

# Policy & Procedures Against Sexual Exploitation, Abuse and Harassment (SEA-H)

## Change history

Date	Description of the change/update	Author
01/2026	Original version of document	Geert Groessens, Selloane Sephoko
03/2026	Management review & approval	Jacob Demeyer

## Purpose and Commitment

The Hirundo group of companies commits to a **zero-tolerance policy** toward all forms of Sexual Exploitation, Abuse and Harassment (SEA-H). These procedures aim to:

- Prevent SEA-H in project activities and workplaces;
- Protect community members, especially women, children, and other vulnerable groups;
- Provide safe, confidential, and survivor-centred reporting and response mechanisms;
- Ensure compliance with the laws of the Kingdom of Lesotho and relevant international standards.

SEA-H is a serious misconduct that constitutes grounds for disciplinary action, contract termination, and referral to law enforcement.

## Scope of Application

This policy applies to all employees, contractors, subcontractors, consultants, suppliers, visitors, and associated personnel of Hirundo Horizon CV, Hirundo Lesotho (Pty.) Ltd., and Mohale's Hoek Wind (Pty.) Ltd.

It applies throughout all phases of the Mohale's Hoek Wind Farm Project and at all times and in all locations where individuals are engaged in, representing, or otherwise connected to project activities, including interactions with colleagues, contractors, and host communities. Conduct occurring outside working hours or off project sites is also covered where such conduct is linked to the project or may affect the safety, dignity, or rights of workers or community members.

## Definitions

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes, including profiting socially or economically from the sexual exploitation of another.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favours, verbal or physical conduct of a sexual nature.
- **Survivor:** A person who has experienced SEA-H (preferred to “victim”).
- **Child:** Any person under the age of 18 years, in line with Lesotho law.

## Legal and Policy Framework

This policy and these procedures are aligned with

### National Laws of Lesotho

Legal and policy framework	Requirements
<b>Constitution of Lesotho (1993)</b>	Protection of the natural environment is enshrined in Section 36 which states ‘Lesotho shall adopt policies designed to protect and enhance the natural and cultural environment of Lesotho for the benefit of both present and future generations and shall endeavour to assure to all its citizens a sound and safe environment adequate for their health and well-being’.
<b>Labour Act, 2024</b>	It introduces provisions on working conditions, including flexible averaging of hours, expanded leave benefits(maternity, paternity, family, bonding and compassionate leave), and mechanisms for collective bargaining and dispute resolution. The Act strengthens labour institutions like the Directorate of Dispute Prevention and Resolution (DDPR) and the Labour Court, aligning national labour law with international standards to improve enforcement and worker protection.
<b>Children’s Protection and Welfare Act No. 7 of 2011</b>	It provides a legal framework to protect children’s rights, safety, and well-being. It addresses abuse, neglect, exploitation, child labour, and child trafficking, prioritising the best interests of the child. The Act promotes family care, education, and social services, aligning with international child-rights standards.
<b>Sexual Offences Act (2003)</b>	It strengthens protection for women, children, and persons with disabilities, including offences like sexual exploitation and abuse of trust. The Act recognises consent and coercion, aiming to prevent gender-based violence and improve access to justice for victims.
<b>Penal Code Act No. 6 of 2012</b>	It covers serious crimes such as homicide, sexual offences, theft, fraud, and corruption. The Act promotes justice and

	human rights by aligning criminal law with Lesotho's Constitution.
<b>Anti-Trafficking in Persons Act No. 1 of 2011</b>	It criminalises all forms of human trafficking, including for sexual exploitation and forced labour. It provides protection, support, and rehabilitation for victims, especially women and children. The Act strengthens prevention and prosecution, aligning Lesotho with international anti-trafficking standards.
<b>Gender and Development Policy (2018–2030) - Lesotho</b>	The Gender and Development Policy is a government tool geared towards addressing the challenges of gender inequities and inequalities, poverty, increased spread of HIV/ AIDS, retrenchment and unemployment by adopting a rights-based approach to development. The policy is based on the realization of human rights of all, women and men alike, holding principles of equal participation in development, non-discrimination and the empowerment of the marginalized women and men, boys and girls

### International Standards and Guidelines

- World Bank Environmental and Social Framework (ESS2, ESS4)
- IFC Performance Standards (PS2, PS4)
- UN Convention on the Rights of the Child
- UN Guidelines on Gender-Based Violence (GBV)
- ILO Convention No. 190 on Violence and Harassment (principles)

### Prohibited Behaviours

The following are strictly prohibited:

- Sexual activity with children (regardless of consent);
- Exchange of money, employment, goods, or services for sex;
- Sexual relationships with community members where power imbalance exists;
- Sexual harassment in the workplace or community;
- Trafficking in persons or facilitation thereof;
- Retaliation against anyone who reports SEA-H.
- Any gender based violence

### Prevention Measures

#### Codes of Conduct

All project workers must sign a SEA-H-compliant Code of Conduct prior to engagement. Codes shall be translated into Sesotho and explained verbally. [Hirundo Energy Code of Conduct.docx](#)

## Training and Awareness

- Mandatory induction training on SEA-H for all workers. [Introductory & periodic training schedule.xlsx](#)
- Regular refresher trainings and toolbox talks;
- Community awareness sessions explaining rights, reporting channels, and support services.

## Labour and Camp Management

- Clear rules for worker accommodation and movement;
- Prohibition of child labour and forced labour;
- Controls on alcohol and substance abuse at work sites.

# Reporting and Grievance Mechanism

## Reporting Channels

Survivors or witnesses may report SEA-H through:

- Project Grievance Redress Mechanism (GRM). [Grievance Redress Mechanism Submission Form – Fill out form](#) or [QRCode for Grievance Redress Mechanism Submission Form.png](#)
- Not yet active 03/2026:
  - Community Relations Officer (CRO);
  - Designated SEA-H Focal Point;
- Anonymous reporting channels where feasible.

Reports can be made verbally or in writing and in Sesotho or English.

## Confidentiality and Survivor Safety

- All reports will be handled confidentially;
- Survivor consent is required before any referral, except where mandatory reporting applies (e.g. cases involving children);
- No retaliation against reporters is permitted.

# Response Procedures

## Immediate Actions

- Ensure the safety and well-being of the survivor;
- Provide information on available medical, psychosocial, and legal support services;
- Obtain informed consent for next steps.

## Investigation and Disciplinary Measures

- Internal investigations shall be prompt, impartial, and confidential;
- Disciplinary measures may include warnings, suspension, dismissal, or contract termination;
- Criminal cases shall be referred to the Lesotho Mounted Police Service.

## Referral Pathways

Where appropriate, survivors shall be referred to:

- Health facilities (post-exposure care);
- Social welfare services;
- Police and judicial authorities;
- Local NGOs providing GBV support.

## Roles and Responsibilities

### Hirundo Management

- Overall accountability for SEA-H prevention and response;
- Appointment of a SEA-H Focal Point;
- Ensuring adequate resources and training.

### Contractors and Sub-Contractors

- Enforce Codes of Conduct;
- Report incidents immediately;
- Cooperate with investigations.

### Community Relations Officer

- Community sensitisation;
- First point of contact for complaints;
- Coordination with local authorities and services.

## Monitoring, Reporting and Review

- SEA-H indicators integrated into ESMP monitoring;
- Periodic reporting to Hirundo management and authorities;
- Annual review and update of these procedures.

## Non-Compliance

Failure to comply with these procedures constitutes serious misconduct and may result in: - Disciplinary action; - Contract termination; - Legal action under Lesotho law.

## Contractor Integration

All Contractors and Sub-Contractors shall:

- Integrate these SEA-H Procedures verbatim into their Contractor Environmental, Social, Health and Safety (ESHS) Manuals;
- Include SEA-H obligations in employment contracts, induction materials, and Codes of Conduct;
- Nominate a site-level SEA-H representative reporting to the Project SEA-H Focal Point;
- Demonstrate SEA-H training completion prior to mobilization.

Non-compliance shall constitute a material breach of contract.

## **Entry into Force, Review and Updates**

These procedures enter into force upon approval by management and shall remain in force until amended or replaced. The policy shall be reviewed at least annually, and updated as necessary, to ensure continued compliance with applicable national laws and alignment with Hirundo's policies and values.

### **Approved by:**

Jacob Demeyer

Permanent representative Hirundo Energy, Director Hirundo Horizon cv

Director Hirundo Energy

Managing Director Hirundo Lesotho

Date: 15/03/2026

Signature

# ANNEX A: SEA-H Risk Context and Mitigation Rationale

## Purpose

This annex provides a concise assessment of Sexual Exploitation, Abuse and Harassment (SEA-H) risks associated with the development, construction and maintenance of the Mohale's Hoek Wind Farm Project in particular and explains the rationale for the mitigation measures adopted.

## Project Risk Context

The project presents moderate SEA-H risk, primarily due to:

- Labour influx during construction, including non-local workers;
- Temporary worker accommodation and transport arrangements;
- Rural host communities with gender and economic vulnerabilities;
- Power asymmetries between workers, supervisors, and community members;
- Limited access to specialised GBV response services in remote areas.

No high-risk factors such as large-scale permanent camps or security forces are anticipated.

## Key Risk Pathways

Risk Pathway	Description
Labour influx	Increased interaction between workers and community members
Transactional sex	Risk of exchange of money, jobs, or gifts for sexual favours
Harassment at work	Hierarchical power relations on construction sites
Child protection	Presence of minors in nearby communities

## Mitigation Rationale

Mitigation measures adopted are proportionate and aligned with World Bank and IFC guidance:

- Mandatory Codes of Conduct signed by all workers;
- SEA-H induction and refresher training;
- Survivor-centered reporting and response mechanisms;
- Strict prohibition of sexual activity with minors;
- Clear disciplinary and referral procedures.

These measures are integrated into contractual obligations and monitored through the ESMP.

## ANNEX B: SEA-H Contractor Compliance Checklist

This checklist shall be used to assess contractor readiness and compliance prior to mobilization and during audits.

<b>Risk Pathway</b>	<b>Description</b>
SEA-H Procedures included verbatim in ESHS Manual	Manual section reference
Signed worker Codes of Conduct	Copies on file
SEA-H induction training completed	Attendance records
Site SEA-H representative appointed	Appointment letter
Reporting channels displayed on site	Photos
Disciplinary measures defined	HR procedures
Referral pathway understood	Training records

Non-compliance shall delay mobilization or trigger corrective action.

# ANNEX C: SEA-H Handling Protocol within the Grievance Redress Mechanism

## Purpose

This annex clarifies the handling of SEA-H cases within the Project Grievance Redress Mechanism (GRM) to ensure confidentiality, survivor safety, and compliance with international best practice.

## GRM Firewall Principle

SEA-H complaints shall **not** be treated as ordinary grievances.

- No mediation or joint meetings between survivor and alleged perpetrator;
- No requirement for written complaints;
- No disclosure without survivor consent (except mandatory child protection cases).

## Reporting and Response Timeline

- Immediate safety assessment upon receipt;
- Survivor contacted within 24 hours (where consent is given);
- Referral information provided within 48 hours;
- Internal disciplinary process initiated without requiring survivor participation.

## Mandatory Reporting

All cases involving children shall be reported to:

- Lesotho Police Service; and
- Department of Social Development, in line with national law.

## Documentation and Data Protection

- SEA-H records shall be kept separately from general GRM logs;
- Access restricted to SEA-H Focal Point and authorized management;
- Data anonymized for reporting purposes.

These SEA-H Procedures enter into force upon approval by Hirundo Lesotho management and apply for the full duration of the Mohale's Hoek Wind Farm Project.

# ANNEX D: Tsebiso ea Sechaba ka Thibelo ea Tlhekefetso ea motabo (SEA-H)

## Morero oa Tsebiso Ena

Hirundo Lesotho le Morero oa Mohale's Hoek Wind Farm ba ikemiselitse ho sireletsa sechaba khahlanong le tlhekefetso ea motabo, tlhekefetso ka tšebeliso ea matla, le tlhekefetso ea boitšoaro bo bobele (SEA-H).

Tsebiso ena e etselitsoe ho: - Hlalosa litokelo tsa litho tsa sechaba; - Hlalosa boitšoaro bo thibetsoeng ho basebetsi bohle ba morero; - Hlalosa moo le kamoo litletlebo li ka tlalehoang ka teng; - Netefatsa polokeho le lekunutu la motho ea tlalehang bothata.

## Tlhekefetso ea Motabo (SEA-H) ke Eng?

Tlhekefetso ea motabo e kenyelletsa:

- Ho qobella kapa ho hatella motho ka thobalano
- Ho kopa motabo ka ho fana ka chelete, mosebetsi, limpho kapa litšebeliso;
- Ho tšoenya motho ka mantsoe, liketso kapa litšupiso tsa thobalano
- Ketso efe kapa efe ea thobalano e amanang le ngoana (motho ea ka tlase ho lilemo tse 18) (ho sa tsotelehe tumello).
- Phapanyetsano ea chelete, mosebetsi, thepa, kapa litšebeliso bakeng sa thobalano;
- Likamano tsa thobalano le litho tsa sechaba moo ho nang le ho se leka-lekane ha matla;
- Tlhekefetso ea thobalano mosebetsing kapa sechabeng
- Khoebo ea batho kapa ho thusa ka eona;
- Phetsetso khahlanong le mang kapa mang ea tlalehang tlhekefetso

Liketso tsena kaofela li thibetsoe ka botlalo.

## Boitlamo ba Morero

- Basebetsi bohle ba morero ba tlameha ho latela melao e thata ea boitšoaro;
- Ha ho mosebetsi kapa thuso e ka fanoang e le moputso oa thobalano;
- Bana ba sirelelitsoe ka botlalo – ha ho tumello, ha ho mabaka;
- Mang kapa mang ea tlolang melao ena o tla fuoa kotlo e matla, ho kenyeletsoa ho lelekoa mosebetsing le ho tlalehoa mapoleseng.

## Mokhoa oa ho Tlaleha Tlhekefetso

Haeba uena kapa motho eo u mo tsebang a hlaloea ke tlhekefetso:

U ka tlaleha: - Ho Mokhanni oa Likamano le Sechaba (CRO); - Ho Moemeli oa SEA-H oa Morero; - Ka Mokhoa oa Litletlebo oa Morero (GRM); - Ka ho bua ka kotloloho le moetapele oa sechaba (Chief kapa Council).

U ka tlaleha ka molomo kapa ka ho ngola, ka Sesotho kapa Senyese mane.

## Lekunutu le Polokeho

- Tlhahisoleseling ea hao e tla bolokoa e le lekunutu;
- Ha ho motho ea lumelloang ho u sokela kapa ho u otlala ka lebaka la ho tlaleha bothata;
- U ka khetha hore na bothata bo fetisetsoe mapoleseng kapa che (ntle le ha ngoana a ameha).

## Tšehetso e Fumanehang

Ha ho hloka hala, morero o tla thusa ho hokahanya motho ea hlahetseng tlhekefetso le:  
- Setsi sa bophelo bo botle; - Lefapha la Nts'etsopele ea Sechaba; - Mapolesa a Lesotho; - Mekhatlo e thusang basali le bana.

## Molaetsa oa Bohlokoa ho Sechaba

**Tlhekefetso ea motabo ha e amohelhe.**

**Morero ona o eme le sechaba ho sireletsa seriti, polokeho le litokelo tsa bohle.**

Haeba u bona kapa u utloa ka tlhekefetso efe kapa efe, **bua – u ke ke ua otloa ka lebaka la ho sireletsa ba bang.**