



Safeguarding, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH), and Child Protection Policy

CORPORATE DOCUMENT

Crown Agents Ukraine LLC

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TABLE OF CONTENTS

1. Purpose and Scope
2. Key Principles
3. Terms and Definitions
4. Standards of Conduct
5. Safe Recruitment and Personnel Vetting
6. Staff Training
7. Safeguarding Risk Assessment
8. Requirements for Partners and Suppliers
9. Reporting Procedure
10. Response Procedure
11. Photography, Filming, and Use of Stories
12. Monitoring Policy Implementation

Crown Agents Ukraine works in international technical assistance, healthcare, recovery, and other projects that may directly or indirectly affect children, patients, displaced persons, and other vulnerable groups. This policy sets out the Company's commitments to preventing harm, responding to it, and protecting the people we interact with in the course of our work. This policy complements Crown Agents Ukraine's Business Partner and Supplier Code of Conduct by setting out safeguarding requirements in more detail.

This Policy has been developed with regard to the Family Code of Ukraine, Article 214 of the Criminal Procedure Code of Ukraine on the procedure for registering statements and reports of criminal offences, and the following international frameworks and standards: the six core principles of the Inter-Agency Standing Committee (IASC) on protection from sexual exploitation and abuse, the Core Humanitarian Standard on Quality and Accountability (CHS), and the Keeping Children Safe (KCS) standards.

1. Purpose and Scope

The purpose of this policy is to ensure that the activities of Crown Agents Ukraine and its business partners never cause harm to children or vulnerable adults, and that the Company has clear, accessible mechanisms for preventing, reporting, and responding to safeguarding incidents.

This policy applies to:

- Crown Agents Ukraine employees;
- consultants;



- contractors and subcontractors;
- suppliers;
- visitors to projects and sites;
- partner organisations involved in joint activities.

2. Key Principles

Zero tolerance. Crown Agents Ukraine does not tolerate any form of sexual exploitation, violence, harassment, or other harm to children and vulnerable adults by staff, partners, or representatives of the Company.

Priority on prevention. The Company seeks to prevent harm before it occurs, through risk assessment, safe recruitment, and staff training, rather than relying solely on reacting after the fact.

A victim/survivor-centred approach. The safety, dignity, and wishes of the affected person are the priority at every stage of the response.

Mandatory reporting. Anyone who becomes aware of an actual or reasonably suspected safeguarding breach is required to report it in accordance with the procedure described below.

Leadership accountability. Compliance with this policy is the responsibility of the Company's leadership just as much as of any individual employee or partner.

3. Terms and Definitions

Safeguarding — the responsibility of the Company and its personnel to take all possible steps to prevent harm that the Company's activities may cause to children or vulnerable adults, and to respond appropriately where harm has nonetheless occurred.

Child — any person under the age of 18, in accordance with Article 1 of the Law of Ukraine “On Child Protection” of 26 April 2001 No. 2402-III and the UN Convention on the Rights of the Child, ratified by Ukraine in 1991.

Vulnerable adult — a person who, owing to age, disability, health condition, displacement, dependency on assistance, or other circumstances, has a limited ability to protect themselves from harm or exploitation.

Power imbalance — a situation in which one party holds significant leverage over another (official authority, economic dependency, access to services or resources, etc.).

Duty of care — the obligation of Crown Agents Ukraine's staff and representatives to prevent harm to others, including any form of sexual exploitation, abuse, or harassment.

Survivor — a person who has experienced violence or exploitation.

Sexual exploitation — any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another person.

Sexual abuse — the actual or threatened physical intrusion of a sexual nature, whether by force, under coercion, or under unequal conditions; such conduct may also constitute offences under Articles 152–156 of the Criminal Code of Ukraine.

Sexual harassment — conduct of a sexual nature, expressed verbally, non-verbally, or physically, that offends or demeans a person's dignity and may create an intimidating, hostile, or humiliating environment, in accordance with Article 1 of the Law of Ukraine “On Ensuring Equal Rights and Opportunities for Women and Men” of 8 September 2005 No. 2866-IV.

Physical, psychological, or economic violence — acts (actions or omissions) as defined in Article 1 of the Law of Ukraine “On Preventing and Combating Domestic Violence” of 7 December 2017 No. 2229-VIII, as well as any other action or



omission causing physical harm, pain, suffering, or psychological trauma in a context connected with the Company's activities.

Human trafficking — acts defined by the Law of Ukraine “On Combating Trafficking in Human Beings” of 20 September 2011 No. 3739-VI and Article 149 of the Criminal Code of Ukraine.

Neglect — the failure to provide adequate care, attention, or protection to a person in a dependent situation.

Exploitation — the use of a position, power, or trust to obtain an improper advantage at another person's expense.

Bullying (mobbing) — systematic (repeated) acts, including of a psychological, economic, or sexual nature, including through the use of information and communication technologies, that demean a person's honour, dignity, or business reputation, cause fear or anxiety, or subordinate a person to another's interests without lawful grounds, within the meaning of the amendments to the Labour Code of Ukraine introduced by the Law of Ukraine of 16 November 2022 No. 2759-IX.

Abuse of power — the use of an official position, authority, or influence to obtain an improper advantage over another person.

4. Standards of Conduct

All persons covered by this policy are expected to maintain the highest standards of personal and professional conduct in the performance of their duties and in any context connected with their work.

This policy expressly prohibits:

- sexual activity with children, regardless of the local age of consent or age of majority;
- being alone with a child without external oversight, except where required by pressing operational necessity;
- the use of physical punishment against a child who is not a relative of the staff member or representative;
- exchanging money, employment, goods, assistance, or services for sexual favours;
- exploiting the vulnerability, power imbalance, or dependency of another person for sexual or other improper purposes;
- the sexual exploitation of project beneficiaries or any other persons with whom staff interact in the course of their work;
- sexual harassment in any form;
- physical, psychological, or sexual violence;
- bullying (mobbing) in any form;
- human trafficking in any form;
- creating, storing, or disseminating materials that exploit children;
- concealing known or reasonably suspected safeguarding incidents;
- retaliation against or victimisation of a person who has reported a concern in good faith.

A breach of these standards is treated as a serious breach of employment or contractual obligations and may result in disciplinary action, contract termination, and, where necessary, referral to the relevant authorities. Disciplinary liability for bullying (mobbing) is applied with regard to Articles 38, 40, and 41 of the Labour Code of Ukraine, and administrative liability under Article 173-5 of the Code of Ukraine on Administrative Offences.

5. Safe Recruitment and Personnel Vetting

Crown Agents Ukraine applies safe recruitment procedures, including reference checks and, where lawful and proportionate, background checks, before engaging individuals in work involving children or vulnerable adults.



6. Staff Training

Personnel involved in project activities receive an induction on this policy and training on recognising safeguarding risks, the procedure for reporting concerns, and the standards of conduct set out in this document.

7. Safeguarding Risk Assessment

Before starting projects that involve engagement with children, patients, or other vulnerable groups, a safeguarding risk assessment is conducted to identify the necessary preventive measures.

8. Requirements for Partners and Suppliers

Crown Agents Ukraine's business partners and suppliers are required to uphold safeguarding standards equivalent to those set out in this policy and in the Business Partner and Supplier Code of Conduct. Corresponding safeguarding clauses are included in contracts with partners and suppliers, and breach of such clauses may result in suspension of cooperation or contract termination.

9. Reporting Procedure

Crown Agents Ukraine provides accessible channels for reporting safeguarding concerns — for staff as well as for beneficiaries, partners, and other stakeholders. Reports can be submitted to tenderbox@crownagents.com.ua.

All reports are handled confidentially, on a need-to-know basis, and to the extent consistent with the need to protect the affected person or conduct an investigation. The Company cannot guarantee complete anonymity, a specific investigation timeframe, or mandatory disclosure of outcomes to third parties where this cannot genuinely be assured.

The Company's approach is oriented toward the safety and interests of the affected person: decisions on next steps are made taking into account the wishes of the affected person, to the extent possible and consistent with the obligation to prevent further harm.

A person who has reported a concern in good faith is protected from retaliation or adverse consequences regardless of the outcome of the review.

10. Response Procedure

On receiving a report, Crown Agents Ukraine takes immediate steps to assess the situation and protect the affected person, including, where necessary, referral to specialist support services. Depending on the nature of the concern, an internal or, where appropriate, independent investigation is conducted.

In cases that may constitute a criminal offence under the Criminal Code of Ukraine (including Articles 149 and 152–156), Crown Agents Ukraine engages with the relevant law enforcement authorities in accordance with applicable law.

All documentation relating to a report and its review is kept confidential and protected in accordance with the Law of Ukraine “On Personal Data Protection” of 1 June 2010 No. 2297-VI.

Following the review, disciplinary measures may be applied to staff, or contractual consequences to business partners, up to and including termination of employment or contractual relationships.

11. Photography, Filming, and Use of Stories

Photography, filming, or the use of the stories of children and vulnerable adults in Crown Agents Ukraine's communication materials is carried out only with informed consent (or the consent of a legal representative, for children) and with respect for the dignity and safety of the person depicted.

In particular: written consent from parents or legal guardians is obtained before any filming or publication; images must convey the child's dignity and positivity rather than their vulnerability; publishing any personal information alongside an image that would allow a child or their location to be identified is prohibited.



12. Monitoring Policy Implementation

Crown Agents Ukraine carries out regular monitoring of the implementation of this policy, including a review of reports received, the effectiveness of staff training, and business partners' compliance with safeguarding requirements.