Whistleblowing Policy.
- Modern Slavery & Human Trafficking Statement.

Together these policies provide an integrated framework for protecting people and promoting ethical conduct.

14. Monitoring and Continuous Improvement

The effectiveness of this Policy will be reviewed through:

- Incident reporting.
- Lessons learned.
- Policy reviews.
- Training evaluations.
- Feedback from personnel and project partners.

Where improvements are identified, the Company will implement appropriate corrective actions.

15. Review

This Policy shall be reviewed annually or following significant legislative, contractual or operational changes.

16. Our Commitment

Due South Group believes that respect, dignity and professionalism are fundamental to responsible project delivery.

We are committed to creating an environment in which every individual is safe from sexual exploitation, abuse and harassment, where concerns can be raised without fear and where inappropriate behaviour is addressed promptly and fairly.

Through strong leadership, ethical conduct and effective safeguarding, we will continue to uphold the confidence placed in us by our clients, governments, funding partners, business partners and the communities we serve.