



Gender Based Violence and Harassment (GBVH) and Sexual Exploration & Abuse (SEA) Prevention and Response Policy

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1. What Is GBVH/SEA?

Gender-Based Violence & Harassment (GBVH)

Any unwelcome behavior, action, or comment related to sex, gender, or a power imbalance that causes humiliation, intimidation, or harm.

Examples include:

- Sexual jokes or comments
- Unwanted touching or “accidental” brushing
- Sending sexual images or messages
- Stalking or intrusive attention
- Mocking someone’s gender, appearance, or private life
- Abusive supervision linked to gender or power

Sexual Exploitation & Abuse (SEA)

Any sexual activity involving coercion, threats, manipulation, or exchange of benefits. Consent cannot be given when one person has authority or power over the other (supervisor, HR, manager, contractor supervisor).

Examples include:

- Demanding sexual favors for jobs, shifts, leave, or overtime
- Threatening negative consequences for refusing
- Using position, authority, or benefits to pressure someone
- Sexual activity with someone unable to give informed consent

2. Your Rights

Everyone at BMT has the right to:

- ✓ A workplace free of harassment, abuse, discrimination, and coercion
- ✓ Report concerns safely and confidentially
- ✓ Be protected from retaliation - zero exceptions
- ✓ Use anonymous reporting channels
- ✓ Request same-gender focal points
- ✓ Immediate safety and support if affected

These protections apply to all workers, contractors, subcontractors, camp residents, visitors, and community members.

3. How to Report GBVH/SEA

Use any confidential channel you feel safe with.

A. Direct & Confidential

- HR Director (GBVH Lead)
- Compliance / Legal
- CEO
- GBVH/SEA Focal Points (HR Supervisor: [+9647835083193](tel:+9647835083193))

B. Anonymous Options

- Suggestion boxes
- Anonymous SMS/WhatsApp to [+9647864779456](tel:+9647864779456)
- Email without name to compliance@bmtiq.com
- Proxy reporting through friend, LRS, CLO, or trusted co-worker

C. Other Options

- LRS (labour grievances)
- CLO (community grievances)
- Supervisor/Manager - if safe
- Contractor focal points
- Union/community representative
- Any trusted person who can escalate it

No form is required. Verbal reports are accepted.

4. What Happens After You Report

BMT follows a confidential, survivor-centred process:

- a. Ensure immediate safety and support
- b. Register case in the Sensitive Case Register with restricted access
- c. Assign trained investigators (same-gender option)
- d. Conduct confidential interviews on a strict need-to-know basis
- e. Review relevant evidence (CCTV, messages, witnesses)
- f. Decide on corrective actions
- g. Follow-up check-ins and retaliation monitoring

You will never be pressured to:

- Confront the perpetrator
- Provide evidence you do not have

- Report to police (unless legally required or safety risk)

5. Confidentiality & Protection

BMT guarantees:

- ✓ Strict confidentiality -names never shared outside investigation
- ✓ Restricted data access (HR Manager, Legal, GBVH focal points)
- ✓ No retaliation -any retaliation is serious misconduct
- ✓ Respect for survivor preferences (gender of interviewer, location, time)
- ✓ Privacy at every step

Sensitive-case documents are stored separately, encrypted, and never shared in general reporting.

6. Consequences for Misconduct

- Depending on severity:
- Immediate removal from Terminal
- Suspension pending investigation
- Final warning
- Loss of supervisory duties
- Demotion
- Termination
- Permanent ban from BMT
- Contractor penalties (payment withholding, service suspension, demobilization, contract termination)
- Reporting to authorities where required by law

SEA, coercion, threats, and abuse of authority are zero-tolerance and may result in immediate termination.

7. Support and Assistance

- If you experience GBVH/SEA:
- You will receive confidential support
- You may choose a same-gender focal point
- You may bring a support person
- You may request changes in work location or supervisor
- You are encouraged to report even if unsure or confused

“Your safety and dignity come first. You are protected. You are not alone.”