



European Bank
for Reconstruction and Development

Sexual exploitation, abuse and harassment – a briefing note for financial institutions

2025

This briefing note assists the EBRD's financial institution (FI) clients in effectively identifying and addressing sexual exploitation, abuse and harassment (SEAH) risks in the subprojects they finance. The note takes a practical approach, focusing on how to incorporate SEAH considerations into existing environmental and social management systems (ESMS).

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While the primary focus of this briefing note is subprojects, the EBRD also requires its FI clients to address SEAH risks in their own operations. A range of resources are available to support FIs in doing so, as outlined in **Section 2 – Overview of the EBRD's requirements for FIs**.

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1. Introduction: what is SEAH and why is it important for FIs to address?

1.1. Why should FIs address SEAH in their subprojects?



ONE IN THREE WOMEN
WORLDWIDE

are subjected to physical or sexual violence by a partner or to sexual violence by a non-partner in their lifetime.¹

Impacts on individual health and well-being

SEAH can cause devastating and long-lasting damage to individuals, harming their physical, mental, sexual and reproductive health, as well as their financial well-being.

Although SEAH occurs frequently, it is rarely reported – fewer than 40 per cent of women seek help and less than 10 per cent report cases to the police.² Victims often remain silent out of fear of losing their jobs, feelings of shame

or concern that they won't be believed. FIs must therefore treat SEAH as a serious and pervasive risk across their entire portfolio, even in the absence of reported cases.

Impacts on business activities

SEAH is not only morally unacceptable, but also poses serious financial, legal and reputational risks to businesses.



Financial risks

Workplace SEAH can result in significant business disruptions, including absenteeism, high staff turnover and reduced productivity. Proactively addressing SEAH in subprojects can help FIs safeguard their investments and long-term financial returns. For example, in Australia, workplace sexual harassment cost an estimated AUD 3.5 billion (€2 billion) in 2018, with each case resulting in about four lost workdays.³



Legal risks

In many jurisdictions, companies are legally required to prevent and respond to SEAH and gender-based violence and harassment (GBVH). Failure to meet these requirements can result in legal liability, such as fines or compensation claims, especially where preventive measures are found to be inadequate.



Reputational risks

Neglecting workplace SEAH can cause severe reputational damage, particularly within local communities. This can reduce profitability, erode investor and customer trust, hinder talent attraction and retention, and create challenges in local recruitment.



In some countries, violence against women can **negatively impact gross domestic product by up to 3.7 per cent.**⁴

¹ See World Bank Group (2019).

² See Asia-Pacific Economic Cooperation (2025).

³ See Deloitte (2020).

⁴ See World Bank Group (2019).

Other norms and standards



International Labour Organization (ILO) Convention No. 190⁵

Adopted in 2019, this is the first international treaty to explicitly address violence and harassment, including GBVH, in the world of work. It sets a clear global standard: all workers have the right to a workplace free from violence and harassment.

United Nations Guiding Principles (UNGPs) on Business and Human Rights⁶

SEAH and GBVH are recognised as human rights violations. As such, they must be addressed through robust human rights due diligence processes, in line with the UNGPs. Companies have a responsibility to identify, prevent and respond to these risks across their operations and supply chains.

Donor requirements

Development finance institutions, including the EBRD, are placing increasing emphasis on SEAH and GBVH in their financing conditions. Donors may require concrete measures to prevent and respond to these risks as part of funding agreements.

1.2. What exactly is SEAH?

SEAH refers to various harmful acts of a sexual nature. While SEAH can affect people of all genders,⁷ it disproportionately affects women and girls. It can also be targeted at people because of their gender identity and/or sexual orientation, for example, people who identify as lesbian, gay, bisexual, transgender or other sexual or gender minorities.



SEAH can be perpetrated in a range of contexts. It may arise in the workplace, while commuting to and from work, during work-related travel, at rest, accommodation and sanitation facilities, and through digital tools or online

⁵ See ILO (2019).

⁶ See United Nations (2011).

⁷ See EBRD (2024), *Environmental and Social Policy*, which defines gender as the behaviours, social attributes and opportunities associated with being of a particular sex, which are socially constructed, learned, context and time specific, and changeable.

communications. It can be carried out by or directed towards employees or third parties such as contractors, service providers, clients and community members.



SEAH is closely related to GBVH and child sexual exploitation and abuse (CSEA):

Gender-based violence and harassment (GBVH) is an umbrella term for violence and harassment directed at someone because of their sex or gender. It includes all cases of sexual exploitation, sexual abuse and sexual harassment, as well as other actions that cause physical or mental harm.

While there is significant overlap between GBVH and SEAH – and much of the guidance that follows applies to both – the terms are not interchangeable. GBVH includes non-sexual acts of harm or violence and is rooted in the power imbalance created by broader societal gender norms.

Child sexual exploitation and abuse (CSEA) occurs when an adult uses their power, authority or influence to coerce, manipulate or deceive a child into sexual activity. All sexual activity between an adult and an individual under the age of 18 is sexual abuse, regardless of local laws or cultural norms.

2. Overview of the EBRD's requirements for FIs

2.1. Addressing SEAH in FIs' own operations

The EBRD requires FIs to take action to address SEAH and GBVH in their own operations. The EBRD's Environmental Social Requirement 2 (ESR 2) on labour and working conditions⁸ and ESR 4 on health, safety and security⁹ set out specific requirements on SEAH and GBVH. A range of other resources are also available that can support FIs in addressing these issues.

How FIs can respond to internal SEAH risks

FIs have a responsibility to address SEAH risks within their own workplaces. Several resources are available to support this, including:

- The EBRD, International Finance Corporation (IFC) and Commonwealth Development Corporation's (CDC)¹⁰ *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector*.¹¹
- The IFC's additional tools, including [sector guidance and tip sheets](#).¹²

These general resources are a helpful starting point, but FIs should tailor their SEAH response measures to reflect the nature and structure of their own operations. For example:

- **Geographic reach and consistency:** many FIs operate through multiple branches across different regions or countries. Policies, procedures and grievance mechanisms should work consistently across all workplaces and should comply with any specific requirements in local laws.
- **High-pressure environments:** the financial sector often involves demanding targets and tight deadlines. Without strong management and safeguards, these pressures can contribute to environments where inappropriate behaviour is more likely to occur. At the same time, finance remains a sector where women are under-represented and more likely to experience discrimination, which can compound the risks. The combination of pressure and unequal representation helps explain why misconduct can persist.
- **Role-specific risks:** SEAH risks can vary depending on an individual's role. For example, customer-facing staff may be more exposed to harassment from customers or may be able to exploit customers, particularly those in vulnerable situations.

Reporting requirements: FIs must notify the EBRD of environmental and social (E&S)-related accidents and incidents, including actual or alleged SEAH. **Serious E&S incidents, such as SEAH, are subject to specific reporting obligations outlined in loan agreements or other transaction agreements.** All SEAH-related reports must comply with the EBRD protocols, including anonymised information, to ensure safe and confidential handling of sensitive disclosures.

2.2. Integrating SEAH into an ESMS

FI clients also need to manage any risks of SEAH in the subprojects they finance. This is best achieved by integrating SEAH considerations into an FI's ESMS. The EBRD's ESR 9 on financial intermediaries requires that financial intermediaries have E&S risk management procedures commensurate with their size and activities.¹³

⁸ See EBRD (2024), pp. 37-44.

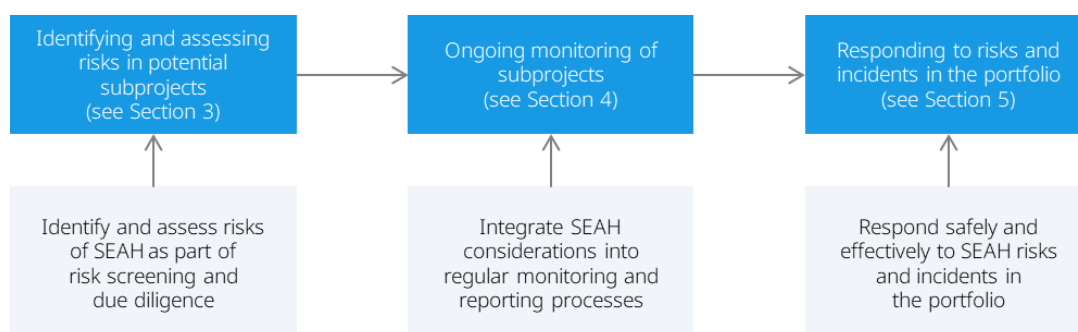
⁹ See EBRD (2024), pp. 51-59.

¹⁰ The CDC is now known as British International Investment (BII).

¹¹ See EBRD, IFC and CDC (2020).

¹² See IFC (2020).

¹³ See EBRD (2024), pp. 95-98.



2.3. SEAH risk considerations for specific financial products

Appropriate risk management strategies vary depending on the type of financial products that an FI offers. Effective mitigation requires tailoring approaches based on product type, client profile, operating context and applicable legal frameworks.

Product	SEAH risk considerations	Useful resources
SME lending 	- SEAH risks in SME lending, especially sexual exploitation and trafficking, are considered “predicate offences” under anti-money-laundering (AML) frameworks like such as the Financial Action Task Force and Sixth AML Directive. - These risks should be managed through compliance systems including know your customer, due diligence and transaction monitoring, not just ESMS. - Compliance and AML teams should be trained to identify and escalate SEAH-related red flags.	Financial Action Task Force, <i>Detecting, Disrupting and Investigating Online Child Sexual Exploitation</i> . ¹⁴ European Commission (n.d.), “Anti-Money Laundering and Countering the Financing of Terrorism at EU Level”. ¹⁵
Microfinance 	- SEAH risks in microfinance vary by context, influenced by gender norms, culture and who controls credit within households. - While microfinance can reduce SEAH risks in some settings, it may increase them where shifts in power dynamics cause tension. - Although rare, there are instances of managers and staff at microfinance institutions exploiting their position to harass women and demand sexual favours before granting loans.	European Microfinance Network, “Financing Her Future: How Microfinance Empowers Women Entrepreneurs Across Europe”. ¹⁶
Private equity 	- SEAH risks should be explicitly assessed during pre-investment due diligence, especially in higher-risk sectors. - Once invested, private equity firms have an active role (particularly where they hold board seats) in integrating SEAH issues into corporate governance, HR systems and grievance mechanisms. - Early-warning indicators such as high turnover among female staff or poor grievance outcomes can signal deeper cultural or systemic issues.	IFC, <i>Tip Sheet: Guidance for Boards of Directors on Overseeing Gender-Based Violence and Harassment</i> . ¹⁷ ILO, <i>Addressing gender-based violence and harassment in a work health and safety framework</i> . ¹⁸
Energy and infrastructure finance 	- SEAH risks in large-scale energy and infrastructure projects are heightened during construction phases, especially where there are migrant workforces, gender-imbalanced employment or proximity to vulnerable communities. - FIs must integrate SEAH safeguards into project due diligence, environmental and social impact assessments and contractor selection and supervision. - Good practices include worker codes of conduct, onsite worker training, accessible gender-sensitive grievance mechanisms and community liaison teams trained to detect early-warning signs.	EBRD, IFC and CDC, <i>Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector</i> . ¹⁹ Green Climate Fund, <i>Sexual Exploitation, Abuse and Harassment (SEAH) risk assessment guideline</i> . ²⁰

14 See Financial Action Task Force (2025).

15 See European Commission (n.d.).

16 See European Microfinance Network (2025).

17 See IFC (2023).

18 See ILO (2024).

19 See EBRD, IFC and CDC (2020).

20 See Green Climate Fund (2023).

2.4. ESR 2 and ESR 4 – setting out a practical approach to SEAH

ESR 2 and ESR 4 provide the foundation for an effective approach to addressing SEAH, outlining requirements across four key areas:

1. **Policies and procedures:** clear policies show a commitment to preventing SEAH, deter misconduct, support survivors and ensure fair handling of cases.
2. **Prevention measures:** identifying risks and taking proactive steps – such as running staff training on SEAH and implementing safe workplace design – help create a safer environment.
3. **Grievance mechanisms:** trusted, confidential channels encourage reporting and deter SEAH by showing that misconduct will be addressed.
4. **Incident response:** survivor-focused protocols ensure access to support, fair investigations and accountability for perpetrators.

1. Policies and procedure	2. Prevention measures
 • Maintain relevant policies, procedures and worker codes of conduct that explicitly address SEAH and CSEA. • Implement effective vetting procedures to ensure that personnel – especially security staff – have no history of SEAH-related misconduct.	 • Identify SEAH and CSEA risks to workers, project-affected people and local communities. • Develop and implement targeted prevention measures to address identified risks. • Provide appropriate training and awareness-raising activities on SEAH for all relevant staff and stakeholders.
3. Grievance mechanism	4. Incident response
 • Establish effective grievance mechanisms for workers and community members, with dedicated channels for SEAH-related concerns. • Ensure clear protocols are in place to handle reports fairly, respectfully and without judgement or discrimination. • Maintain strict confidentiality regarding the identities of and information relating to survivors and witnesses. • Allow survivors to report issues anonymously if they wish.	 • Ensure access to immediate and ongoing support for survivors, including referral to external support services (for example, legal, medical and psychosocial). • Apply a survivor-centred approach, prioritising the safety, confidentiality and well-being of survivors and witnesses, and protecting them from retaliation or further harm. • Designate trained staff with the appropriate skills to handle SEAH cases safely and competently. • Cooperate with national authorities where required and appropriate.

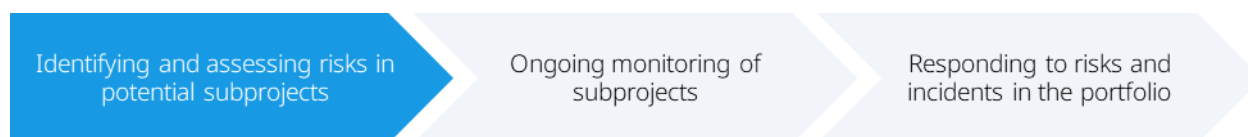
The EBRD requires that **all responses to SEAH are grounded in a “survivor-centred approach”**. This means prioritising the rights, safety, well-being and choices of those who have experienced SEAH. The aim is to support recovery, uphold dignity and minimise the risk of further harm.

Key principles of a survivor-centred approach include:

1. ensuring the immediate and ongoing safety of survivors
2. maintaining strict confidentiality
3. treating survivors with dignity, respect and without judgement
4. supporting survivors in making informed decisions about next steps.

The EBRD also requires clients to comply with national laws, which may include specific requirements concerning SEAH. For example, national law may specify policies or procedures that need to be developed or may require reporting to national authorities.

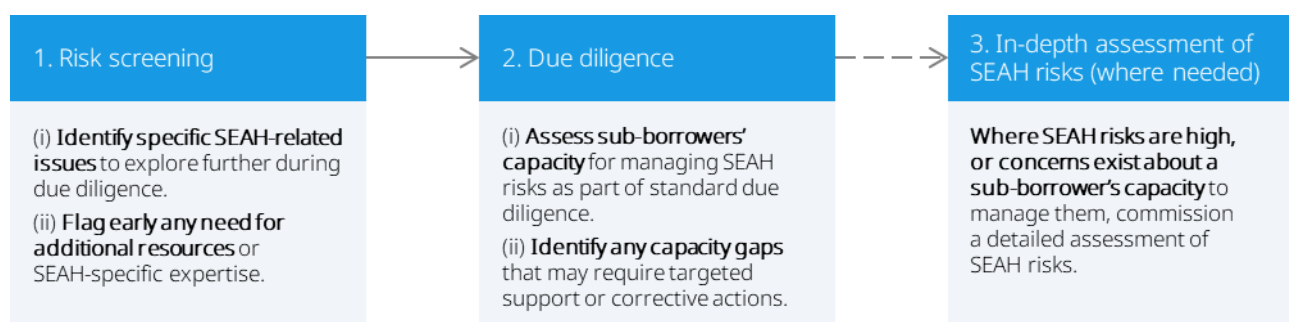
3. Identifying and assessing risks in potential subprojects



3.1. Overview

SEAH risks vary by geography and sector, so FIs must understand the specific risks associated with each project and investment. This will enable them to implement targeted measures and allocate resources more effectively. For example, FIs operating across multiple countries can assess country-level SEAH risks, determining where to prioritise efforts.

SEAH risks should be integrated into every stage of the risk identification and assessment process, such as:



3.2. Risk screening

During the risk-screening phase, FIs should carry out a high-level assessment of potential SEAH risks linked to the subproject. This assessment should consider:

1. **Geographical risk factors:** risks associated with the country and/or region where the subproject is located.
2. **Project-specific risk factors:** risks arising from the nature of the subproject itself, including its sector, workforce profile, or type of activities involved.

Geographical risk factors	• high levels of gender inequality and entrenched gender stereotypes • weak or poorly enforced national legislation on gender equality and SEAH • limited access to justice, including weak judicial and non-judicial mechanisms • high levels of intimate partner violence • widespread poverty, marginalisation and discrimination • corruption among local authorities and businesses • contexts of ongoing fragility, conflict or post-conflict recovery • inadequate or non-existent SEAH support services • remote regions or isolated locations • areas with limited alternative employment opportunities for workers.
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Project-specific risk factors

- labour demands leading to an influx of male workers
- high presence of temporary, informal and/or migrant workers, who may be more vulnerable to SEAH or less likely to report it
- gender imbalance in the workforce, with women workers concentrated in lower levels of the organisation or in casual, low-paid roles
- seasonal or high-pressure work environments with tight deadlines
- transportation routes passing through remote or vulnerable communities
- presence of security personnel on site
- sites spread across large geographical areas
- frequent use of customer-facing digital tools, such as in banking
- high prevalence of remote working or work-from-home arrangements among the workforce, which may increase the risk of digital SEAH.

There are also factors that increase the risk of CSEA:

- presence of children on worksites or in company accommodation, including when they are accompanying their parents
- activities involving prolonged and unsupervised contact between adults and children (for example, in schools, hospitals, hotels, leisure facilities or community-based services).

These risk drivers are more common in specific sectors, such as large infrastructure projects, and in specific countries. As a result, FIs' exposure to SEAH risks will vary depending on the composition of their portfolio.



FIs can consider creating a screening checklist tailored to their portfolio. Such checklists provide a quick and efficient way to identify subprojects that may require enhanced due diligence.



For a list of SEAH risk indicators, see Annex 1 of the EBRD, IFC and CDC's [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#).²¹

The [Women, Peace and Security Index](#) is a good starting point for assessing country-level risks.²²

3.3. Due diligence

The primary aim of due diligence is to check that, where SEAH risks are higher, the potential sub-borrower is aware of these risks (including those identified by the FI during project screening) and has an effective approach in place to manage them as required by ESR 9.

The table below outlines key elements that an FI can check as part of the due diligence process, across all four areas of an effective approach to SEAH.

1. Policies and procedures



At a minimum, due diligence should confirm that the subproject:

- complies with relevant national legal requirements
- includes an explicit prohibition on SEAH within relevant policies and procedures, including worker codes of conduct
- has adequate staffing and resources to implement these policies effectively, including female contact points for receiving grievances.

Where contextual risks are higher or specific risk factors are identified, subprojects should have additional safeguards in place. For example:

- where children are service users, having formal child safeguarding policies
- where security personnel are in place, they have appropriate vetting procedures.

²¹ See EBRD, IFC and CDC (2020), pp. 74-78.

²² See Georgetown Institute for Women, Peace and Security (2023).

2. Prevention measures



This means checking that the subproject has effective prevention measures in place. This could include:

- **Risk identification:** sub-borrowers should have a good understanding of the SEAH risks associated with the project.
- **Recruitment and induction:** new workers should be appropriately vetted and informed of the company's SEAH policies from the outset. Where roles involve contact with children, additional background checks and targeted awareness-raising are essential.
- **Physical design:** the workplace should be designed with safety in mind, including adequate lighting, security cameras and lockable, gender-segregated bathrooms and sleeping areas.
- **Training and awareness-raising:** regular training should be provided to ensure workers understand what constitutes SEAH and how to report concerns.

3. Grievance mechanisms



This means checking that the subproject has an effective grievance mechanism(s) in place to safely receive and respond to SEAH-related complaints from both workers and community members. An effective grievance mechanism concerning SEAH will possess the following characteristics:

- **Multiple reporting channels:** including online and in-person options, with the ability to report to staff of different genders and levels of seniority.
- **Separate channels for community members and service users:** to ensure accessibility beyond the workforce.
- **Anonymous reporting options:** to support survivors or witnesses who do not wish to be identified.
- **Clear procedures to ensure safety:** immediate and ongoing protection for survivors and witnesses – including measures to prevent retaliation – in line with their preferences.
- **Access to support services:** procedures for informing survivors and witnesses of available services (for example, legal, medical, psychosocial) and facilitating access if desired.
- **Trained staff:** designated personnel with appropriate SEAH training and experience in handling sensitive investigations.
- **Confidentiality protocols:** robust measures to protect the confidentiality of complainants and witnesses and to maintain anonymity where requested.

FIs should also review data on how any grievance mechanism is being used. An absence of SEAH-related grievances may indicate that survivors and witnesses of SEAH do not feel comfortable using the grievance mechanism.

4. Incident response



This means checking that the subproject has systems in place to respond appropriately to reports of SEAH. This could include:

- **Clear incident management procedure:** a well-defined incident management procedure should be in place and all staff should be trained to act accordingly. The procedure should have clear criteria for when reports of SEAH would require further investigation, such as when allegations are severe.
- **Led by trained personnel:** all incident responses should be led by trained, impartial individuals with the necessary skills to take a survivor-centred approach. In severe or complex cases, it may be appropriate to engage external specialists. Mishandling SEAH reports can lead to further harm to survivors and significantly damage the company's credibility.
- **Survivor-centred approach:** survivors must be treated with dignity and respect and given the agency to make informed decisions about how to proceed. Their comfort, safety and confidentiality must be prioritised at every stage.
- **Immediate support:** survivors must be given the option of accessing immediate professional support in line with their wishes, such as medical aid, psychosocial support and legal advice.

If an FI is conducting a site visit as part of due diligence, it is essential not to attempt to identify SEAH risks by asking anyone if they have experienced SEAH. This approach is unnecessary, inappropriate and may cause harm or distress to those involved.



For a list of questions that FIs can use to assess whether basic capacity and resources are in place at the subproject, see Annex 3 of the EBRD, IFC and CDC's [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#).²³

3.4. In-depth assessment of SEAH risks

In higher-risk projects where significant capacity gaps are identified, FIs should conduct or commission an in-depth assessment of the potential subproject, led by a trained SEAH expert. Such assessments are critical when there are specific allegations against the company, a large labour influx or project activities involving contact with children. FIs will usually not have in-house expertise to carry out these assessments and will need to bring in external expertise.

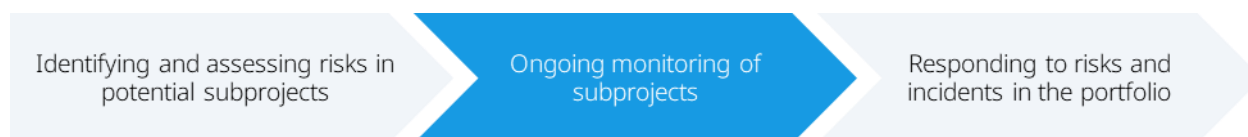


For guidance on commissioning an in-depth assessment of SEAH risks, see Annex 4 of the EBRD, IFC and CDC's [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#).²⁴

²³ See EBRD, IFC and CDC (2020), pp. 83-84.

²⁴ Ibid.

4. Ongoing monitoring of subprojects



Establishing ongoing monitoring and reporting protocols gives FIs clear visibility into how subprojects identify and respond to SEAH risks and incidents. There are two main parts to this: (i) integrating SEAH into regular monitoring and reporting, and (ii) requiring that SEAH incidents on subprojects are immediately reported. It is essential to maintain confidentiality throughout and respect requests for anonymity in all SEAH reports.

4.1. Integrate SEAH considerations into regular monitoring and reporting requirements

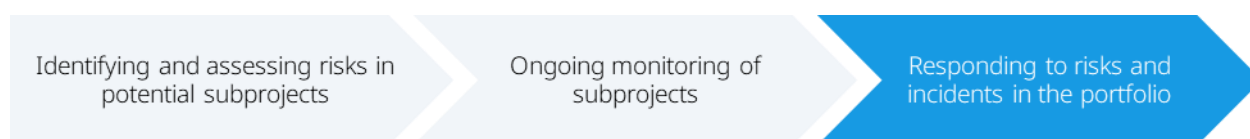
- Include SEAH-related indicators in routine monitoring and reporting, focusing on actions taken by the subproject to identify, prevent and respond to SEAH risks (see the resource listed at the end of this section for examples of key performance indicators).
- Collect aggregated data on SEAH incidents as part of regular reporting, ensuring that survivor or witness identities are never disclosed.
- Adjust reporting frequency and detail according to the level of risk, with higher-risk projects subject to more frequent monitoring.
- Carefully review all monitoring reports to identify areas needing further engagement or strengthened prevention and response measures. For example, note whether the grievance mechanism is underused or whether existing safeguards are ineffective in practice.
- The FI's response to reporting should always be supportive and non-punitive, aimed at helping the sub-borrower to respond safely to SEAH, without imposing penalties.



For examples of key performance indicators that investors can use to monitor SEAH risks, see Annex 8 of the EBRD, IFC and CDC's [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#).²⁵

²⁵ See EBRD, IFC and CDC (2020), p. 89.

5. Responding to risks and incidents in the portfolio



FIs must act if a risk assessment or ongoing monitoring reveals that a subproject is not effectively managing the risks of SEAH. The table below outlines key intervention points across each core element of an effective SEAH approach, along with recommended resources to support these efforts.

Area	Options for response	Useful resources
1. Policies and procedures 	• Require subprojects to develop and/or update their policies and procedures as part of a corrective action plan, for example, to establish worker codes of conduct. • Provide support on specific areas of implementation, such as recommendations from SEAH safeguarding specialists to ensure policies align with national laws and international best practices.	• BII, Template GBVH policy.²⁶ This can be shared with sub-borrowers as a template for updating or developing a SEAH policy. • EBRD and ILLAC, Guide to developing an organizational policy against gender-based violence and harassment (companies).²⁷ • IFC, How to Support Your Company to ... Write and implement an employee code of conduct for prevention of sexual exploitation and abuse.²⁸
2. Prevention measures 	• Specific interventions: when key gaps are identified in a subproject's SEAH prevention measures, FIs can implement targeted actions to address these deficiencies. For example, improving the physical design of workplaces, such as enhancing lighting, can be incorporated into a corrective action plan. Where appropriate, FIs may also provide technical assistance or funding to help sub-borrowers implement these prevention measures effectively. • Knowledge sharing and awareness raising: FIs play a vital role in educating their clients about SEAH, explaining what it is, why prevention is critical and outlining practical steps to reduce risks.	• EBRD, IFC and CDC, Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector. Annex 2 outlines a range of measures that companies can take to prevent and respond to SEAH. It also provides the basis for a phased approach, focusing on getting the basics right first.²⁹

²⁶ See BII (n.d.a.).

²⁷ See EBRD and ILLAC (n.d.).

²⁸ See IFC (2021).

²⁹ See EBRD, IFC and CDC (2020), pp. 79-80.

3. Grievance mechanisms



- **Raise awareness** of the importance of safe and effective grievance mechanisms for SEAH.
- **Provide technical assistance** in developing or refining SEAH-specific grievance mechanisms.
- **Facilitate specialised training** for subproject personnel who are responsible for handling grievances.

- EBRD, IFC and CDC, [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#).

Annex 7 outlines points to consider when developing SEAH grievance mechanisms.³⁰

- BII, [Short guide on integrating GBVH considerations into a worker grievance mechanism](#).³¹
- IFC, [Supporting Companies to Develop and Manage Community-Based Grievance and Feedback Mechanisms Regarding Sexual Exploitation, Abuse and Harassment](#).³²

4. Incident response



- **FIs can offer or support specialised training** for managers or other staff members with responsibility for managing SEAH incidents.
- **Where the sub-borrower lacks capacity, FIs can give direct help with managing SEAH incidents** or connect clients with appropriate external support.

- EBRD, IFC and CDC, [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#).

Annex 7 outlines key considerations for investigation procedures.³³

³⁰ See EBRD, IFC and CDC (2020), p. 88.

³¹ See BII (n.d.b.).

³² See IFC (2022).

³³ See EBRD, IFC and CDC (2020), p. 88.

References

- Asia-Pacific Economic Cooperation (2025), "Violence Against Women: An Overlooked Economic Barrier". www.apec.org/press/blogs/2025/violence-against-women--an-overlooked-economic-barrier.
- BII (n.d.a.), Template GBVH policy, *Practical guidance on developing a GBVH policy*. Available at: <https://toolkit.bii.co.uk/wp-content/uploads/2022/03/BII-GBVH-policy-guide-and-template-FINAL-vF.docx>.
- BII (n.d.b.), *Short guide on integrating GBVH considerations into a worker grievance mechanism*. Available at: <https://toolkit.bii.co.uk/wp-content/uploads/2022/03/BII-Guide-on-integrating-GBVH-considerations-into-worker-GMs-vF.docx>.
- Deloitte (2020), "The economic costs of sexual harassment in the workplace". Available at: www.deloitte.com/au/en/services/economics/perspectives/economic-costs-sexual-harassment-workplace.html.
- EBRD (2024), *Environmental and Social Policy*, London. Available at www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html.
- EBRD, IFC and CDC (2020), *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector*, London and Washington, D.C. Available at: www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_addressinggcvh.
- EBRD and ILLAC (n.d.), *Guide to developing an organizational policy against gender-based violence and harassment (companies)*. Available at: www.ebrd.com/content/dam/ebd_dxp/assets/pdfs/environment---sustainability/implementation-requirements/social/gbvh-guidance-for-private-sector-clients-in-t%C3%BCrkiye/GBVH+Guidance+for+Private+Sector+Clients+in+Turkiye+-+English.pdf.
- European Commission (n.d.), "Anti-Money Laundering and Countering the Financing of Terrorism at EU Level". Available at: https://finance.ec.europa.eu/financial-crime/anti-money-laundering-and-countering-financing-terrorism-eu-level_en.
- European Microfinance Network (2025), "Financing Her Future: How Microfinance Empowers Women Entrepreneurs Across Europe". Available at: www.european-microfinance.org/financing-her-future-how-microfinance-empowers-women-entrepreneurs-across-europe.
- Financial Action Task Force (2025), *Detecting, Disrupting and Investigating Online Child Sexual Exploitation: Using Financial Intelligence to Protect children From Harm*, Paris. Available at: www.fatf-gafi.org/content/dam/fatf-gafi/reports/Online%20Child%20Sexual%20Exploitation%20Report.pdf.coredownload.inline.pdf.
- Georgetown Institute for Women, Peace and Security (2023), *Women, Peace and Security Index*, Washington, D.C. Available at: <https://giwps.georgetown.edu/the-index/>.
- Green Climate Fund (2023), *Sexual Exploitation, Abuse and Harassment (SEAH) risk assessment guideline*. Available at: www.greenclimate.fund/document/sexual-exploitation-abuse-and-harassment-seah-risk-assessment-guideline.
- IFC (2020), *Addressing Gender-Based Violence and Harassment – Sector Briefs and Tip Sheets: How To Guidance*. Available at: www.ifc.org/en/insights-reports/2020/publications-gpn-addressinggcvh.
- IFC (2021), *How to Support Your Company to ... Write and implement an employee code of conduct for prevention of sexual exploitation and abuse*, Washington, D.C. Available at: www.ifc.org/content/dam/ifc/doc/mgrt/tipsheet-implement-a-code-of-conduct-for-prevention-of-sea-october2021-ext.pdf.
- IFC (2022), *Supporting Companies to Develop and Manage Community-Based Grievance and Feedback Mechanisms Regarding Sexual Exploitation, Abuse and Harassment*, Washington, D.C. Available at: www.ifc.org/en/insights-reports/2022/publications-gender-grm-toolkit.
- IFC (2023), *Tip Sheet: Guidance for Boards of Directors on Overseeing Gender-Based Violence and Harassment*, Washington, D.C. Available at: www.ifc.org/content/dam/ifc/doc/2023-delta/external-tip-sheet-for-bod-gbvh-risk-governance.pdf.

ILO (2019), *C190 - Violence and Harassment Convention*. Available at:

https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190.

ILO (2024), *Addressing gender-based violence and harassment in a work health and safety framework*. Available at:

<https://webapps.ilo.org/static/english/intserv/working-papers/wp116/index.html#ID0EEC>.

United Nations (2011), *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*, Available at:

www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf.

World Bank Group (2019), "Gender-Based Violence (Violence Against Women and Girls)". Available at:

www.worldbank.org/en/topic/socialsustainability/brief/violence-against-women-and-girls.

Acronyms and abbreviations

AML	anti-money-laundering
BII	British International Investment
CDC	Commonwealth Development Corporation
CSEA	child sexual exploitation and abuse
E&S	environmental and social
ESMS	environmental and social management systems
ESR	Environmental Social Requirement
FI	financial institution
GBVH	gender-based violence and harassment
IFC	International Finance Corporation
ILO	International Labour Organization
SEAH	sexual exploitation, abuse and harassment
UNGPs	United Nations Guiding Principles

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