

CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION

Annex 1 to Order No. 2-org
dated 1 June 2026



POLICY ON THE PREVENTION OF SEXUAL EXPLOITATION AND ABUSE OF THE CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION

All forms of sexual exploitation and abuse committed by employees of the CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION (hereinafter referred to as "SPANBOND") or its associated personnel constitute serious violations of human rights and an abuse of power over vulnerable persons. Sexual exploitation and abuse may have lasting adverse consequences for affected persons.

The purpose of this Policy on the Prevention of Sexual Exploitation and Abuse (hereinafter referred to as the "Policy") is to ensure that SPANBOND projects, employees and other persons working with or on behalf of SPANBOND do not cause harm to vulnerable groups and that any incidents of misconduct are identified, reported and addressed properly and promptly.

This Policy is based on one fundamental principle: zero tolerance for all forms of sexual exploitation and/or abuse directed at beneficiaries, members of communities or any other vulnerable persons, regardless of whether such misconduct is committed by SPANBOND personnel or by authorised representatives acting on behalf of SPANBOND. The solicitation of sexual services in exchange for money, employment, goods, services or any other form of assistance is strictly prohibited.

The purpose of this Policy is to create a working environment that supports the prevention of sexual exploitation and abuse.

This Policy applies to all SPANBOND employees, contracting parties, volunteers, consultants and suppliers of services and/or goods.

The purpose of this Policy is to serve as a practical guide.

DEFINITIONS AND TERMS

Sexual Exploitation means 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 person.

Sexual Abuse means actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment means the repeated use of words or conduct with sexual or sexist implications that undermines a person's dignity because of its humiliating nature or creates an intimidating, hostile or offensive environment for that person.

Gender-Based Violence (GBV) means violence committed against a person because of that person's sex or gender. Sexual exploitation and abuse may therefore be regarded as forms of GBV, as persons affected by SEA are often women and girls, although boys and men may also be affected in certain circumstances.

The abbreviation PSEA is used to refer to the Prevention of Sexual Exploitation and Abuse.

I. CORE PRINCIPLES

1. All SPANBOND employees and contracting parties shall be informed of and acknowledge that:

- Sexual exploitation and abuse constitute serious misconduct and grounds for disciplinary measures, including termination of employment or contractual relations;
- Sexual activity involving children, meaning persons under the age of 18, is strictly prohibited and may be subject to criminal prosecution and punishment, regardless of the local age of majority or age of consent. A mistaken belief regarding a child's age shall not constitute an acceptable defence;

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- The exchange of money, employment, goods or services for sex is prohibited, including any conduct that undermines human dignity or is humiliating, offensive or exploitative. This prohibition applies to beneficiaries as well as to persons seeking employment;
- Sexual relationships between personnel and beneficiaries are strongly discouraged because they are based on unequal power dynamics;
- Employees and associated persons are required to create and maintain an environment that prevents sexual exploitation and abuse;
- Where a SPANBOND employee has concerns or suspicions regarding sexual exploitation or abuse by a colleague or a representative of another organisation, they must immediately report the matter to SPANBOND and may also report it to the competent law enforcement authorities.

2. ASSESSMENT OF POTENTIAL RISKS OF SEXUAL EXPLOITATION AND ABUSE

To prevent potential incidents of sexual exploitation and abuse effectively, the risks of such incidents must be identified and anticipated. SPANBOND requires the following:

- partners, suppliers and contractors shall be assessed with regard to their contact with beneficiaries and their ability to implement PSEA measures;
- provisions concerning PSEA shall be incorporated into all agreements;
- potential risks of sexual exploitation and abuse identified within programmes shall be assessed and addressed;
- measures aimed at raising awareness and ensuring acceptance of PSEA principles shall be incorporated into project plans.

3. RECRUITMENT

Recruitment is one of the most important elements of PSEA-related activities. The following requirements shall apply during the recruitment process:

- SPANBOND's commitment to preventing sexual exploitation and abuse shall be taken into account during the recruitment of personnel;
- subject to restrictions established by law for programmes involving minors, and where possible within a reasonable period, employees may be required to provide certificates confirming the absence of a criminal record;
- employees entering into written employment agreements shall sign agreements to which the relevant SPANBOND policies are attached.

4. PARTNERS AND SERVICE PROVIDERS

Partners, whether local or international, and service providers shall also comply with minimum PSEA standards, including, but not limited to, the following:

- Comprehensive legal due diligence: when establishing a partnership with a new organisation, SPANBOND shall include an assessment of the prospective partner's PSEA policy as part of its comprehensive legal due diligence;
- If a prospective partner's PSEA policy is found to be inadequate, SPANBOND shall not enter into a partnership with that organisation or shall assist it in meeting the minimum PSEA standards.

5. STAFF AWARENESS AND TRAINING

Training and awareness-raising play a fundamental role in preventing sexual exploitation and abuse. Such efforts may help address gaps in knowledge, strengthen employee support in this area and promote more open discussion of PSEA, which remains a sensitive subject in many cultures.

SPANBOND shall take the following measures with regard to its employees:

- induction training for newly recruited personnel shall include at least one briefing on PSEA;
- individual or group information sessions shall be conducted to maintain personnel awareness of the Code of Conduct and SPANBOND's PSEA policies.

II. REPORTING AND COMPLAINT MECHANISM

1. REPORTING MECHANISMS

Any allegations or suspicions concerning potentially unlawful or inappropriate conduct shall be reported immediately.

The following persons may submit a complaint or report:

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- beneficiaries participating in projects implemented by SPANBOND and its partners;
- SPANBOND employees;
- official representatives of SPANBOND partner organisations;
- personnel of SPANBOND partner organisations;
- other stakeholders participating in SPANBOND's activities.

Information or reports concerning SEA shall be submitted to SPANBOND's official email address or postal address.

2. HANDLING OF REPORTS AND COMPLAINTS

Any report or suspicion concerning potentially unlawful conduct that becomes known to a SPANBOND employee shall be brought immediately to the attention of the CEO of SPANBOND.

Any report or suspicion concerning inappropriate conduct, including harassment, pressure or unacceptable language, that becomes known to or is witnessed by a SPANBOND employee shall be reported to the CEO of SPANBOND.

IMPORTANT: Any suspicion concerning potentially unlawful conduct must be reported immediately.

3. CONFIDENTIALITY

All reported cases shall be handled confidentially to protect the affected person or persons, the reporting person or persons and potential witnesses, and to preserve the necessary presumption of innocence.

In certain cases, it may be necessary to involve a third party. Such involvement shall be considered separately in each individual case and, where possible, shall be subject to the consent of the reporting person.

Reports shall be considered with due regard to the specific circumstances of each case and the associated risks to the relevant stakeholders.

4. VERIFICATION OF REPORTED FACTS

SPANBOND shall use all necessary means to verify reported facts. Depending on the seriousness and complexity of the reported facts, SPANBOND may decide to outsource the investigation process using specialised external resources.

Depending on the seriousness of the allegations, SPANBOND shall refer the matter to the National Police, particularly where:

- information has been received concerning several incidents;
- the inappropriate conduct is repeated;
- the conduct under review gives rise to serious concern.

Particular attention shall be paid to providing affected persons with an opportunity to speak in a supportive and respectful environment. Depending on the circumstances, affected persons shall be referred to appropriate specialised services, including medical, social, legal or police services, for the provision of assistance and the submission of any relevant complaints.

III. DISCIPLINARY PROCEEDINGS

In accordance with PSEA requirements and SPANBOND's internal rules, an employee who violates SPANBOND's Policy or engages in inappropriate conduct may be subject to disciplinary measures ranging from a written warning to termination of employment.

Where suspicions concern a criminal offence or unlawful conduct, SPANBOND's management or, upon its instruction, the CEO of SPANBOND shall submit a formal complaint or report concerning the suspected person.

Where SEA is committed by a representative of a contracting party, the contracting party shall immediately replace that representative for the continuation of work on the project and conduct an internal investigation into the relevant incident. Where such replacement is not possible, SPANBOND shall have the right to terminate the contractual relationship immediately or before the expiry of its agreed term.