



SEXUAL HARASSMENT FREE WORKPLACE POLICY

GIZ Laos

We want to maintain a workplace where everyone is free
from any form of sexual harassment

March 2026

This policy was adopted by the Management Team Laos on 12 March 2025.
1st adaptation: In March 2026 to include the compliance focal points of GIZ Laos as official contact persons.

Table of Contents

I. OBJECTIVE AND COVERAGE OF THIS POLICY 2

II. DEFINITION AND FORMS OF SEXUAL HARASSMENT..... 2

III. POLICY IMPLEMENTATION PROCEDURE 2

IV. DISCIPLINARY AND SANCTION 3

V. PROTECTIVE & REMEDIAL ACTION 3

VI. CONTACT PERSONS 4

VII. FINAL PROVISION 4

Annex 1: Grievance mechanism..... 5

Annex 2: Relevant national laws..... 7

I. OBJECTIVE AND COVERAGE OF THIS POLICY

This Policy aims to serve as an instrument to raise our collective awareness to prevent sexual harassment in all its forms at the workplace. It complements the company-wide [GIZ policy banning sexual harassment at the workplace](#) at country level. For that purpose, this Policy outlines steps and procedures for raising awareness amongst GIZ staff, if any case occurs, how to file a complaint, and how GIZ management would issue disciplinary measures. The grievance mechanisms include partners and beneficiaries who want to file a complaint against a GIZ employee.

This Policy covers the entire operation of GIZ Laos, where employees, consultants, as well as partner organizations/institutions, clients and beneficiaries are engaged.

II. DEFINITION AND FORMS OF SEXUAL HARASSMENT

‘Sexual harassment’ is defined as any behaviour of a sexual nature that affects the dignity of any person regardless of their gender which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient, and that creates an intimidating, hostile, unstable or offensive work environment. Sexual harassment in the workplace can be physical, verbal or non-verbal (visual) and include:

(a) **Physical forms** of sexual harassment such as any unwanted contact that ranging from intentionally touching, caressing, pinching, hugging or kissing to sexual assault or rape.

(b) **Verbal forms** of sexual harassment include socially and culturally inappropriate and unwelcome comments with sexual undertones such as sexually suggestive jokes or comments about a person’s dress or body made in their presence or directed towards them. They also include persistent proposals and unwelcome requests or persistent personal invitations to go out.

(c) **Non-verbal** (visual) forms of sexual harassment include unwelcome gestures, suggestive body language, improper exposure, lustful looks, repeated winks and gestures with fingers. It also includes the unwelcome display of pornographic materials, sexually explicit pictures and objects, screen savers or posters as well as sexually explicit emails, notes or SMS messages.

III. POLICY IMPLEMENTATION PROCEDURE

a. AWARENESS-RAISING FOR PREVENTION OF SEXUAL HARASSMENT

Prevention is key for successful implementation of the Policy. As a first step of implementing this Policy a series of awareness-raising sessions about workplace sexual harassment is carried out. The participation in this workshop series is mandatory for all staff. Afterwards the workshops will be continuously held as part of the induction of new staff to ensure participation and that all GIZ staff members are aware of the Policy and the importance of preventing workplace sexual harassment.

Through collective efforts by the management and project teams free time capacities are enabled for each staff member to attend the workshop.

b. PROCEDURE TO FILE A COMPLAINT - GRIEVANCE PROCEDURE

Any staff member of GIZ is encouraged to speak about unwelcome or unwanted behaviour at their workplace without tolerating such acts. In case of an incident of

sexual harassment at the workplace, the victim can report the incident to a below mentioned contact person and file an official complaint. Any complaint will be responded to in timely manner (according to P+R 554 within 7 days) with strict confidentiality. By making a complaint, the complainant cannot be sanctioned or penalized.

GIZ responsibility is to investigate all sexual harassment complaints impartially, seriously, thoroughly, and promptly. All reports are carefully evaluated and handled confidentially. If an investigation confirms that a violation of the Policy has occurred, GIZ will take corrective action, including disciplinary measures, up to and including immediate termination of employment in accordance with the applicable GIZ internal regulations and the applicable law (see annex 2). Contact persons for any complaint are listed at the bottom of this Policy. A complaint can be made to raise a sexual harassment incident for the complainant to receive support, engage in dialogue for conflict resolution, or start a formal procedure to investigate the complaint. Formal, informal and anonymous options to report an incident of SH at the workplace are described in annex 1 of this policy.

IV. DISCIPLINARY AND SANCTION

The staff who has been found guilty to have breached this Policy will be subjected to appropriate disciplinary action in accordance with the applicable GIZ internal regulations and the applicable law.

Depending on the severity of the case, consequences can range from an apology to the victim, written reprimand, transfer to another post, demotion, and in the event of severe or pervasive harassment (as judged from the perspective of a reasonable person), dismissal or unilateral termination of contract without notice in accordance with the applicable law. Immediate disciplinary action will be taken against anyone who victimizes or retaliates against a person who has complained of harassment.

If a complaint against non-staff members, including customers, suppliers and partners, is rightfully upheld, it could result in termination of a contract, suspension of service or business cooperation. Any sort of false complaint of harassment or providing false information regarding the complaint of harassment is considered as a violation of this Policy.

V. PROTECTIVE & REMEDIAL ACTION

Retaliation is a matter of serious concern, particularly in cases where the alleged harasser is of superior rank. The trust person (see VI contact persons) should take the following action and support measures:

- 1) Guarantee confidentiality during the investigation.
- 2) Initiate restoration of the victim in cases where a demotion, a denial of a promotion, wrongful dismissal or termination of employment, or monetary loss, arising out of a denial of employment-related benefits would not have occurred had the sexual harassment not taken place.
- 3) Request an apology from the harasser, if requested by the complainant.
- 4) Initiate restoration of sick or annual leave taken because of the harassment.
- 5) Initiate removal of negative evaluations from the personnel file of the harassment victim that arose from the harassment.
- 6) Initiate reinstating the victim's employment contract if it was wrongfully terminated.

- 7) Review treatment and employment decisions affecting the complainant and witnesses to ensure that such treatment or decisions are not retaliatory in nature.

VI. CONTACT PERSONS

Persons affected are free to choose who to turn to for support.

At GIZ Laos, the person affected is suggested to contact one of the following:

<p>Compliance Focal Points of GIZ Laos. Contacts can be found here Compliance Focal Points</p>
<p>Gender focal point on country level. Contacts can be found here Gender focal points</p>
<p>Stop-it Part of the unit 'Governance, Risk, Compliance' (GRC) Counselling and formal complaints IDA: Stop-it: Discrimination, sexual misconduct and work harassment (bullying) Email: stop-it@giz.de</p>
<p>COPE GIZ's psychosocial counselling unit Counselling and personal emergencies IDA: COPE – Advice and personal emergencies Email: cope@giz.de T: +49 619 679 2222 (during business hours) T: +49 619 679 7977 (emergency number after business hours)</p>
<p>Confidential reporting of information Anonymous reporting system www.giz.de/tell-us</p>

VII. FINAL PROVISION

This Policy will be reviewed every three years from the date of enforcement. The Policy may need to be reviewed more frequently if there is a major concern regarding its implementation and compliance.

Annex 1: Grievance mechanism

The victim as well as bystanders are advised to write down their experience to later on remember what had happened.

If an incident occurs, a first step would be talking to a person of trust (friend, family, colleagues, supervisor, gender focal point, stop-it, COPE) and consider the following four options. There is no order which option should be perceived first. This depends on the victim and the severity of the incident. There is always the option to file a formal complaint or an anonymous report from the beginning.

Option 1: Self-help

In case the victim would like to deal with a situation themselves, s/he can get advice from a support or counselling person (e.g. stop-it or COPE, see contacts in chapter VI) for the best strategy on how to tell the harasser to stop the inappropriate behaviour.

Option 2: Informal solution

A support person speaks to the alleged harasser on behalf of the victim. In addition, or as an alternative a mediation between the victim and the harasser together with a counsellor can be helpful, e.g. when the victim wants to talk to the harasser but not alone, or in case the harasser doesn't understand that their behaviour is sexual harassment.

If any of the Option 1 or 2 two is successful, the process ends. If the self-help or informal solution is not successful, all options including formal solution and anonymous should be considered again.

Option 3: Formal solution

A formal complaint against GIZ staff needs to be submitted to the 'Governance, Risk, Compliance' (GRC) unit at head quarter via the stop-it email address. COPE can support you in filing a complaint with the 'Governance, Risk, Compliance' (GRC) unit as well. An investigation process is carried out with hearing both parties and assessment of evidence. Detailed steps of the investigation are described in the [case management process](#) of the GRC unit. If the complaint is substantiated sanctions will follow.

Depending on the severity of the case sanctions can vary from a warning, to a written reprimand, disciplinary transfer and dismissal.

For formal complaints against partners or stakeholders the grievance mechanism of the respective partner or stakeholder system applies. Nonetheless, it is recommended to all GIZ employees to contact stop-it or COPE for counselling first, in order to discuss options and safety of the victim.

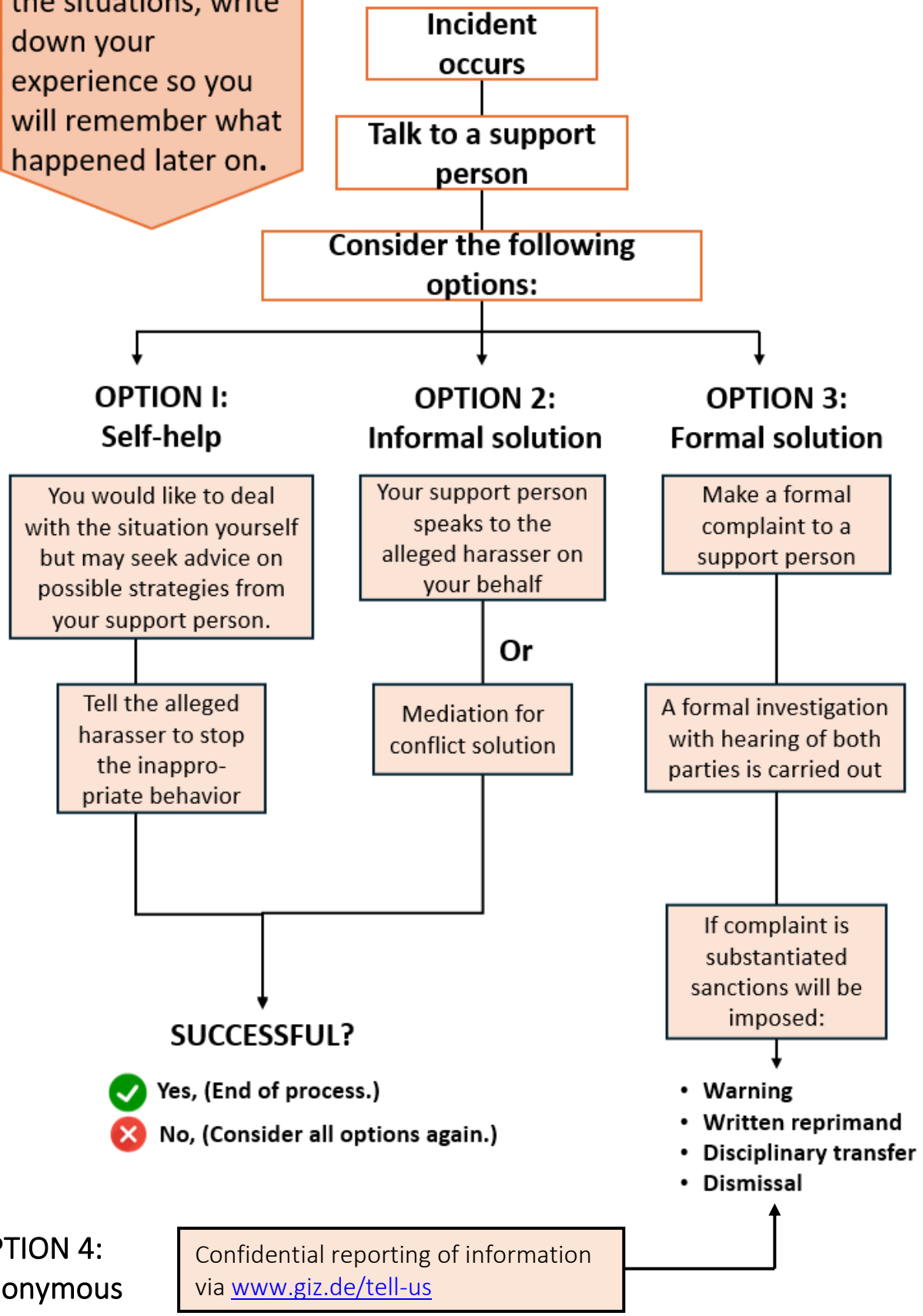
Option 4: Anonymous

Any violation of GIZ's Code of Ethics and rules as well as applicable laws, including incidents of SH can be reported via the webpage <http://www.giz.de/tell-us>.

For a report to be processed, it must be related to the work of GIZ. This portal is accessible for victims, witnesses, GIZ staff, partners, stakeholders, and beneficiaries. Within its abilities, GIZ ensures that there are no negative consequences for any whistleblower who submits a substantiated report.

All reports are carefully evaluated and handled confidentially.

Our advice: in any of the situations, write down your experience so you will remember what happened later on.



Annex 2: Relevant national laws

The following Lao national laws are related to sexual harassment at the workplace. GIZ does not assume responsibility for the completeness of the overview, the interpretation of the laws and their enforcement in Laos.

Constitution of the Lao PDR (2015):

- Article 35: Lao citizens are all equal before the law irrespective of their gender [...],
- Article 37: Citizens of both genders enjoy equal rights in the political, economic, cultural and social fields and in family affairs.

Penal Code (2017):

- Article 259 Outrage to Decency:

Any person engaging in any act that causes embarrassment of a sexual nature to another person against such other person's will shall be punished from three months to two years of imprisonment or re-education without deprivation of liberty and shall be fined from 3.000.000 kip to 10.000.000 kip.

Law on Preventing and Combatting Violence against Women and Children (2014):

- Article 11: Violence against women and children [...] is any act, negligence or neglect by individuals, [...] including authorities and staff members that results in physical, psychological, sexual, property or economic harm or suffering to women and children in the community setting, public setting, workplaces, educational setting, alternative care setting and other places.

Lao Law on Gender Equality (2019):

- Article 13: Equal rights for women and men means [...] women and men have the same value and opportunities in politics, the economy, society and culture [...];
- Article 15: [...] Women have the rights to choose their professions, to be employed, to be remunerated and to receive other benefits from their work. [...] Women who have the same position, task, work, and responsibility as men shall have the right to remuneration and benefits on an equal basis with men.
- Article 19: Women have rights and interests in the context of employment, such as [the rights] to work in safe conditions and environments [...].

Lao Labor Law (2013):

- Article 83: The employee has the right to request cancellation of an employment contract and receive compensation in the following cases: [...] In the event there is any molestation, harassment, or sexual harassment on the part of the employer, or the employer ignores the occurrence of such actions.
- Article 86: The employer has the right to cancel the employment contract without paying compensation [...] in cases where the employee has committed any of the following faults: [...] Violating the rights of other employees, especially women, and has received a warning already
- Article 141: The employer is prohibited from the following actions: [...] Violating the personal rights of employees, especially female employees, through speech, sight, text, touch or touching inappropriate areas

