

Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy

Purpose

This policy provides guidance on preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) in Kramer Ausenco and the projects we participate in.

Kramer Ausenco is committed to the fair and equal treatment of all personnel, subcontractors, suppliers, clients, business partners and service providers. Our values and culture support this policy in relation to preventing and managing PSEAH.

Context

PSEAH may exist in various forms and may be perpetrated against any person. All personnel and subcontractors have a right to work in an environment that is free from PSEAH. Tackling PSEAH requires all Kramer Ausenco employees to play their part in being responsible for preventing and reporting any risks or incidents in any aspect of the Kramer Ausenco business and its business relationships.

Training and reporting procedures

Kramer Ausenco personnel and subcontractors are required to formally acknowledge adherence to all Kramer Ausenco policies and standards, particularly this policy relating to PSEAH, and the appropriate procedures for management and action in relation to PSEAH incidents.

Kramer Ausenco encourages personnel and subcontractors to report any alleged incidents of PSEAH in relation to any Kramer Ausenco project and in accordance with the reporting procedures set out in the Business Ethics policy. Incidents should be reported to HSEC Managers or the Anonymous Whistleblower Alertline, and will be dealt with confidentially, expeditiously and in accordance with all Kramer Ausenco standard policies and procedures.

The Executive Management Unit (EMU) are responsible for prioritising the needs of victims/survivors of PSEAH, managing reported PSEAH incidents, taking all appropriate actions, and notifying any relevant third parties.

Assessment and management of risk

Kramer Ausenco is an international project management, engineering, and architecture professional services business. Kramer Ausenco's business operations consists primarily of office-based professionals. Most organisations with which we engage are demonstrably focussed on supporting and complying with PSEAH policies and laws. Kramer Ausenco will assess the internal and external risks of PSEAH on an ongoing basis, including country risks, sector risks and business partnership risks within our operations.

Kramer Ausenco operates across several jurisdictions in the South Pacific region. We acknowledge the possibility of concerns in the region within which we operate. The risk areas are typically not Kramer Ausenco customers, suppliers, or partners. We comply with and seek the cooperation of the clients and customers with whom we work to likewise be vigilant and engage with us in implementing policies supportive of the legal requirements in each jurisdiction in which we operate. We investigate each concern by reference to available information and resources.

Definitions

PSEAH may be defined as:

- **Sexual Exploitation** - Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from the sexual exploitation of another.
- **Sexual Abuse** - The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with someone under the age of consent (in the law of the host country or an Australian jurisdiction, whichever is greater) is considered to be sexual abuse.
- **Sexual Harassment** – An unwelcome sexual advance or a request for sexual favours or engaging in other unwelcome conduct of a sexual nature, that may cause the person harassed to be offended, humiliated, or intimidated.

Other relevant terms:

- **Fraternisation** - any relationship occurring in the course of conducting business that involves, or appears to involve, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It includes sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations. Where there are significant power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc) the potential for exploitative transactional sex and fraternisation is heightened.
- **Transactional Sex** - The exchange of money, employment, goods, or services for sex, including sexual favours.

Application & Responsibility

As an integral part of meeting the objectives of this policy, each Country Manager is responsible for implementing this policy in each of our jurisdictions and ensuring that relevant personnel and subcontractors receive the adequate training and support applicable to their role.

The EMU will ensure the provision of standards and the required expertise, training, and support to achieve our goals in this PSEAH policy. The Chief Executive Officer is accountable to the Board of Directors for the implementation of Kramer Ausenco's policy preventing sexual exploitation, abuse, and harassment.

All Kramer Ausenco personnel, employees, contractors, suppliers, clients, business partners and service providers are responsible for their use and application of this Policy.

Related Kramer Ausenco Documents:

- Business Ethics Policy & Standard
- Risk and Hazard Management Policy & Standard
- Whistleblower Policy



Frank Kramer
Chief Executive Officer

