



ALIANZA POR LA
MINERÍA RESPONSABLE

Protocol for the Prevention, Handling, and Punishment of Sexual Harassment, Exploitation, and Abuse in the Workplace and in the Context of Development Interventions.

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GUIDELINES FOR THE PREVENTION AND MANAGEMENT OF SEXUAL HARASSMENT AND GENDER-BASED VIOLENCE FROM THE ALLIANCE FOR RESPONSIBLE MINING FOUNDATION

1. BACKGROUND

The Alliance for Responsible Mining (ARM) recognizes the importance of incorporating a cross-cutting gender perspective. As an organization, ARM understands how gender—as a social and cultural construct—can be an obstacle to achieving equity and equality for both men and women. That is why ARM draws on various concepts and principles from international treaties and declarations, including the Universal Declaration of Human Rights, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979), the Inter-American Convention on the Prevention, Punishment, and Eradication of Violence against Women (Belém do Pará Convention, 1994), the Declaration and Platform for Action of the Fourth World Conference on Women (Beijing, 1995), and the various ILO conventions on ^{labor} rights.¹

This document was developed during the consulting process for the creation, implementation, and dissemination of a protocol for the prevention and management of sexual harassment and gender-based violence in the workplace, with the aim of strengthening ARM's organizational strategy. The guide provides guidelines for raising awareness, preventing, and managing any form of gender-based violence and sexual harassment within the organization's ARM environment. Through this guide, the ARM team will be able to identify and manage situations of violence that may arise and stay informed about the actions taken by the organization regarding this issue.

2. OBJECTIVE

To provide guidance to the Alliance for Responsible Mining on the prevention and management of incidents of sexual harassment and gender-based violence that may occur in the workplace.

3. SCOPE AND AREA OF APPLICATION

The applicability of the Protocol for the Prevention, Response, and Sanctioning of Sexual Harassment, Exploitation, and Abuse in the Workplace and in the Context of Development Interventions is limited to the geographical area where ARM operates, and is binding on all individuals associated with the organization, including employees, contractors, volunteers, and beneficiaries, hereinafter referred to as the “ARM Environment.” This includes digital spaces, offices, field sites, the organization's social events, and other activities arising from the employment or contractual relationship

1 (Accessed at: https://www.responsiblemines.org/wp-content/uploads/2019/03/posición-ARM-género-colombia_-ESP_compressed.pdf)



Its jurisdiction is limited to the prevention and management of this type of violence; therefore, its work will not focus on investigating and disciplining professionals who engage in this type of behavior.

4. PRINCIPLES

4.1 Do No Harm

This approach is based on the premise that no external intervention, whether carried out by humanitarian or development actors, is free from causing (unintended) harm through its actions (Truth Commission). In light of this, the Alliance for Responsible Mining will adopt an ethical stance when faced with situations of sexual and gender-based violence, through which it will acknowledge its role as an agent of change or as a legitimizer of such behaviors, and will reflect on the impact of its decisions on the organization.

4.2 Due Diligence

The Inter-American Convention on the Prevention, Punishment, and Eradication of Violence against Women (Belém do Pará Convention) stipulates that it is an obligation for States to act with “due diligence to prevent, investigate, and punish violence against women” (Article 7).

This is not an obligation exclusive to judicial authorities; rather, it applies to any entity responsible for preventing or investigating situations of gender-based violence. In the same vein, these entities must work to facilitate swift, expeditious, and effective mechanisms for response, protection, and prevention.

4.3 Shared Responsibility

Joint responsibility is an obligation primarily stipulated in Colombian law and refers to the shared responsibility of all social sectors in guaranteeing and respecting human rights. According to the “More Justice, Fewer Barriers” Local Model of the Colectiva Justicia Mujer Corporation:

“shared responsibility seeks to achieve commitment, complementarity, subsidiarity, and the collaboration of all social sectors toward gender equality, the eradication of violence against women, and the restoration of the rights of survivors of such violence” (CCJM, 2019, p. 24).

4.4 Due Process

The Inter-American Court of Human Rights has determined that due process “is a procedural guarantee that must be present in all types of proceedings—not only in criminal cases, but also in civil, administrative, or any other proceedings”—and seeks to ensure respect for the minimum requirements of legality, that investigations be conducted within a reasonable time frame, by an impartial authority, and in accordance with previously established criteria (IACHR, Article 8.1).

4.5 Intersectional Approach

In implementing these guidelines, the Alliance for Responsible Mining will recognize and incorporate the categories of gender, sexual orientation, ethnic identity, age, nationality, class,



economic status, and functional diversity—which intersect among all individuals belonging to the ARM, as well as its beneficiaries.

4.6 No Neutrality or Impartiality

This principle entails taking an active stance toward the eradication of all forms of gender-based violence that occur in the workplace and, furthermore, it implies addressing cases of sexual and gender-based violence through “a gender-centered analysis capable of exposing prejudices, stereotypes, and preconceptions that devalue women and ultimately become obstacles to the full realization of their rights” (Colombian Constitutional Court, 2021). This amounts to the adoption of a zero-tolerance policy toward

4.7 Good Faith

Good faith is a principle that, in cases of gender-based violence against men and women, requires validating victims’ testimony as admissible evidence on which to base protective measures, care, and sanctions, without the need for rigorous proof through excessive formalities that result in revictimization. Furthermore, it requires “relaxing the burden of proof in cases of violence or discrimination, giving priority to circumstantial evidence over direct evidence when the latter is insufficient” (Colombian Constitutional Court, 2017).

4.8 Principle of Victim-Centered Approach

According to the United Nations High Commissioner for Refugees (UNHCR)’s victim-centered approach policy, a victim-centered approach is a way of engaging with victims that “systematically focuses on their safety, rights, well-being, needs, and expressed decisions, thereby returning as much control as possible to the victim(s) and ensuring that services are provided in an empathetic and sensitive manner, with non-judgmental support” (UNHCR/HCP/2020/04).

4.9 Principle of ex officio action.

Under this principle, the Alliance for Responsible Mining will, without the need for a formal report or complaint, initiate proceedings on its own initiative in cases of sexual violence or gender-based violence of which it becomes aware through any means. This involves reflecting on the organization’s role in light of the potential impact that a failure to act could have on its ability to prevent and address any form of victimization.

4.10 Non-Discrimination

The principle of non-discrimination can be understood as a guarantee that seeks to promote equal access to the rights to which every person is entitled, based on human dignity, and to prevent exclusion on the grounds of gender, ethnicity, sexual orientation, and other factors. However, based on this same principle, it is justified to adopt affirmative actions that allow for differential treatment of those who face specific vulnerabilities and who, therefore, require the application of a special approach and/or measures.



5. DEFINITIONS

5.1 Age of Consent

The age of consent refers to the age at which a person has the mental and physical capacity to consent to a sexual relationship. Any sexual conduct by a member of the ARM with a person under the age of 18 will be considered sexual abuse, regardless of the legal age of consent established in each country.

The existence of a marriage, an engagement, ignorance of the age of the person under 18, or any consent expressed by that person may not be invoked to exclude or mitigate liability.

5.2 Gender

Gender is a form of social classification that assigns values, behaviors, spaces, roles, or functions to men and women based on their biological differences. It indicates that Western society is founded on a binary construct regarding the positions that men and women occupy in society. For this reason, it is culturally understood that values related to reason, strength, or the public sphere (work, art, the street, or politics) are masculine; conversely, the feminine is associated with values such as emotion, weakness, and the private sphere (the home).

Gender allows us to assert that, due to its social nature, it is susceptible to transformation, and that biological difference does not necessarily translate into inequality on the political, social, and economic levels. Just like ethnicity, economic status, and class, gender is a category that varies according to territorial, historical, and political contexts, thereby enabling us to identify and challenge inequalities based on sexual difference.

5.2 Gender Identity

The Inter-American Court of Human Rights outlines several guiding concepts for understanding the rights of LGBT people and has defined gender identity as “the internal and individual experience of gender as each person deeply feels it, which may or may not correspond to the sex assigned at birth, including the personal experience of the body” (IACHR, 2015).

5.3 Gender-Based Violence

Gender-based violence refers to any type of aggression against a woman or man simply because of their gender, or against a person based on their gender identity or sexual orientation. It is a form of social discipline intended to ensure that people conform to the gender assignment they were socialized to accept within a specific historical and/or cultural context.

According to the United Nations (UN), gender-based violence refers to any action that causes physical, sexual, psychological, or economic harm to a person because of their gender or for failing to conform to traditional gender roles (UN, 1993).

Likewise, the United Nations High Commissioner for Refugees includes in this category of violence “acts of sexual violence, such as rape, sexual harassment, and sexual exploitation, as well as



other forms of gender-based violence, such as female genital mutilation, forced marriage, trafficking in women and girls, domestic violence, human trafficking, and femicide” (UNHCR, 2003).

5.4 Sexual Harassment

It refers to any sexual advance that is unreciprocated or not consented to by the person toward whom it is directed. It may consist of actions such as comments, stares, sounds, and stalking of a sexual nature, which may occur in the workplace, public spaces, or on college campuses.

Bedolla and García (2002) refer to harassment as “non-reciprocal sexual actions” that include “verbal and physical behaviors involving aspects related to sexuality, which are received by someone without being welcome.”

On the other hand, the United Nations, in its bulletin on sexual harassment in the workplace, defined it as:

“any unwanted conduct of a sexual nature that could reasonably be considered offensive or humiliating to another person or be perceived as such, when such conduct interferes with work, becomes a condition of employment, or creates an intimidating, hostile, or offensive work environment” (ST/SGB/2019/8).

It adds that, while it may result from a series of actions, it is considered sexual harassment even when it takes the form of a single incident, and emphasizes the importance of taking into account the perspective of the affected person.

In this regard, some behaviors that may be considered sexual harassment include:

“Catcalls, jokes, obscene comments, or questions of a sexual nature; lewd stares or suggestive gestures; nonconsensual exposure for sexual purposes on social media or other virtual spaces; pressure to accept invitations of a sexual nature; phone calls, messages, photographs, illustrations, or videos with sexual content sent electronically or physically; summoning someone to an office or other location within the workplace under the pretext of work-related matters to engage in unwanted sexual interactions; threats or blackmail to coerce sexual interactions; offering financial, employment-related, or other rewards in exchange for sexual activities; forcing any sexual contact such as hugs, caresses, kisses, or touching, including behaviors such as groping, grabbing, or cornering, as well as psychological pressure to engage in sexual contact” (See Cano, et al., 2022, p. 757).

Sexual harassment differs from other types of violence due to three key elements: the power dynamic, the absence of consent, and the sexual connotation.

5.4.1 Power Relationship

A power relationship arises from an interaction in which one party holds a physical, occupational, cultural, academic, economic, or age-based advantage over another. For this reason, power is not limited solely to that which exists within the framework of an institutional hierarchy; rather, it can arise from taking advantage of a younger person’s emotional immaturity; from the sexual role assigned to men by gender; from cultural capital; and, finally, from the relationship of subordination established by an institution.



5.4.2 Consent

Consent refers to the level of reciprocity or mutual agreement in response to a sexual advance. To be valid, consent must be clear, explicit, and unambiguous, given in an environment free from coercion; consequently, it cannot be inferred from silence, indifference, lack of clarity, a person's sexual history, or their behavior.

5.4.3 Sexual Connotation

Sexual connotation, on the other hand, is the sexual undertone embedded in a comment, glance, or sound, which does not necessarily require an explicit sexual proposition involving reference to the genitals. Thus, these practices “are not necessarily physical and are not limited to physical contact or contact with genital organs; rather, they can also be verbal and nonverbal practices based on sex that affect a person's dignity” (Arancibia, et al., 2015, p. 15).

5.5 Workplace Harassment

According to the United Nations, “harassment is defined as any unwanted conduct that could reasonably be considered offensive or humiliating to another person or be perceived as such, when such conduct interferes with work or creates an intimidating, hostile, or offensive work environment.” It can take the form of “gestures or actions intended to annoy, alarm, hurt, degrade, intimidate, belittle, humiliate, or embarrass another person,” and may be directed at one or more people who share a common characteristic or trait” (ST/SGB/2019/8).

5.6 Sexual exploitation

According to the United Nations, sexual exploitation refers to:

“any abuse or threat of abuse committed in a situation of vulnerability, unequal power dynamics, or a relationship of trust, for sexual purposes, for the purpose of—though not limited exclusively to—deriving material, social, or political benefit from the sexual exploitation of another person” (ST/SGB/2003/13).

5.7 Sexual Abuse

Similarly, the Organization defines sexual abuse as “any physical intrusion or threat of physical intrusion of a sexual nature, whether by force, under conditions of inequality, or through coercion” (ST/SGB/2003/13).

5.8 Workplace

For the purposes of applying this protocol, conduct shall be deemed to occur in the workplace when it takes place in the course of performing duties, activities, or interactions directly related to work, arising from an employment or contractual relationship. This context includes physical, virtual, or hybrid spaces, as well as those associated with outsourcing, intermediation, civil, or commercial contracting arrangements, in which there is a functional or



material connection to work, without this implying the attribution of disciplinary, punitive, or supervisory powers outside the legal jurisdiction of the Alliance for Responsible Mining.

5.9 Context of Development Interventions

This refers to the environment in which the Alliance for Responsible Mining implements medium- and long-term projects to transform artisanal and small-scale mining into a socially and environmentally responsible activity. Unlike humanitarian emergencies, this scenario allows organizations to work alongside communities and local institutions to strengthen their capacities, create sustainable infrastructure, and transfer productive skills, thereby helping to improve the quality of life for miners and their communities.

6. OBLIGATIONS AND PROHIBITIONS

Pursuant to the zero-tolerance policy regarding exploitation, abuse, sexual harassment, and gender-based violence, the ARM Environment is governed by the following prohibitions; failure to comply with them will be considered a serious breach of contractual and employment obligations.

6.1 General Duties and Prohibitions

6.1.1. Mandatory PEAAS Training and Certificate Registration

All Project personnel, including employees, contractors, volunteers, and other individuals associated with its implementation, must complete, prior to commencing activities, the e-course on the prevention of sexual exploitation and abuse (PSEA e-course), developed by UNICEF and available on the Agora platform in Spanish: www.agora.unicef.org/course/info.php?id=18167. Completion of the course will result in the issuance of a certificate, which is mandatory and must be documented as part of the Project's training record. This requirement is set forth in Article 13.3 of the Partner Contract IMPACT-ARM-01-2026, which mandates mandatory training on the Code of Conduct and the prevention of sexual exploitation and abuse prior to the start of activities, as well as annual refresher training.

The certificate must be uploaded and stored in the Project's shared workspace on Box, in accordance with the coordination and document management procedures agreed upon between IMPACT and ARM. Annual recertification must be completed through the refresher course provided for this purpose, and the corresponding certificate must be added to the same record.

6.1.2 Prohibition on Engaging in Conduct Constituting Sexual Harassment

It is prohibited to engage in any act of persecution, harassment, or stalking of a sexual, lewd, or libidinous nature or connotation, manifested through vertical or horizontal power dynamics mediated by age, sex, gender, sexual orientation, and gender identity, or by one's professional, social, or economic status, that occurs once or multiple times against another person in the workplace.

6.1.3 Prohibition on Acts of Sexual Exploitation

Any abuse committed or threat of abuse against members of the ARM community or beneficiaries, taking advantage of a situation of vulnerability, an unequal power dynamic, or a relationship of trust, with the intent to obtain sexual favors or to take material, social, or political advantage of



situation. This prohibition applies even if there is apparent “consent” obtained by taking advantage of the victim’s need or vulnerability.

In accordance with standards regarding sexual exploitation, all staff are strictly prohibited from soliciting, accepting, or offering sexual favors in exchange for money, employment, humanitarian assistance, goods, or services provided by the organization. This conduct constitutes a serious offense that results in the immediate termination of the employment contract.

6.1.4. Prohibition on Acts of Sexual Abuse

Any physical intrusion of a sexual nature, or the threat thereof, against any person associated with the organization or its projects is absolutely prohibited. This includes conduct committed through the use of force, coercion, or by taking advantage of unequal conditions that prevent the victim from resisting or freely expressing their refusal.

In this regard, engaging in sexual conduct with beneficiaries of the organization’s programs is prohibited when such relationships are based on an inherently unequal power dynamic that vitiates consent and compromises the integrity of ARM’s humanitarian and social work.

6.2 Prohibitions Related to the Process

6.2.1 Retaliation: Engaging in any act of threat, hostility, unjustified change in working conditions, or termination of employment against victims, complainants, or witnesses of an incident of sexual harassment.

6.2.2 Censorship and revictimization: Preventing the victim from publicly speaking out about acts of sexual harassment or making comments based on gender stereotypes that cast doubt on their testimony.

6.2.3 Breach of confidentiality: Disclosing sensitive information, the identities of the parties, or details of the investigation outside the competent authorities.

6.3 GENDER AFFAIRS COMMITTEE

This is a body affiliated with the Alliance for Responsible Mining that is responsible for implementing the Guidelines to Prevent and Manage Sexual Harassment and Gender-Based Violence. It is structured as a body with equal representation (in terms of gender and ethnic identity) and consists of an odd number of members representing various areas of the organization. Its members will be led by the executive director but will have equal decision-making authority. Additionally, it will occasionally include at least one professional from the region where the incident occurred when tasked with receiving and processing a report.

6.3.1 Selection

The members of the Gender Affairs Committee are appointed by the ARM’s executive management at its discretion or based on applications submitted by individuals on their own behalf, taking into account the following eligibility criteria for selection:

- Be affiliated with the organization through an employment contract, a service contract, or a contract for specific work or tasks.



- Have certified training in gender or human rights (certificates, courses, seminars, or specializations totaling more than 20 hours of training).
- Demonstrate sensitivity to issues related to sexual violence and gender-based violence.
- Not be subject to any investigations (criminal or disciplinary) or convictions for conduct related to sexual violence. To verify this requirement, prior authorization from the individual in question will be obtained through the “Authorization for the Processing of Personal Data” form.
- Be available and have a flexible schedule.
- Have decision-making capacity.
- Not be subject to any of the grounds for disqualification or incompatibility listed in section 6.4.

The designated individuals will serve as members of the Committee for a two-year term, renewable in accordance with the organization’s capacity and the provisions of the executive leadership of ARM Europe and Latin America, who will ensure that the Committee is diverse and actively engages all the territories where the Foundation operates.

It will be composed of the executive leadership of ARM Latin America and ARM Europe, a Gender and Human Rights Specialist, the Human Resources Coordination team, and two representatives from the organization elected by the Gender Committee.

6.3.2 Functions

- To receive and process reports of sexual harassment or gender-based violence that occur within the ARM environment, without making judgments about whether the incident took place or about the innocence or guilt of the individuals involved.
- Ensure a comprehensive response to requests for assistance and/or support received either in the requester’s own name or anonymously, and through any channel provided for this purpose.
- Adopt its own bylaws based on the guidelines set forth in this document.
- Appoint a member to serve as chair of the Committee and another to fulfill the duties of a technical secretary.
- Develop and periodically implement training and prevention initiatives regarding sexual harassment or gender-based violence in the workplace.
- Coordinate with all entities within the Alliance for Responsible Mining to ensure effective handling of reports regarding the conduct described in this document.
- Meet at least once every two months and on an ad hoc basis whenever required by the cases brought to the Committee’s attention.
- Periodically assess the effectiveness of prevention and management measures for situations that may be considered gender-based violence or sexual harassment.
- Ensure that a gender perspective is incorporated into the occupational safety and health strategies implemented by the human resources department.



- Develop and implement a data collection tool that allows for the characterization of the organization's members in terms of ethnicity, gender, age, and sexual orientation.
- Consult experts when the matter falls outside the expertise of the Committee members.

6.3.3 Duties

- Safeguard the information necessary to fulfill the Committee's objective, particularly sensitive data pertaining to the identification of victims, alleged perpetrators, incidents, and contact information. To this end, a filing procedure will be established to facilitate the fulfillment of this duty.
- Maintain confidentiality and legal discretion regarding information obtained in their capacity as members of the Gender Affairs Committee.
- Declare a conflict of interest whenever a case of sexual harassment or GBV is being processed within the Committee in which they may have a vested interest or may be personally affected.

6.3.4 Grounds for Disqualification and Incompatibility.

Grounds for incompatibility are situations or characteristics of a professional that affect their impartiality at a given time when they are required to review and process a case of GBV or sexual harassment; this will prevent them from participating on an ad hoc basis in the Gender Affairs Committee if they are involved in any such situation. Disqualifications, on the other hand, are those circumstances that prevent a professional from serving on the Gender Affairs Committee on a permanent basis.

The following are considered disqualifications:

- Having a criminal conviction or being under criminal or disciplinary investigation for conduct related to sexual or gender-based violence.
- Lack of experience or certified training in gender or human rights.

Incompatibilities include:

- Having personal or financial interests in the case under consideration that could affect their impartiality or independence in decision-making.
- Having been identified as an alleged perpetrator of conduct that may constitute sexual violence or gender-based violence.

7 RESPONSE PROCEDURE

The response protocol consists of the procedure that guides the actions of the organization and its members in the event of an incident of sexual harassment or gender-based violence within the ARM environment.

7.1 Reporting the Incident



Whether in their own name or anonymously, the affected person or anyone with knowledge of the incident may report any incident of sexual harassment or gender-based violence that occurred while performing contractual duties with ARM to the Gender Affairs Committee through the following channels:

- Email 123arm@responsiblemines.org
- From anonymous anonymously to via the form <https://forms.office.com/pages/responsepage.aspx?id=EEwE0kL2-0yqgKPFzuqbv46fvCZJV15Gkwy130luZUxUNIjLVEQ5TENSTVE4UE45OUQ3QlpPMkZBNy4u&route=shorturl>

The ARM Gender Affairs Committee will also process cases that come to its attention through public complaints or other informal means. Furthermore, the report will be processed based on mere indications; therefore, it need not be accompanied by evidence, nor must it comply with additional formalities that could be considered excessive bureaucracy.

When the person accused is a superior within the organization, the complaint must be filed with the labor inspectorate, which will be responsible for following up on the complaint; if it finds merit, it will forward copies to the competent authority.

7.1.1 Reporting on One's Own Behalf via Digital Channels

If the case is received in the reporter's own name via email or cell phone, the Gender Affairs Committee will contact the reporter within 72 business hours and interview both parties separately. Based on this, the Committee will take the measures defined in this document, in accordance with the specific circumstances of each case. If it is determined that the reported case constitutes a form of workplace harassment or another type of violence that falls outside the scope of these guidelines, it will be referred to the Well-being and Dialogue Committee or the appropriate department via email.

The Committee will designate one or two of its own members—professionals with training in psychology or related fields—to conduct the initial interview, ensuring that gender, human rights, and intersectional perspectives are incorporated, as well as the principles and rights set forth in this document.

7.1.2 In-person report filed in one's own name

If the case is reported in person at the Human Resources office, the staff member acting as the first responder will be responsible for implementing the support measures outlined in the following sections; however, if they do not have sufficient resources or technical capacity, they will schedule an appointment for an initial interview—after explaining the process offered by the Committee and these guidelines—within 72 business hours.

7.1.3 Anonymous Alert or Report

If the case is received anonymously, it will be processed as an alert. The Committee will contact the affected person to assess their intention to seek assistance and to verify the details in the



report without revealing the existence of the anonymous report. If the affected person expresses interest, the Committee will activate the established process; however, if the person identified as affected does not identify themselves as such, the Committee will proceed with a group educational intervention only, or any other prevention strategy.

In all cases, crisis support and psychological first aid will be provided; the relevant occupational risk management agency (ARL) will be notified; transportation of the affected person to the nearest health center will be arranged; and any other measures aimed at immediately restoring the emotional well-being of the person filing the report will be implemented.

7.2 Psychological Counseling

The Gender Affairs Committee, through the Human Resources Department, will provide the victim and the person accused of sexual harassment or GBV with basic mental health counseling and will determine whether to activate external referral pathways to obtain clinical psychology therapy sessions.

In cases of emotional crisis, the ARM, through the Gender Committee, will assign a professional to provide immediate support and determine whether it is appropriate to transport the individual to the nearest health center.

In all cases, guidance will be provided on the mental health services offered by local authorities for such situations.

7.3 Legal Guidance

The Gender Affairs Committee, drawing on the organization's available resources, will provide initial legal guidance to both complainants and individuals identified as alleged perpetrators, informing them of their rights, the process the ARM follows in response to the report, and the resources offered by local authorities in the areas of health, justice, and protection.

This guidance will be provided by a female attorney who is a member of the Gender Affairs Committee or who is hired by the ARM specifically for this purpose; she will work in conjunction with a psychosocial professional.

7.4 Case Documentation

The ARM will maintain a system for documenting cases of sexual harassment or GBV, in which it will record reports received using variables that characterize the complainants and the alleged perpetrators, and will log all actions taken by the organization to process the case.

In addition, it will have three forms: an interview form, a confidentiality form, and an informed consent form, which will be managed exclusively by the Gender Affairs Committee to fulfill the purpose of these guidelines.

7.5 Advice and Support in Activating External Channels



The Gender Affairs Committee, acting in a supportive capacity and with the prior authorization of the affected person, will activate the external channels provided for by the relevant local regulations.

In Colombia, the following mechanisms may be used:

- National Hotline 155 (counseling for women who are victims of violence).
- Hotline 141 of the Colombian Institute of Family Welfare (in cases of victimization of children and adolescents)

For Medellín, Colombia:

- Victim Assistance Center of the Attorney General's Office at 604 4446677, ext. 3151.
- Comprehensive Assistance Center for Victims of Sexual Abuse, at 604 3852600.
- Line 123, Social Services Agency of the Medellín Mayor's Office.
- Line 123 (General Inquiries) of the Medellín Mayor's Office.
- Child Protection Unit (phone: 604 3855555 ext. 9250; address: CR 72B # 78B-54).
- Toll-free hotlines of the Attorney General's Office to file complaints: 122 from a cell phone and 018000919748 from a landline; via the "A Denunciar" platform; or via email: mesacontrol.usuariosmed@fiscalia.gov.co and denunciaanonima@fiscalia.gov.co.
- Antioquia Regional Office of the Ombudsman for free legal representation (phone: 604 5114381 ext. 114; address: CR 49 # 49-24; email: antioquia@defensoria.gov.co).

For the Llanada region of Nariño, the following resources are available:

- Family Police Station, for handling cases of domestic violence, via phone at 3168824350 or email comisariaflia@lallanada-narino.gov.co
- Police Inspectorate, for direct assistance with cases of elder abuse, by phone at 3216441947, email: inspeccionpolicia@lallanada-narino.gov.co
- Local Health Department, for direct assistance with cases of abuse involving minors and adults. Phone: 3225339299; 3214784062, email: saludpublicallanada@lallanada-narino.gov.co
- E.S.E. San Juan Bosco, for direct assistance at the health center's facilities. Emergency phone: 3128268240; psychological assistance phone: 3106722406.
- National Police, for in-person assistance in cases requiring emergency help. Phone: 3136978018

For Santa Rosa del Sur, Bolívar, the following are available:

- Municipal Mayor's Office, phone: 3183727475; email: comisariaflia@santarosadelsur-bolivar.gov.co
- Office of the Attorney General and the Judicial and Criminal Investigation Division (SIJIN). Attorney General's Office phone numbers: 3505081913; 018000919748; SIJIN phone number: 3164675531.

For Guapi, Cauca, the following resources are available:



- Municipal Ombudsman's Office, for legal and psychosocial support. Phone: 3229138883.
- Office of the Ombudsman, to receive and refer complaints. Phone: 3147009929.
- E.S.E. Guapi, to receive and refer cases. Phone: 3122145110

For Popayán, Cauca, the following are available:

- Departmental Secretariat for Women, to provide opportunities to strengthen defense mechanisms against gender-based violence. Address: Calle 4, corner of Carrera 7 – 602 8220928.

For Timbiquí, Cauca:

- Department of Health, to receive reports and make referrals. Phone: 3234759076
- E.S.E. de Occidente, for victim assistance. Phone: 3114947190
- Office of the Attorney General, to receive reports. Phone: 602-840-3089
- National Police, to receive reports. Phone: 3218103784

For Buenos Aires, Cauca, the following is available:

- Gender Liaison Office, to report gender-based violence. Phone: 3206335443

For Suarez, Cauca:

- Gender Liaison Office, to report cases of gender-based violence. Phone: 3126742937.

In Suriname, the following mechanisms are available:

- Suriname Police Helpline at +597 115.
- Counseling and Support Center for Victims of Violence at +597 477 777.
- National Institute for Women in Suriname, at +597 477 815
- International Organization for Migration (IOM) in Suriname, at +597 401 336
- Suriname Police Sexual Crimes Unit at +597 404 022, ext. 240
- Department of Labor Affairs of the Ministry of Social Affairs, responsible for receiving and processing complaints related to sexual harassment in the workplace, via email atinfo@arbeidssz.sr or by phone at +597 473634.
- The Counseling and Support Center for Victims of Violence, which offers counseling and support to victims of sexual violence, can be reached by phone at +597 477 777 or by email at cavs@sr.net.



There are also several nongovernmental organizations in Suriname that provide support to victims of sexual violence. Some of these organizations are:

- Stichting Lobi: info@lobi.sr
- Bureau voor Rechtshulp: info@bureauvoorrechtshulp.com
- Kariña: info@karinasuriname.org
- Women's Rights Center: womensrightscentre@sr.net

In Honduras, the following resources are available:

- The General Directorate of Labor Inspection, the agency responsible for receiving and handling labor complaints, including sexual harassment, via phone at 2232-1042 or by email atinspeccion@dol.gob.hn.
- The Special Prosecutor's Office for Women, responsible for investigating cases of gender-based violence, can be reached by phone at 2231-3120.
- The Secretariat for Human Rights, Justice, the Interior, and Decentralization, a government agency that provides information and guidance on how to report sexual harassment in the workplace and other types of gender-based violence, by calling 2231-7864 or visiting its website.
- The National Institute for Women, by calling 2232-1093.

In Burkina Faso, you can contact the following:

- The Gendarmerie, via the 16 hotline.
- The National Police, via the 17 hotline,
- the Service for Women, Solidarity, and the Family, by calling 116, which is responsible for the prevention, prosecution, and redress of violence against women and girls, as well as victim assistance

For Ouagadougou, Burkina Faso, the following is available:

- Regional Child Protection Brigade (BRPEC), via the number 70 09 74 48.
- National Monitoring and Alert Center, via the number 1010.
- The Boulmiougou Solidarity Shelter, at 71 93 92 20.
- Nogr Masom Solidarity Shelter, at 70 55 70 15.
- The Somgandé Emergency Shelter, by calling 78 05 50 32.
- The emergency reception center located within the Provincial Directorate in Patte d'Oie, by calling 70 24 92 52.
- Center for Victims of Gender-Based Violence, by calling 70 10 46 12; 70 73 90 93; 79 35 18 86.
- Association of Women Lawyers of Burkina Faso, at 25 40 16 16; 25 36 15 56.
- Keogo Association, at 25 38 54 40.
- Voz Femenina 70 29 22 33, at
- Cardinal Emile BIAYENTA Foundation, at 70 73 76 22; 70 72 60 22.



- Tierra de hombres, at 25 36 91 82.

In Peru, the following organizations are available:

- Ministry of Labor and Employment Promotion (MTPE), by phone at 0800-16872 or by email: consultas@trabajo.gob.pe
- Ministry of Women and Vulnerable Populations (MIMP), via the toll-free hotline for victims of violence at 100, or by email at consultas@MIMP.gob.pe
- Ombudsman's Office, by phone at (01) 999-793-837 (WhatsApp), or by email: consultas@defensoria.gob.pe
- Ministry Public Prosecutor's Office, via via by phone (01) 417-7100, or email email: webmaster@mpfn.gob.pe

Crime Victim Assistance Centers (CAVD), by phone at 0800-007-02 or by email: cavd@minjus.gob.pe

7.6 Case Follow-up

The Gender Affairs Committee will keep a record of the cases received and establish a mechanism to monitor and assess the effectiveness of the measures taken on a case-by-case basis, as well as evaluate the overall effectiveness of the prevention strategies implemented.

In addition, the same body will follow up on external referrals coordinated with local authorities to verify the effectiveness of the services provided.

8. PROTECTIVE MEASURES

Protective measures are urgent actions adopted on a provisional basis while the rights allegedly violated are being restored and a final decision is reached in administrative, disciplinary, or criminal proceedings. They seek to prevent further harm or a recurrence of the events. These measures must be implemented within no more than five (5) business days following the victim's request.

In this regard, the ARM will adopt the following measures or any other measures deemed appropriate in each case, based on Law 2365 of 2024, as well as the principles and approaches outlined above:

8.1 No confrontation between the alleged victim and the alleged perpetrator

Efforts will be made to adopt the appropriate measures to ensure that there is no confrontation between the person identified as the victim and the alleged perpetrator, in accordance with the principles of due process, due diligence, and the principle of victim-centeredness. To this end, at the request of the victim, the following priority actions will be taken:

- Physical or functional relocation of the workplace.
- Authorization to work remotely if there are conditions that pose a risk to the victim.
- Modification of shifts or duties to avoid any contact with the person under investigation.
- The employee or contractor may expressly terminate the employment contract without incurring a penalty for failure to provide advance notice.



These measures are not exhaustive; therefore, any other measures deemed appropriate by the Gender Affairs Committee to safeguard this right will be adopted.

8.2 Enhanced Job Security and Prohibition of Retaliation

Unilateral termination of the employment contract or service agreement of a victim of sexual harassment who has reported the incident, as a form of retaliation, is prohibited. This protection extends to third parties who serve as witnesses. To this end, the following measures will be adopted:

- Any unilateral termination of the contract within six (6) months of the complaint shall be null and void if it constitutes an act of retaliation for filing the complaint.
- If the dismissal occurs after six months, the burden of proof shall be on the organization to demonstrate that the dismissal was not caused by the complaint.

8.3 Preponderance of Circumstantial Evidence

For the receipt of a report of sexual harassment or gender-based violence, the testimony of the person filing the report and/or accompanying circumstantial evidence shall suffice. A formal complaint, documentary evidence, or a court ruling substantiating the occurrence of the events described shall not be required. Vertical or horizontal power dynamics and the victim's vulnerability due to gender, age, sexual orientation, or economic status shall be taken into account.

9 PREVENTION MEASURES

The Gender Affairs Committee will develop a prevention strategy that brings together the communications department, the standards and quality assurance department, the professional responsible for gender and human rights, and the project coordinators.

This strategy will address issues related to gender, non-hegemonic masculinities, sexual and reproductive health, economic autonomy, the care economy, and other topics through formats such as discussion groups, courses, seed groups, awareness-raising sessions, workshops, periodic newsletters, film forums, videos, e-cards, book clubs, infographics, and webinars.

It will focus on challenging common assumptions regarding traditional relationships between men and women in the workplace, as well as fostering a positive, non-discriminatory organizational culture that promotes gender equity; this may include promoting values and practices that support new relationships based on equality and challenge the beliefs or practices that underpin sexual harassment and gender-based violence (GBV).

It will coordinate with the ARLs to ensure that victims receive immediate emotional and psychological support.

Following an alleged incident of harassment, an educational campaign will be immediately launched to transform the workplace environment toward equality.



ARM will publish, on a semi-annual basis, the number of complaints processed and sanctions imposed (in anonymized form) and will report this information to the Integrated Information System on Gender-Based Violence (SIVIGE) in accordance with the provisions of Law 2365 of 2026 and its Cross-Cutting Plan for the Elimination of Sexual Harassment.

10 ADMINISTRATIVE MEASURES

Administrative measures are the organizational standards that ensure compliance with the obligations set forth in these guidelines.

In this regard, to ensure compliance with the provisions regarding sexual harassment and gender-based violence, the following measures will be applied:

- If sexual harassment or GBV is proven to have occurred, the provisions of Section 11 of the ARM Code of Conduct shall apply.
- A contractual clause will be included in all contracts prohibiting any conduct related to harassment, exploitation, sexual abuse, and any other conduct that may constitute a form of gender-based violence.
- A section will be included in the Code of Ethics stating that conduct related to harassment, exploitation, sexual abuse, and gender-based violence will not be tolerated.
- A background check system will be implemented as part of the hiring process to determine whether a person is involved in legal proceedings related to a sexual offense or is under disciplinary investigation for any of these behaviors. To this end, the ARM's "background check" resource will be utilized.

11 Glossary

ARM: Alliance for Responsible Mining.

Response: Refers to the set of measures and decisions adopted to ensure the fulfillment of the duties of protection, assistance, and prevention of sexual harassment and gender-based violence as outlined in these guidelines.

Counseling: Guidance detailing the legal or psychosocial resources available to a person who identifies as a victim of any type of sexual violence or gender-based violence described in this document.

Support: This refers to a set of measures that the organization implements to guarantee the rights of victims and individuals accused of the behaviors listed in this document. These actions may involve activating pathways related to health, justice, and protection, or securing other services to assist individuals seeking to have their rights restored.

Report: the act of bringing to the attention of law enforcement authorities facts that may constitute a crime as defined by local law.



Complainant/Reporter: This document uses both terms to refer to individuals who report incidents that may constitute sexual harassment or gender-based violence.

ARM Community: Refers to the people who make up the Alliance for Responsible Mining, namely employees, contractors, beneficiaries, and volunteers.

Report: This is the means by which an incident that may be considered sexual harassment or gender-based violence is brought to the organization's attention.

This can be done through the channels outlined in the "Response Process" section, and may be made by the direct victim or by anyone with knowledge of the case.

GBV: Gender-based violence.

Victim: This term refers to individuals who report a case in which they claim to have been affected, even if there is no judicial or administrative ruling recognizing that the events occurred.

APPENDICES

Victims' Rights. Informed Consent.

Confidentiality Agreement. Initial

Interview with the Reporter.

Interview Form for the Identified

Individual. Interview Reception

Guide.

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