

- 1. PURPOSE** The purpose of this policy is to establish LEI's zero tolerance of Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH). It sets clear obligations to prevent and respond to SEAH and to refrain from condoning, encouraging, participating in, or engaging in SEAH.
- 2. RESPONSIBILITY** All LEI employees, consultants, and representatives of the company.
- 3. DEFINITION**

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, threatening or profiting monetarily, socially, or politically from the sexual exploitation of another.

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

Sexual Harassment: unwanted physical, verbal or non-verbal conduct of a sexual nature that can include indecent remarks or sexual demands.
- 4. POLICY**

GUIDING PRINCIPLES

LEI is committed to the highest standards of legal and ethical behaviour, and does not tolerate any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment. Employees, consultants, and representatives of the Company will not engage in SEAH, and will not engage with Counterparts that condone, encourage, participate in, or engage in SEAH.

LEI will take all available measures to prevent, mitigate, investigate, and remedy any incidents of SEAH.

LEI will take all available measures to protect actual or suspected victims from retaliation or any detrimental act, direct or indirect, recommended, threatened, or taken against them, because of a report of actual or suspected SEAH.

LEI will take steps to encourage its relevant Counterparts to adopt policies and procedures that are consistent with this Policy, with the purpose of safeguarding against any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment in all company activities.

COMMUNICATING THE POLICY

LEI will ensure that all employees, consultants, and representatives of the company are made aware of this SEAH Safeguarding policy and that everyone understands their roles and responsibilities in response to the policy.

All new employees, consultants or representatives of the company will be given this policy as part of their induction and must agree to commit to it.

Yearly in-house training will be provided to all employees, consultants, and representatives of the company.

Failure to comply with this policy will result in either disciplinary action, termination of services, legal action or criminal investigation.

REPORTING

Employees, consultants, or representatives of the company who have a complaint or concern relating to SEAH safeguarding should report it immediately to a superior, Team Leader, LEI Managing Director or through the LEI [Whistleblower Platform](#).

The platform asks for the kind of misconduct being reported, details of the persons involved, when the misconduct took place and a detailed description of the

incident. All reports lodged through the platform will be reviewed and actioned by the Chair of the LEI Board, as an independent body external to LEI.

WHISTLE BLOWER PROTECTION

LEI will not tolerate retaliation against a whistle blower (P-CO-14_Whistle Blower Policy). Any attempt to deter a whistle blower from reporting a complaint or concern is a serious offence and may be subject to disciplinary action including termination of any contractual relationship with the company.

GOOD FAITH ALLEGATION

Persons or entities reporting actual or suspected SEAH shall do so in good faith and provide where possible any information or evidence in their possession that would support a reasonable belief that SEAH may have occurred. Prior to making a report, such persons or entities are not required to evaluate or to determine whether a report that they intend to make meets any threshold of seriousness or gravity. Reporting persons or entities are not required to prove the suspected SEAH or to meet any evidentiary requirements.

FORMS:

P-CO-9_Complaints Management Procedure

SIGN OFF:

MANAGING
DIRECTOR:



Date: 03-04-25