



Bankable Frontier Associates LLC

(BFA Global)

Safeguarding Policy

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Policy statement

Bankable Frontier Associates, LLC dba BFA Global is committed to ensuring the safety, security, and well-being of all individuals directly or indirectly involved with our operations. We maintain a zero-tolerance policy towards all forms of abuse or exploitation. This policy underpins our commitment to act ethically and with integrity in all our relationships and to implement and enforce effective systems to safeguard against any harm that may arise from the actions or omissions of any person associated with us.

Purpose

This safeguarding policy outlines BFA Global's commitments to prevent, address, and respond adequately to safeguarding issues involving employees, contractors or vendors, and associated third parties. It aims to promote a culture where safeguarding is prioritized, ensuring a safe and secure environment for everyone associated with BFA Global.

Scope

This policy applies to all employees, contractors or vendors, and other third parties associated with BFA Global operations worldwide and to all organizational activities.

1. Definitions and standards

BFA Global is committed to the highest ethical and legal standards against exploitation and abuse. BFA Global's standards are in line with the requirements set out under U.S. Federal Law, including in the Fair Labor Standards Act of 1938, 29 U.S.C. §203, and their implementing regulations, and the state laws of the Commonwealth of Massachusetts, where BFA Global is incorporated, including in particular the Massachusetts Fair Employment Practices Act, M.G.L. ch. 151B and Massachusetts Child Labor Law, codified at M.G.L. Ch. 149, §§56-105. This policy also takes into consideration the laws of Kenya where BFA Global has a subsidiary including the Children Act, of 2001, and the Sexual Offences Act, of 2006. The following definitions shall apply:

- 1.1. **Vulnerable individual:** A vulnerable individual is someone who may require care, support, or protection due to factors such as age, disability, or exposure to risk of abuse, neglect, or exploitation. Vulnerability can also stem from personal circumstances, including but not limited to, economic hardship, mental health issues, and environmental factors such as living in conflict zones or areas of high crime. Vulnerable individuals may have reduced capacities to protect themselves from harm or to fully understand or resist abuse. Examples of vulnerable individuals include children (anyone under the age of 18), specially-abled persons, and the elderly.
- 1.2. **Safeguarding:** Safeguarding involves taking proactive and reactive measures to protect individuals from harm, abuse, exploitation, and neglect. It encompasses the creation of safe environments, the establishment of preventive practices, and the implementation of appropriate responses to incidents of harm and abuse. Safeguarding ensures that individuals, especially vulnerable individuals, are provided with support and protection to participate in any service, activity, or opportunity without the risk of harm. It also involves educating and training staff and stakeholders on the recognition, prevention, and reporting of harm or abuse, as well as ensuring that all legal and ethical obligations to report and address such issues are met.

BFA Global personnel and associated third parties must not engage in any prohibited behavior including, but not limited to the following:

- a) **Exploitation:** BFA Global prohibits any form of exploitation of **vulnerable individuals** including **children** and the **elderly, or any other individuals**. Exploitation occurs when someone takes unfair advantage of another's vulnerability for personal gain, profit, or entertainment. This includes, but is not limited to:
 - i) Manipulating or deceiving individuals into performing laborious, dangerous, or demeaning tasks;
 - ii) Sexually exploiting individuals through coercion or manipulation;
 - iii) Misusing power to deprive someone of his or her rights, such as forcing them into human trafficking, forced labor, or modern slavery; and
 - iv) Any other commercially exploitative activities such as:
 - Child labor; and
 - Exchanging money, employment, goods, or services for any sexual activity,

including prostitution

- b) **Physical abuse:** BFA Global prohibits any form of physical abuse of **vulnerable individuals** including **children** and the **elderly, or any other individuals**. Physical abuse involves intentionally inflicting physical harm upon an individual. This can include hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate physical sanctions. It may also involve the fabrication of symptoms or deliberately inducing illness in someone.
- c) **Sexual abuse:** BFA Global prohibits any form of sexual abuse of **vulnerable individuals** including **children** and the **elderly, or any other individuals**. Sexual abuse is any act that forces or entices someone to participate in unwanted, unsafe, or degrading sexual activity including for payment. It includes but is not limited to, rape, molestation, sexual assault, forced involvement in pornography, and the sexual exploitation of anyone including vulnerable individuals. Sexual abuse can occur in any setting and is characterized by the exploitation of vulnerability or power imbalance. Specifically, this includes manipulating someone for sexual favors in exchange for salary increases, promotions, or other benefits.
- d) **Psychological abuse:** BFA Global prohibits any form of psychological abuse of **vulnerable individuals** including **children** and the **elderly, or any other individuals**. Also known as emotional abuse, this involves the infliction of anguish, pain, or distress through verbal or non-verbal acts. Examples include intimidation, coercion, ridicule, harassment, treating an individual in a demeaning manner, isolating an individual from the community, family, or friends, or denying access to information or assistance.

In addition, BFA Global employees and associated personnel are obliged to:

- a) Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- b) Report any concerns or suspicions regarding safeguarding violations in accordance with the reporting and whistleblowing guidelines below.

2. Preventive measures against exploitation or abuse

- 2.1. **Commitment from senior leadership** - BFA Global's leadership team pledges to supervise the zero-tolerance policy towards exploitation or abuse.
- 2.2. **Screening of parties before engagement** - BFA Global shall implement a risk-based approach to screening employees, clients, contractors, vendors, and other relevant stakeholders prior to any engagement. A third-party service provider will be used to conduct employee screening and [Namescan](#) will be used to screen contractors or vendors, subgrantees, and clients. The screening will be done as per the below guidelines:

Category	Monetary threshold	Screening criteria	Engagement conditions
Employees	None	<ul style="list-style-type: none"> - Academic background verification - Criminal checks - Credit checks - Reference checks - Employment checks 	Only candidates who pass all checks will be engaged

Category	Monetary threshold	Screening criteria	Engagement conditions
contractors or vendors	USD 10,000 or KES 1,000,000 and above	- Sanctions, adverse media, and political exposure screening of: (a) Company or individual (b) Directors (c) Shareholders with 25% ownership and above (d) Ultimate beneficial owners	-No engagement with parties subject to sanctions -The CEO may review and decide whether to engage a party with adverse media or political exposure if the risk is low or can be sufficiently mitigated
Subgrantees	USD 10,000 or KES 1,000,000 and above	- Sanctions, adverse media, and political exposure screening of: (a) Company or individual (b) Directors (c) Shareholders with 25% ownership and above (d) Ultimate beneficial owners	-No engagement with parties subject to sanctions -The CEO may review and decide whether to engage a party with adverse media or political exposure if the risk is low or can be sufficiently mitigated -No engagement with parties with unresolved safeguarding incidents, unless they can show that resolution is in progress at the right pace
Clients	None	- Sanctions, adverse media, and political exposure screening of: (a) Company or individual (b) Directors (c) Shareholders with 25% ownership and above (d) Ultimate beneficial owners	-No engagement with parties subject to sanctions -CEO may review and decide whether to engage a party with adverse media or political exposure if the risk is low or can be sufficiently -No engagement with parties with unresolved safeguarding incidents, unless they can show that resolution is in progress at the right pace

- 2.3. Onboarding downstream entities including customers and subgrantee** - before deploying funds to any downstream entity, BFA Global will implement a process for checking that the entity has an adequate safeguarding policy and practice including a mechanism for raising safeguarding concerns anonymously and safe recruitment practices for its staff.
- 2.4. Open communication channel** - During contractual relations, BFA Global will ensure that such entities have a live and active communications channel through which to escalate any allegations of safeguarding violations, whether proven or not.
- 2.5. Contractual obligations with employees and third parties** - Employees, contractors, subgrantees, and other third parties will be required to review and commit in writing to comply with this policy before any engagement.

- 2.6. **Internal controls** - BFA Global shall implement internal controls, including segregation of duties, audits, management oversight, and other appropriate processes and policies against exploitation or abuse.
- 2.7. **Designated Safeguarding Officer** - BFA Global shall have the Head of Talent and Culture as the Safeguarding Officer to monitor compliance, advise team members in case of any compliance queries, record incidences, conduct investigations and internal reviews, and report on compliance. The Safeguarding Officer shall be trained appropriately to supervise compliance.
- 2.8. **Communication and training:** BFA Global will train all employees and inform associated parties of these policies in a manner that is commensurate with their role in the organization. This training will be conducted at least annually to ensure compliance. BFA Global shall ensure that all staff have access to, are familiar with, and understand their responsibilities within this policy.
- 2.9. BFA Global shall **design and undertake all its programs and activities in a way that protects people from any risk** of harm that may arise from their coming into contact with BFA Global. This includes the way in which information about individuals in our programs is gathered and communicated.
- 2.10. BFA Global shall implement **stringent safeguarding procedures** when recruiting, managing, and deploying staff and associated personnel.
- 2.11. **Follow up on reports of safeguarding concerns** promptly and according to due process.

3. Reactive measures (Reporting & Whistleblowing) for exploitation or abuse

3.1. Reporting and whistleblowing

All BFA Global employees, contractors or vendors, and associated third parties are required to report any suspicions of exploitation or abuse immediately, even if no evidence is available.

BFA Global employees may initially report their suspicions to their Line Manager. Third parties associated with BFA Global may report their concerns to the Manager responsible for overseeing their contract. If the employee, contractor or vendor, or third party believes that the line Manager may be involved or that the suspicion may not be taken seriously, they should report the matter directly to the Safeguarding Officer.

Managers who receive a report of suspicion are required to forward it to the Safeguarding Officer within 72 hours. BFA Global staff and associated third parties can also report suspicions directly to the Safeguarding Officer by emailing safeguarding@bfaaglobal.com or **anonymously** via [this form](#).

If you are unsure whether a violation has occurred, you should discuss the matter with the Safeguarding Officer via safeguarding@bfaaglobal.com. BFA Global has a non-retaliation policy that applies to employees, contractors or vendors & other associated third parties who report such matters in good faith. More specifically, we will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any parties based on the lawful and good faith actions of such members submitting a concern either internally, as noted above, or to your official governmental agency.

3.2. Responding to reports or whistleblowing

Upon receiving a report of suspicion, the Safeguarding Officer will acknowledge receipt within 72 hours to the individual who submitted the report. The report will then undergo an assessment to evaluate its credibility. If the suspicion is deemed credible and reasonably justified, it will be escalated for further investigation.

The **outcome** of the investigation could lead to various actions against the perpetrator, depending on the severity, contractual obligations, and nature of the offense. Actions may include disciplinary measures up to and including termination of employment and legal action. In cases of legal violations, the matter will be referred to the appropriate law enforcement or regulatory authorities for further action.

Once the investigation is concluded, the Safeguarding Officer will communicate the findings and any actions taken to the reporter, respecting confidentiality. This communication underscores BFA Global's commitment to transparency and accountability in handling such reports.

3.3. Documentation and retention

BFA Global will keep a register of all suspected and reported violations, including details of the incidents, documentation, findings, and actions taken in line with internal data retention policies and applicable laws.

4. Implementation and oversight

Compliance with this policy is mandatory for all BFA Global employees, contractors or vendors, and associated parties. The Safeguarding Officer is responsible for overseeing and enforcing this policy and will conduct regular audits and updates to ensure its effectiveness.

5. Review and amendments

This policy will be reviewed annually by BFA Global's management or sooner if required by changes in legislation or business practices.