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Conservation Strategy Fund (CSF) considers any violation of the rights of children, adolescents, and adults in situations of vulnerability to be unacceptable. In order to create a safe environment for everyone, CSF has developed this Safeguarding Policy, applicable to all its programs, projects, and activities.

Section 1 - Objective, Scope, and Definitions

This policy creates conditions to promote and protect the rights of children, adolescents, adults in situations of vulnerability, and indigenous communities, establishing rules and procedures to be followed by CSF's employees to (a) prevent damage to the physical, psychological, and moral integrity of children, adolescents, and vulnerable adults and (b) adequately respond to any suspected violations of this commitment.

This policy applies to all members, directors, officers, employees, and volunteers of CSF and, where applicable, to consultants and other suppliers of services to CSF.

For the purposes of this policy, the following definitions apply:

- a) **adolescent:** person between 12 (twelve) and 18 (eighteen) years of age;
- b) **adult:** person over 18 (eighteen) years of age;
- c) **child:** person up to 12 (twelve) years old;
- d) **collaborator:** one who, with his/her/their work, contributes to the functioning of CSF, either internally (associate, advisor, director, employee or employee) or externally (consultant or any other supplier of services);
- e) **damage:** violation of the person's physical, mental or moral integrity resulting from action or inaction, including negligence, discrimination, exploitation, violence, cruelty, oppression, or any other form of violation;
- f) **person with a disability:** a person who has a long-term physical, mental, intellectual or sensory impairment, which can obstruct their participation in society on equal terms with other people;
- g) **senior:** person aged 65 (sixty-five) years or older;
- h) **Ethics Committee:** the committee in charge of ensuring the proper implementation of this policy;
- i) **Ombudsman:** the person from CSF designated by the Board of Directors to coordinate the actions to implement this policy, ensuring that all employees are aware of it, appearing as the first point of contact in case of any potential or real damage and maintaining contact with the Ethics Committee;
- j) **person in a situation of vulnerability:** child, adolescent, or adult who, due to age, illness, disability, or situation is unable to protect themselves against any type of significant damage; which may include:
 - i) **migrant:** a person who works or resides temporarily or permanently in a place other than their country of nationality; and
 - ii) **refugee:** a person who (i) due to well-founded fears of persecution for reasons of race, religion, nationality, social group or political opinion is outside his/her/their country of nationality and cannot or does not want to accept the protection of that country ; (ii) not having nationality and being outside the country where he previously had his or her habitual residence, he or she cannot or does not want to return to it, due to the circumstances described in the previous item; or (iii) due to a serious and widespread violation of human rights, you are required to leave your country of nationality to seek refuge in another country.

Section 2 - Mission, Values, Commitments, Principles, and Guidelines

CSF is a global conservation organization that brings economics to those working in conservation and development so that they can make better decisions that impact nature and people. CSF's mission is to use economics to benefit people and nature.

CSF is a 501 (c)(3) non-profit organization according to an Internal Revenue Service determination. In all of its actions, CSF will adhere to the following values:

Integrity: CSF actions, principles, and values are consistent across all CSF offices. CSF offices will operate according to its policies and procedures as a single, coherent entity. CSF staff will perform their duties with a commitment to ethics in the pursuit of the CSF mission and goals.

Quality: CSF maintains the highest standards of quality in all of its work.

Accountability: CSF is accountable for all of its actions. CSF is bound by the belief that accountability and honesty are the basis for credibility and trust.

Cooperation: CSF understands that it is important to build and strengthen alliances with other stakeholders in order to accomplish common conservation goals. Leveraging the strengths of these stakeholders will act as a complement to the capacity of CSF and will facilitate the realization of the CSF mission.

Transparency: CSF work, policies, and procedures are transparent, ethical and reliable, and are in alignment with all applicable laws. CSF believes that transparency is a key component for establishing credibility and that credibility is absolutely necessary in accomplishing the CSF mission.

CSF is committed to:

- a) adopting all measures at its disposal to avoid any harm to children, adolescents, and adults in vulnerable situations;
- b) giving absolute priority to the protection of people in situations of vulnerability;
- c) never tolerating any type of conduct that causes or may cause damage to this population;
- d) reporting of any suspected damage resulting from the actions of CSF or its collaborators, investigating them, taking the necessary steps to care for the victims, hold those responsible, and prevent similar events from occurring in the future.

Employees must always act according to CSF's mission, values, and commitments established in the previous items and abide by the following specific principles for the protection of vulnerable people:

- a) all children, adolescents, and adults in a vulnerable situation have the right to protection from harm;
- b) everyone has a responsibility to support the protection of vulnerable children, adolescents, and adults;
- c) CSF will use its best efforts to care for children, adolescents, and adults in vulnerable situations with whom they work, are in contact or are affected by their work and activities;
- d) no employee of CSF may use his/her/their position or the benefits provided by CSF to induce people in situations of vulnerability to adopt behaviors that are potentially harmful to them;
- e) any suspicion of harm to children, adolescents, and/or adults in a situation of vulnerability, regardless of the severity or level of certainty as to its actual occurrence, should be reported;
- f) all actions related to protection must be adopted in the best interest of children, adolescents, and adults in situations of vulnerability, which are paramount.

CSF will adopt concrete measures to:

- a) value, listen to, and respect children, adolescents, and adults in vulnerable situations;
- b) maintain easily accessible channels for guidance and receipt of reports of violations of this policy, ensuring whistleblowers' confidentiality;
- c) assess the situations in which its collaborators interact with people in vulnerable situations, measuring the risk of damage and developing control and mitigation actions;
- d) promote the safe recruitment of officers, employees and volunteers, especially those who will have contact with people in vulnerable situations;
- e) document and archive information and documents in a safe and professional manner, maintaining confidentiality.

Section 3 - Conduct in higher risk situations

Face-to-face activities with vulnerable people

In face-to-face activities with people in vulnerable situations, CSF will adopt the following protective measures:

- a) employees of CSF must always use appropriate and respectful language;
- b) demonstrations of physical affection, such as hugs, when appropriate, should not exceed the limit of what would be understood, in the context, as normal between people who maintain a professional relationship;
- c) employees must refrain from flirting, offering gifts, or giving privileged treatment to people in situations of vulnerability in order to obtain their sympathy or attention;
- d) employees and collaborators will not subject any person in a situation of vulnerability to embarrassing or demeaning situations;
- e) any reprimanding should be carried out in a respectful manner, preferably individually, and should not exceed the limits of what is strictly necessary;
- f) if employees observe signs of mistreatment, oppression, or sexual abuse in a person served by CSF, they must immediately inform the Ethics Committee, even if these possible violations have nothing to do with CSF's activities;
- g) events and meetings will follow all current local and CSF health and safety rules and guidelines relating to the COVID-19 pandemic and any future pandemic;
- h) any event related to this policy must be reported in writing, as soon as possible, to CSF's Ombudsman.

Additional precautions in face-to-face activities with children and adolescents

In face-to-face activities with children and adolescents, CSF will adopt, in addition to the measures indicated above, the following protection measures:

- a) CSF must ensure that the parent or guardian has been duly informed and authorized the participation of the child or adolescent by signing an authorization form;
- b) activities that have promiscuous connotation or involve physical contact with intimate body parts are not allowed under any circumstances;
- c) if employees observe signs of mistreatment, oppression or sexual abuse in children or adolescents during an event attended during official CSF business, they must immediately inform the CSF Ombudsman, even if these possible violations have no relationship with CSF's activities.

Additional precautions in activities with seniors

In face-to-face activities with seniors, CSF will adopt, in addition to the measures indicated above, the following protective measures:

- a) seniors should receive preferential care, ensuring special priority for those over 80;
- b) if employees observe signs of mistreatment, oppression, or sexual abuse in a senior during an event or activity attended by CSF, they must immediately inform the CSF Ombudsman, even if these possible violations have no relationship with CSF's activities.

Additional precautions in face-to-face activities with people with disabilities

In face-to-face activities with people with disabilities, the CSF will adopt, in addition to the measures indicated above, the following protection measures:

- a) employees will take measures to ensure activities are inclusive for people with disabilities, and if necessary, seek the support of an expert/ trained person;

- b) take reasonable measures to ensure the place where the activity will take place meets accessibility standards for people with disabilities;
- c) if employees observe signs of mistreatment, oppression or sexual abuse in a person with a disability attended by CSF, they must immediately inform the CSF Ombudsman, even if these possible violations have no relationship with CSF's activities.

Publications containing photos of vulnerable people

CSF will avoid using photographs of people in vulnerable situations in its publications and, when necessary, ensure that:

- a) the photographer/ journalist is accompanied by a collaborator during the visit to CSF and/or its activities;
- b) whenever possible, the photos do not allow the person to be identified;
- c) the photos that allow the identification of the person do not expose them in an embarrassing situation or a situation that may put them at risk;
- d) the use of the photos has the express consent of the person or, in the case of children, adolescents and persons legally incapable of expressing their consent, of the parent or guardian, by signing a term of authorization to use the image.

Section 4 - Employee selection and training

Selection of collaborators & training

In the process of selecting employees or employees who, depending on their duties, will have direct and frequent contact with people in vulnerable situations, CSF will adopt the following minimum precautions:

- a) request for references to at least two professional contacts of the candidate, preferably former employers.

CSF will seek to keep its employees trained and aware of the protection of people in situations of vulnerability, primarily through sharing of this policy with every new employee, internal or external, during his/her/their first month with the organization;

Section 5 - Consultations and complaints

Consultations to clarify doubts

Questions regarding the application of this policy and the adequacy of any conduct relating to people in a vulnerable situation should be addressed to CSF's Financial Director (Holly Busse, holly@conservation-strategy.org) or CSF's Ombudsman (ombudsman@conservation-strategy.org).

Reporting Violations of this Policy

Any interested party may submit a report of violation of this policy to the CSF Ombudsman (ombudsman@conservation-strategy.org), or by mail addressed to the CSF Ombudsman at CSF's headquarters, indicating the facts occurred with the as much detail as possible and attaching any documents that corroborate your statements.

- a. Complaints must contain the identification of the complainant (name, and in the case of an employee/ collaborator, the position with CSF), which will be kept confidential.
- b. The Ethics Committee may determine that the summary filing of complaints do not present minimum indications of materiality or authorship of the violation of this policy, as well as those made anonymously, informing interested parties of their decision.

- c. Not being a case of summary filing, the Ethics Committee will establish, within a maximum period of one week (7 days), a confidential investigation procedure, with a view to clarifying what has happened.
- d. The investigative procedure may also be instituted officially, when the Ethics Committee becomes aware of a fact that, in theory, may characterize a violation of this policy, regardless if a formal complaint has been submitted.
- e. The Ethics Committee may request documents, carry out the hearing of employees and proceed with any other action it deems necessary during the investigation procedure.
- f. At any time, the Ethics Committee may determine, cautiously, (a) the provisional removal of the accused from his/her/their duties and (b) the adoption of the necessary measures to alleviate the physical or psychological suffering of the victim(s).
- g. If there are well-founded indications of the occurrence of a fact classified as a crime, the Ethics Committee shall take steps to ensure that it is communicated, as soon as possible, to the competent authorities, regardless of the stage at which the investigative procedure is.
- h. The investigation procedure must be concluded, preferably, within a period of up to 60 (sixty) days, counted from the receipt of the complaint.
- i. At the end of the investigative procedure, the Ethics Committee must approve a conclusive report and, in the case of concluding that this policy has been effectively violated, recommend to the competent bodies the adoption of the necessary measures to hold those responsible, recompense the victim(s) and / or prevent similar episodes from recurring.
- j. The right of ample defense of the accused will be guaranteed and respected throughout the investigation procedure.

Section 6 - Monitoring and evaluation

The Ethics Committee will comprise at least two members, including the CSF Ombudsman, with the task of ensuring the proper implementation of this policy. The Ethics Committee must report to the Board of Directors at least once a year, giving notice of all consultations and complaints it has analyzed and presenting the reports and suggestions it deems relevant.

This policy will be reviewed regularly as part of CSF's Manual of Policies and Procedures.

Section 7 - Final Provisions

Communication and Accessibility

CSF administration shall make this policy easily accessible to all employees and collaborators.

Employee commitment

Every internal employee of CSF shall, upon taking their position, sign a term of acknowledgment and adherence to CSF's Manual of Policies and Procedures, of which this policy is part.

Contracts to be signed with consultants and other suppliers of services who interact with the public or other external events should include a specific clause whereby the contractor declares to have full knowledge and understanding of this policy, undertakes to comply with it as appropriate and, further, recognizes that any violation of rules set forth herein constitutes a breach of contract.

Implementation

This policy will come into force 30 (thirty) days after its approval, and must be periodically reviewed and improved.