Code of Conduct

To Prevent Sexual Exploitation & Abuse

Date of adoption: December 2019



Desjardins
Développement international

1. General Statement

- Any form of sexual exploitation or abuse is a violation of human rights. Sexual exploitation and abuse do not just affect the victim, but also their family, friends and the people around them. Sexual exploitation and abuse often cause lifelong physical and mental health issues in those affected by it.
- This Code of Conduct supports the zero-tolerance approach that Développement International Desjardins ("DID") and its regional offices take toward all forms of sexual exploitation and abuse, while also upholding the DID commitment to preventing and fighting these issues.
- In 2018, DID signed the *Canadian Council for International Co-operation (CCIC) Leaders' Pledge on Preventing and Addressing Sexual Misconduct*.

2. Objective

At DID, we recognize the importance of the people who make up our organization and our responsibility for offering all of them a safe and respectful workplace. This Code of Conduct sets out the guiding principles for preventing sexual exploitation and abuse and promoting environments where no one experiences or commits such violations.

3. Scope

This Code is intended for Canadian, international or in-country employees, managers and directors, as well as volunteer specialists and interns (hereinafter "Personnel") and our Partner Organizations. They will all be required to comply with the Code and standards of conduct set out in this document, at all times and without exception, both when they are on- and off-duty. Each individual is responsible for reading, understanding and complying with the Code. The Code is an integral part of any contractual relationship with DID.

4. Terminology

Certain terms and expressions used in this Code are defined in Appendix 1.

5. DID's commitments

DID will not tolerate sexual exploitation or abuse within the organization itself or the projects and programs it carries out.

With respect to this issue, DID takes a zero-tolerance approach and is committed to raising awareness among Personnel and Partner Organizations. DID undertakes to:

- clearly set out its expected standards of conduct and ensure that everyone understands and respects them;
- implement best practices for recruitment, orientation and integration;
- take the appropriate measures to protect people's well-being, prevent sexual exploitation and abuse and stop any proven instances of sexual exploitation or abuse;
- provide employees with training on preventing sexual exploitation and abuse;
- provide everyone with a reporting tool they can use to report inappropriate conduct safely and confidentially;
- respond promptly and effectively to any allegations of sexual exploitation and abuse and take the appropriate measures with the people held responsible for any proven inappropriate conduct;
- properly support victim(s) of sexual exploitation and abuse while respecting their safety and right to privacy.

Public

6. ROLES AND RESPONSIBILITIES

6.1 The members of the Board of Directors and of the Executive Management Committee

- Declare that they will not tolerate any form of sexual exploitation or abuse;
- Ensure that this Code of Conduct is implemented and communicated;
- Ensure that the financial and human resources needed for the organization to meet its commitments are available

6.2 Field project managers and directors

- Take part in and support the culture of zero tolerance toward any form of sexual exploitation and abuse and adopt related best practices;
- Model respect for the individual and promote this value among their teams, while holding them accountable for their role in maintaining a safe and respectful environment;
- Inform, educate and hold DID Partner Organizations accountable regarding our culture of zero tolerance toward any form of sexual exploitation or abuse;
- Take the required training on recognizing high-risk situations, comply with the requirements that apply to their activities and ensure that their employees do so as well;
- Promptly respond to any sexual exploitation or abuse that come to their attention by reporting it to the Legal department at the DID head office by writing to signalement@did.qc.ca;
- Cooperate with investigations arising from allegations of sexual exploitation or abuse;
- Ensure all facts and information reported to them remain confidential;
- Work with HRSD to decide what disciplinary measures should be taken.

6.3 Human Resources and Security Department (HRSD)

- Strengthen DID practices for preventing and fighting sexual exploitation and abuse;
- Make sure that Personnel understand, sign and comply with the Code of Conduct;
- Take the necessary steps to inform, educate and hold Personnel accountable regarding sexual exploitation and abuse;
- Support and advise field project managers and directors with their initiatives;
- Ensure that any report is followed up with appropriate action;
- Make sure that victims receive the support they need.

6.4 Personnel

- Behave respectfully and with civility at all times;
- Read and comply with the Code of Conduct to Prevent Sexual Exploitation and Abuse;
- Take the required training on preventing sexual exploitation and abuse;
- Report any incident and cooperate with investigations arising from allegations of sexual exploitation or abuse;
- Confirm that they have read and understood the Code of Conduct to Prevent Sexual
- Exploitation and Abuse, and are aware of what is expected from everyone.

6.5 DID partner organizations

- Comply with the values and culture of zero tolerance toward any form of sexual exploitation or abuse;
- Receive a copy of this Code of Conduct and declare that they undertake to comply with it; or adopt their own policies and procedures to prevent sexual exploitation and abuse that comply with the goals and objectives of this Code;
- Help prevent sexual exploitation and abuse;
- Report any incident to DID and, if applicable, cooperate with investigations arising from allegations of sexual exploitation or abuse.

7. STANDARDS OF CONDUCT

7.1 Personnel and Partner Organizations must behave in a way that ensures everyone works in a positive, respectful and professional environment.

7.2 Everyone must create and maintain an environment that prevents any abusive behaviour, especially sexually exploitation and abuse.

7.3 Behaviours that will not be tolerated under any circumstances include, but are not limited to:

a) Acting aggressively or with violence (whether verbal, physical or sexual).
b) Having an intimate relationship with a person in a vulnerable situation. A vulnerable situation includes, but is not limited to, a relationship between a Canadian or international DID representative and a local person employed for a project.
c) Having a relationship or sexual contact with a person under the age of 18, regardless of local laws on the age of majority or consent. Ignorance of a minor's real age cannot be used as a defence.
d) Trading money, a job, goods or services for sexual relations, including sexual favours.
e) Accepting or soliciting sexual services. This standard applies at all times, whether a person is on- or off-duty.
f) Any other form of humiliating or degrading behaviour is forbidden.

8. REPORTING TOOL AND INTERVENTION GUIDELINES

Personnel and Partner Organizations that are aware of a sexually exploitative or abusive event, action, behaviour or situation that they believe could violate this Code of Conduct must immediately report them. There are three ways to file a report:

1. A report may be made to a field project manager or director in a country where DID operates. The field project manager or director will collect detailed information about the allegations, the name(s) of the alleged victim(s), the name of the person alleged to have committed the violation, a description of the event(s), the date(s) when they occurred and the date when the person reporting the incident became aware of it. Depending on the circumstances, the names of witnesses may also be added.
2. A report can also be sent to the legal department at the DID head office in Canada by writing to the following email address: signalement@did.qc.ca. This written report must include the following information: the type of allegation, the name(s) of the alleged victim(s), the name of the person alleged to have committed the violation, a description of the event(s), the date(s) when they occurred and, depending on the circumstances, the name(s) of any witnesses.
3. Finally, a report can be sent via the anonymous reporting tool set up by Desjardins Group through this website: www.clearviewconnects.com or by phone at 1-877-363-3535.

HRSD is responsible for handling reports of cases of sexual exploitation or abuse.

Once the report is received, the facts will be analyzed and if there is enough evidence to justify an investigation, a confidential investigation will be conducted and appropriately monitored.

Upon receiving a report, the HRSD analyzes the facts brought to its attention and decides on the mode of intervention to be implemented. Depending on the situation and the nature of the allegations, a mediation process may be proposed. This process is free, voluntary and confidential and is intended as a simple, flexible and rapid way to resolve the situation if the parties are in good faith. The services of an external mediator may be retained. This person will attempt to bring the parties to an amicable settlement after a satisfactory and freely consented solution has been found. The person responsible for mediation ensures the confidentiality and impartiality of the process.

If mediation cannot be proposed, an investigation is then initiated by the HRSD, which will meet with the possible witnesses and/or the persons involved, as well as the alleged perpetrator, in order to gather their version of the facts. At the conclusion of the investigation, the HRSD issues a recommendation to the DID head office with regard to any potential disciplinary measures or actions. All necessary steps will be taken to ensure confidentiality and protect the identity of the person making the report or filing the complaint.

No action shall be taken against an employee who has made a report in good faith. However, any groundless report made in bad faith can lead to serious disciplinary action or sanctions, depending on the contract.

Reports and complaints will be dealt with quickly, thoroughly and with discretion.

Any violation of this Code of Conduct to prevent sexual exploitation and abuse could lead to disciplinary action based on the seriousness of the violation. Such action could include dismissal, or the suspension or termination of the contract.

Any breach of laws and regulations may also lead to civil and/or criminal prosecution (penalties, imprisonment, compensatory damages, etc.). Any such violation will be referred to the appropriate authorities.

9. MONITORING

A register of reported incidents is maintained by HRSD, which presents a quarterly report on this register to the Audit Committee of the DID Board of Directors.

10. APPENDICES

Appendix 1: Terminology

Appendix 1

Terminology

Agreement

When referring to an international development project, “Agreement” refers to a contribution agreement between DID and the Government of Canada (or any other organization, if applicable) under which the Government of Canada grants funding to DID so it can execute a project.

Final beneficiary

Individual or organization that has signed a contract with DID and that, as part of a project covered by an Agreement, receives part of the contribution so it can carry out the project’s activities.

Local partner

Organization working in a recipient country that, under an Agreement, helps implement a project as a result of a contract signed with DID.

Partner organization

Refers to a final beneficiary, subcontractor or local partner.

Report

Process intended to report any sexual exploitation or abuse.

Sexual abuse

Any actual or threatened physical intrusion of a sexual nature, whether by force, aggression or under unequal or coercive conditions. In addition, any kind of sexual activity or activity with sexual overtones between an adult and a minor (person under the age of 18) is considered to be sexual abuse.

Sexual exploitation

The act of abusing or trying to abuse a state of vulnerability, unequal conditions or a relationship of trust for sexual purposes, including but not limited to taking financial, social or political advantage of this exploitation.

Subcontractor

An individual (other than an employee), firm, for-profit or non-profit organization, charitable organization or institution acting alone or as a consortium, joint venture, corporation (limited partnership, or other), having concluded a contract with DID in order to fulfill an activity or perform work with the aim of achieving results or the products of a project. The term “Subcontractor” encompasses Canadian and local consultants.

Appendix 2

Acknowledgement

Acknowledgement

I, _____, hereby confirm that I have read and understood this Code of Conduct and that I know what is expected of me. I understand that my behaviour must be in line with the Développement International Desjardins culture of zero tolerance toward sexual exploitation and abuse. I understand that any violation of this Code may lead to disciplinary measures that may include my dismissal or the termination of my contract with DID. Finally, I understand that civil and/or criminal prosecution could result from any violation of the law.

Last name:

Signature:

Date:

Développement International Desjardins (DID) is a **world leader** in providing and promoting inclusive finance in developing and emerging countries.

Our expertise is based on more than one hundred years of experience acquired by the Desjardins Group, the leading cooperative financial group in Canada and the fifth largest in the world.

We are guided by best practices that have been tested in collaboration with our numerous partners for creating, expanding and strengthening financial institutions in developing and emerging countries.

Whether providing technical assistance, operating an institution or investing, DID stands out for its in-depth expertise in the following fields:

- **Mobilization of savings**
- **Agricultural finance**
- **Technological solutions**
- **Financing for entrepreneurs**
- **Investment**
- **Training**
- **Social performance**
- **Supervision**
- **Gender equality**
- **Governance**
- **Green finance**

Firmly focused on the future, DID draws on its talented staff to expand access to financial services for populations in developing countries. Together we are building the future. That is our ultimate goal.

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