
SAFEGUARDING

Protection from Sexual Exploitation and Abuse Policy

Zero tolerance for sexual exploitation and abuse by anyone working for or with Accenti.

Date 22 October 2026
Reference AC-HR-POL-003 · Revision 00
To All employees, temporary personnel, contractors and subcontractors working for or on behalf of Accenti LLC

Issue of the Protection from Sexual Exploitation and Abuse Policy, AC-HR-POL-003, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Protection from Sexual Exploitation and Abuse Policy, effective 22 October 2026. It applies to every person who works for Accenti or on our behalf, on and off duty.

We work alongside humanitarian organisations, the United Nations and communities affected by conflict and displacement. People in those communities are entitled to be safe from anyone in a position of power, including us.

Every manager is responsible for making sure their team understands these standards, and for reporting any concern straight away. A PSEA focal point in Human Resources will receive reports and make sure they are handled confidentially.

Please read this policy carefully, sign the acknowledgement, and report any concern immediately. Compliance is mandatory.

Yours sincerely,


Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



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DEFENSE INFRASTRUCTURE

MISSION SUPPORT

SAFEGUARDING

Protection from Sexual Exploitation and Abuse Policy

DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-HR-POL-003	00	22 Oct 2026	Approved / Issued
APPROVAL AUTHORITY		POLICY OWNER	
Accenti LLC Management		Human Resources Department (PSEA focal point)	
APPROVED BY		APPROVED ON	NEXT REVIEW
Ali Ahmed Dhadhaow, Chief Executive Officer		22 Oct 2026	22 Oct 2027

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Human Resources; printed copies are uncontrolled.

Accenti LLC has zero tolerance for sexual exploitation and abuse. Every person working for or with Accenti shall protect the people and communities they come into contact with.

1 Application

This policy applies to all Accenti employees, temporary personnel, contractors and subcontractors, at all times — on and off duty, at work and in accommodation. It reflects the standards expected by the United Nations and humanitarian partners of their contractors.

2 Prohibited conduct

- 2.1 Sexual exploitation and abuse. Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, and any actual or threatened physical intrusion of a sexual nature, is prohibited.
- 2.2 Children. Sexual activity with any person under 18 is prohibited, regardless of local age of consent. Mistaken belief in age is not a defence.
- 2.3 Transactional sex. Exchanging money, employment, goods, services or assistance for sex, including favours or other humiliating, degrading or exploitative behaviour, is prohibited.
- 2.4 Relationships with beneficiaries. Sexual relationships with beneficiaries of assistance, or others in a position of dependence on Accenti's work, are strongly discouraged because they are based on unequal power.

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- 2.5 Duty to report. Any person who has a concern or suspicion of sexual exploitation or abuse, by anyone, shall report it immediately to the PSEA focal point.
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3 Reporting, investigation and support

- 01 Reports may be made in person, by phone or in writing, and may be anonymous.
 - 02 Reports shall be handled confidentially, on a need-to-know basis.
 - 03 The safety and wellbeing of the survivor come first; support and referral to specialist services shall be offered.
 - 04 Allegations shall be investigated promptly by trained people and, where required, reported to the client and the competent authorities.
 - 05 Retaliation against anyone who reports in good faith is a disciplinary offence.
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4 Responsibilities and enforcement

Management shall appoint a PSEA focal point and resource this policy. Human Resources shall carry out reference checks, deliver training at induction and keep acknowledgement records. Managers shall create an environment that prevents exploitation and abuse. A substantiated breach shall result in dismissal and may be referred to the authorities.

5 Reference framework

- 01 UN Secretary-General's Bulletin ST/SGB/2003/13 — Special measures for protection from sexual exploitation and abuse.
- 02 The IASC Six Core Principles relating to sexual exploitation and abuse.
- 03 The UN Supplier Code of Conduct and client PSEA requirements.

 Zero tolerance. Every concern reported. Every survivor supported.

Questions about this policy?

PSEA concerns go to the PSEA focal point in Human Resources or directly to the Chief Executive Officer. Reports are handled in strict confidence.

Operations — Somalia

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Headquarters

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Policy owner

Human Resources Department (PSEA focal point)
AC-HR-POL-003 · Revision 00

■ On every site

Report every concern

You do not need proof. Report any suspicion of sexual exploitation or abuse to the PSEA focal point immediately.

info@accenti.com →





Zero harm to people, property and the environment.

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