

SEXUAL EXPLOITATION POLICY

1. Purpose

The purpose of this Policy is to clearly articulate the attitude of RA towards the use of prostitutes in the countries in which we operate. It applies to all employees, regardless of gender.

2. Principles

As a signatory to the UN Global Compact, as well as in recognizing International Law and to maintain the reputation of the Company, the principles as set out in RA's 'Dignity at Work' Policy apply.

3. Scope

This Policy applies to all RA personnel (regardless of gender) deployed in support of a contract. It also applies to RA personnel when not deployed (home base personnel), both in and out of set working hours when acting as or perceived as a representative of RA.

4. Definitions

Throughout this Policy the following definitions shall apply:

- 4.1 Prostitute - a person, male or female, employee of RA or not, who engages in sexual activity for payment.
- 4.2 Sexual activity – any action which may be considered sexual, whether mutual or not, and includes but is not limited to touching, kissing, caressing, provocative dancing.
- 4.3 Payment – applies to the method of reward/payment in exchange for sexual favors. This may be, but is not limited to cash, goods, gifts, services, career advancement, future favorable consideration or any form of inducement.
- 4.4 Consent – regardless of the age of consent in the actual country we are operating in, the RA recognized age of consent for sexual activity is 18 years.

5. Locations

By the very nature of work and the countries in which RA operates poverty and hardship are commonplace amongst the local population. Employees of RA, particularly our International staff are commonly seen as very well off, living in comparative luxury, with access to facilities and food the locals may never have experienced.

6. Exploitation

Due to extreme poverty, lack of education and/or formal qualifications, it may be that prostitution is the only easily accessible route to gain an income. 'Rich' foreigners, regardless of which country they are from, may be seen as an easy way by which to obtain cash/goods by which to survive – especially as the prices charged may appear extremely low. Taking advantage of the financial circumstances of an individual in this way in order to engage in sexual activity is exploitation and is strictly against the behavior expected of RA employees. As stated in Article 3 of the RA Code of Conduct, this is expressly forbidden.

7. Consent

Many countries in which we operate are failed states or where the rule of law is fragmented, corrupt or ineffective. As such, allegations of sexual exploitation may fall on deaf ears, be ignored or the investigating officials may be 'incentivized' to overlook such activities. The statutes regarding the age of sexual consent vary between countries but all RA employees are expected to respect the age of majority, internationally recognized by the UN and other bodies as 18 years of age. Any sexual activity by an adult involving anyone under this age will be considered an offense against a minor. In the worst case this may include rape. Even if the activity is agreed to by both participants prior to taking place – due to the environment it could again be perceived as exploitation and therefore, regardless of perceived or actual consent, any sexual activity involving any form of reward (actual, implied or perceived) is forbidden.

8. Responsibility

As a responsible employer, RA regards the health and wellbeing of all its employees, as well as providing an as hygienic working and living environment as possible, as vital and a moral obligation. Engaging in any sexual activity carries a high risk of contracting sexually transmitted diseases and blood borne viruses ranging from HIV/AIDS and syphilis to those which are vector carried such as lice. Costs for the treatment for these, where available, will fall to the individual as they will be deemed self-inflicted.

In addition to the health risks related to prostitution there is the risk of doing real harm to the reputation of the individual within their community. Unwanted pregnancy and childbirth can still be extremely hazardous in the countries we operate due to a lack of basic healthcare.

9. Relationships

RA recognizes that relationships may develop when deployed. In the event of a relationship forming which could develop to the point where consensual sex occurs, there is to be no sexual activity within RA accommodation and premises – even if both involved are employees of RA. Particular care is to be taken to ensure that both partners are over 18 and available for a relationship. The spouses of others are not appropriate 'relationship' partners and may bring significant negative publicity on the individuals and RA itself and so are to be avoided wherever possible.

10. Summary

Working in the locations RA does carries with it a significant moral responsibility. Engaging in those activities outlined in (but not limited to) this policy undermines this responsibility not only in the eyes of RA, but also in the eyes of the nationals of that country and the International community. Any sexual activity for any form of reward (actual or implied) is totally at odds with the ethos and standards of RA International and if discovered will result in instant dismissal without notice.


11. Duty to Report

It is the duty of each employee who has concerns about the behavior of another employee with regard to this policy to report these concerns to the HR personnel in their location. HR staff will treat the information with discretion and keep the identity of the staff who reported the concerns anonymous. HR staff will report the concerns – whether perceived as valid or not – to the Head of Human Resources.

Any concerns shall be treated with urgency and consideration. RA does not tolerate retaliation or threats of retaliation against anyone who raises a concern in good faith under this policy or who assists with an internal investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.

12. Violations

Any violations of this Policy will be subject to investigation and possible disciplinary action in line with RA's Disciplinary procedure will be taken.

A blue ink signature of Soraya Narfeldt, written in a cursive style, positioned above a horizontal line.

Soraya Narfeldt
CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027