



Sexual Exploitation, Abuse, and Harassment (SEAH) Policy

Organization: Nordic Impact

Policy Title: Sexual Exploitation, Abuse, and Harassment (SEAH) Policy

Effective Date: 25th February 2026

Review Date: 25th February 2028

Approved By: The Board of Nordic Impact

Applies To: All staff, volunteers, consultants, contractors, partners, and representatives

Geographical Scope: All countries where Nordic Impact operates



Statement of Commitment

Nordic Impact is committed to a zero-tolerance approach to Sexual Exploitation, Abuse, and Harassment (SEAH). All personnel, representatives, and partners are required to uphold the highest standards of conduct and to protect beneficiaries, colleagues, and communities from harm.

Sexual exploitation, abuse, harassment, and any abuse of power for sexual purposes are strictly prohibited.

Any violation of this Policy will result in disciplinary action, including termination of employment or contracts, and referral to relevant authorities where appropriate.



1. Purpose

This Policy affirms Nordic Impact’s commitment to preventing and responding to Sexual Exploitation, Abuse, and Harassment (SEAH) in all aspects of its operations. It aims to ensure a safe, respectful, and accountable environment for employees, partners, beneficiaries, and communities.

2. Scope

This policy applies to:

- All employees (full-time, part-time, temporary)
- Contractors, consultants, interns, and volunteers
- Stakeholders, beneficiaries, vendors, and visitors
- All workplace settings, including office environments, off-site meetings, organizational events, and virtual environments

3. Definitions

Sexual exploitation means 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.

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

Sexual activity with beneficiaries is strictly prohibited.



The exchange of money, employment, goods, or services for sexual favors is strictly prohibited.

Sexual harassment includes any unwelcome sexual advance, request for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature when:

- Submission is made a condition of employment (explicitly or implicitly)
- Submission or rejection affects employment decisions
- The conduct creates an intimidating, hostile, or offensive work environment

Sexual harassment may occur between individuals of the same or different genders.

Examples of Prohibited Conduct

- Unwanted touching, hugging, or physical contact
- Sexual comments, jokes, or innuendos
- Displaying sexually explicit materials
- Repeated requests for dates after refusal
- Sending inappropriate emails, messages, or images
- Staring, leering, or suggestive gestures
- Sexual assault



4. Reporting Procedure

Employees who experience or witness sexual harassment are encouraged to report it immediately through one of the following channels:

- Direct supervisor or manager
- Human Resources department
- Designated compliance officer

Reports may be made verbally or in writing.

Reports may also be submitted through the organization's Whistleblowing Policy and designated confidential reporting channels. Reporting channels shall be safe, confidential, and accessible to all employees, beneficiaries, and community members.

5. Investigation Process

- All complaints will be taken seriously and handled promptly.
- Investigations will be conducted fairly and impartially.
- Confidentiality will be maintained to the extent possible.
- Both complainant and respondent will have the opportunity to present information.



6. Protection Against Retaliation

Retaliation against any individual who reports harassment or participates in an investigation is strictly prohibited. Any retaliation will result in disciplinary action.

These protections apply equally to employees, board members, volunteers, contractors, consultants, and implementing partner personnel.

7. Disciplinary Action

If an investigation confirms that sexual harassment has occurred, appropriate disciplinary action will be taken, up to and including termination of employment.

Disciplinary measures will be determined in accordance with Nordic Impact's internal procedures and applicable laws.

8. Responsibilities

Managers are responsible for ensuring that safeguarding risks are identified, mitigated, and monitored within their areas of responsibility.

Employees

- Treat colleagues with respect
- Refrain from engaging in prohibited conduct
- Report incidents promptly



Managers and Supervisors

- Model appropriate behavior
- Take complaints seriously
- Escalate reports to HR immediately

9. Training and Awareness

The organization will provide regular training to employees and managers regarding sexual harassment prevention and reporting procedures.

10. Policy Review

This policy will be reviewed periodically to ensure compliance with applicable laws and best practices.