

Policy on Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) and Anti-Human-Trafficking April 2025

I. Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH)

1. Introduction:

Rainforest Foundation US / Rainforest Foundation US Perú (RFUS) are committed to ensuring a safe, trusted, and respectful environment within our organization, international offices, programs, and projects. RFUS's work with communities sometimes involves RFUS staff and implementing partners interacting with community members, including those marginalized or vulnerable. In all instances, the rights and dignity of individuals are prioritized through defined prevention measures and reporting procedures.

This policy defines RFUS guiding principles with respect to Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH). It outlines procedures for preventing and responding to allegations of sexual abuse and harassment.

This policy expands on the RFUS **Ethics and Code of Conduct**, which outlines ethical standards and acceptable behavior applicable to RFUS operations and complements the RFUS internal policies on **Non-Harassment, Sexual Harassment Prevention, Conflict of Interest, and Whistleblowers** included in the [RFUS Employee Handbook](#) and [RFUS website](#).

This policy complies with the prevention of SEAH (pSEAH) standards included in the [IASC - Guidelines to Implement the MOS-PSEA](#) and the [Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment \(CAPSEAH\)](#) in alignment with the scope of work of Rainforest Foundation US and Rainforest Foundation US Perú.

2. Scope of this Policy:

This Policy applies to all RFUS employees, interns, volunteers, and representatives (jointly, "**RFUS staff**"), as well as (i) RFUS partners who receive any funding directly from RFUS to implement activities; and (ii) independent contractors/consultants paid directly by RFUS and their employees, and representatives (jointly, "**implementing partners**").

RFUS staff and implementing partners must comply with this policy, and RFUS will have a procedure to ensure that they can recognize SEAH risk and understand how to prevent and report it adequately.

3. Our principles and actions:

Awareness: SEAH is prohibited and may constitute gross misconduct and grounds for termination of contract and potential legal prosecution depending on its severity. The acts of SEAH are an abuse of power and undermine the integrity and impact of RFUS work. In particular:

- Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, is prohibited.
- Exchange of money, employment, goods, or services for sex, including demands for sex / 'sexual favors' or other forms of abusive, humiliating, degrading, or exploitative behavior, is prohibited. This includes the exchange of any assistance or protection that is due to people or communities.
- Any sexual relationship that involves improper use of rank, role, or position, or any abuse of power and power imbalances, is prohibited.
- Sexual activity with children (persons under the age of 18) is prohibited, regardless of the age of majority or age of consent locally. A mistaken belief regarding a child's age is not a justified defense.
- Sexual harassment of co-workers (whether in the same organization or not) or people in communities receiving assistance or protection (beneficiaries).
- Any abuse of alcohol or substances that may increase the probability of these described actions.

RFUS will ensure that all RFUS staff and implementing partners are aware of the shared responsibility to prevent and address any SEAH-related concerns.

- RFUS requires all staff to abide by its pSEAH policy and Code of Conduct, sign the pSEAH policy acknowledgment form, and attend annual/biannual training provided by the People and Culture department.
- RFUS requires (i) RFUS partners who receive any funding directly from RFUS to implement activities and (ii) independent contractors/consultants paid directly by RFUS and their employees and representatives (jointly, "implementing partners") to comply with RFUS's pSEAH policy that will be included in grantee agreements, Memorandums Of Understanding (MOUs), and service provider contracts when appropriate.

Prevention: RFUS believes that the prevention of SEAH (pSEAH) is a shared responsibility. All must play an active role in preventing and addressing any SEAH-related concerns while delivering RFUS business. RFUS takes a risk-based approach to preventing SEAH. Every grantee agreement, MOU, and service provider contract transferring RFUS funds to implementing partners will include a description of the scope of work and activities, the SEAH risk classification, and the predetermined preventive measures required. This responsibility includes project management teams: (i) classifying all projects/programs/consultancies funded by RFUS and implementing partners based on SEAH potential risk before funding transfer approval; and (ii) documenting the implementation of predetermined preventive actions depending on the level of risk, providing capacity building where necessary.

1. Project managers will assess RFUS-funded and paid professional services/ projects/programs and classify the level of risk for SEAH according to the [classification tool \(in Appendix\)](#).
2. After identifying the risk level, RFUS will include the proportionate preventative measures as necessary in the grantee agreement, MOU, and service provider contract to detect, avoid, or mitigate SEAH risk according to the [predetermined preventive measures table \(in Appendix\)](#). Further steps may be required for unusual projects with higher SEAH risks, including special SEAH risk analysis and developing specific SEAH prevention actions, considering the input from implementing partners receiving the funding.

Reporting: RFUS holds itself accountable to the people we serve, including beneficiaries, communities, our implementing partners, donors, and RFUS Staff. RFUS is committed to accountability and transparency through appropriate, accessible, and safe reporting mechanisms. We also support our implementing partners in doing the same. Stronger reporting allows RFUS to monitor SEAH better, understand risks, improve systems, and safeguard people accordingly. This includes the options for

reporting confidentially and/or anonymously. All concerns, reports, and investigations will be dealt with on a need-to-know basis, and all records will be held securely. Communication regarding concerns, reports, and investigations will be kept confidential and secure.

Prioritizing needs of the victim/survivor: RFUS is committed to ensuring all our work is underpinned by a "do-no-harm" approach and prioritizes the rights, needs, and wishes of the victim/survivor to ensure their safety, health, and well-being. Every effort will be made to protect the privacy of all complainants, reporters, and the subjects of the complaint. While RFUS cannot guarantee complete anonymity, information about the complaint and investigation will be limited to individuals on a need-to-know basis.

Zero tolerance of inaction: RFUS does not condone, encourage, or tolerate participation or engagement in SEAH or any conduct substantially equivalent to SEAH. RFUS defines "zero tolerance" as acting on every allegation fairly and reasonably with due regard for procedural fairness. Zero tolerance does not mean zero incidents but ensures that RFUS makes a defined effort to provide a comfortable and confidential way for victims/survivors to report, and an appropriate response is put into action. This also means zero tolerance for inaction to prevent, report, or respond to SEAH and zero tolerance for retaliation against victim-survivors or whistleblowers. Reporting is strongly encouraged and should not be penalized.

Monitoring: RFUS actively and consistently will assess potential risks and monitor or investigate incidents related to SEAH, with the goal of preventing such behaviors by taking proactive measures and responding appropriately when issues arise. The monitoring responsibility will be shared as described below:

- The RFUS **Programs department** will be responsible for (i) assessing each RFUS-funded consultancy work and project/program and classifying the risk level for SEAH; and (ii) supporting the implementation of the proportionate preventative measures.
- The RFUS **Finance and Administration department** will ensure (i) that every grantee agreement, MOU, and service provider contract includes documentation of the SEAH level of risk classification and (ii) that preventive actions are implemented and filed properly.
- The RFUS **People and Culture Department** will (i) provide PSEAH policy-specific training and process background checks when needed; (ii) manage any complaints received and lead potential investigations; and (iii) provide annual reports to the RFUS Senior Management Team: e.g., SEAH risk assessments, complaints received, and investigations implemented.

Proactive communication with implementing partners: RFUS will consult implementing partners when possible and collaborate with, listen to, and use the knowledge of local people when classifying SEAH risk levels, implementing predetermined preventive measures approaches, and reporting mechanisms effectiveness, especially in those unusual projects with higher SEAH risks that require special SEAH risk analysis and developing specific SEAH prevention actions.

4. Reporting Incidents:

All RFUS Staff are required to report any concerns or violations of this policy to RFUS leadership following the mechanism included in the [Discrimination, Harassment, and Retaliation Prevention Policy](#).

Implementing partners are required to report concerns via complaints@rainforestus.org for the RFUS Executive Director review.

Individuals may report concerns or complaints on a confidential basis via complaints@rainforestus.org for the RFUS Executive Director review.

All RFUS staff and implementing partners who receive a verbal report or hear concerns from another individual must immediately share all pertinent information with the RFUS Executive Director or the Director of Programs.

Retaliation against any individual who submits a SEAH report in good faith is strictly prohibited under the RFUS [Whistleblower Policy](#).

RFUS will promptly and thoroughly investigate all SEAH complaints following its established procedures included in the [Discrimination, Harassment, and Retaliation Prevention Policy](#). RFUS is committed to treating all victims with dignity and respect, listening to them, and being led by their wishes where possible and appropriate. Every effort will be made to protect the privacy of all complainants, reporters, and subjects of a complaint. While RFUS cannot guarantee complete confidentiality, information about the complaint and investigation will be limited to individuals on a need-to-know basis.

Implementing partners shall cooperate with RFUS and RFUS-designated parties and ensure the cooperation of individuals and entities (under their control) in any SEAH-related investigation.

As appropriate and only with the victim's expressed desire, RFUS will report to the relevant authorities with jurisdiction over the criminal prosecution of SEAH offenses.

5. Consequences of Policy Violations:

If an investigation confirms that RFUS staff has violated a policy, RFUS will take disciplinary action following the [RFUS Harassment Prevention Policy](#), including termination as appropriate under its policies and applicable law.

If an investigation confirms that an implementing partner failed to comply with the applicable contractual language in any grantee agreement, MOU, or service provider contract, remedial action will result, including, but not limited to, additional training, warning, termination of the agreement for a cause with immediate effect, or potential disqualification from future contracts or grants with RFUS.

6. Definitions:

- **Child:** According to the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18 unless, under applicable law, the age of a child is defined as being younger. For the purposes of this policy, RFUS considers a child to be a person under the age of 18 years. If the host country defines the age of consent as 21, in that country, "child" means an individual under the age of 21.
- **SEAH:** Sexual Exploitation, Sexual Abuse and Sexual Harassment.
- **pSEAH:** Prevention of Sexual Exploitation, Sexual Abuse, and Sexual Harassment
- **Retaliation:** Any direct or indirect detrimental action recommended, threatened, or taken because an individual has been the victim of or reported suspicion of alleged misconduct in good faith, such as sexual exploitation or abuse, or participated in an authorized audit or investigation. Retaliation may include denial of aid or inequitable allocation of assistance, adverse administrative actions, such as, but not limited to, unwarranted poor performance evaluations, changes in job duties, a hostile work climate, or other negative decisions affecting the individual's terms and conditions of employment. Retaliation may also take the form of verbal abuse or harassment.

- **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered to be sexual abuse.
- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, threatening or profiting monetarily, socially, or politically from the sexual exploitation of another.
- **Sexual Harassment:** Any unwelcome sexual advance, request for sexual favor, or other verbal, non-verbal, or physical conduct of a sexual nature that interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive environment in connection with the delivery of RFUS business and projects. Sexual harassment may occur between or amongst persons of different sexes or genders or the same sex or gender and may be initiated by any gender or sex. Even if an individual voluntarily participates in activities or discussions of a sexual nature, the actions may constitute sexual harassment if the individual indicates that the conduct was unwelcome.
- **SEAH Vulnerable Populations:** Children and minors (less than 18 years old), people with disabilities, the elderly/seniors, and women from beneficiary communities (not including RFUS staff, implementing partners' team members or consultants, or community leaders).

7. Appendix:

References:

- [Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment \(CAPSEAH\)](#)
- [Core Humanitarian Standard](#)
- [The Inter-Agency Standing Committee for Protection from Sexual Exploitation and Abuse and the IASC - Guidelines to Implement the MOS-PSEA](#)
- <https://psea.interagencystandingcommittee.org/resources/unicef-psea-toolkit-implementing-partners>

Classification of projects/programs/activities based on SEAH potential risk

Level of Risk	Definitions
<p>Low Risk</p>	<p>Program activities do not directly engage with vulnerable populations: Work is most often done in groups (workshops, monitoring trips, organizational strengthening activities); participants are usually community leaders, organization staff, and others in a professional or leadership capacity.</p> <p>In spaces: When visiting the beneficiary community, it is very unlikely that an RFUS staff member or implementing partner will be alone with a potential victim for a considerable period in an isolated space. This includes casual situations when RFUS staff and implementing partners may be in a short-term situation alone with vulnerable populations within the community between program activities.</p>
<p>Medium Risk</p>	<p>Program activities may engage with vulnerable populations, but they are not the program's main focus. Implementing partners may interact with SEAH-vulnerable populations when implementing RFUS-funded activities.</p> <p>In spaces: When visiting the beneficiary community, an RFUS staff member or implementing partner might be alone with a potential victim for a considerable period in an isolated space. This includes situations where RFUS staff and implementation partners might be with potential victims away from their community, unaccompanied by other adults for a considerable period of time.</p>
<p>High Risk</p>	<p>Work directly with SEAH vulnerable populations: Implementing partners will have to interact with vulnerable populations when implementing RFUS-funded activities: minors, people with physical or mental disabilities, elderly people, sex workers...</p> <p>In spaces: When visiting the beneficiary community, it is very likely that an RFUS staff member or implementing partner be alone in an isolated space with the potential victim for a long-term period. This includes situations where potential victims are away from their community, unaccompanied by other adults, for an extended period of time.</p>

Predetermined preventive actions depending on the level of risk.	Apply to:		
SEAH MINIMUM STANDARDS CHECKLIST	<i>Low risk</i>	<i>Med risk</i>	<i>High risk</i>
When hired, all RFUS staff will sign the pSEAH policy acknowledgment form and attend annual training provided by the People and Culture department.	x	x	x
When signing their MOU or contract, implementing partners must attach the signed RFUS pSEAH policy.	x	x	x
When signing their MOU or contract, implementing partners must watch a prerecorded video presentation describing the pSEAH policy.		x	x
RFUS must provide PSEAH policy-specific training for implementing partners after signing their MOU or contract. If long-term/regular implementing partners, this training will be provided every two years.			x
Activities will be specifically planned to avoid RFUS staff / implementing partners being alone with SEAH vulnerable populations in isolated or private spaces without the presence of additional staff members, their parents, or an adult from the community for a considerable period of time. RFUS will consult with implementing partners whenever possible and collaborate with, listen to, and use the local population's knowledge when implementing preventive measures.			x
Recruitment and screening processes for all RFUS and implementing partners' staff/consultants include reviewing criminal records, conducting background checks, or collecting community leaders' reference letters.			x
RFUS staff and implementing partners must sign a specific document containing a clear prohibition against participating in fraternization activities with vulnerable populations of the community outside of working hours, staying alone/ isolated in a private space with the SEAH potential victim.			x
RFUS staff and implementing partners will reinforce a communication strategy to inform vulnerable populations about incident reporting mechanisms.			X

II. Preventing Human Trafficking

1. Introduction:

Rainforest Foundation US (RFUS) is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. RFUS will not tolerate or condone human trafficking or slavery in any part of our global organization.

RFUS and the United States Government prohibit trafficking in persons. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the heading "Summary of Prohibiting Trafficking in Persons."

RFUS employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom RFUS conducts business must confirm that they do not belong to an entity included in the terrorist watch list, cartels, drug traffickers, human traffickers, criminal organized groups, or have promoted mass migration for at least the last 10 years and they are not complicit in any practices that constitute trafficking in persons or slavery.

2. Scope of this Policy:

This policy applies to all employees, interns, volunteers, and representatives from Rainforest Foundation US and Rainforest Foundation US Perú, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding, and complying with this policy. RFUS supervisors are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete the annual training required by the People and Culture department. If you have any questions or concerns relating to this policy, consult the People & Culture department.

3. Summary of Prohibiting Trafficking in Persons

RFUS, as an organization, and its employees must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicant's recruitment fees.

- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

4. Reporting Incidents:

Employees must report any conduct they believe violates this policy to their supervisor or the People & Culture department. Reports may also be made through the RFUS complaints email at complaints@rainforestus.org for the RFUS Executive Director review, which allows anonymous reporting as permitted by applicable law.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

5. Consequences of Policy Violations:

RFUS will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report. It is strictly prohibited under the RFUS [Whistleblower Policy](#).

Any violation of this policy may be grounds for disciplinary action, up to and including termination. RFUS has the exclusive right to interpret this policy regarding their respective employees. Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

6. Definitions:

- **Human Trafficking** is a modern-day form of slavery involving the illegal trade of people for exploitation or commercial gain. A victim need not be physically transported from one location to another for the crime to fall within this definition.
- **Sex trafficking** is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age (22 USC § 7102).
- **Labor trafficking** is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purposes of subjection to involuntary servitude, peonage, debt bondage, or slavery, (22 USC § 7102).
- **Involuntary servitude** is a condition of servitude induced by means of any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or the abuse or threatened abuse of the legal process (22 U.S.C. 7102 (6)).
- **Debt Bondage** is the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt

or the length and nature of those services are not respectively limited and defined (22 U.S.C. 7102 (5)).

- **Coercion** may include: (A) threats of serious harm to or physical restraint against any person; (B) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (C) the abuse or threatened abuse of the legal process (22 U.S.C. 7102 (3)).
- **Commercial Sex Act** term means any sex act on account of which anything of value is given to or received by any person (22 U.S.C. 7102 (4)).

7. Resources:

- [Trafficking Victims Protection Act \(TVPA\) of 2000](#)
- [National Human Trafficking Hotline](#)
- [Polaris Project](#)
- [Homeland Security](#)
- [Department of State](#)
- [Department of Justice](#)
- [New York State](#)