

## SEXUAL HARASSMENT PREVENTION POLICY

East African Crude Oil Pipeline (EACOP) is committed to providing a safe environment for all its employees free from any form of harassment at work including sexual harassment. This EACOP Sexual Harassment Prevention Policy requires shared responsibility by all EACOP personnel to create an environment free of sexual harassment.

This Sexual Harassment Prevention Policy is aligned with the EACOP Human Rights Policy (2022) which prohibits any form of harassment and is subject to the laws of the countries where EACOP operates. EACOP activities are guided by good practice and standards including the Commission on Human and Peoples' Rights Guidelines on Combatting Sexual Violence and its Consequences in Africa.

- EACOP has zero-tolerance towards any form of sexual harassment. Sexual harassment is unwelcome conduct of a sexual nature causing offence, humiliation and/or intimidation. Sexual harassment may be physical, verbal and/ or non-verbal. It may occur through visual or electronic means. It includes, but is not limited to, situations where a person is asked to engage in sexual activity as a condition of that person's employment, unwelcome physical contact including patting, pinching, stroking, kissing, or inappropriate touching, sexual comments, stories jokes, repeated and unwanted social and invitations for dates or physical intimacy, displays of sexually explicit or suggestive material, sexually-suggestive gestures, whistling, or leering.
- This policy applies to all EACOP staff including direct employees, contractors, or third parties present on all sites. Sexual harassment is prohibited irrespective of where it takes place provided it's at a worksite or work-related event such as business trips, seminars, training sessions.
- EACOP recognises that sexual harassment may occur in unequal relationships. Any complaint under this policy can be raised through the

designated EACOP staff in Uganda and Tanzania offices including Senior Leadership Team (SLT) m, the designated Committee (Committee) or via the EACOP or Contractor grievance mechanisms or the NAVEX platform.

- EACOP shall provide education and training programs on sexual harassment for EACOP staff on a regular basis. EACOP shall also arrange for a dedicated training for the Committee and for the SLT.
- EACOP shall ensure that allegations are promptly investigated whilst protecting the confidentiality of all persons concerned (person(s) affected and/ or bringing the complaint, witnesses, persons serving on the investigation committee).
- Where there is a finding of sexual harassment, after a fair and thorough investigation, EACOP may decide on the appropriate disciplinary action to take, which may include termination of employment.
- A person raising a sexual harassment complaint shall not be retaliated against. An employee shall not raise a false or frivolous sexual harassment claim. In such a case the employer may take the appropriate steps.

The implementation of this policy is periodically reviewed by the Human Rights Steering Committee. We encourage our business partners and contractors to act in a manner consistent with the principles set out in this policy.

Guillaume DULOUT Managing Director, EACOP Date: May 2025 E-LSO-POL-0003