



Code of Conduct

Prefab Modular, LDA is committed to ensuring that projects are implemented in a way that minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment in which gender based violence (GBV) and violence against children (VAC) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company.

To ensure that all those engaged in the Works are aware of these commitments, the Contractor commits to the following core principles and minimum standards of behaviour that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception.

General

1. The company — and therefore all employees, associates, representatives, sub-contractors and suppliers—commits to complying with all relevant national laws, rules and regulations.
2. The company commits to fully implementing its 'Contractors Environmental and Social Management Plan' (CESMP).
3. The company commits to treating women, children (persons under the age of 18), and men with respect regardless of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, property, birth or health status, including HIV status. Acts of GBV and VAC are in violation of this commitment.
4. The company will provide a workplace environment where unsafe, offensive, abusive, or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation. It will prohibit demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behaviour among all company employees, associates, and



representatives, including sub-contractors and suppliers.

5. The company will ensure that interactions with local community members are respectful and non-discriminatory.

6. The company will protect and ensure proper use of property to prevent, to the degree possible, theft and waste.

Health and Safety

7. The company will ensure that the project's OHS Management Plan is effectively implemented by company staff, as well as sub-contractors and suppliers.

8. The company will assess and report on the safety hazards related to the Works.

9. The company will provide appropriate personal protective equipment (PPE) in appropriate sizes for male and female workers. The use of this PPE by workers will be mandatory.

10. The company will prohibit workers from working under the influence of alcohol or drugs, including medications that impair cognitive function.

11. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project. This includes providing separate facilities for men and women.

Gender Based Violence and Violence Against Children

12. The company will prohibit all forms of GBV and VAC and implement penalties against workers who perpetrate GBV and VAC. Penalties will range from warnings to termination of a worker's employment by the company, and may include reporting the perpetrator to the police or other legal actions.

13. The company understands that GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females.

14. The company understands that GBV includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. The term GBV is used to underscore systemic inequality between males and females (which exists in every society in the world) and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. The different forms of GBV are understood to include:



a. Rape: physically forced or otherwise coerced penetration — however slight — of the vagina, anus, or mouth with a penis, other body part or object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. The rape of a person by two or more perpetrators is known as gang rape.

b. Sexual Assault: any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.

c. Sexual Harassment: unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts but always involves a power and gender dynamic in which a person in power uses their position to harass another based on their gender.

Sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome. Examples include looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.

Sexual Favours: a form of sexual harassment that includes making promises of favourable treatment (e.g. promotion) or threats of unfavourable treatment (e.g. loss of job) dependent on sexual acts— or other forms of humiliating, degrading or exploitative behaviour.

d. Sexual Exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual exploitation can also include lying about one's intentions, position or influence for sexual purposes.

e. Physical Assault: an act of physical violence that is not sexual in nature. Examples include: hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that results in pain, discomfort or injury.

f. Forced Marriage: the marriage of an individual against her or his will.

g. Denial of Resources, Opportunities or Services: denial of rightful access to economic resources/assets or livelihood opportunities, education, health or other social services. Examples include earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, or a girl prevented from attending school).

h. Psychological / Emotional Abuse: infliction of mental or emotional pain or injury. Examples include: threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, harassment, unwanted attention, remarks, gestures or written



words of a sexual and/or menacing nature, or destruction of cherished things.

15. The company understands that VAC is defined as physical, sexual, emotional and/or psychological harm to or negligent treatment of children under the age of 18. Neither a mistaken belief regarding the age of the child nor the belief that the child consents justifies VAC. The different forms of VAC are also understood to include:

a. Exposure to any environment or circumstance that creates potential or actual harm to a child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

b. Using children for profit, labour, sexual gratification, or some other personal or financial advantage.

c. Using computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.

d. Grooming, which is any behaviour that makes it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualize that relationship. Grooming includes online grooming, which is the act of sending an electronic message with indecent content to a recipient who the sender believes to be a person under the age of 18, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

16. The company will encourage all employees, volunteers and sub-contractors to report suspected and actual acts of GBV or VAC by a worker, whether in the same company or not.

17. The company will disseminate the Code of Conduct for Contractor Personnel in local communities and engage with communities so that they understand the content of this Code. Through this engagement, the company will encourage communities to report suspected and actual acts of GBV and VAC by a worker.

18. The company will provide training to Managers on their responsibilities to report and take action to remedy suspected and actual acts of GBV or VAC.

19. The company will manage all cases of suspected and actual GBV or VAC through the Grievance Redress Mechanism (GRM) and GBV response protocols, and will use the protections in place in the grievance redress process to protect survivors.



Implementation

20. The company will translate the Contractor Personnel Code of Conduct into the languages necessary to communicate the contents of the Code to workers and local communities. This includes the languages necessary to communicate with international workers.

21. The company will ensure that training is provided to all workers, prior to them starting work, including sub-contractors, on the Contractor Personnel Code of Conduct. This training will conclude with each worker signing their individual Code of Conduct to confirm:

- a. Their agreement to comply with the ESHS and OHS requirements relevant to their work.
- b. Their agreement not to engage in GBV or VAC.
- c. Their understanding of the sanctions and penalties that they will incur if they engage in GBV or VAC.

22. The company will ensure that training is provided to all workers, including sub-contractors, on the GRM. This will include training on the confidential and anonymous avenues to use the GRM and other protections in place for the survivors of GBV and VAC.

23. The company will display the Contractor Personnel Code of Conduct and GRM contact information prominently and in clear view at workers' camps, offices, and in public areas of the workspace, in the full range of appropriate languages. Examples of public areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.

24. The company will implement the Employer's GBV Action Plan, including the following components.

- a. Survivor-centred reporting and response protocol for cases of GBV and VAC, which will include protections for the confidentiality of people who report GBV or VAC related incidents.
- b. Protocols for maintaining records of GBV and VAC cases and transferring these records to the Employer for archiving.

25. The company will appoint a senior Manager as its GBV and VAC Focal Point responsible for overseeing the implementation of the GBV Action Plan and the resolution of GBV-related grievances. Depending on the scope of the Contractor's

activities, this person may be supported by number of junior coordinators to ensure that GBV and VAC risks are sufficiently addressed and consistently reported on. The Contractor will work with the Employer's GBV Focal Points to structure reporting.



26. The company will not hire any public or private security forces for the Works without the prior knowledge and written approval of this engagement by the Employer. Security forces that are employed will be provided with training on the Voluntary Principles on Security and Human Rights.

Authorized Representative of the Contractor:

First Name(s): Caku

Last Name: Amaral-Dias

Contractor: Prefab Modular, Ltd

Title: Director

Signature:

Date: 01/03/2023