

Policy on Protection from Gender-Based Discrimination, Sexual Exploitation, Abuse and Harassment

Minerva Business and Human Rights Association

Policy and Procedures No. COC03

1. Objective

The Policy on Protection from Gender-Based Discrimination, Sexual Exploitation, Abuse and Harassment (**the Policy**) sets out the duties, commitments and responsibilities of members and employees of the Business and Human Rights Association (**Minerva**) to ensure the safety of beneficiaries, employees and stakeholders. These duties, commitments and responsibilities include actions that include preventive approaches to prevent discrimination, neglect, abuse, and harm from occurring and actions to respond to the situation of beneficiaries who have been or may be subjected to abuse.

The Policy is based on the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, the United Nations (UN) Convention on the Elimination of All Forms of Discrimination against Women, the UN Global Compact and the Constitution of the Republic of Türkiye and regulates the activities of all Minerva members and employees in accordance with the UN Principles on Protection from Sexual Exploitation and Abuse. In this context, it is aimed that all activities to be carried out within Minerva comply with the Zero Tolerance Policy on Sexual Exploitation and Abuse in accordance with the UN Secretary-General's Bulletin.

Minerva has a “zero tolerance” approach to gender-based discrimination, sexual exploitation, abuse, and harassment. In this context, behaviours and/or attitude of any partner, supplier, subcontractor, representative or any individual appointed by Minerva that involve gender-based discrimination, sexual exploitation and/or abuse towards any interlocutor are unacceptable. Minerva aims to protect all beneficiaries in direct or indirect relationships from all forms of gender discrimination, sexual abuse, and exploitation.

2. Scope

The Policy applies to members of Minerva's Board of Directors, employees, representatives, consultants, interns, volunteers, and all related persons and entities representing Minerva on or off duty. These persons are referred to as "Minerva Stakeholders" in this Policy

This Policy relates to the protection of adults from gender-based discrimination, sexual exploitation and abuse and covers direct or indirect beneficiaries of any projects, services and/or programs, adults in the wider communities in which they work, and those in contact with Minerva or those representing Minerva.

All adults have the right to equal treatment and equal protection regardless of their personal characteristics, including age, gender, ability, culture, ethnicity, religious beliefs, and sexual identity. This Policy also covers non-governmental organisations, public institutions, companies and their employees from which goods and services are received, and persons and organisations working on behalf of Minerva (business partners), including suppliers, consultants, lawyers, external auditors, and is valid every day of the year, both inside and outside working hours.

The Policy complements the Minerva Code of Conduct and is in line with the Child Safety Conduct Policy.

Allegations of gender-based discrimination, sexual exploitation, abuse, and harassment are evaluated through the Minerva Feedback and Grievance Mechanism.

3. Definitions

Beneficiary: All persons to whom Minerva provides services directly or indirectly.

Sexual Exploitation: The actual exploitation or attempted exploitation of a position of vulnerability, power relationship or trust for sexual purposes, including, but not limited to, the economic, social, or political benefit from the sexual exploitation of a person. Sexual exploitation means the actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, the 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 the persons concerned.

Sexual Abuse: Sexual activities that are actually performed or threatened to be performed by the use of force or under unequal or coercive conditions.

Sexual Harassment: Sexual harassment includes unwelcome words, behaviors, or bodily insinuations and expressions of a sexual nature, including sexual assault, attempted sexual assault, rape and attempted rape. The realization of these actions by taking advantage of the ease of the subordinate-superior relationship is also considered within the scope of sexual harassment. The reasonableness or appropriateness of any words or behaviour is determined by the opinion of the person subjected to such words or behaviour.

Sexual harassment can lead to reactions such as confusion, shock, and inability to make sense of it. For this reason, it is recommended that anyone who feels that they have been subjected to sexual harassment or assault, even if they are not sure of the nature of the incident, should report it to a unit (Feedback and Complaint Mechanism) or person (manager, etc.) who can guide them. Depending on the environment and context in which the incident occurred, repeated behaviors or a single incident may be considered sexual harassment, and continuity is not required. The following examples constitute, without limitation, types of sexual harassment.

a. Actions that create uncomfortable, undesirable environments:

- Making jokes, sexual jokes, or compliments, or using slang.
- Persistent behaviour that goes beyond what is usual for flirting and/or causes discomfort to the addressee.
- Disturbing with pornographic material.
- Asking uncomfortable questions and/or gossiping about a person's sexual life.
- Making discriminatory statements and/or taking actions related to sexual orientation or gender identity.

b. Acts resulting from threats, blackmail or insults and similar acts:

- Stalking, threatening, frequently harassing by phone or electronically.

c. Situations that may arise from abuse of one's professional position or authority:

- Explicitly stating or implying, especially where there is an imbalance of power between individuals (e.g. manager and employee, beneficiary, and employee, etc.), that failure to comply with a sexual and/or romantic proposal will have a negative impact on the individual's professional life or, if the individual is a beneficiary, on

the support and services they receive, or that compliance will result in undeserved benefits.

Sexual Assault: Sexual assault is the violation of a person's bodily inviolability by non-consensual sexual behavior without having to be continuous. Sexual assault may occur in the form of hugging, groping, caressing, touching, or violating the inviolability of the person's body by inserting a sexual organ or other object into the body, depending on the characteristics of the situation, without limitation.

Gender-based discrimination: When individuals are treated differently or face inequality of opportunity because of their gender, gender identity, or sexual orientation compared to others in the same or similar position. It is supported by societal norms and values that expect people to behave in accordance with gender roles, expectations, and norms. Therefore, women, men, and people of different sexual orientations may experience gender-based discrimination.

4. Policy Principles

In addition to the working principles above, the Policy is based in the following seven principles:

- 4.1.** Gender-based discrimination, sexual exploitation, assault, abuse, and harassment are considered to be serious misconduct by employees and will result in just cause termination of employment.
- 4.2.** Sexual interaction with children (individuals under the age of 18) is prohibited under any circumstances. Misinformation about the age of the child cannot be used as a defence.
- 4.3.** It is forbidden to provide money flows, employment, goods, or services for the purpose of sexual relations, including sexual favors or any other humiliating, degrading or abusive behavior. This includes assistance services to beneficiaries.
- 4.4.** Sexual relationships between Minerva employees, partners, volunteers and beneficiaries or others in Minerva's sphere of interest are strongly discouraged as they may be based on unfair power dynamics and undermine the credibility and integrity of the organisations. Employees are prohibited from using their position inappropriately to engage in any sexual relationship with beneficiaries.

- 4.5. Periodic wage analyses should be conducted to ensure that employees of all genders and sexual orientations are not discriminated against in recruitment, promotion and remuneration processes and to prevent wage inequality.
- 4.6. If employees have any suspicions or reservations about gender-based discrimination, sexual exploitation, assault, abuse and harassment within the organisation, these reservations should be immediately reported through the Feedback and Grievance Mechanism.
- 4.7. All employees have a responsibility to create and maintain an environment that prevents gender-based discrimination, sexual exploitation, assaults, abuse and harassment and promotes the effective implementation of this Policy. Members of the Board of Directors are responsible for implementing and monitoring the Minerva Code of Conduct, and Minerva managers at all levels must provide the appropriate environment for the implementation, support, and development of the Policy.

5. Commitment

In the event of any situation within the scope of gender-based discrimination, sexual exploitation, assault, abuse, and/or harassment, the Code of Conduct will apply and the processes within the scope of the feedback and grievance mechanism will be implemented and, if necessary, the relevant legal processes will be applied.

Status: No. COC03 under Minerva Policy and Procedures, Approved.

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