



Policy on Prevention of Sexual Exploitation, Sexual Abuse and Sexual Harassment

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Policy on Prevention of Sexual Exploitation, Sexual Abuse and Sexual Harassment

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Contents

1 Introduction.....	
2 Purpose and relationship with other policies	4
3 Definitions.....	5
4 Scope of the Policy.....	6
5 Institutional principles and obligations.....	6
6 SEAH-specific prevention and awareness.....	7
7 Reporting, investigations and response.....	7
8 Protection of Victims, Whistleblowers and Witnesses.....	8
9 Roles and responsibilities.....	9
10 Implementation.....	10

1 Introduction

The Nordic Development Fund (“NDF” or “the Fund”) is the joint international finance institution of the five Nordic countries – Denmark, Finland, Iceland, Norway and Sweden. NDF focuses on the nexus between climate change and development in lower-income countries. It advances Nordic climate leadership through financing, knowledge and partnerships, and provides concessional financing to projects in the form of grants, loans and equity together with strategic partners, including multilateral development banks, development finance institutions and other public and private partners.

As a co-financier NDF does not itself implement projects but provides financing, administration or other support to activities implemented by its cooperation partners and other counterparties. The same applies when NDF acts as a financier managing donor funds. Therefore, any project implementing entity is vested with the responsibility for carrying out the project, including but not limited to compliance with applicable laws, regulations and standards in all relevant fields. NDF’s established contractual practice is to include requirements on the Counterparty to this effect.

2 Purpose and relationship with other policies

This Policy on Prevention of Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH Policy) reaffirms, at institutional level, that NDF does not tolerate SEAH in NDF Activities.

NDF’s Environmental and Social Policy and related Guidelines and Gender Equality Policy and related Guidelines, as applicable from time to time, address environmental and social risk management, gender equality and related requirements in NDF-supported activities. Prevention of SEAH is explicitly included in these policies and guidelines. NDF’s codes of conduct applicable to NDF Personnel and governing bodies address SEAH through their provisions on misconduct and harassment. This SEAH Policy complements those documents¹ by consolidating the SEAH-specific institutional rules, reporting obligations, response arrangements and accountability measures that apply across NDF Activities.

In particular, this Policy covers institutional zero tolerance of SEAH, SEAH-specific definitions, individual reporting and cooperation obligations, protection against retaliation, interim protective measures, recruitment and procurement screening, contractual SEAH obligations, possible disciplinary, contractual, judicial or other consequences, and related roles and responsibilities.

This Policy is to be read together with NDF’s applicable codes of conduct, Staff Regulations, incident reporting and grievance arrangements², contractual provisions and other relevant rules and procedures for the case at hand.

¹ The publicly available policy, guidelines and codes of conduct are found on NDF’s website [Legal framework - Nordic Development Fund](#)

² NDF is in the process of further developing its grievance procedures

Where SEAH-related risks, requirements or corrective actions are already addressed through NDF's Environmental and Social Policy and Guidelines and/or Gender Equality Policy and Guidelines, this Policy does not duplicate those provisions but focuses on the institutional and accountability framework specific to SEAH.

3 Definitions

For the purposes of this Policy, the following terms and abbreviations have the meanings set out below:

"Covered Persons" means entities and individuals covered by this Policy in accordance with Article 3.

"Counterparty" means a legal entity or a natural person that receives financing, remuneration or cost coverage from or through NDF, or otherwise executes, implements, contributes or substantially participates in a NDF Activity.

"Designated NDF Function" means the NDF function, person or persons designated under the applicable code of conduct, incident reporting mechanism, grievance mechanism, contractual arrangement or project-level reporting channel to receive, assess, escalate, coordinate or otherwise handle reports of suspected SEAH.

"NDF Activity" means an activity financed, administered or supported by NDF, including, but not limited to, projects financed by NDF and NDF's work-related activities.

"NDF Funds" means funds held, administered, committed or disbursed by NDF, whether NDF's own funds or funds belonging to a third party.

"NDF Personnel" means NDF staff and other individuals contracted or engaged to act for NDF who are bound by the Code of Conduct for Staff, such as hired staff or in-house consultants.

"Retaliation" means any detrimental act, direct or indirect, recommended, threatened or taken against a Victim, Whistleblower or Witness, or a person associated with a Victim, Whistleblower or Witness, because of a report of suspected wrongdoing or cooperation with an investigation by NDF.

"SEAH" means Sexual Exploitation, Sexual Abuse and Sexual Harassment.

"Sexual Abuse" means actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual Abuse also includes sexual relations with a child, meaning a person under the age of 18.

"Sexual Exploitation" means 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 also includes sexual relations with a child, meaning a person under the age of 18.

"Sexual Harassment" means an unwelcome sexual advance, request for sexual favour, or other verbal, non-verbal or physical conduct of a sexual nature that interferes with work, is made a condition of employment or promotion, or creates an intimidating, hostile or offensive environment.

"Victim" means a person who is or has been subjected to SEAH in an NDF Activity.

"Witness" means a person or entity who is not the subject of an investigation, but who provides information or evidence or otherwise cooperates in good faith with an investigation of an alleged act of SEAH.

“Whistleblower” means any person who voluntarily, in good faith and on reasonable grounds, reports, attempts to report, is believed to be about to report, or is believed to have reported a suspected act of SEAH.

4 Scope of the Policy

4.1 This Policy applies to NDF Activities and applies specifically to the following entities and individuals:

- i) NDF Personnel;
- ii) members of NDF’s Board of Directors and Control Committee; and
- iii) Counterparties.

The entities and individuals listed in i)–iii) above are jointly referred to as “Covered Persons”.

4.2 This Policy applies to SEAH-specific obligations, procedures and accountability arrangements across NDF Activities. It does not replace the procedural rules of the applicable codes of conduct, including their rules on reporting, assessment, investigation, decision-making or disciplinary measures. Nor does it replace the environmental and social risk assessment, due diligence, monitoring, reporting, corrective action or gender equality requirements set out in NDF’s Environmental and Social Policy and related Guidelines and Gender Equality Policy and related Guidelines and other applicable NDF documents such as NDF’s Risk Management Policy and Integrity Due Diligence Policy..

5 Institutional principles and obligations

5.1 NDF shall not directly or indirectly condone, encourage or tolerate SEAH and shall take appropriate measures within its control to prevent, detect, investigate and respond to SEAH in NDF Activities.

- (a) Establish and maintain rules and procedures to receive, assess, escalate, investigate and respond to reports of suspected SEAH;
- (b) Take appropriate measures to respond to established SEAH, including disciplinary, contractual, judicial or other measures as applicable and appropriate;
- (c) Include appropriate SEAH-specific obligations in contracts with Counterparties, including obligations not to condone, encourage or tolerate SEAH, to report suspected SEAH promptly, to cooperate with NDF in investigations, and to accept specified consequences for breach of such obligations; and
- (d) Take reasonable measures within its control to protect actual or suspected Victims, Whistleblowers and Witnesses in accordance with Article 7.

5.2 Covered Persons shall:

- (a) Refrain from directly or indirectly participating or engaging in SEAH in NDF Activities;

- (b) Promptly report suspected SEAH in accordance with Article 6.1 below after becoming aware of a suspected act of SEAH in an NDF Activity;
- (c) Comply with any additional SEAH-related obligations set out in the applicable codes of conduct and/or in relevant contractual arrangements; and
- (d) Cooperate as requested in any investigation of SEAH in an NDF Activity.

6 SEAH-specific prevention and awareness

6.1 In order to prevent and mitigate the risk of SEAH, NDF shall:

- (a) Emphasise by appropriate means NDF's expectations regarding high standards of personal conduct and its zero tolerance of SEAH in NDF Activities;
- (b) Raise awareness among NDF Personnel, the Board of Directors, Control Committee and Counterparties on how to prevent and respond to SEAH;
- (c) Establish and maintain recruitment and procurement practices requiring applicants/tenderers to self-declare criminal convictions, disciplinary measures or sanctions relating to SEAH, and, where appropriate, carry out reference checks of shortlisted candidates to verify the information provided; and
- (d) Encourage Counterparties and other cooperation partners to establish proportionate SEAH-specific policies, safeguards and reporting arrangements where such measures are not already adequately covered by applicable environmental and social or gender equality requirements.

7 Reporting, investigations and response

7.1 Covered Persons are obligated to report suspected SEAH in NDF Activities through the applicable incident reporting, grievance, contractual or project-level reporting channels established for the relevant NDF Activity.

7.2 Suspected SEAH by NDF Personnel, by the Managing Director or a member of the Board of Directors, or by a member of the Control Committee shall be reported and handled in accordance with the applicable code of conduct.

7.3 Suspected SEAH by other Covered Persons, including Counterparties and other persons engaged in NDF Activities, shall be reported through the applicable incident reporting, grievance, contractual or project-level reporting channels for the relevant NDF Activity, and be escalated to the Designated NDF Function in accordance with NDF's applicable rules and procedures.

7.4 Persons reporting suspected SEAH shall do so in good faith and provide, where possible, information or evidence related to the alleged SEAH. Persons reporting suspected SEAH shall not evaluate or try to determine whether a report meets a threshold of seriousness or gravity. For the avoidance of doubt, NDF Personnel do not need clearance or approval by a supervisor before reporting.

7.5 NDF shall promptly assess and, where appropriate, investigate reports of suspected SEAH fairly and objectively in accordance with applicable codes of conduct and other rules

and procedures established by NDF, while taking available measures to protect privacy and confidentiality. NDF's handling of reports and investigations of SEAH shall be coordinated by the Designated NDF Function.

7.6 Covered Persons are obligated to cooperate with the Designated NDF Function and/or other representatives duly appointed by NDF for the investigation, in accordance with the applicable code of conduct, contractual arrangement or other applicable rules and procedures.

7.7 Where it has been established that SEAH has taken place, NDF shall pursue contractual, disciplinary, and/or other actions in accordance with applicable contractual provisions and NDF's applicable rules and procedures. In the case of NDF Personnel, disciplinary measures shall be determined in accordance with the Code of Conduct for Staff and the Staff Regulations.

7.8 NDF may refer information relating to SEAH to national authorities if deemed appropriate and in accordance with the applicable rules and procedures. Any referral that would require or imply a waiver of NDF's privileges or immunities, including the functional immunity of NDF Personnel, the Managing Director, members of the Board of Directors or members of the Control Committee, shall be subject to a decision by the Board of Directors. Other decisions on referral shall be made by the Managing Director in consultation with the General Counsel unless applicable rules or contractual provisions provide otherwise.

8 Protection of Victims, Whistleblowers and Witnesses

8.1 NDF shall take reasonable measures available and in its control, to ensure that Victims, Whistleblowers and Witnesses are protected against Retaliation when reporting to, providing information to or otherwise cooperating with NDF in relation to SEAH. Thereby these persons may remain anonymous or request that their identity be kept confidential, for the purposes of NDF's own investigations. It is though worth to note that the main responsibility for protection of Whistleblowers, Victims and Witnesses in NDF financed project activities lies with the implementing entity. Moreover, NDF cannot provide any physical or legal protection for Victims, Whistleblowers or Witnesses.

8.2 The Designated NDF Function shall promptly assess and, where appropriate, investigate any reports of suspected or alleged Retaliation in accordance with the applicable code of conduct, contractual arrangement or other rules and guidelines established by NDF.

8.3 Individuals making false or malicious allegations of suspected SEAH shall not enjoy the protection under Article 8.1 above.

8.4 Reporting suspected SEAH or acting as a Witness shall not protect a Victim, Whistleblower or Witness from sanctions or other measures arising from their own wrongdoing. However, the Victim's, Whistleblower's or Witness's reporting and cooperation shall be taken into consideration when determining an appropriate disciplinary measure or sanction.

8.5 Retaliation or a false or malicious SEAH allegation constitutes misconduct or breach of contract. If such conduct is established, NDF may pursue disciplinary, contractual, judicial

or other action in accordance with applicable contracts, rules and procedures. For NDF Personnel, the relevant provisions of the Code of Conduct for Staff on false or unfounded allegations of Misconduct, retaliation and disciplinary measures shall apply.

8.6 In cases of reported acts of SEAH where the Victim and the alleged offender are NDF Personnel, NDF shall:

- (a) Take available steps to prevent the repetition of the reported behaviour, protect the integrity of the investigation and address the risk of Retaliation, taking into consideration also the interests of NDF. Such measures may include physical separation of the alleged offender and the Victim, reassignment of either the alleged offender or the Victim, temporary changes in reporting lines, and instituting flexible working arrangements; and
- (b) Provide to the Victim information on available medical, counselling and support services.

9 Roles and responsibilities

9.1 The main roles and responsibilities under this Policy are set out in Articles 9.2–9.6 below.

9.2 The Board of Directors shall:

- i) Establish relevant policies required to promote high standards of ethical behaviour within NDF and in NDF Activities;
- ii) Monitor NDF's work on promoting ethics in general and preventing SEAH by receiving and requesting reports and updates.

9.3 The Managing Director, supported by NDF's Executive Management Committee when relevant, shall:

- i) Promote a culture of respect and foster expectations of high standards of ethical behaviour;
 - ii) Issue rules and guidelines as required to complement and ensure implementation of this Policy;
 - iii) Make and implement decisions on interim measures to address reports of acts or risks of SEAH, including the measures set out in Article 7.6(a), in accordance with applicable rules and procedures;
 - iv) Make and implement decisions on disciplinary measures, sanctions or other responses to acts of SEAH or Retaliation, in accordance with the Staff Code of Conduct, contractual provisions, rules and procedures.
- V) See to that relevant training is arranged for NDF Personnel;

9.4 The General Counsel shall

- i) Support development of internal guidelines on how to detect, mitigate and prevent SEAH. This shall include coordination, where relevant, with functions responsible for applying NDF's Environmental and Social Policy and related Guidelines;

- ii) Ensure that relevant policies and rules relating to SEAH, including codes of conduct, are up to date;
- iii)) Coordinate cooperation with relevant international organisations on the prevention of SEAH.

9.5 The Designated NDF Function shall:

- i) Receive, assess, escalate and coordinate the handling of reports on alleged acts of SEAH in accordance with the applicable incident reporting, grievance, contractual or project-level reporting channels or in accordance with the accordance with the applicable code of conduct, as the case may be;

9.5 NDF Personnel shall:

- i) Comply with applicable policies and rules, and in particular the code of conduct, when carrying out their tasks;
- ii) Participate in training provided by NDF on SEAH or other topics related to the code of conduct;
- iii) Report suspected SEAH without delay;
- iv) Cooperate in any investigation carried out or coordinated by the Designated NDF Function.

9.6 Other Covered Persons shall:

- i) Comply with this Policy and relevant contractual commitments on SEAH and ethics in NDF Activities.

10 Implementation

10.1 NDF shall issue rules and guidelines and establish operational and administrative procedures to implement this Policy, as necessary. Such rules, guidelines and procedures may include guidance on reporting channels, assessment and escalation of reports, coordination of investigations, confidentiality, interim measures, contractual SEAH clauses, training and cooperation with relevant internal functions.

10.2 Measures or action taken under this Policy are without prejudice to NDF's privileges and immunities as set forth in NDF's constituent documents or in applicable national or international law.