



POLICY AND CODE OF CONDUCT

Prevention of Sexual Harassment, Exploitation and Abuse (PSEAH / SEAH)

Replaces : HEAS Policy of 17 February 2020

Approved by the Board of Directors: March 11, 2025

Version : 2025 – Updated in compliance with international PSEAH standards

LIST OF ACRONYMS

Acronym	Meaning
BEI	Bureau d'Éthique et d'Intégrité – MFC Nyetaa's Ethics and Integrity Office
BOD	Board of Directors
HR	Human Resources Department
IASC	Inter-Agency Standing Committee
IFI	International Financial Institutions
MFC	Mali-Folkecenter Nyetaa
NGO	Non-Governmental Organisation
PPDT	Politique de Protection des Dénonciateurs et Témoins – MFC Nyetaa's Whistleblower and Witness Protection Policy
PSEA	Protection against Sexual Exploitation and Abuse
PSEAH	Prevention and Protection from Sexual Exploitation, Abuse and Harassment
SEAH	Sexual Exploitation, Abuse and Harassment
SGBV	Sexual and Gender-Based Violence

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I. INTRODUCTION

Mali-Folkecenter Nyetaa (MFC Nyetaa), governed by Law No. 04-038 of 5 August 2004 on associations, is a Malian Non-Governmental Organisation (NGO) founded in 1999. A signatory to Framework Agreement No. 02341001161 with the Malian State (20 February 2008), MFC Nyetaa's mission is to mobilise expertise and resources to support local development initiatives in favour of a sustainable, low-carbon and climate-resilient environment.

As part of its partnerships with international financial institutions and funding partners, MFC Nyetaa is committed to full compliance with international standards for the Prevention of and Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH). These standards are established notably by the Inter-Agency Standing Committee (IASC) and by the best practices of International Financial Institutions (IFIs) in the area of PSEAH.

This PSEAH Policy and Code of Conduct is the 2025 update of the document adopted on 17 February 2020. It incorporates strengthened requirements from international PSEAH standards and best practices in the prevention, detection, reporting, investigation and response to SEAH behaviours. It reflects MFC Nyetaa's commitment to gender equality, fundamental rights, human dignity and sustainable development.

MFC Nyetaa reaffirms its zero-tolerance policy towards all forms of sexual exploitation, sexual abuse and sexual harassment (SEAH), whether committed by a staff member, consultant, volunteer, partner or subcontractor, in connection with or outside the scope of its activities.

“SEAH has no place at MFC Nyetaa or in any activity conducted under its responsibility.”

II. OBJECTIVES AND FOUNDATIONS

2.1. General Objective

This policy aims to equip MFC Nyetaa with effective mechanisms to prevent SEAH behaviours and respond to them. It pursues the following specific objectives:

- Enable staff to understand and recognise behaviours constituting SEAH;
- Raise staff awareness of detecting and reporting SEAH incidents;
- Equip staff with the skills to intervene as active bystanders and interrupt potentially harmful situations;
- Provide a clear framework for effective, equitable and survivor-centred responses;
- Comply with the requirements of funding partners and institutional partners regarding the prevention, detection, investigation and remediation of SEAH;
- Protect beneficiaries, staff, communities and partners against all forms of SEAH.

2.2. Legal and Normative Basis

This policy is grounded in:

- The IASC Minimum Operating Standards for PSEA (MOS-PSEA);
- The best practices of International Financial Institutions (IFIs) in the prevention of SEAH;
- The United Nations Convention on the Rights of the Child (Article 34);
- The Malian Labour Code and applicable criminal provisions on sexual violence;
- The Code of Ethics and Gender Policy of MFC Nyetaa;
- The Whistleblower and Witness Protection Policy (PPDT) of MFC Nyetaa;
- The Policy against Fraud, Corruption and Prohibited Practices of MFC Nyetaa.

2.3. Scope of Application

This policy applies without exception to:

- All permanent staff of MFC Nyetaa (managers, officers, technicians);
- Consultants, experts and individual service providers;
- Volunteers, interns and members of the Board of Directors;
- Implementing partners, subcontractors and any entity collaborating with MFC Nyetaa in the framework of its activities.

It applies in official workplaces as well as during professional travel, field missions, training sessions, official events and any interaction related to the activities of MFC Nyetaa.

2.4. Alignment with International Partner Requirements

MFC Nyetaa commits, in the context of its relationships with international funding partners, to:

- Maintain effective policies and procedures to prevent, detect, investigate, remedy and sanction SEAH behaviours across all its activities;
- Ensure protection against retaliation for victims, witnesses and whistleblowers in relation to SEAH, in accordance with the PPDT;
- Report without delay any suspected or confirmed case of SEAH to the competent oversight body of the relevant funding partner, in accordance with the applicable partnership agreements;

- Fully cooperate with any funding partner or institutional partner in any SEAH-related investigation;
- Ensure that contracts concluded with third parties for the implementation of activities include equivalent SEAH obligations.

III. DEFINITIONS

The following definitions are aligned with international IASC standards and the best practices of international financial institutions:

Term	Definition
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	Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Any sexual activity with a person under 18 years of age constitutes sexual abuse, regardless of local legislation.
Sexual Harassment	Any unwelcome sexual advance, request for sexual favours or other verbal, non-verbal or physical conduct of a sexual nature that interferes with work, is presented as a condition of employment, or creates an intimidating, hostile or offensive environment. It may occur between persons of different or identical sexes or genders.
SEAH	Acronym for Sexual Exploitation, Abuse and Harassment. Used interchangeably with HEAS in this document.
Victim / Survivor	Any person who is or has been subjected to sexual exploitation, sexual abuse or sexual harassment. The term ‘survivor’ is also used to acknowledge the strength and resilience of those concerned.
SEAH Declaration	A sworn statement in which a candidate/employee discloses their SEAH history (criminal convictions, relevant disciplinary sanctions). Required during recruitment in accordance with international PSEAH best practices.
SEAH Check	A recruitment practice requiring a candidate to provide a SEAH Declaration, the information of which is verified through reference checks.
Ethics and Integrity Office (BEI)	MFC Nyetaa’s internal body responsible for receiving, registering and coordinating investigations into integrity allegations, including SEAH.
Counterparty	Any partner, subcontractor or entity contributing to the implementation of MFC Nyetaa’s activities.
Retaliation	Any hostile act against a person who has reported a SEAH incident, including demotion, dismissal, disciplinary action, salary reduction or punitive reassignment.
Active Bystander	A person who, witnessing an inappropriate behaviour or SEAH incident, intervenes safely and ethically to stop it or informs the competent authorities.

IV. MFC NYETAA CODE OF CONDUCT

4.1. Purpose and Objective

MFC Nyetaa’s Code of Conduct defines the behavioural standards that every staff member, consultant, partner or representative of the organisation is required to uphold. It applies in all places and circumstances in the context of MFC Nyetaa’s activities.

MFC Nyetaa’s management requires every employee, director, manager, officer, assistant, intern, consultant, volunteer and partner to read, understand and comply with this Code. Any breach constitutes a disciplinary offence that may result in sanctions up to and including dismissal or contract termination.

4.2. Integrity, Respect and Non-Discrimination

All members of MFC Nyetaa must:

- Behave with honesty, integrity and transparency in all circumstances;
- Treat every person with respect, dignity and fairness, regardless of their age, sex, gender, ethnicity, religion, nationality, social status, disability or sexual orientation;
- Refuse any degrading, insulting, discriminatory or abusive behaviour;
- Respect the privacy and personal boundaries of every individual.

4.3. Mandatory Behaviours Regarding SEAH

MFC Nyetaa adopts a ZERO-TOLERANCE policy towards SEAH. Accordingly, it is MANDATORY for all staff and partners to:

- Refrain from any behaviour constituting sexual exploitation, sexual abuse or sexual harassment;
- Never use a position of authority to solicit sexual favours in exchange for professional, material or programme-related benefits;
- Refrain from any sexual activity with a person under 18 years of age, without any exception or mitigating circumstance;
- Never exchange money, goods, employment or services for sexual relations or sexual favours, including in connection with assistance to beneficiaries;
- Immediately report any SEAH incident or suspicion through the established channels;
- Fully cooperate with any SEAH-related investigation;
- Maintain the confidentiality of all information relating to SEAH incidents.

4.4. Prohibited Behaviours

The following are strictly prohibited, without limitation:

- Any unwelcome sexual advance, verbal, non-verbal or physical;
- The dissemination or display of offensive sexual material (images, text, videos) in the workplace or during MFC Nyetaa activities;
- Comments, jokes or insinuations of a sexual nature;
- Cyber-harassment and harassment via social networks or messaging platforms;
- Any behaviour intended to intimidate, humiliate or degrade a person on the basis of their sex or gender;
- Retaliation against any person who has reported a SEAH incident or participated in an investigation;

- Complicity or passive tolerance of SEAH behaviours.

4.5. Reporting Obligations

Any staff member who is aware of or suspects a SEAH incident has an obligation to report it immediately. Silence in the face of SEAH behaviours constitutes a violation of this Code. Reporting must be carried out through the channels defined in Section VIII.

For activities funded by international partners: any suspected or confirmed SEAH incident must also be reported in accordance with the provisions of the applicable partnership agreements.

4.6. Specific Obligations of Managers and Supervisors

Managers, directors and supervisors have enhanced obligations:

- Act immediately upon becoming aware of any SEAH behaviour or incident, whether as a result of a formal complaint or not;
- Never tolerate, minimise or suppress a SEAH allegation;
- Create and maintain a safe working environment free from SEAH;
- Regularly raise awareness among their teams on SEAH matters;
- Take preventive measures to address SEAH risks when planning activities;
- Ensure that victims do not suffer any retaliation.

A manager who authorises, tolerates or fails to report SEAH behaviours commits a serious breach and is subject to the same sanctions as the perpetrator.

4.7. Interpersonal Relationships and Conflicts of Interest

Personal or romantic relationships between staff members are not automatically prohibited, but must be declared where they involve a direct hierarchical relationship or a situation that could create a conflict of interest. It is the responsibility of the HR Department, in coordination with management, to take the necessary steps to prevent any abuse of position.

V. MFC NYETAA PSEAH POLICY

5.1. Zero-Tolerance Declaration

MFC Nyetaa adopts a zero-tolerance policy towards all forms of SEAH. This zero tolerance applies in all places, at all times, in any context related to MFC Nyetaa's activities, including activities funded by national and international funding partners. Any SEAH behaviour constitutes a serious offence that may result in the immediate termination of the employment contract or partnership, and where applicable, criminal proceedings.

5.2. Protection Declaration

The organisation commits to:

- Establishing a safe working culture, free from all forms of SEAH, for all staff and beneficiaries;
- Ensuring that all SEAH-related concerns or allegations are addressed promptly, fairly and independently;
- Maintaining multiple accessible, confidential and secure reporting channels;

- Upholding zero tolerance through robust prevention, awareness-raising and intervention work, supporting survivors and holding perpetrators accountable;
- Protecting the rights of victims to live in safety, free from abuse and neglect;
- Providing special protection to children and vulnerable persons from all forms of mistreatment;
- Guaranteeing that whistleblowers suffer no retaliation, in accordance with the PPDT;
- Being transparent about protection incidents that occur and committing to a process of continuous improvement;
- Reporting SEAH incidents without delay to the competent oversight bodies of funding partners, in accordance with applicable partnership agreements.

5.3. Guiding Principles

MFC Nyetaa’s approach to SEAH protection and response is based on the following principles:

Principle	Description
Survivor-centred	The needs, rights and safety of victims are at the heart of every response. The informed consent of the victim is required before any action is taken on their behalf.
Confidentiality	Information on incidents is shared only on a need-to-know basis. The identities of victims and witnesses are protected.
Non-discrimination	Every victim receives the same treatment and access to services, without discrimination.
Non-directive	The organisation helps victims explore their options without imposing its own views or decisions.
Non-judgmental	No judgement is made about victims or complainants for their past actions or decisions.
Independent Investigation	Investigations are conducted by neutral parties, free from conflicts of interest, recognising the rights of all parties involved.
Safety and Security	The physical and psychological safety of all persons concerned is a priority.
Quality Commitment	The organisation is committed to providing the best possible service and remains open to continuous learning.

VI. PREVENTION AND DUE DILIGENCE

6.1. SEAH Verification during Recruitment (SEAH Check)

In accordance with international best practices in SEAH prevention and the requirements of funding partners, MFC Nyetaa integrates SEAH verifications into all its recruitment processes:

- All candidates for a position within MFC Nyetaa are required to complete and sign a SEAH Declaration (see Annex 3) before any employment offer, contract or assignment;
- The SEAH Declaration requires disclosure of any SEAH-related background: criminal convictions, disciplinary sanctions imposed by former employers or professional organisations;
- Reference checks are systematically conducted to verify the information provided in the SEAH Declaration;
- Any false declaration or omission in the SEAH Declaration constitutes grounds for withdrawal of the offer or termination of contract;
- Persons already employed by MFC Nyetaa at the time of adoption of this policy are required to submit a SEAH Declaration without delay;

- MFC Nyetaa commits to consulting lists of persons sanctioned for SEAH (available inter-agency databases) before any hire.

6.2. Mandatory Training

MFC Nyetaa establishes a mandatory SEAH training programme for all its staff:

Target Audience	Type of Training	Frequency
All staff	SEAH awareness training (in-person + e-learning)	Upon recruitment + annually
Managers / Supervisors	Advanced SEAH training + case management	Upon taking post + every 2 years
Designated SEAH Investigators	In-depth training (3 to 5 days) on investigation procedures, interviewing, reporting	Before any investigation
Field Staff	Training specific to SEAH risks in community contexts	Before each field mission
Partners / Subcontractors	Awareness of MFC Nyetaa and funders' SEAH obligations	At the start of any partnership

SEAH investigator training must cover: SEAH terms and definitions, the concept of consent, gender-based violence, SEAH policies, conducting fair investigations, interviewing techniques, report writing, a survivor-centred approach, trauma management and psychological first aid.

6.3. Awareness-Raising and Communication

MFC Nyetaa implements a communication and awareness-raising plan including:

- Posting the SEAH Code of Conduct in common areas, in French and in local language (Bambara);
- Distributing this policy to all staff upon adoption and at each update;
- Integrating SEAH matters into team meetings and staff assemblies;
- Communicating reporting channels to beneficiaries and communities where MFC Nyetaa operates;
- Publishing the PSEAH Policy on MFC Nyetaa's website;
- Regular internal awareness campaigns (posters, flyers, information sessions).

6.4. SEAH Risk Assessment

MFC Nyetaa conducts a SEAH risk assessment:

- Before the start of any project or programme, particularly those funded by international partners;
- During the design of field activities (identification of high-risk contexts: conflict zones, vulnerable communities, displacement);
- Annually, as part of the PSEAH Policy review.

The SEAH risk assessment form (see Annex 5) must be completed and submitted to Management before the commencement of any activity.

VII. RESPONSES TO CONDUCT IN BREACH OF THIS POLICY

7.1. Obligations of Employees

Any employee who believes they are a victim of SEAH must:

- Inform the perpetrator that their conduct is unacceptable and must stop, if it is safe and possible to do so;
- Document incidents (dates, times, location, nature of acts, possible witnesses);
- Report the incident as soon as possible to their manager, the HR Department, or through the available reporting channels;
- Cooperate with the investigation while preserving confidentiality.

If the direct manager is involved in the incident, the report must be addressed directly to the HR Department, the Ethics and Integrity Office (BEI) or the Executive Directorate.

7.2. Obligations of Managers and Supervisors

Upon becoming aware of a SEAH incident or allegation:

- Take all allegations seriously, regardless of their apparent severity;
- Ensure the immediate safety of the alleged victim;
- Report the incident to the HR Department within 24 hours;
- Not attempt to resolve the incident internally without informing the HR Department;
- Not disclose the identities of the parties concerned beyond the strict circle of persons involved in handling the case;
- Prevent retaliation and monitor the situation during and after the investigation.

7.3. Obligations of the HR Department and Ethics and Integrity Office (BEI)

The HR Department, in coordination with the BEI, is responsible for:

- Receiving and registering all SEAH reports in the confidential allegations register;
- Informing the complainant and the alleged perpetrator of the seriousness of the complaint and applicable procedures;
- Deciding, in consultation with the Executive Directorate, whether the investigation will be conducted internally (BEI) or entrusted to an external party (any complaint involving a member of management will be handled by an external party);
- Organising and coordinating the investigation, preparing and transmitting the written report to Management;
- Communicating corrective measures to the parties concerned and monitoring their implementation;
- Contacting the competent judicial authorities in cases of suspected criminal activity;
- Notifying, in accordance with applicable partnership agreements, any confirmed incident to the competent oversight body of the relevant funding partner.

7.4. Disciplinary Measures

Employees who breach this policy are subject to disciplinary sanctions proportionate to the severity of the acts:

Level of Infraction	Applicable Sanction
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Minor Infraction (1st occurrence)	Written warning + mandatory enhanced SEAH training
Moderate Infraction or Repeat Offence	Suspension without pay, transfer, final warning
Serious Infraction (sexual exploitation or abuse)	Immediate dismissal for gross misconduct + referral to competent criminal authorities
Retaliation against a complainant	Immediate dismissal for gross misconduct
False SEAH Declaration (during recruitment)	Contract termination or withdrawal of offer

The minimum mandatory sanction for any proven breach of this policy is a written warning. In cases of proven sexual exploitation or abuse, dismissal is the default sanction.

7.5. Confidentiality

All information relating to SEAH incidents is treated with the strictest confidentiality. Information is communicated only to those who need it to manage the case (need-to-know principle). Any breach of confidentiality constitutes a disciplinary offence.

Exception: confidentiality may be lifted if a person is in immediate danger or if the law requires it.

7.6. Protection against Retaliation

MFC Nyetaa guarantees full protection against retaliation for any person who has in good faith reported a SEAH incident, participated in an investigation or refused to submit to SEAH behaviour. Retaliation itself constitutes grounds for immediate dismissal. The mechanisms for protecting whistleblowers and witnesses are defined in MFC Nyetaa's Whistleblower and Witness Protection Policy (PPDT).

VIII. REPORTING AND INVESTIGATION PROCEDURES

8.1. Reporting Channels

MFC Nyetaa makes available the following reporting channels, accessible to any staff member, beneficiary, partner or community member:

Channel	Modalities
Direct Report	To the direct line manager, the HR Department, the BEI or the Executive Directorate
SEAH Reporting Form	Paper form available from the HR Department (see Annex 1). May be submitted in person, by mail or via a dedicated drop box
Dedicated Hotline	Confidential number communicated to all staff and posted in the premises
Confidential Email Address	Dedicated address, accessible only to the HR Department and Executive Directorate
Anonymous Report	Via the drop box or anonymous mail. Factual details are required to enable investigation
Report to Funding Partners	For activities funded by international partners: in accordance with the provisions of applicable partnership agreements

8.2. Mandatory Reporting

Reporting is mandatory for any staff member who is aware of or has reasonable grounds to suspect a SEAH incident. Non-disclosure is a breach of this policy. For activities related to international funding partners, reporting to the competent oversight body is also mandatory, in compliance with applicable national laws and partnership agreements.

8.3. Step-by-Step Reporting Procedure

Step	Responsible Actor	Action
1	Complainant / Witness	Complete the SEAH Reporting Form (Annex 1) or contact a reporting channel
2	Manager / HR / BEI	Receipt and registration of the report within 24 hours
3	HR + Management	Preliminary assessment and decision on type of investigation (internal BEI or external) within 48 hours
4	Designated Investigator(s)	Opening of investigation within 3 working days of the report
5	Investigator(s) / BEI	Conduct of investigation (interviews, evidence collection) within a maximum of 30 days
6	HR + Management	Investigation report, findings and sanction recommendations
7	Executive Directorate / BOD	Disciplinary decision and communication to parties
8	HR / BEI	Follow-up, anti-retaliation protection and victim support
9	HR	Notification to funding partner oversight bodies if applicable, in accordance with partnership agreements

8.4. Notification to Funders and Institutional Partners

In accordance with agreements concluded with international funding partners, MFC Nyetaa notifies without delay the competent oversight or integrity body of the relevant funder of any suspected or confirmed case of SEAH in activities funded by that partner. This notification is made by the Executive Directorate or the HR Department through the official channels indicated in the respective partnership agreements. MFC Nyetaa commits to fully cooperating with any investigation conducted by its partners.

8.5. Internal Investigations

Investigations are conducted in accordance with the following principles: competence, thoroughness, confidentiality, documentation, objectivity, safety and timeliness. Investigators are appointed from among trained BEI staff or independent third parties. Any investigation involving a member of management is entrusted to an external party.

The investigation is opened within 3 working days of the report. It is conducted within a maximum period of 30 days, unless exceptional complexity justifies an extension. The rights of the alleged perpetrator are respected: they are informed of the allegations and have the opportunity to respond in writing.

8.6. Findings and Measures

At the conclusion of the investigation, outcomes may be:

- Unsubstantiated allegations: the alleged perpetrator is informed as soon as possible and the case is closed. Rehabilitation measures may be considered if necessary;
- Substantiated allegations: disciplinary procedures are initiated in accordance with Section VII.4 and, where applicable, criminal authorities are notified;
- Identified risk of retaliation: a monitoring plan is put in place by Management to protect the parties concerned, in accordance with the PPDT.

IX. OBLIGATIONS TOWARDS PARTNERS AND SUBCONTRACTORS

In accordance with international best practices and the requirements of its funding partners, MFC Nyetaa ensures that all its partners, subcontractors and implementing organisations adhere to SEAH standards equivalent to those of this policy.

To this end, MFC Nyetaa:

- Integrates mandatory SEAH clauses into all contracts concluded with partners or subcontractors (see model clause in Annex 6);
- Requires partners and subcontractors to have SEAH policies or to be subject to equivalent legislation;
- Requires partners and subcontractors to report without delay to MFC Nyetaa any suspected or confirmed SEAH incident in an activity carried out under the partnership;
- Ensures that partners cooperate with MFC Nyetaa and, where applicable, with funding partners in any SEAH investigation;
- Periodically verifies partner compliance with SEAH obligations during project implementation reviews.

Failure by a partner or subcontractor to comply with these obligations constitutes grounds for contract termination.

X. VICTIM SUPPORT AND REPARATION

MFC Nyetaa commits to providing or facilitating access to the following support services for SEAH victims:

Type of Support	Modalities
Psychological Support	Referral to local or national psychological counselling services; partial or full funding of sessions if necessary
Medical Support	Referral to health facilities for medical care, including in cases of physical violence
Legal Support	Information on the victim's rights and available legal remedies; referral to legal aid services
Immediate Safety	Separation measures between the victim and the alleged perpetrator in the work environment
Accompaniment	Designation of a trusted person within MFC Nyetaa to support the victim throughout the process
Reparation	Appropriate corrective measures (reinstatement, compensation, etc.) according to investigation findings

The informed consent of the victim is required before any action is taken on their behalf. The victim retains the right to withdraw their complaint at any time, without this affecting MFC Nyetaa's reporting obligations in cases of risk to others.

XI. TRAINING AND AWARENESS

The management will ensure that this policy is widely disseminated to all stakeholders and that mandatory and periodic training sessions are organized for staff. These training sessions aim to strengthen the team's understanding the Policy against sexual Exploitation and abuse and encourage the systematic integration of all internal and external activities within Mali-Folkecenter Nyetaa.

XII. RESOURCES AND REFERENCES

For the implementation of this policy, MFC Nyetaa draws on the following international references:

- IASC Minimum Operating Standards for PSEA (MOS-PSEA) – www.interagencystandingcommittee.org
- IASC Action Plan and Core Principles on Codes of Conduct (SEAH) – interagencystandingcommittee.org
- USAID Policy against Sexual Exploitation and Abuse (2018) – www.usaid.gov
- Building Safer Organizations (BSO) – Guidelines for Receiving and Investigating Allegations of Abuse and Exploitation (2007)
- InterAction – Training Materials for Humanitarian and Development Professionals – interaction.org
- National Sexual Violence Resource Center (NSVRC) – www.nsvrc.org
- Malian Labour Code and applicable criminal provisions on sexual violence
- United Nations Convention on the Rights of the Child (Article 34)
- Best practices of International Financial Institutions (IFIs) in the prevention of SEAH
- Code of Ethics of MFC Nyetaa
- Gender Policy of MFC Nyetaa
- Whistleblower and Witness Protection Policy (PPDT) of MFC Nyetaa
- Policy against Fraud, Corruption and Prohibited Practices of MFC Nyetaa

XIII. ENTRY INTO FORCE AND REVISION

This PSEAH Policy and Code of Conduct 2025 enters into force upon adoption by MFC Nyetaa's Board of Directors. It replaces and supersedes the version of 17 February 2020.

It shall be reviewed at a minimum every two (2) years or upon any significant update to applicable international standards or the requirements of funding partners.

Approved by:

The Board of Directors of Mali-Folkecenter Nyetaa

Effective date: March 11, 2025

Dr. Ibrahim TOGOLA

Chairman of the Board of Directors
Knight of the National Order

ANNEX 1: SEAH REPORTING FORM

MALI-FOLKECENTER NYETAA | Confidential Form

If you believe you have been a victim or witness of an act of sexual harassment, exploitation or abuse, please complete this form and submit it in person or by confidential mail to the HR Department or the Ethics and Integrity Office (BEI), or deposit it in the designated drop box. Your complaint will be handled in full confidentiality in accordance with MFC Nyetaa’s PSEAH Policy.

SECTION A – COMPLAINANT INFORMATION

Full Name	
Position / Role	
Department / Project	
Telephone	
Email	
Preferred contact method	<input type="checkbox"/> Email <input type="checkbox"/> Telephone <input type="checkbox"/> In person
Do you wish to remain anonymous?	<input type="checkbox"/> Yes <input type="checkbox"/> No

SECTION B – ALLEGED PERPETRATOR INFORMATION

Full Name (if known)	
Position / Role	
Department / Organisation	
Relationship complainant to	<input type="checkbox"/> Supervisor <input type="checkbox"/> Colleague <input type="checkbox"/> Subordinate <input type="checkbox"/> Partner/Provider <input type="checkbox"/> Other

SECTION C – INCIDENT DESCRIPTION

Date(s) of incident	
Location of incident	
Type of incident	<input type="checkbox"/> Sexual harassment <input type="checkbox"/> Sexual exploitation <input type="checkbox"/> Sexual abuse <input type="checkbox"/> Other: _____
Is the incident ongoing?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Detailed description of the incident (use additional sheets if necessary):

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SECTION D – WITNESSES AND EVIDENCE

Names of possible witnesses	
Witnesses’ contact details	
Available documents / evidence	<input type="checkbox"/> Emails <input type="checkbox"/> Messages <input type="checkbox"/> Photos/Videos <input type="checkbox"/> Other: _____
Steps taken by complainant	
Other persons potentially affected	

I, the undersigned, certify that the information above is accurate to the best of my knowledge and request MFC Nyetaa to open an investigation as soon as possible and in full confidentiality.

Complainant’s Signature:	Date: ____ / ____ / ____ Received by (HR/BEI): _____
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ANNEX 2: INDIVIDUAL COMMITMENT – SEAH CODE OF CONDUCT

MALI-FOLKECENTER NYETAA

I, the undersigned, _____ (Full Name), holding the position of _____ at Mali-Folkecenter Nyetaa, acknowledge having read MFC Nyetaa’s PSEAH Policy and Code of Conduct 2025.

I commit to:

- Strictly complying with MFC Nyetaa’s PSEAH Policy and international SEAH prevention standards;
- Refraining from any behaviour constituting sexual exploitation, sexual abuse or sexual harassment;
- Never engaging in sexual relations with a person under 18 years of age;
- Never exchanging money, goods, employment or services for sexual favours;
- Immediately reporting any SEAH incident or suspicion through the established channels;
- Maintaining the confidentiality of all information relating to SEAH incidents;
- Fully cooperating with any SEAH-related investigation;
- Not retaliating against any person who has reported a SEAH incident;
- Participating in mandatory SEAH training organised by MFC Nyetaa;
- Respecting the rights, dignity and privacy of all persons with whom I interact in the course of my duties.

I understand that failure to comply with these commitments may result in disciplinary sanctions up to and including dismissal and, where applicable, criminal proceedings.

Full Name: _____ Position: _____ Signature: _____ Date: ____ / ____ / ____	Received and registered by HR / BEI: Name: _____ Signature: _____ Date: ____ / ____ / ____
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ANNEX 3: SEAH DECLARATION – PRE-EMPLOYMENT SCREENING

MALI-FOLKECENTER NYETAA | Confidential – HR Use Only

In accordance with international PSEAH best practices and MFC Nyetaa’s PSEAH Policy, all candidates for a position, contract or assignment are required to complete and sign this SEAH Declaration. This declaration is a prerequisite for any employment or contract offer.

CANDIDATE INFORMATION

Full Name	
Nationality	
Position / Assignment applied for	
Date of Birth	

DECLARATION

I solemnly declare in good faith that:

- I have never been subject to a criminal conviction for acts of sexual exploitation, sexual abuse or sexual harassment; True False – If False, please specify: _____
- I have never been subject to a formal disciplinary sanction by an employer or professional organisation for acts of sexual exploitation, sexual abuse or sexual harassment; True False – If False, please specify: _____
- I have never been dismissed or compelled to resign as a result of allegations or acts of sexual exploitation, sexual abuse or sexual harassment; True False – If False, please specify: _____
- I have no current or past sexual relationship with a person under 18 years of age in a professional or humanitarian aid context; True False – If False, please specify: _____

I understand that any false declaration or omission in this form constitutes grounds for immediate withdrawal of the employment offer or contract termination. I consent to the information provided being verified with my references and former employers as part of the recruitment process.

Declarant’s Signature:	Received and verified by HR:
Date: ____ / ____ / ____	Date: ____ / ____ / ____

ANNEX 4: SEAH INVESTIGATION REPORT

MALI-FOLKECENTER NYETAA | CONFIDENTIAL – BEI / HR

A. GENERAL INFORMATION

Case Number	
Investigation Opening Date	
Lead Investigator(s)	
Date of Initial Report	
Nature of Alleged Incident	<input type="checkbox"/> Sexual Exploitation <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> SEAH Retaliation

B. SUMMARY OF ALLEGED FACTS

C. PERSONS INTERVIEWED

Name	Role (Complainant / Alleged Perpetrator / Witness)	Interview Date

D. EVIDENCE COLLECTED

E. FINDINGS

Allegations substantiated?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partially
Justification	
Breach of PSEAH Policy?	<input type="checkbox"/> Yes <input type="checkbox"/> No

F. RECOMMENDATIONS

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G. PARTNER NOTIFICATION

Activity funded by an international partner?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Funder’s oversight body notified?	<input type="checkbox"/> Yes – Date: _____ <input type="checkbox"/> No – Reason: _____
Notification reference	

Lead Investigator / BEI: Name: _____ Signature: _____ Date: ____ / ____ / ____	Approved by Management: Name: _____ Signature: _____ Date: ____ / ____ / ____
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ANNEX 5: SEAH RISK ASSESSMENT FORM

MALI-FOLKECENTER NYETAA | To be completed before the start of any activity

A. PROJECT / ACTIVITY IDENTIFICATION

Project / Activity name	
Funding (funder)	
Geographic area of intervention	
Planned duration	
Responsible for the assessment	
Date of assessment	

B. SEAH RISK FACTOR ASSESSMENT

Risk Factor	Low	Medium	High
Direct contact with vulnerable beneficiaries (women, children, persons with disabilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Activities in remote areas or conflict contexts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Significant power imbalance between staff and beneficiaries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Activities involving the distribution of resources or material benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insufficient female representation on the project team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Low beneficiary awareness of reporting channels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Engagement of temporary or new staff not trained in SEAH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insufficient supervision of field staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cultural or social context with high risk of SGBV/SEAH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C. PLANNED MITIGATION MEASURES

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D. OVERALL RISK LEVEL

Overall risk level	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
Specific SEAH Plan required?	<input type="checkbox"/> Yes (to be attached) <input type="checkbox"/> No

<p>Responsible for Assessment: Name: _____ Signature: _____ Date: ____ / ____ / ____</p>	<p>Validated by Management: Name: _____ Signature: _____ Date: ____ / ____ / ____</p>
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ANNEX 6: SEAH CONTRACTUAL CLAUSE FOR PARTNERS AND SUBCONTRACTORS

MALI-FOLKECENTER NYETAA | To be included in all partnership contracts

CLAUSE ON THE PREVENTION OF SEXUAL HARASSMENT, EXPLOITATION AND ABUSE (SEAH)

1. The partner/subcontractor commits to upholding a zero-tolerance policy towards sexual harassment, sexual exploitation and sexual abuse (SEAH), in accordance with MFC Nyetaa’s PSEAH Policy and applicable international PSEAH standards.
2. The partner/subcontractor commits to having equivalent policies and procedures to prevent, detect, investigate and remedy SEAH behaviours within the scope of the activities covered by this contract.
3. The partner/subcontractor commits to informing MFC Nyetaa, without delay, of any suspected or confirmed SEAH incident within the scope of the activities covered by this contract. MFC Nyetaa reserves the right to notify the relevant funding partners’ oversight bodies as appropriate.
4. The partner/subcontractor commits to fully cooperating with any investigation conducted by MFC Nyetaa or its funding partners relating to SEAH within the scope of the activities covered by this contract.
5. The partner/subcontractor commits to protecting victims, witnesses and whistleblowers in matters of SEAH against any form of retaliation.
6. Failure to comply with this clause constitutes a breach of contract and may result in its immediate termination as well as sanctions in accordance with applicable legal provisions.

<p>For MFC Nyetaa: Name: _____ Position: _____ Signature: _____ Date: ____ / ____ / ____</p>	<p>For the Partner / Subcontractor: Name: _____ Organisation: _____ Signature: _____ Date: ____ / ____ / ____</p>
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