

# POLICY ON THE PREVENTION

# OF SEXUAL EXPLOITATION AND ABUSE

ADOPTED BY THE BOARD  
OF DIRECTORS  
ON 9 DECEMBER 2025



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# 1. OBJECTIVES OF THE POLICY ON THE PREVENTION OF SEXUAL EXPLOITATION AND SEXUAL ABUSE \*

*\*hereinafter PPEAS*

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Committed alongside its partners, CECI works for inclusive and sustainable economies, where women and young people fully exercise their rights and leadership in pursuing climate-resilient economic opportunities, education and health. CECI does this by building relationships based on values of cooperation, respect, equality, integrity and commitment.

However, despite this framework, CECI recognizes that power imbalances inherent in this work remain. CECI is aware of its duty to protect not only the populations it works with, but also its own staff.

CECI is also committed to creating safe workplaces and programs that provide a climate free from all forms of sexual abuse and exploitation.

Within this framework, the objectives of PPSEA are to:

- Combat all forms of gender-based sexual exploitation and abuse in the workplace, including all forms of sexual misconduct;
- Establish clear prevention and intervention mechanisms;
- Protect the integrity and dignity of individuals in all contexts of CECI's activities;
- Guarantee fair and confidential processes for handling reports.

Please note that this PPSEA complements and reaffirms the general obligations also established in the [Policy against Psychological and Sexual Harassment](#) as well as in [CECI's Code of Conduct, Rules of Ethics and Conflicts of Interest](#).

## 2. CECI'S COMMITMENTS

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CECI undertakes to prevent and eliminate all forms of sexual exploitation and abuse within its organization and in the projects and programmes it implements.

CECI is committed to maintaining harmonious working environments, where collaboration, respect for individuals and the principles of gender equality prevail, and where staff, volunteers, partners and communities do not suffer or commit any form of exploitation, abuse or misconduct.

CECI applies a zero-tolerance policy towards all forms of sexual exploitation and abuse and takes appropriate corrective action in all proven cases.

CECI offers psychological support as well as a safe and confidential space to alleged victims.

### 3. SCOPE OF APPLICATION

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The PPSEA applies and aims to protect:

- All staff and volunteers of the organization (including interns and service providers);
- Board members;
- Strategic and financial partner organizations;
- Members of the communities with whom CECI and its partners and subcontractors work;
- Consultants and sub-contractors;
- All those who interact with CECI in the course of its activities.

The PPSEA applies in all of the following contexts:

- At all CECI workplaces, as well as outside of them;
- On and off company time;
- During work-related travel;
- During work-related social activities (conventions, happy hours, celebratory events, etc.);
- In business communications, by whatever means (in person, telephone, social media, etc.);
- In all other work-related context, including teleworking.

## 4. DEFINITIONS

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| <p><b>Sexual exploitation</b></p>                                  | <p>Term defined by the United Nations Secretary-General's Bulletin on special measures for protection from sexual exploitation and sexual abuse as "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".</p>   |
| <p><b>Sexual abuse</b></p>   | <p>Term defined by the United Nations Secretary-General's Bulletin on special measures for protection from sexual exploitation and sexual abuse as "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual activity with a child (a person under the age of 18) is prohibited regardless of the age of majority or age of consent locally".</p>  |
| <p><b>PEAS (Protection from Sexual Exploitation and Abuse)</b></p> | <p>Term used by the United Nations and the non-governmental organization (NGO) community to describe "measures taken to prevent and respond to sexual exploitation and sexual abuse committed by UN staff, NGO staff, and contractors", or "any associated personnel, or safeguards designed to protect affected or vulnerable populations, especially in humanitarian or development settings".</p>   |
| <p><b>Sexual violence</b></p>                                      | <p>A term defined by the World Health Organization on special provisions for understanding and responding to violence against women, as "any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic a person's sexuality, using coercion, by any person regardless of their relationship to the victim, in any setting."</p> <ul style="list-style-type: none"> <li>• Coercion may include:</li> <li>• The use of varying degrees of force;</li> <li>• Psychological intimidation;</li> <li>• Blackmail</li> <li>• Threats.</li> </ul> <p>Sexual violence can also occur when the person assaulted is unable to give consent - because they are inebriated, drugged, asleep or mentally incapacitated.</p> |
| <p><b>Alleged victim</b></p>                                       | <p>A person who claims to have suffered, or who is reasonably believed to have potentially suffered, an act of sexual abuse and exploitation, as well as any other harm, before the facts have been established by a formal investigation or analysis.</p>   |

|                              |  |
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|                              | <p>The use of this term is meant to protect the person by acknowledging their testimony and enabling support or safety measures to be put in place, while respecting the presumption of innocence of those who may be involved.</p>  |
| <p><b>Whistleblowing</b></p> | <p>Whistleblowing is a process whereby a person brings to CECL's attention a concerning situation, inappropriate behaviour or a potentially problematic working climate, without necessarily declaring themselves to be a victim or making a formal accusation. The situation may be observed, experienced or reported.</p> <p>Except where a report is manifestly futile or frivolous, all reports are subject to an admissibility analysis. By default, this analysis is carried out or supported by a qualified external consultant, who is independent of the organization.</p>  |
| <p><b>Complaint</b></p>      | <p>A complaint is a formal procedure undertaken by a person who considers him/herself to be a victim or survivor of sexual exploitation or abuse. It involves an explicit request for intervention from CECL, in accordance with established procedures. Filing a complaint generally leads to an admissibility assessment and may lead to an internal investigation or other official measures.</p> <p>Except where a complaint is manifestly frivolous or frivolous, all complaints are subject to an admissibility analysis. By default, this analysis is carried out or supported by an external, qualified consultant who is independent of the organization.</p> |

## 5. ROLES AND RESPONSABILITIES

To ensure a safe workplace free from sexual exploitation and abuse, all individuals involved with CECL share responsibility for preventing, detecting and responding to inappropriate behaviour.

The following responsibilities define, but are not limited to, the commitments expected of everyone:

### RESPONSABILITIES SHARED BY ALL

- Adopt exemplary conduct to promote a workplace free from sexual exploitation and abuse.
- Actively promote the principles of prevention in their work, with partners and in all contexts where CECL is active.

- Report any risk situation or any violation of the PPSEA using one of the reporting mechanisms provided for in this policy.

### **MEMBERS OF THE BOARD OF DIRECTORS**

- Dedicate the required human and financial resources to ensure that the organization meets its commitments.
- Undertake to review the PPSEA every five (5) years or as required by the law governing the matter and/or the context.
- Ensure exemplary ethical governance in the prevention of sexual exploitation and abuse.

### **CECI'S EXECUTIVE DIRECTOR**

- Stay informed of all complaints and reports that are admissible or pose a risk for CECI, and of the measures taken to deal with them.
- Receive relevant information from investigative reports, in order to manage the repercussions on the team and ensure continuity of operations.
- Be consulted on the measures to be considered, in accordance with Article 10.2, when the situation so requires.
- Refer the matter to the Ethics, Governance and Human Resources Committee of the Board of Directors if necessary.

### **EXECUTIVE COMMITTEE**

- Actively promote an organisational culture based on prevention, accountability and transparency regarding sexual exploitation and abuse.
- Ensure that the policy is disseminated to all stakeholders in the organization.
- Protect alleged victims and complainants and offer them appropriate support measures.
- Support managers in the prevention and management of complaints and reports.
- Ensure exemplary ethical governance in the prevention of sexual exploitation and abuse.
- Actively promote an organisational culture of respect and inclusion.

### **EMPLOYEES AND VOLUNTEERS** (including interns and services providers)

- Contribute, through their conduct, to making their environment free from sexual exploitation and abuse.
- Respect colleagues and others with whom they interact in the course of their work.
- Participate in collaborative activities (training, awareness-raising, communities of practice) established to prevent sexual exploitation and abuse.
- Report any situation of sexual exploitation or abuse that they witness or that is reported to them.
- Ensure the confidentiality of all information related to a report.
- Collaborate in investigations, when required.

## THE HUMAN RESOURCES DEPARTMENT

- Provide support and advice to managers in their interventions, in the corrective measures to be taken, and in disciplinary matters.
- Determine the nature of the action to be taken following a complaint or report.
- Ensure ongoing training of stakeholders.
- Manage and promote the Employee Assistance Program.
- Consult specialized resources for support, as required.
- Administer and ensure the consistent and confidential application of PPSEA.
- Retain confidential documents for a period of time in accordance with the required standards of the various regions.
- Coordinate with employees and monitor the process of signing policy certificates.
- Carry out the required communication of the event with donors, completing and transmitting the documents requested, in accordance with their specific requirements, while ensuring the confidentiality of reports and complaints.

## COUNTRY DIRECTORATES, REPRESENTATIVES, AND ALL PERSONS RESPONSIBLE FOR THE APPLICATION OF THE PPSEA WITH PARTNER ORGANIZATIONS

- Communicate, raise awareness and ensure that the PPSEA acknowledgement, which is part of the employment contract, is signed by staff, volunteers, partners, trainees and service providers/consultants.
- Ensure that participating communities, partners and all other stakeholders, including communities working directly with CECI, are fully informed of the existence of the complaints and reporting mechanism, and that they have simple, secure and easily accessible access to it.
- Receive and document complaints or reports received in person or by e-mail.
  - Where appropriate, communicate rapidly with Human Resources department to determine the nature of the intervention required (use of an expert consultant for the investigation, legal support, etc.), determine the steps for managing the complaint or report, and obtain the necessary support for implementing the appropriate corrective and disciplinary measures.
- Designate a person to conduct the investigation locally (if necessary).
- Coordinate the implementation of team activities (training, awareness-raising, communities of practice, etc.).
- Ensure the confidentiality of any and all information relating to a complaint or report.

## ALL CECI MANAGERS

- Remain vigilant and attentive, in order to identify and act upon risk factors.
- React promptly to any situation of which they become aware and report it immediately in accordance with internal procedures.
- Identify, in collaboration with the Human Resources department, the corrective and/or disciplinary measures to be applied.
- Intervene promptly, as soon as a problem situation is brought to their attention.

- Where applicable, contact the Human Resources department to obtain support in applying the corrective measures to be taken and in disciplinary matters, and determine the nature of the intervention to be carried out (mediation or investigation) following the report or complaint.
- Ensure the confidentiality of any and all information relating to a complaint or report.

## PARTNER ORGANIZATIONS

- If a policy similar to CECI's PPSEAS is not in force and communicated to the partner organizations, the latter must sign and adhere to this PPSEAS, which is appended to the partnership contracts.
- Ensure that participating communities and other stakeholders and partners are fully informed and have simple and secure access to a complaint and reporting mechanism.
- Inform and communicate this PPSEAS to their employees and collaborators ensuring that all are aware of it and understands its implications.
- Ensure a working environment free from sexual exploitation and abuse, taking all necessary measures to ensure the safety and respect of their employees, collaborators and the communities where they work on behalf of the project.
- Implement actions to prevent sexual exploitation and abuse, integrating these issues into their internal communications and practices.
- Actively collaborate in awareness-raising and prevention initiatives organized by CECI, such as, but not limited to, training, awareness-raising workshops and communities of practice, to strengthen the fight against these violations.
- Cooperate in any investigation following a complaint or report involving any CECI stakeholder.
- Inform CECI of any report or incident relating to the Policy on the Prevention of Sexual Exploitation and Abuse, in accordance with established procedures.
- Handle all reports of sexual exploitation or abuse rigorously and in accordance with the guiding principles of the PPSEA.
- Maintain the confidentiality of all facts and information brought to their knowledge in connection with the PPSEA.

## 6. GUIDING PRINCIPLES

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Despite the possibility of the individualized approach described in section 11, any complaint or report submitted under the PPSEA policy will be treated with the same rigour, discretion and seriousness as those submitted under the [\*Policy against Psychological and Sexual Harassment\*](#).

In addition to guaranteeing procedural fairness and confidentiality, CECI is committed to adopting an approach centred on the alleged victims, placing their dignity, safety and empowerment at the heart of its response.

The following principles guide the implementation of the PPSEA policy:

|                                       |   |
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| <b>Autonomy and choice</b>            | Respecting the right of alleged victims to make informed decisions about their recovery, while offering them caring support and access to resources to help them heal.  |
| <b>Safety and well-being</b>          | The physical, emotional and psychological safety of alleged victims will be a priority at every stage. A trauma-informed approach will be adopted to minimize the effects of trauma and promote the healing of alleged victims.     |
| <b>Voice and participation</b>        | The perspectives and experiences of alleged victims will guide the development and implementation of policies, programs and practices. Their experiences will be respectfully taken into account and considered as essential input. |
| <b>Confidentiality and discretion</b> | All complaints and reports will be treated with the utmost confidentiality, ensuring that information is shared only on a "need-to-know" basis and with the consent of the alleged victim where circumstances permit.               |
| <b>Fairness and accountability</b>    | The process will be impartial and transparent, ensuring that all parties are treated fairly, and that appropriate action is taken in response to substantiated complaints and reports.  |

## 7. PREVENTION PROGRAM

CECI's prevention program offers a series of planned and structured activities.

- **Training and awareness**
  - Mandatory training for all new staff within six (6) months of being hired;
  - Specific training for those responsible for handling complaints and reports (unless this responsibility is handled externally);
  - Refresher training every three (3) years for all staff.
- **Risk identification and control**
  - Implementation of preventative measures based on risk analysis;
  - Review of measures following reported incidents.
- **Communication and awareness**
  - Dissemination and annual signature of the policy's Acknowledgement Certificate by employees and volunteers. Board members will be required to sign the PPSEA Acknowledgement Certificate every two years;

- Accommodation and awareness-raising adapted to different cultural contexts;
- Awareness-raising material for staff and partners, but also available for communities with whom CECI or its partners work.

## 8. MECHANISMS FOR THE MANAGING COMPLAINTS AND REPORTS

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### 8.1 COMPLAINTS AND REPORTS

CECI encourages everyone to report any misconduct related to the PPSEA.

CECI provides complaint and reporting mechanisms available to staff, volunteers, partners, communities working with the organization or one of its partners, and all individuals associated with a project or program. The goal of these mechanisms is to enable anyone who wishes to report any inappropriate behaviour or to denounce any situation of sexual exploitation or abuse.

The alleged victim or complainant must provide sufficient information to enable the complaint or report to be dealt with properly. This information usually includes:

- The identity of those concerned;
- A description of the context and the alleged facts;
- Any other relevant information, especially the names of witnesses, locations, dates and details, if applicable.

### 8.2 CHANNELS FOR FORWARDING COMPLAINTS AND REPORTS

- *Complaints or written reports to the Human Resources department*

Complaints and reports may be sent directly to the Human Resources department at [directionRH@ceci.ca](mailto:directionRH@ceci.ca). The e-mail must include the information mentioned above.

- *Complaints or reports submitted to the manager, country management, representative, or the person designated as responsible for applying the PPSEA in the country.*

A complaint or report may be submitted to a manager or to the country representative who is responsible for the application of this PPSEA, This individual will gather the information mentioned in the previous paragraph and, with the consent of the alleged victim or complainant, they will share it with the Human Resources department ([directionRH@ceci.ca](mailto:directionRH@ceci.ca)).

➤ *Complaints or reports submitted to an independent, external resource*

Complaints or reports can be submitted anonymously and confidentially in French, English or Spanish to the following address: [plainte@koesia.ca](mailto:plainte@koesia.ca).

This email address is managed by an external professional resource, independent of CECI. The information shared remains strictly confidential and will only be communicated to a CECI confidant with the explicit consent of the alleged victim or complainant.

➤ *Complaints or reports submitted to partner organizations*

As mentioned in the "Roles and responsibilities" section, partner organizations should have a policy that is as rigorous as CECI's PPSEA. If this is not the case, the partner must develop one or use and communicate the CECI policy.

All of CECI's partners are required to put in place an effective reporting mechanism, as well as a rigorous approach that complies with standards for preventing and dealing with cases of sexual exploitation and abuse.

In addition, two key staff for each project are designated to support the follow-up of complaints and reports made as part of CECI's projects with partner organizations:

- One person from the partner organization;
- One person from the CECI project staff designated as responsible for the application of the PPSEA.

Together, these two individuals are responsible for ensuring that the partners adhere to the policy and for reporting cases of sexual exploitation and abuse to CECI and the partners.

CECI request that all partner organizations and their participating communities to notify it as soon as any complaint or report related to the PPSEA is made.

In the event of a complaint or report concerning a person working within a partner organization, CECI's designated staff will forward the complaint or report as soon as possible to CECI's Human Resources department and to the partner organization concerned. He or she will ensure that the partner organization handles the report in accordance with its internal policies and procedures, and that it complies with its obligations under its own policy.

CECI's designated staff also ensures that he/she remains informed of how the complaint or report is handled, if it is admissible, and of the measures taken after the investigation, including any sanctions.

This process must uphold the independence and ensure that its own procedures remain fair, while also complying with any legal obligations and constraints that apply to it.

CECI's designated staff will offer support to the partner organization, and will collaborate in the processing and investigation, where appropriate.

Local community members may also, at their convenience, report such cases directly to CECI's designated staff.

It is important to specify that a complaint made by the partner organization does not lead to an automatic withdrawal of project funding.

However, it is expected that all parties will rigorously respect this PPSEA, demonstrating diligence, awareness and commitment to guaranteeing a working environment free from all sexual abuse and exploitation.

### **8.3 EXCEPTIONS: COMPLAINTS OR REPORTS CONCERNING A MEMBER OF THE BOARD OF DIRECTORS, EXECUTIVE DIRECTOR, OR THE HUMAN RESOURCES DEPARTMENT**

Complaints and reports will be handled in accordance with the procedure established in this policy. The individuals responsible for handling the report or complaint will do so in the following manner:

➤ *Complaints or reports concerning a member of the Board of Directors*

If a complaint or report concerns a member of the Board of Directors, in addition to calling on the independent external resource, the Executive Director and the Human Resources department will call upon the Chair of the Board of Directors and the Chair of the Ethics, Governance and Human Resources Committee to help determine admissibility and, where appropriate, the approach to the investigation and the resulting measures.

If the complaint or report concerns the Chair of the Board of Directors or the Chair of the Ethics, Governance and Human Resources Committee, the person concerned will be replaced by another member of the EGRH Committee to help manage the case.

➤ *Complaints or reports concerning the Executive Director*

If a complaint or report concerns CECI's Executive Director, in addition to calling on the independent external resource, the Human Resources department will call on the Chair of the Board of Directors and the Chair of the Board of Directors' Ethics, Governance and Human Resources Committee to help determine admissibility and, where applicable, the approach to the investigation and the resulting measures.

➤ *Complaints or reports concerning the Human Resources management*

If a complaint or report concerns the Human Resources department, in addition to calling on the independent external resource, the Executive Director will call upon another colleague from the Executive Committee to help determine admissibility and, where appropriate, the approach to the investigation and any resulting measures.

## 9. RECEIPT OF A COMPLAINT OR REPORT

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Any complaint or report received in a country office, whether addressed to a manager, a director or a local representative, must be promptly communicated to CECI's Human Resources department in order to ensure centralized and appropriate follow-up in accordance with internal procedures.

The Human Resources department or the person responsible for managing the complaint will inform the alleged victim or complainant in writing that the report has been received. They will then contact the alleged victim or complainant in order to:

- Explain the process for handling the complaint or report;
- Explain their rights and responsibilities;
- Understand the nature of the situation reported.

As soon as the complaint or report is received, the manager, the local director or representative and the Human Resources department must respect the obligation of confidentiality.

### 9.1 PROTECTION MEASURES

As soon as a complaint or report is filed, CECI may implement, without delay, the measures deemed necessary or relevant in order to:

- Preserve a safe and respectful work environment;
- Protect the individuals concerned;
- Limit the impact on the teams;
- Ensure continuity of operations in a healthy working environment.

CECI is committed to treating every complaint and report seriously, diligently and humanely. Upon receipt, the Human Resources department or the person appointed to manage the complaint will take the necessary steps to ensure that it is dealt with appropriately.

At this stage, the goal is to confirm that the information provided is adequate to move forward, and that the allegations are not frivolous or made in bad faith, and that the alleged conducts – if accurate – could amount to sexual exploitation or abuse.

When a complaint or report is deemed **inadmissible**, the complainant is clearly and respectfully informed of the reasons for this decision. CECI remains attentive to the complainant's well-being and may suggest alternative ways of resolving the situation, involving managers if necessary. Even if a complaint is not accepted, problematic behaviour may be identified and corrected to preserve a healthy working environment.

When a complaint or report is deemed **admissible**, a fair and impartial process is set in motion. The parties are informed in writing, and the person concerned receives a copy of

the alleged facts so that they can adequately prepare for a possible meeting and, if they wish, respond in writing.

Managers are informed only of the information required to manage the team. CECI provides ongoing support to the alleged victim or complainant, offering a listening ear, support and clarity at every stage of the process.

## 10. PROCESSING COMPLAINTS AND ADMISSIBLE REPORTS

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To ensure rigorous neutrality, all complaints and reports are systematically examined by a specialized, external consultant. The extent of the consultant's involvement is adapted to the particularities of each case.

This support – adjusted to the specific circumstances of each case, including assistance from a complaints-management specialist, legal guidance, police services, or psychosocial support. The purpose of this approach is to maintain the neutrality of the process, reinforce the confidence of all parties involved, provide context-appropriate support tailored to the person presumed to be the victim, and safeguard the integrity of the complaints and reporting mechanism.

### 10.1 FORMAL INVESTIGATION

If the report is deemed admissible under the PPSEA, a fair, impartial and confidential investigation is launched within a reasonable timeframe.

The objectives of the investigation are to:

- Determine whether the alleged facts are well-founded;
- Guarantee the right of each party to be heard and to present their version of the facts;
- Offer each party fair conditions to respond to the allegations or present their point of view;
- Produce a written and documented report and propose conclusions.

The investigation may be conducted by:

- A trained internal professional;
- An independent, external resource in sensitive or complex cases.

The investigation is rigorously documented by the person responsible for the investigation and is kept in a secure place by the Human Resources department, with full traceability of all steps taken throughout the process.

- Concerned parties are informed in writing of the launch of the investigation.

- Each party is given the opportunity to present their version of the facts in a fair manner.
- Witnesses deemed relevant are interviewed as part of the investigation.
- The investigation is conducted rigorously, diligently and impartially.
- The confidentiality of the entire process is strictly respected.

## 10.2 INVESTIGATION REPORT

At the end of the investigative process, the person responsible of the investigation completes a final and detailed report, setting out the facts, analyses and conclusions.

In all cases, this investigation report must be sent to the Human Resources department. This document forms the basis on which CECI's HR department assesses the situation and communicates its conclusions to senior management.

The investigation may lead to the following conclusions:

### COMPLAINT OR WELL-FOUNDED REPORT

When the complaint or report is deemed to be well-founded, the Human Resources department, in consultation with senior management and the departments concerned, determines the appropriate measures, which may include:

- Disciplinary measures, including immediate dismissal;
- Termination of the employment, collaboration or partnership contract;
- Support measures for the alleged victim;
- Support in implementing legal measures;
- Documentation of the complaint or report in the HR file of the person found responsible.

### UNFOUNDED COMPLAINTS OR REPORTS MADE IN GOOD FAITH

When a complaint or report is deemed unfounded but made in good faith:

- No action is taken against the complainant;
- Recommendations may be made to improve the situation;
- Support measures may be offered to the parties;
- Follow-up is done with the person at fault.

### COMPLAINTS OR REPORTS MADE IN BAD FAITH

A complaint or report made in bad faith or with malicious intent:

- Is considered serious misconduct;
- May result in disciplinary action against the complainant, up to and including dismissal;

- Documentation of the incident in the complainant's HR file.

In compliance with privacy legislation, managers will receive information on a need-to-know basis in order to manage the impact on their teams and ensure continuity of operations.

### 10.3 PROTECTION AGAINST REPRISALS

No form of reprisal will be taken against a person who, in good faith, files a complaint or report, cooperates in an investigation or testifies in an investigation. CECI is committed to ensuring a safe and respectful environment where everyone can express themselves freely without fear of reprisal.

## 11. INDIVIDUAL APPROACH

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CECI acknowledges that every complaint or report related to the PPSEA is unique and is committed to an individualized approach, grounded in care for alleged victim or complainant. Beyond the formal mechanisms outlined in sections 8, 9 and 10, the response process, the specific circumstances of each situation – such as the nature of the incident, the alleged facts, the relationship between those involved, the emotional impact, particular needs, or the person's preferences regarding the type of intervention. This approach ensures support that is appropriate, respectful and reassuring, allowing each person to be heard, supported, and protected throughout the process.

Any alleged victim may also choose, at any time within the legal time limits, to pursue legal action in court, particularly in cases involving physical or sexual assault covered by the Criminal Code. Filing a complaint or a report with the appropriate authorities is a fundamental right, and the internal process must never hinder that possibility. CECI is committed to supporting anyone who wishes to take such steps by providing appropriate and compassionate assistance, so they can exercise their rights with confidence and a sense of safety.

## 12. DOCUMENTATION AND RETENTION

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- All documents relating to an investigation are kept in a separate, confidential file with limited access. No document relating to a complaint or report of harassment shall be placed in the personal file of either party, with the exception of administrative and disciplinary letters, which shall be placed in the HR file of the person against whom action is being taken.
- Unless prescribed by local legislation, all documents shall be stored for a reasonable period following the closure of the file.

- All documents shall be destroyed in a secure manner at the end of the retention period.

## 13. SUPPORT MEASURES

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Specific measures are available to support all alleged victims and complainants, depending on the circumstances.

CECI offers:

- An Employee Assistance Program (EAP) for staff and volunteers;
- Professional support as required;
- Specialized resources adapted to the local context (when available);
- Reasonable accommodation measures at work, if necessary.

## 14. MONITORING AND EVALUATION

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The Human Resources department shall:

- Maintain a confidential register of all complaints and reports and their treatment.
- Produce an anonymized annual report to the Executive Committee that includes:
  - The number and nature of complaints and reports received;
  - The types of actions taken;
  - The corrective measures applied;
  - Recommendations for improvement.

The Executive Director shall:

- Evaluate the effectiveness of the PPSEA on an annual basis;
- Ensure that the PPSEA is reviewed every five (5) years, or more frequently if necessary;
- Ensure that the recommended improvements to the policy are implemented;
- Present the results of the anonymized report and make recommendations, where necessary, to the Ethics, Governance and Human Resources Committee of CECI's Board of Directors.

This PPSEA meets the contractual requirements issued by Global Affairs Canada (GAC) and complies with Cooperation Canada's Leaders' Commitment to Prevent and Combat Sexual Misconduct.

## 15. QUESTIONS

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Any questions regarding this PPSEA, its interpretation or its application may be addressed to the Human Resources department at [directionRH@ceci.ca](mailto:directionRH@ceci.ca).

## ACKNOWLEDGMENT

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I, the undersigned, declare:

- I have read and understood the Policy on the Prevention of Sexual Exploitation and Abuse (PPSEA);
- I understand my role and responsibilities in preventing and reporting situations of sexual exploitation and abuse;
- I undertake to:
  - Behave in a manner consistent with the values of the organization;
  - Adhere to the standards of behaviour described in this PPSEA;
  - Report any situation of sexual exploitation and abuse that I witness;
  - Maintain the confidentiality of all information relating to a report;
  - Cooperate with any investigation, if requested.

I understand that failure to comply with the PPSEA or a breach of one or more of its provisions may result in disciplinary action up to and including dismissal, termination of my contract or dismissal.

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Name

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Signature

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Position

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Date