

Working Capital Innovation Fund (WCIF) Safeguarding Policy:

Protection from Sexual Harassment, Exploitation and Abuse, and Child Abuse

November 2022

1. Policy Statement

WCIF places human dignity at the center of its operations and investment work. The heart of WCIF's effort is to improve labor rights for marginalized and vulnerable workers. In WCIF, we recognize the particular responsibility we have to promote equal opportunity within our own organization and maintain a safe and respectful workplace. We recognize the importance of organizational culture and accountability in creating a safe and supportive organization for our staff.

At WCIF, we believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, and that no child should be subjected to abuse of any form. Our primary work is to invest in companies that illuminate exploitation of various kinds within global supply chains. As part of our work, we act on the belief sexual harassment, exploitation and abuse, and child abuse especially in the form of child labor are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities. We also recognize that there is unequal power between WCIF Employees and Related Personnel and the people we partner and work with throughout our programs, and also between people within our organization. We expect that our power will not be used to cause harm to others.

WCIF recognizes we have a responsibility to protect people we work with, and who work for us, and we will continuously strive to prevent sexual harassment, exploitation and abuse and child abuse from happening. We take seriously all reports of sexual harassment, exploitation and abuse, and child abuse.

As articulated in our Employee Handbook, WCIF has a zero-tolerance approach toward sexual harassment, exploitation and abuse, and child abuse. We will carefully examine allegations and investigate, and take appropriate disciplinary action where this is needed, taking into consideration the rights and interests of the survivor, consistent with a survivor-centered approach. We make very clear that sexual harassment, exploitation and abuse, and child abuse in any form, perpetrated by our staff, partners or other related personnel, towards anyone, will not be tolerated.

2. Scope of Application

This policy applies to all WCIF Employees and Related-Personnel:

- WCIF Employees include all employees of any Working Capital Holdings.
- Related Personnel includes volunteers, interns, and consultants.

The policy applies both during, and outside, normal work hours. Actions taken by WCIF Employees and Related Personnel outside of working hours that are seen to contradict this policy will be seen as a violation of this policy.

3. WCIF's Safeguarding Commitments³

Organizational Culture, Leadership and Accountability

- 3.1 **WCIF will make every effort to promote, create and maintain a safe organizational culture** for all people who work for and with WCIF, including our partners. At all times, it is expected that WCIF's leaders will promote WCIF's safeguarding values by highlighting the organization's commitment to equality, diversity and respect for others. WCIF will create an environment where it is safe to address sexual harassment, exploitation and abuse, and child abuse.
- 3.2 **WCIF will develop organization-specific safeguarding strategies**, to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.
- 3.3 **WCIF will ensure high-level oversight and accountability** around its safeguarding efforts. We will do this by appointing a Partner to be responsible for monitoring and reviewing our safeguarding performance and seeking feedback from WCIF Employees and Related Personnel. We are committed to continuous learning and improvement to prevent and respond to sexual harassment, exploitation, and abuse, and child abuse. We will be accountable and transparent in communicating our efforts and progress to various internal and external audiences, including WCIF governance and leadership structures, staff, investors, portfolio companies, and the wider sector. All information shared will be informed by a survivor-centered approach and risk assessment.

People Management

- 3.4 **WCIF will seek to employ staff who are aligned with our vision, mission and values, and, in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation and abuse and child abuse from being (re)hired or (re)deployed.** We will incorporate appropriate job responsibilities in leadership, managers, and other staff positions. Those responsible for hiring will ensure robust recruitment screening processes for all personnel. We may include in performance management/ feedback processes of senior managers, the adherence to create and maintain an environment which promotes this policy and Safeguarding Code of Conduct and to prevent sexual harassment, exploitation and abuse, and child abuse.
- 3.5 **WCIF will ensure all personnel are aware of our Safeguarding Policy, our expected behaviors and conduct, and how to report wrongdoing** by incorporating WCIF's expectations on the prevention of sexual harassment, exploitation and abuse, and child abuse in relevant Employee Handbooks and performance management systems, new employee orientations, awareness raising training and refresher courses, and through appropriate internal communications.

Partners

- 3.6 **WCIF will promote safeguarding with partners whose operations put them in a position where they interact directly with potentially vulnerable people.** We will only invest in companies that are committed to achieving impact for vulnerable people, and will endeavor to help them develop their own Safeguarding policies where they are willing.

Embedding Safeguarding in our Work

- 3.7 **WCIF will undertake safeguarding risk assessments** to identify areas of safeguarding and sexual harassment, exploitation, and abuse, and child abuse risks, and document steps that are being taken to remove or reduce these risks.
- 3.8 **WCIF will incorporate safeguarding measures into conversations with portfolio companies where appropriate and where a risk assessment warrants.** In general, we aim to identify and mitigate, or minimize, risks arising from our programs.
- 3.9 **WCIF will ensure that mechanisms for reporting sexual harassment, exploitation and abuse, and child abuse are accessible** and sensitive to the differing needs of anyone wishing to report, including vulnerable adults and children most at risk of sexual harassment, exploitation and abuse, and child abuse, and WCIF Employees and Related Personnel. WCIF will ensure that anyone responsible for receiving reports understands how to carry out their duties and handle them in a safe and confidential manner. We will be transparent with survivors around any obligations or actions that may need to be taken as a result of their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved.

Response and follow up to Reports

- 3.10 **WCIF will provide support and assistance to complainants and to anyone who has experienced sexual harassment, exploitation and abuse, or child abuse by WCIF Employees and Related Personnel, as appropriate within the law.** This may include medical treatment, legal assistance and psycho-social support. Our support and assistance will be informed by a survivor-centered approach, feasibility, and an assessment of risk to all those involved.
- 3.11 **WCIF will take appropriate actions to the best of WCIF's abilities to protect persons from retaliation** where allegations of sexual harassment, exploitation and abuse, or child abuse involving WCIF Employees or Related Personnel are reported in good faith.
- 3.12 **WCIF will ensure that all allegations of sexual harassment, exploitation and abuse, and child abuse by WCIF Employees and Related Personnel are thoroughly examined, risk-assessed, and where needed, investigated and/or referred to another agency for investigation or reported to law enforcement.** WCIF's investigations will be conducted in a timely, safe and professional manner by those with appropriate training and experience in sensitive investigations and informed by gender-sensitive and

survivor-centered approaches. Investigations will include an assessment of risk to all those involved.

3.13 WCIF will take swift and appropriate action with any Employee or Related Personnel who breach this policy by perpetrating sexual harassment, exploitation and abuse, and child abuse. This may include administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country. All actions will be informed by a survivor-centered approach and an assessment of feasibility and risk to all those involved.

4. WCIF's Safeguarding Code of Conduct

WCIF's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all WCIF Employees and Related Personnel. To this end, all WCIF Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by WCIF's policies. This policy defines the safeguarding conduct to be followed by all WCIF Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse by WCIF Employees and Related Personnel.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for WCIF Employees and Related Personnel to make decisions that exemplify WCIF's core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures outlined in the Employee Handbook. All WCIF Employees and Related Personnel must read and sign this Safeguarding Code of Conduct.⁵

5. Responsibilities

5.1 All WCIF Employees and Related Personnel

All WCIF Employees and Related Personnel share an obligation to prevent, report and respond to sexual harassment, exploitation and abuse and child abuse. It is the responsibility of all WCIF Employees and Related Personnel to uphold WCIF's Safeguarding Policy and Safeguarding Code of Conduct. All WCIF Employees and Related Personnel must read this policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct.

5.2 Managers, Supervisors and Human Resource Managers

Managers, Supervisors and Human Resource Managers must ensure that all WCIF Employees and Related Personnel understand and comply with WCIF's Safeguarding Policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct. Human Resource Managers are also responsible for robust safe recruitment and induction, whilst Managers and Supervisors are responsible for ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises. Managers will ensure performance management of staff, supports an accountable and safe organizational culture to prevent sexual harassment, exploitation and abuse, and child abuse.

6. Associated Policies

This policy is complementary to the set of standards of behavior that all WCIF employees are required to adhere to in the Employee Handbook.

ANNEX 1 - WCIF's Safeguarding Code of Conduct⁷

WCIF's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all WCIF Employees and Related Personnel. To this end, all WCIF Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by WCIF's policies. The WCIF International Safeguarding Policy, and this Safeguarding Code of Conduct, define the safeguarding conduct to be followed by all WCIF Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse, by WCIF Employees and Related Personnel.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for WCIF Employees and Related Personnel to make decisions that exemplify WCIF's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures of each WCIF International Member or Affiliate and applicable laws. All WCIF Employees and Related Personnel must read and sign this Safeguarding Code of Conduct.

As a WCIF Employee or Related Personnel, I will –

1. create and maintain a safe and equitable organizational culture that prevents and opposes sexual harassment, exploitation and abuse, and child abuse.
2. treat everyone with dignity and respect and challenge attitudes and behaviors that contravene the WCIF International Safeguarding Policy and Safeguarding Code of Conduct.
3. immediately report any concerns I have regarding possible violations of the WCIF International Safeguarding Policy or Safeguarding Code of Conduct, whether by a WCIF Employee or by Related Personnel. I understand that failure to report any concerns may lead to disciplinary action. I will ensure I am aware of the options available to me to report and that when I report a concern or allegation, I will do so confidentially.
4. share sensitive information I may be aware of that relates to concerns of sexual harassment, exploitation and abuse or child abuse, whether involving staff, program participants or others in the communities where WCIF works, through the reporting options available to me. I understand that for respect, dignity and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I am aware that breach of this policy may put others at risk and will therefore result in disciplinary procedures.
5. disclose to WCIF any civil judgment or criminal conviction that relates to allegations made against me of sexual harassment, exploitation or abuse of anyone.
6. always ensure that for work-related purposes when I photograph or film a child, I:
 - comply with local traditions or restrictions for reproducing personal images,
 - obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photograph or film will be used,
 - ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner,
 - ensure children are adequately clothed and not in poses that could be seen as sexually suggestive,

⁷ Based on the six Core Principles from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

⁸ Employees and individuals that have entered into partnership, sub-grant or sub-recipient agreements with WCIF may instead sign their employer's code of conduct and standards if they are generally consistent with these standards.

⁹ UN Secretary General (n 3)

¹⁰ *ibid*

- ensure images are honest representations of the context and the facts, and
 - ensure file labels do not reveal identifying information about a child, for example, name and exact location.
7. protect, manage and utilize WCIF human, financial and material resources appropriately and will never use WCIF resources, including the use of computers, cameras, mobile phones or social media, to exploit, groom or harass participants of WCIF programs, children or others in the communities in which WCIF works. I am aware that this means that it is prohibited for staff to access, display or transmit offensive and/or pornographic material on any WCIF-provided or subsidized electronic device (e.g. computer, tablet, phone) at any time, or on any personal electronic device on a WCIF network in the workplace.

As a WCIF Employee or Related Personnel, *I will not* -

1. sexually harass, exploit or abuse anyone and understand that these behaviors constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including dismissal.
2. engage in any form of sexual activity or develop physical/sexual relationships with children (persons under the age of 18) regardless of the age of consent locally. I understand that ignorance or mistaken belief in the age of a child is not a defense.
3. exchange money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. I understand this means I must not buy sex from anyone at any time, or exchange any goods for sex.
4. request any service or sexual favor from those who might benefit from WCIF investment, and will not engage in sexually harassing, exploitative or abusive relationships.
5. support or take part in any form of sexually exploitative or abusive activities, including, for example, child pornography, trafficking of human beings or child marriage.
6. hire children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation.
7. use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

ANNEX 2

Definitions

A Child

A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Adults experiencing vulnerability

Anyone 18 years or over who -

- is unable to take WCIF of themselves/ protect themselves from harm or exploitation; or
- due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.
- is in a situation of subordination and therefore experiencing a power differential putting them at risk

Sexual Harassment¹⁸

Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident.

Sexual Exploitation¹⁹

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.

Sexual Abuse

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

Child Exploitation and Abuse (involves one or more of the following)

a. Physical abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child. This may for instance, take the form of slapping, hitting, punching, shaking, kicking, beating, burning, shoving or grabbing. Physical abuse can be a single or repeated act. It doesn't always leave visible marks or injuries.

b. Emotional abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

c. Neglect

Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

d. Sexual Misconduct with a Child

Sexual Misconduct with a Child is any form of sexual activity with a child. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include,

but is not limited to, contact or non-contact activities, the inducement or coercion of a child to engage in any sexual activity, the use of a child in prostitution or other sexual practices, or exposing a child to online sexual exploitation material, the use of children in pornographic performances and materials, or taking sexual exploitative images of children.

Grooming

Grooming generally refers to behavior that makes it easier for an offender to procure a child or vulnerable adult for sexual activity. It often involves the act of building the trust of children and/or their caregivers or a vulnerable adult, to gain access to them in order to sexually abuse them. For example, grooming includes the provision of, or attention paid to a specific child or adult, providing gifts, money, drugs or alcohol to them, encouraging romantic feelings or exposing them to sexual concepts through conversation or exposure to pornography.

Online grooming is the act of sending an electronic message, series of messages or engaging over an online platform with content that may be of an indecent nature, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Both children and vulnerable adults can be victims of grooming and online grooming, with children being particularly targeted by online groomers.

Safeguarding

The measures we take to prevent, report and respond to harm or abuse and to protect the health, well-being and human rights of anyone that comes into contact with WCIF, whether it is WCIF Employees and Related Personnel, partners, program participants and communities.

Incentive Worker

A person who is provided an incentive to do tasks for WCIF that have a temporary and voluntary character. Incentive workers may, for example, be people with refugee status, internally displaced peoples, returnees, or members of the host community, who are working for WCIF by doing tasks in return for incentives.

Visitors

Refers to a range of persons who are visiting WCIF offices or programs, including donor representatives, journalists, media, researchers, celebrities, family members.



APPROVED by the Partners
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