

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Mitigation and Response Action Plan
Bay Terminal Marine Infrastructure Development Project (P176812)
Chittagong Port Authority (CPA)
May 2026

1. Introduction and Purpose

This SEA/SH Action Plan has been prepared by the Chittagong Port Authority (CPA) in fulfilment of its obligations under the Environmental and Social Commitment Plan (ESCP), Action 4.3, for the Bay Terminal Marine Infrastructure Development Project (P176812), financed by the International Development Association (IDA) of the World Bank. The Action Plan is aligned with the World Bank's Environmental and Social Standards ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS2 (Labor and Working Conditions), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement and Information Disclosure). It is further guided by the World Bank's Good Practice Note on addressing Sexual Exploitation and Abuse and Sexual Harassment in Investment Project Financing Involving Major Civil Works (2020).

This Plan sets out a comprehensive, survivor-centered framework¹ of prevention, response, referral, monitoring, and capacity-building measures, proportionate to the project's assessed Substantial SEA/SH risk rating. It covers all project workers (including CPA staff, contractors, subcontractors, and their employees), the communities within the project's area of influence, and all persons who interact with the project. The Plan is a living document which could be adjusted according to the risk level assessed throughout the cycle of the project and shall remain in force for the entire duration of project implementation. This Action Plan is grounded in the existing international, national, and project level legal and policy frameworks related to GBV and SEA/SH.²

2. Project Background

The Bay Terminal Marine Infrastructure Development Project supports Bangladesh's ambition to develop a world-class deep-sea port at Chittagong (Chattogram), the country's primary international trade gateway, handling approximately 92% of Bangladesh's international cargo. The project involves large-scale marine and land civil works approximately 1.4 km offshore in the Bay of Bengal, including construction of a 6.217 km rubble mound breakwater on an existing offshore sandbar; capital dredging of approximately 30 million m³ to achieve a 15.5 m channel depth for Panamax-class vessels; land reclamation of approximately 1,620 acres; development of a Multi-Purpose Terminal (MPT) and Container Terminal 1 (CT1); construction of road and rail connectors and associated utility facilities; and installation of navigation aids and upgrades to the Vessel Traffic Management System (VTMS). The project is implemented by the Chittagong Port Authority (CPA) through a dedicated Project Implementation Unit (PIU) with an Environmental and Social Cell (ES Cell) and is supervised by an Environmental and Social Supervision and Monitoring Consultant Firm (ES Supervision Firm). The project has an effective date of December 8, 2025 and is expected to be completed by June 30, 2031.

¹Annex 1 for list of definitions

²Annex 2 legal and policy Framework

3. National GBV and SEA/SH Risk Context

Bangladesh faces pervasive gender inequality and high rates of gender-based violence (GBV) with approximately 72% of ever-married women in Bangladesh experiencing some form of intimate partner violence (IPV) in their lifetime, one of the highest rates in the Asia-Pacific region³. The country ranks 99th out of 146 countries on the World Economic Forum's Global Gender Gap Index (2023). Women's participation in the formal labor force remains constrained by social norms, limited mobility, care responsibilities, and pervasive insecurity in public and workplace settings. Access to formal services including legal aid, medical care, and psychosocial support is unequal across genders and particularly constrained for women in low-income and peri-urban communities. Bangladesh has a strong legislative framework such as the Women and Children Repression Prevention Act (2000, amended 2003) and the National Action Plan on Violence Against Women and Children (2013–2025), but enforcement and access to justice for survivors of GBV remain weak, especially for women with limited literacy, financial resources, or social capital. These systemic factors create a structural context in which any large project that significantly increases the presence of predominantly male workers in or near communities where women face constrained agency and limited alternatives carries an elevated risk of SEA/SH, regardless of whether those workers are from outside or within the local area.

The project site is in the Haliashahar-Anandabazar coastal zone of Chittagong (Chattogram), a peri-urban area approximately 1.4 km offshore in the Bay of Bengal. Three fishing communities lie within 1–3 km of the project footprint. About 87 fish traders (many of whom are women or whose livelihoods depend on women's labor in fish processing and trade) and 12 cattle and fish farms face direct livelihood impacts from the project. These communities are already poor and vulnerable so when a large male-dominated workforce operates in close proximity to economically constrained communities, the power differential between workers (who may represent income or material resources) and women in those communities creates conditions in which sexual exploitation and abuse can occur. Considering all the factors and vulnerabilities mentioned above, the project's SEA/SH risk has been assessed as Moderate at Appraisal with the information available at the time. The SEA/SH risk may be revised upward to reflect complexity of the project design and context. This Action Plan has been prepared with consideration of potentially higher SEA/SH risk rating, which will demand rigorous and structured commitment to the implementation of this Plan. Key risk drivers and the project-specific evidence for each are as follows:

Risk Driver	Project-Specific Assessment
Scale and nature of civil works	Very large-scale marine and land works — breakwater construction, 30 million m ³ of capital dredging, and about 1,620 acres of land reclamation — over a sustained period (2025–2031). The scale and duration of works create conditions for sustained proximity between a large workforce and adjacent communities.
Size and composition of the workforce	The project will require a large number of laborers during civil works, including skilled specialists for marine engineering and unskilled workers for construction and land reclamation. The workforce will be predominantly male, with limited gender sensitivity training in a sector with no established norms around respectful workplace behavior toward women.

³Bangladesh Bureau of Statistics (BBS) and UN data,

Labor influx and origin of workers	The project expects most workers to be recruited locally (from Chittagong and surrounding areas). This reduces but does not eliminate SEA/SH risk. It is a critical misconception to equate SEA/SH risk solely with external or migrant labor. The project will mobilize a large workforce of both skilled and unskilled workers over a multi-year period, many of whom will be working and living near vulnerable fishing and coastal communities, which is a significant SEA/SH risk factor, regardless of whether workers are locally hired or brought in from elsewhere.
Worker accommodation	Major remote worker camps are not anticipated. Workers are expected to commute from Chittagong. This reduces but does not prevent risks associated with accommodation settings — risks of SEA/SH also occur in transit areas, worksites, and in community settings where workers socialize.
Community vulnerability	Three adjacent fishing communities with female literacy of approximately 47.9%, limited economic alternatives for women, and constrained access to formal services and recourse. Livelihood disruption from the project increases vulnerability by reducing women's economic agency.
Sector culture and institutional norms	CPA has taken encouraging steps in promoting women's representation in its workforce and the development of gender-related policies, however the port and maritime sector in Bangladesh remains predominantly male-dominated, and institutional experience with gender-responsive frameworks is still developing.
Port sector specific risks	The port and maritime sector involves actors beyond the formal project workforce who also carry SEA/SH risk including international and domestic ship crews, truck operators and waiting drivers at terminal gates, seasonal casual port workers, private security contractors, and labor brokers controlling access to employment. Informal power holders including local political figures and labor contractors may also influence job access and compensation in ways that create coercive conditions. These dynamics can be addressed through the CoC scope, community GRM, port security training, and formal coordination with local law enforcement.
CPA institutional capacity	While CPA has prior experience working with development partners such as JICA and ADB, this is its first project under the World Bank's Environmental and Social Framework. The systems, protocols, and organizational capacity specifically required to prevent and respond to SEA/SH are therefore still being established, and remain an area where dedicated support and capacity building will be needed throughout project implementation.
Availability of survivor services	Some services are available in urban Chittagong (hospitals, NGOs, police) but are not systematically mapped or accessible for women in the project's peri-urban communities. The quality and reliability of services require verification (see Section 9).

4. Phased SEA/SH Risk Management

SEA/SH risks are not limited to the civil works phase. They are present throughout the project lifecycle, and mitigation measures must be activated accordingly. The table below outlines the key risk areas and corresponding key actions across three project phases.

Phase	Key SEA/SH Risk Areas	Key Mitigation Actions
Pre-Construction (Current)	E&S fieldwork and community consultations; livelihood-restoration discussions; compensation verification; recruitment and training; environmental and social assessments involving community contact; design consultancy with community interface	• Issue project-level Code of Conduct or behavioral standards to all active consultants before community engagement • Activate interim GRM linked to existing CPA mechanism • Map and verify GBV service providers • Designate Gender/GBV Focal Person in ES Cell • Sensitize CPA PIU on survivor-centered approach
Construction	Large concentration of workers in proximity to fishing communities; contractor and subcontractor labor; dredging and marine vessel crews; transport workers; worker-community interaction in transit areas and worksites; truck and waiting areas	• Full GRM operational with SEA/SH SOP • CoC signed by all workers before commencement • Worker-level and vessel-level focal persons in place • Induction training for 100% of workers • Safe Site Design Measures implemented • OCC referral pathway activated
Operations	Terminal operator staff and security personnel; access control at gates; truck and waiting areas; workers in contact with communities and female port users; jobs and benefits access	• SEA/SH obligations in ITO and terminal operator agreements • safe design features including lighting, separate facilities, and complaint information at gates • security staff trained • GRM remains operational • SEA/SH obligations in all operator contracts

The SEA/SH risk rating and the measures in this Plan shall be formally reviewed at the following milestones, at minimum: (i) before detailed design finalization; (ii) before major works procurement; (iii) before contractor mobilization; and (iv) before terminal operations commencement. The World Bank Regional SEA/SH Focal Point and in country E&S focal point shall be consulted at each review.

5. Accountability Framework for the SEA/SH mitigation measures

Actor	SEA/SH Role and Responsibilities
CPA PIU Director	Overall institutional accountability for SEA/SH Action Plan adoption, implementation, and compliance; approves 48-hour notifications to the World Bank; receives escalated complaints involving senior staff or contractors
CPA ES Cell	Day-to-day institutional management of SEA/SH plan implementation; coordination across all actors; oversight of GRM; preparation of monitoring reports
CPA Social Specialist (Gender Focal Point)	Operational management of the plan; training delivery oversight; GRM case management for SEA/SH; survivor referrals; maintenance of confidential case log; preparation of quarterly SEA/SH monitoring data
ES Supervision and Monitoring Consultant Firm	Field-level monitoring of contractor compliance with CoC and SEA/SH obligations; review of training records at each supervision visit; inclusion of SEA/SH compliance status in monthly and quarterly supervision reports
Contractors (Civil Works)	Implementation of CoC for all workers; designation of a SEA/SH Focal Point; delivery and documentation of induction and refresher training; operation of

	worker-level GRM; immediate reporting of any SEA/SH incident to CPA Social Specialist; cooperation with investigations
Contractor SEA/SH Focal Point	First point of contact for worker-level SEA/SH complaints; ensures survivor safety; documents complaint confidentially; refers to CPA Social Specialist within 24 hours; does not investigate — refers only
International Terminal Operators (ITOs)	Comply with SEA/SH obligations under Associated Facilities agreements (ESCP Action 1.5); implement CoC and GRM for their workers
GBV Service Provider of the project	Case management; coordination with CPA and other service provider; technical support in capacity building activities
World Bank Task Team	Oversight and supervision; receives 48-hour incident notifications and provides technical support; conducts periodic supervision missions

6. Accountability Framework for Incident Management

When a SEA/SH complaint is received through any channel, the following process applies. For detail step-by-step incident management protocol, forms, and timelines, see Annex 3, GRM Standard Operating Procedure.

STEP	Action	Timeline	Responsibility
1. Receive and escalate	Log the complaint and escalates to tier 2 if complaint received at the field level tier 1 logs the complaint if complaint received at CPA tier 2 level	Within 24 hours	Tier 1 focal point (contractor, vessel, or field GRC) Tier 2 social specialist if complaint received at CPA level
2. Safety and referral	Assesses immediate safety, obtain survivor's informed consent, and initiate referral to CPA Hospital and then Chittagong OCC for specialized care as required/needed	within 24 hours of receiving the case or being informed about the case	CPA Social Specialist
3. Corrective actions	Develop and implement corrective actions at two levels: (i) incident-specific measures to address the immediate situation (e.g., site access controls, redeployment, enhanced supervision); and (ii) project-level systemic measures to prevent recurrence, to be submitted to the World Bank as part of the incident report and tracked until closure.	Parallelly after incident notification	CPA social specialist
4. Perpetrator accountability	immediately suspends the alleged perpetrator from site pending internal investigation; criminal cases are referred to law enforcement.	Immediately upon notification	Contractor (suspension notification) CPA PIU
5. World Bank notification	notify the World Bank about the incident	within 48 hours of notification	CPA PIU Project Manager/Coordinator
6. Follow-up and closure	follow up on/with The survivor	within 5 working days of referral,	CPA Social Specialist

	• Service providers • Implementation of corrective actions • WB for incident reporting process • Document case closure	then as needed until case closure	
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7. Amendment/update

This Action Plan shall be reviewed and updated

- Annually, at minimum
- Following any SEA/SH incident, to identify and address any systemic gaps
- When project conditions change significantly (e.g., new contractor mobilization, significant change in labor force size or composition, new phases of civil works)
- At the request of the World Bank Task Team

8. Disclosure

This Action Plan shall be

- Disclosed publicly on the CPA website and the World Bank project portal before adoption
- Reviewed by the World Bank prior to public disclosure to confirm compliance with the ESCP
- Made available in hard copy at CPA project offices and at all worksites
- Provided to all contractors as part of ESHS procurement documentation.

SEA/SH action plan Matrix

#	Area	Actions	Indicators	Timeline	Responsible	Indicative Budget
1	Institutional Setup	- Designate a Gender/GBV Focal Person within the ES Cell to oversee this Action Plan. - Designate GRM focal person at the project office (preferably female) within project worksite (breakwater, dredging, reclamation, terminal).	- ES Cell operational with Gender/GBV Focal Person designated - GRM focal persons in place project sites - Safeguard specialist with a designated backup (if risk increase, then additional staff possibility)	Before initiation of physical works	CPA PIU	Included in CPA PIU operational costs
2	SEA/SH in E&S instruments (annex: integration guidelines)	<u>Labor Management Procedures (LMP)</u> - Include prohibition of SEA/SH as a disciplinary offence - link project GRM SEA/SH procedure with labor GRM - Include formal coordination protocol with Chittagong Metropolitan Police and local Women Affairs Office for criminal referrals <u>Stakeholder Engagement Plan (SEP)</u> - Incorporate SEA/SH risks and response options including orientation sessions with the three adjacent fishing communities on SEA/SH risks, - Conduct minimum 6 community awareness sessions per year throughout implementation including targeted women only sessions - Ensure that all stakeholder consultations include SEA/SH - Reference the national Women Helpline (10921) in all community communications. Engage a local women's organization or NGO as a trusted reporting channel and co-facilitator, formalized through an MoU within 60 days of plan adoption	- Workers CoC finalized and annexed to LMP - SEA/SH Focal point at labor GRM - SEP includes at least 6 community sessions/year conducted # of community members reached (disaggregated by sex) - women-only sessions documented	90 days before hiring workers. In procurement documents: before first tender is issued - MoU with local NGO signed within 60 days of plan adoption - ESIA/ESMP update: before bidding for physical works. C-	- CPA PIU social specialist; World Bank (review before adoption) - CPA Social Specialist; ES Supervision Firm (monitoring) - Contractors (C-ESMP);	\$20,000/year (NGO engagement and case management); \$4,000–6,000/year (sessions and materials) - Included in ESIA/ESMP update costs

#	Area	Actions	Indicators	Timeline	Responsible	Indicative Budget
		SEA/SH Risk Assessment and ESIA/ESMP Update - Assess GBV/SEA/SH risks as part of the ESIA/ESMP update at detailed design stage and before bidding - Conduct consultations with the three adjacent fishing communities. - Ensure contractors reflect SEA/SH measures in their Contractor ESMPs (C-ESMPs)	- ESIA/ESMP updated with SEA/SH assessment before bidding - C-ESMPs reviewed and approved before each works phase	ESMP review: before each before bidding major works phase	- CPA reviews each C-ESMP before each major works phase commences - CPA PIU social specialist (ESIA/ESMP update)	
3	SEA/SH Requirements in Procurement	Include in all bidding and contract documents for civil works reference to this Action Plan and CoC; obligation to designate a contractor SEA/SH Focal Point; requirement for a worker-level GRM; obligation to cooperate with investigations; and explicit itemization of all SEA/SH-related costs including training, site facilities, and a contingency fund for emergency survivor referral costs	- SEA/SH requirements in 100% of procurement documents - SEA/SH costs explicitly itemized in ESHS budgets - emergency contingency fund of minimum USD 5,000/year in project budget	Before first tender is issued	- CPA PIU - World Bank (review prior to issuance)	\$5,000/year contingency fund (CPA) - contractor costs itemized in ESHS specs
4	Code of Conduct (CoC)	- Develop a Code of Conduct (CoC) (Annex 1 for sample) including CPA staff, contractors, subcontractors, dredging and marine vessel crew, and ITO workers under associated facility agreements and ensure that the CoC also covers all informal actors connected to the project, including labor intermediaries, transport operators, and security contractors - Embed CoC in all civil works contracts and procurement documents - Conduct regular on site CoC orientation and have the CoC signed by each worker and registered in a log - Disseminate CoC in visual/leaflet format at all worksites - Apply this code of conduct to all active consultants during all three phases (current preconstruction, construction, operation)	- CoC incorporated into 100% of procurement and contract documents - CoC signing registry log	- Preconstruction, 90 days before hiring workers. - In procurement documents: before first tender is issued - CoC refresher orientation every 2 months during peak construction phases and every 6 months during pre-construction and operations phases.	CPA/PIU, ES Cell	\$3,000 one-time (CoC development, translation, printing)

#	Area	Actions	Indicators	Timeline	Responsible	Indicative Budget
		Ensure that CoCs are translated into languages used by laborers/workers				
5	Grievance Redress Mechanism (GRM) with SEA/SH Protocols	- Establish SEA/SH procedure at two levels - worker-level GRM - project-level GRM - Ensure the project-level SEA/SH procedure is linked to the worker-level GRM established under the LMP, so that SEA/SH complaints received at the worker level are automatically escalated into the project-level SEA/SH pathway - ensure multiple safe reporting channels like complaint boxes, hotline, female focal persons, sms - Develop a standard operating procedure (SOP) for SEA/SH case handling and link GRM to the verified survivor services directory. See Annex 2 for the SEA/SH Response Protocol - designate a vessel-level SEA/SH Focal Person - Use CPA's existing institutional complaints channel as the interim SEA/SH reporting pathway and ensure a focal person is identified and communicated to all active project consultants and affected communities, and link this channel to the Chittagong OCC for survivor referral until the formal project-level GRM is fully operational.	- Worker and project-level GRM operational with SoP - GBV Focal Person trained on survivor-centered approach # of reporting channels available - vessel-level SEA/SH Focal Person designated on each offshore vessel # of SEA/SH cases reported and resolved - The interim CPA GRM activated with link to ICC	- Before engaging workers / before physical work commences - vessel-level focal persons appointed - interim GRM to be activated during the preparation of all project documents and instruments (assessments, studies, surveys, consultations)	- CPA PIU/ES Cell (project GRM) - Contractors (worker GRM and vessel focal persons) - ES Supervision Firm (oversight) - World Bank (technical support)	Included in GRM operational costs
6	GBV Services Directory	- Map and verify GBV services available in the Chittagong project area of influence. (see Annex 3 for directory format and current entries) - Ensure the directory is accessible to all GRM focal persons at all levels at all times and updated regularly	All GRM focal persons have a copy of verified directory updated at least annually	Before SEA/SH plan adoption	- CPA Social Specialist (Gender/GBV Focal Person) - ES supervision Firm	\$1,000–2,000/year (field verification and update)
7	Survivor Referral Pathway and Response	The CPA Hospital will serve as the first point of contact for immediate medical attention for survivors and will refer all SEA/SH cases to the Chittagong One Stop Crisis Centre (OCC) at Chittagong Medical College Hospital for specialized medical, psychosocial, and legal support.	Referral pathway documented in the GRM SOP and accessible to all focal persons	Before plan disclosure	- CPA PIU - CPA gender/GBV specialist	200,000

#	Area	Actions	Indicators	Timeline	Responsible	Indicative Budget
		- designate staff member at the CPA Hospital as the focal point and provide SEA/SH first-responder orientation training - Confirm referral arrangement with OCC authorities before plan disclosure - Use the UNFPA supported SOPs operating at the OCC for project referral pathway	- MoU with OCC on referral arrangement # of survivors referred to services (tracked confidentially) - referral and response budget available and accessible.		GBV service provider (OCC) for case management	
8	Training and Orientation on SEA/SH	- Ensure SEA/SH training modules are included in first-year Environmental and Social Training Plan (ESTP) - Deliver training at four levels throughout implementation: (i) <i>CPA PIU/ES Cell</i> — on survivor-centered response, GRM management, and reporting obligations (ii) <i>ES Supervision Consultant</i> — on field monitoring of SEA/SH compliance and CoC (iii) <i>Contractors, subcontractors, and all workers, including marine and dredging crews</i> — CoC Workers who cannot read must have the CoC read aloud in their preferred local language (iv) <i>community-level SEA/SH awareness</i> — on SEA/SH mechanism of the project - in all capacity building and awareness activities, Include IEC materials and dedicated session on how to report using available channels, what happens after a complaint is made, and confidentiality assurances in addition to SEA/SH prohibition messaging	- ESTP submitted 100% of workers trained and CoC signed before commencing work # of training sessions per level; # of refresher sessions per site per year (minimum 2) - training records maintained and submitted quarterly to ES Supervision Firm	- Induction training: before each worker commences. - Onboard vessel training: before offshore works commence. - Refreshers: every 6 months	- CPA PIU/ES Cell (ESTP, CPA-level training) - Contractors (worker induction, refreshers, and onboard vessel training); - ES Supervision Firm (oversight, including vessel inspections) - GBV service provider (technical delivery)	\$8,000–12,000/year (materials, facilitation, translation, contractor costs in ESHS specs)
9	Safe and Gender-Friendly Site Measures	- Before civil works commence at each works phase, ensure all project sites have: - separate, well-lit, and lockable toilet and rest facilities for women; a designated private safe space at the CPA project office where women can report	site measures documented and confirmed	Before commencement of each major works phase, monitored continuously	- CPA PIU (oversight) - Contractors (implementation); ES Supervision Firm	\$5,000–10,000/year (audits)

#	Area	Actions	Indicators	Timeline	Responsible	Indicative Budget
		- concerns or access information; adequate lighting at all work areas, transit routes, and community-adjacent spaces; visible signage in Bengali prohibiting GBV/SEA/SH. - Conduct audits of all safe and gender-friendly site facilities - Ensure and implement following Port specific measures ➤ vessel access management protocols at all port entry points ➤ port security staff with SEA/SH behavioral standards and training before commencing duties ➤ truck waiting and gate areas have lighting and signage ➤ SEA/SH obligations embedded in all security contractor agreements	Quarterly facility audit reports submitted to CPA PIU	Audits every 3 months throughout construction	(monitoring, audit))	contractor facility costs in ESHS specs)
10	SEA/SH Obligations in ITO Agreements	Ensure incorporation of SEA/SH obligations into agreements with ITOs for CPT and MPT	CoC, GRM, training, and incident reporting obligations included in all ITO agreements	Before signing ITO agreements	- CPA PIU - World Bank (review)	Included in institutional costs
11	Monitoring and Reporting	- Prepare and submit quarterly SEA/SH monitoring reports to the World Bank Task Team, covering: training records; CoC signing rates; GRM utilization (number and type of complaints received, disaggregated by sex); referrals made to services; contractor compliance status; and site safety measure status - Include SEA/SH compliance status in all monthly and quarterly ES reports - Report any SEA/SH incident to the World Bank within 48 hours of the CPA PIU becoming aware - Notify the World Bank within 7 working days of any referral to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a compliance review in	- Quarterly SEA/SH monitoring reports submitted to World Bank on schedule 48-hour incident notifications issued - DAAB notifications issued as required - Annual Action Plan review completed and shared with World Bank # of SEA/SH activities completed per plan (tracked against matrix)	- Quarterly reporting throughout implementation 48-hour notifications within 48 hours of CPA PIU being informed of any case - DAAB notifications within 7 working days - Annual review every 12 months from plan adoption	- CPA Social Specialist and supervision firm (quarterly reports and incident notifications) - CPA PIU Director (DAAB notifications) - Supervision Firm (monthly/quarterly compliance reporting)	Included in CPA PIU and Supervision Firm operational costs.

#	Area	Actions	Indicators	Timeline	Responsible	Indicative Budget
		- relation to a contractor's SEA/SH obligations, and of any subsequent DAAB decision, Notice of Dissatisfaction, or arbitration proceedings and orders - Conduct an annual review of the Action Plan against implementation progress and update it accordingly and share updated plan with World Bank.			World Bank Task Team review	
12	Adoption of SEA/SH Action plan	Finalize and adopt this SEA/SH Action Plan, including prevention and response measures, survivor services directory, GRM protocols, CoC provisions, and monitoring framework.	Finalized and disclosed in CPA website	2 weeks after the draft	- CPA PIU - Review prior to disclosure (WB)	

Annex 1 Integration of SEA/SH into Other E&S Instruments

E&S instruments currently under preparation or to be prepared at later stages shall build on and reference this Plan. The table below provides guidance on how SEA/SH aspects should be incorporated into each instrument.

Instrument	Key SEA/SH Integration Requirements
Labor Management Procedures (LMP)	Include explicit prohibition of SEA/SH as a disciplinary offence; reference this Action Plan and the CoC; describe the worker-level GRM with SEA/SH protocol; include procedure for immediate reporting of SEA/SH incidents to the CPA Social Specialist; define consequences for CoC violations including termination
Resettlement Action Plan (RAP)	Incorporate SEA/SH risk considerations in RAP fieldwork protocols; ensure female RAP enumerators and separate consultation spaces for women; include SEA/SH awareness in livelihood-restoration programs; ensure compensation and benefit access processes are free from conditions related to personal relationships or favors; reference project GRM as the complaint channel for affected women
Stakeholder Engagement Plan (SEP)	Incorporate SEA/SH risks and response options in all community engagement activities; include women-only consultation sessions; reference national Women Helpline (10921) in all community communications; engage a local women's organization or NGO as a trusted reporting channel; ensure all consultation records are disaggregated by sex
Environmental and Social Management Plan (ESMP) / Contractor ESMPs (C-ESMPs)	Include SEA/SH risk assessment as part of the ESIA/ESMP update at detailed design stage; require all C-ESMPs to reflect contractor-level SEA/SH measures including CoC, worker training, GRM, and safe site design; C-ESMPs to be reviewed and approved by CPA before each major works phase; ensure a dedicated budget line for SEA/SH actions
ITO and Terminal Operator Agreements	Include minimum SEA/SH obligations: CoC signing and induction training; linkage to project GRM; 48-hour incident reporting to CPA PIU; safe site design standards for terminal areas

Annex 2 Legal and Policy Framework

World Bank Frameworks

- World Bank Environmental and Social Framework (ESF): ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS2 (Labor and Working Conditions), ESS4 (Community Health and Safety), ESS10 (Stakeholder Engagement and Information Disclosure)
- World Bank Good Practice Note on SEA/SH in Investment Project Financing Involving Major Civil Works (2020)
- World Bank Grievance Mechanisms for SEA/SH in World Bank financed Projects (2020)

Bangladesh National Legal Frameworks

- Constitution of Bangladesh, Articles 27 (equality before law), 28 (non-discrimination on grounds of sex), and 31 (right to protection of law)
- National Women Development Policy 2011
- Bangladesh Labor Act 2006 and Bangladesh Labor Rules 2015: sections on female worker protections, workplace safety, and provisions that can be applied to workplace harassment including grievance mechanism provisions under labor tribunals
- Bangladesh Penal Code 1860: sections 354 (assault or criminal force to a woman with intent to outrage her modesty), 375–376 (rape), and 509 (word, gesture, or act intended to insult the modesty of a woman)
- Prevention of Oppression Against Women and Children Act 2000 (amended 2003): primary criminal law covering sexual offences against women and children, including acid attacks, rape, and trafficking; establishes special tribunals for prosecution
- National Action Plan to Prevent Violence Against Women and Children (2013–2025): government framework for coordinated GBV response
- High Court Division Directives on Sexual Harassment (2009): legislative guidance requiring all employers to establish anti-sexual harassment policies and committees

International Frameworks

- UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) — Bangladesh acceded in 1984
- UN Sustainable Development Goals (SDGs) — particularly SDG 5 (Gender Equality) and SDG 8 (Decent Work)

Project-Specific Instruments

- Project ESCP
 - Action 1.3: Incorporate ESHS specifications, including SEA/SH CoC obligations, into all procurement documents and contracts with contractors and supervising firms, prior to commencing civil works
 - Action 1.5: Extend E&S requirements (including SEA/SH) to Associated Facilities (MPT, CT1) through agreements with International Terminal Operators (ITOs)
 - Action 2.1: Finalize and implement the Labor Management Procedures (LMP), including a Code of Conduct relating to SEA/SH
 - Action 2.2: Establish grievance arrangements for project workers, including mechanisms for SEA/SH complaints, before commencement of works

- Action 4.3: Prepare, adopt, and implement this SEA/SH Action Plan
- Action 10.2: Establish and operate a project-level Grievance Redress Mechanism prior to commencement of any physical works
- Action CS1: Submit the first-year Environmental and Social Training Plan (ESTP) including GBV risk mitigation training to the World Bank
- Monitoring Action B: Notify the World Bank within 48 hours of any SEA/SH incident
- Monitoring Action D: Notify the World Bank within 7 working days of any contractor referral to the Dispute Avoidance and Adjudication Board (DAAB) for non-compliance with SEA/SH obligations
- Project Labor Management Procedures (LMP)
- Project Stakeholder Engagement Plan (SEP), ESIA, ESMP and project-level GRM to include SEA/SH procedures and measures

Annex 3: Definitions

For the purposes of this Action Plan, the following definitions apply (consistent with World Bank ESF and GPN on SEA/SH):

Sexual Exploitation (SE)	Any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.
Sexual Abuse (SA)	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual Harassment (SH)	Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature in the workplace or project environment.
Gender-Based Violence (GBV)	An umbrella term for any harmful act directed against a person on the basis of their gender, including SEA/SH, intimate partner violence, forced marriage, trafficking, and female genital mutilation.
Survivor	Any person who has experienced GBV/SEA/SH. The term "survivor" is preferred over "victim" to recognize agency, dignity, and resilience.
Survivor-Centered Approach	A framework for response that prioritizes the safety, agency, nondiscrimination, and confidentiality of the survivor in all decisions relating to reporting, referral, investigation, and support.
Labor Influx	The movement of workers, whether from within or outside the project area, into an area due to project activities, leading to increased concentration of workers in proximity to communities.

Annex 4: SEA/SH GRM Protocol

Standard Operating Procedure (SOP) for SEA/SH Grievance Redress
Bay Terminal Marine Infrastructure Development Project
Chittagong Port Authority (CPA)

1. Purpose and Scope

This SOP establishes process for receiving, handling, referring, and following up on complaints and disclosures related to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) under the Bay Terminal Marine Infrastructure Development Project. This SOP applies to all project-associated personnel including CPA staff, consultants, contractors, subcontractors, dredging and marine vessel crews, transport workers, security staff, ITO workers, and any other person representing the project and to any community member, affected household member, or other person who experiences or witnesses SEA/SH in connection with the project.

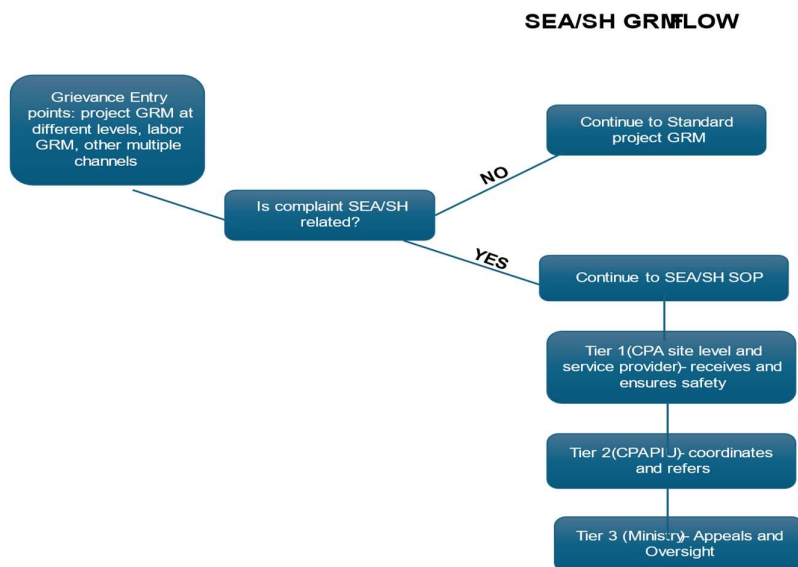
This SOP is aligned with the UNFPA Interagency GBV Standard Operating Procedures, Cox's Bazar, Bangladesh, and draws on the survivor-centered principles, referral pathway structure, and case management approach established therein and serves as the project-specific operational protocol that links project GRM to the broader GBV service ecosystem in Chittagong. All GRM focal persons of the project and GBV service provider/s involved in receiving, managing, or responding to SEA/SH complaints under this SOP must adhere to survivor centric principles⁴, consistent with international GBV good practice and the UNFPA Cox's Bazar SOP framework.

2. SEA/SH GRM Structure

Tier 1 Project site level	Tier 2 CPA PIU Level	Tier 3 Ministry level
Project SEA/SH Focal Point at each worksite (senior field level Officer/site in charge)	Administered and managed by CPA PIU with gender/social specialist as the focal point	Provides oversight of the GRM's functioning and credibility
First point of contact for workers and, where accessible, for community members at the worksite level	Central coordination point for all SEA/SH cases	Appeals where the survivor is not satisfied at Tier 2, or where a conflict of interest exists at PIU level.
Focal points receive, acknowledge, ensure immediate safety, and escalate to Tier 2 within 24 hours	reporting to the Bank (within 48 hours of knowing about the case) and ensures all reporting procedures with and to the Bank	Applies the same confidentiality and survivor-centered standards.
	Follows the SEA/SH GRM SoP and ensures case documentation, survivor referral, follow up AND/OR Hands over case management to Project GBV service provider (NGO, OCC, CPA hospital)	
Refers the case to the CPA social/gender specialist within 24 hours	Investigates to assess/verify whether case is related to the project or not	
	Coordinates with service providers, contractors	
	manages perpetrator accountability	

⁴Survivor-centered approach (safety, well-being, respect, dignity, confidentiality, non-discrimination, non-retaliation, non-biases, and agency of the survivor)

The SEA/SH GRM mirrors the project's three-tier structure established in the SEP. The SEA/SH pathway cuts across both the Project GRM and the labor GRM. Any SEA/SH complaint received through either system must immediately exit the standard grievance process and be handled exclusively through this SEA/SH SOP since standard GRM channels are not equipped for survivor-centered SEA/SH response.



3. Reporting Channels

All channels must be displayed visibly in Bengali/preferred local language at all worksites, vessel notice boards, transit areas, community notice boards, and CPA project offices. Anonymous reporting is accepted through all channels. The following reporting channels are available to workers and community members

Channel	Details
Contractor/Vessel SEA/SH Focal Point	Name and contact displayed at all worksites and vessel notice boards
CPA Social Specialist (Gender/GBV Focal Point)	Name, Number
Project Complaint Box	Located at worksite locations; opened by CPA Social Specialist only
Project Hotline / SMS	Number
Local Women's NGO (project partner)	Name and contact
National Women's Helpline	10921 (toll-free, 24 hours, Ministry of Women and Children Affairs)
National Emergency	999
Child Helpline	1098
Chittagong OCC	Contact number

4. Procedure to address SEA/SH grievance

STEP 1: Receive, Register, and Verification of the Grievance

Responsible: Tier 1 focal point; or CPA Social/gender Specialist if received directly.

Do	Do Not
Log date, time, and channel of receipt immediately	Ask for graphic details or proof
Treat all complaints including anonymous ones as credible	Express doubt, blame, or judgment
Acknowledge receipt to the person reporting (where identifiable) within 2 working days	Contact the alleged perpetrator or their supervisor
Escalate to CPA Social Specialist (Tier 2) within 24 hours	Handle the case through the standard GRM process
If you are in danger, call 999 first	Share any information beyond what is strictly necessary for escalation

For vessel-based complaints: The vessel focal point logs the complaint and escalates to the site office at the next port call, or via satellite communication if urgent.

- The CPA PIU social/gender specialist will review the case and assess whether it was project-induced (caused by project activities) and/or whether the perpetrator is linked (related) to the project.⁵
- Once the link to the project has been established, the Focal Point will:
 - Assess the case against the Code of Conduct (CoC) and the perpetrator dealt with accordingly – actions can range from a warning to a suspension and termination, and hand over to the relevant authorities in severe cases.

STEP 2: Refer and Support

Responsible: CPA Social Specialist (Tier 2)

- Assess whether the survivor faces an immediate or ongoing risk.
- If the alleged perpetrator is project-associated, facilitate the process of perpetrator's suspension pending investigation, regardless of whether a formal investigation has commenced.
- Inform and Obtain Consent (where survivor is known and accessible) and inform complainant of available support options: medical care, psychosocial support, legal aid, safety planning.
- if the survivor is under 18, report to child protection authorities as required by Bangladeshi law regardless of consent, communicate this sensitively.
- If the survivor is unknown or anonymous, proceed with safety and accountability steps only. Keep the referral option open.
- Refer to Services With the survivor's consent, initiate the two-step referral:
 - 1) CPA Hospital: immediate medical attention. Contact the designated first-responder staff member before the survivor arrives. Arrange a female escort if requested.
 - 2) Chittagong OCC (Chittagong Medical College Hospital): the primary anchor for multi-sectoral SEA/SH survivor care, consistent with the UNFPA Interagency GBV SOP framework for

⁵The difference between Project related and Project induced cases should be determined i.e., Project related refers to the perpetrator as part of the ; It should be noted that the objective of the review and verification process is to examine only whether there is a link between the project and the reported incident and to assure accountability by recommending appropriate and proportional measures.

Bangladesh. Services cover all five response sectors: health (medical examination and treatment), mental health and psychosocial support (MHPSS), legal aid and guidance, safety and security planning, and shelter referral were needed. A trained OCC case worker will manage the case from this point. Contact the OCC before the survivor's arrival; share only the minimum necessary information with the survivor's consent.

- Document Record in the confidential case log with minimal information age, sex, and brief nature of complaint, and services provided (see Incident Report Form below)
- Notify the World Bank Task Team within 48 hours of becoming aware of any SEA/SH incident, confirming a case was received and that the survivor's safety has been addressed, with no identifying information about the survivor.

STEP 3: Follow Up and Close

Responsible: CPA Social/gender Specialist.

subject to survivor's consent, follow up discreetly to:

- Confirm the survivor accessed services
- Check for further needs or ongoing safety risks
- support and monitor contractor's actions on applying sanctions (if the incident is induced by contractor worker)
- Case closure occurs when:
 - The survivor has received adequate assistance and no longer requires support
 - The survivor does not wish to pursue further action (documented with consent)
 - Appropriate accountability action has been taken against the alleged perpetrator
 - Majority of corrective actions have been implemented
- Document closure in the case log. Communicate the outcome to the survivor in writing within 1 day of the closure decision, where the survivor is known and accessible.

5. Training Requirements

All persons with a role under this SOP must receive orientation training which should be delivered before the GRM is activated and refreshed annually. The ES Supervision Firm shall monitor and document training compliance.

CPA Social Specialist	Survivor-centered approach; case documentation; referral pathway; OCC SOP alignment; confidentiality management
Contractor/Vessel Focal Points	How to receive a complaint; what to say and not say; how to refer; confidentiality obligations
CPA Hospital First-Responder Staff	Trauma-informed reception; confidentiality; referral to OCC
CPA PIU Director	48-hour notification procedure; World Bank reporting requirements; internal accountability process.
Local Women's NGO	Community-level intake; referral pathway; safe accompaniment

6. Review and Update

This SOP is a living document. It shall be reviewed and updated:

- Annually from the date of adoption
- Following any SEA/SH incident, to incorporate lessons learned
- Whenever the GBV services directory changes significantly
- Before each major project phase (construction, offshore works, terminal operations)

- Updates shall be shared with the World Bank Task Team and with all focal persons

7. Incident Report Form

Note: this form is to be filled by the designated GBV focal person of the GRM with complete sensitivity and non-biases towards the survivor and the incident

PART 1

SURVIVOR INFORMATION

1. CASE NUMBER: (assign the Survivor a case number or incident number for confidentiality according to local coding protocols)
2. DATE AND TIME OF THE REPORT:
3. SURVIVOR AGE:
4. SEX:
 - a. FEMALE
 - b. MALE
 - c. OTHER (Please specify)
 - d. RATHER NOT SAY
5. SUMMARY OF INCIDENT: (A brief summary of the incident without disclosing the survivor's personal information)

PART 2

INFORMATION ON SREFRRALS MADE

Service	Provider	Date of Referral	Confirmed Access?
Medical	CPA Hospital		☐ Yes ☐ No ☐ Unknown
Specialized SEA/SH care	Chittagong OCC		☐ Yes ☐ No ☐ Unknown
Legal aid	BLAST		☐ Yes ☐ No ☐ Unknown
Psychosocial			☐ Yes ☐ No ☐ Unknown
Child protection	Dept. of Social Services		☐ Yes ☐ No ☐ Unknown
Police	Chittagong Metropolitan Police		☐ Yes ☐ No ☐ Unknown
Other			

8. Consent for Release of Information

This form is completed with the survivor's full understanding and freely given agreement. It must be read aloud in the survivor's preferred language if they cannot read.

I, __ (or Case No. _ if anonymity is preferred), give permission for the CPA Social Specialist to share information about the incident I have reported with the following, solely for the purpose of ensuring I receive appropriate care and assistance:

☐ Chittagong OCC (medical and psychosocial support) ☐ CPA Hospital (immediate medical care) ☐
BLAST — Chittagong Branch (legal aid) ☐ Local women's NGO (psychosocial and community support)
☐ World Bank Task Team (notification only) ☐ Police / law enforcement ☐ Other: ____

I understand that:

- Only the minimum necessary information will be shared.
- I can withdraw this consent at any time.
- Sharing my information does not automatically mean a police case will be opened.

Signature or thumbprint of survivor: _ Date: _

Signature or thumbprint of parent/guardian (if survivor is under 18): _ Date: _

Completed by (CPA Social Specialist): _ Date: _

Annex 5: Mapping of Local Services (Chittagong)

The directory will be updated at least annually, or whenever service information changes.

Organizations should be contacted in advance to confirm their capacity and willingness to receive project referrals.

Medical Services

Service	Provider	Location / Contact	Notes
Emergency medical care (rape kit, STI testing, emergency contraception, forensic examination)	Chittagong Medical College Hospital (CMCH)	Panchlaish, Chittagong 24-hour emergency ward	Primary government hospital; verify OCC availability at this location
Immediate medical attention.	CPA Hospital	CMO of CPA Hospital	The CPA Hospital will serve as the first point of contact for immediate medical attention for survivors and will refer all SEA/SH cases to the Chittagong One Stop Crisis Centre (OCC) at Chittagong Medical College Hospital for specialized medical, psychosocial, and legal support.
One-Stop Crisis Centre (OCC)	National OCC Network (Ministry of Women and Children Affairs / Ministry of Health)	OCCs are present at major divisional hospitals in Bangladesh; CPA Social Specialist to confirm OCC location nearest to project site	Government-run; provides integrated medical, legal, and psychosocial support under one roof
Private gynecological and trauma care	To be identified by CPA Social Specialist	Chittagong city	For cases where survivors prefer private medical care

Psychosocial Support

Service	Provider	Location / Contact	Notes
Psychosocial counseling and GBV response	BRAC Chittagong	BRAC field offices	BRAC is active nationally in GBV prevention and response
Legal and psychosocial services	Ain o Salish Kendra (ASK)	National NGO	Well-regarded human rights and GBV organization
Community-based support	Local women's groups / CBOs	To be identified	To be mapped during plan operationalization

Legal Aid and Protection

Service	Provider	Location / Contact	Notes
Legal aid and advice for GBV survivors	Bangladesh Legal Aid and Services Trust (BLAST)	National NGO (verify if there is Chittagong branch)	Free legal services for low-income clients
Free government legal aid	District Legal Aid Office, Chittagong	Chittagong District Court complex	Government mandated free legal aid
Police response and protection	Patenga Police Station / Halishahar Police Station	Nearest stations to project site	For cases survivors choose to pursue through formal criminal justice

Criminal prosecution	Women and Children Repression Prevention Tribunal, Chittagong	Chittagong Court Complex	Specialized tribunal under the 2000 Act
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National Helplines

Service	Number	Notes
National Emergency	999	24/7
Women Helpline (Bangladesh)	10921	Government helpline for women in distress
Child Helpline	1098	For cases involving minors

Annex 6: SEA/SH code of conduct

CODE OF CONDUCT

Prevention of Sexual Exploitation, Abuse, and Sexual Harassment (SEA/SH)

Bay Terminal Marine Infrastructure Development Project

Chittagong Port Authority

This Code of Conduct sets out the standards of behavior expected of all persons working on or in connection with this project, including CPA staff and officials; consultants engaged for design, surveys, studies, assessments, developing E&S instruments or any other project related work; contractors, subcontractors, and their workers; dredging and marine vessel crew; transport and logistics workers; security personnel; ITO staff; and any other person representing the project in any capacity. Compliance with this Code of Conduct is a condition of engagement with this project. Violations will result in disciplinary action, including removal from the project and termination of contract, and may be referred to law enforcement authorities in accordance with the laws of Bangladesh.

Commitments for All Project-Associated Personnel

By signing this Code of Conduct, I acknowledge that I have read and understood its contents (or that it has been read and explained to me in a language I understand), and I agree and commit to comply with it for the full duration of my engagement with the Bay Terminal project.

1. Respect for all persons

I will treat all persons connected with the project including community members, co-workers, affected households, women, children, and vulnerable groups with dignity and respect. I will not discriminate on the basis of gender, age, religion, ethnicity, disability, or any other ground.

2. Prohibition of sexual exploitation and abuse (SEA)

I will not engage in sexual exploitation or abuse in connection with this project. This includes:

- Engaging in any sexual activity with a person under 18 years of age, regardless of whether consent is claimed. Belief that a person is 18 or older is not a defense.
- Engaging in sexual activity with community members, affected households, job seekers, trainees, or project beneficiaries in connection with my project role.
- Exchanging money, employment, goods, services, project benefits, compensation, training access, or any other advantage for sex or sexual favors from any person — including from persons who depend on project assistance or are vulnerable to coercion.
- Using my position, authority, or access provided through the project to seek or obtain sexual favors or personal relationships.

3. Prohibition of sexual harassment (SH)

I will not subject any person to sexual harassment. This includes:

- Making unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- Making sexual comments, jokes, gestures, sounds, or innuendo directed at any person.
- Sending or displaying sexually explicit messages, images, photographs, or videos through any medium, including mobile phones and social media.

- Requesting personal phone numbers, social media contacts, private meetings, or gifts from community members, workers, job seekers, trainees, or affected persons for personal or sexual purposes.
- Following, stalking, or persistently approaching a person after they have indicated they are not interested or have asked to be left alone.
- Conditioning access to project information, benefits, compensation, jobs, or services on compliance with any sexual or personal request.

4. Prohibition of child sexual exploitation and abuse (CSEA)

I will not engage in any form of sexual exploitation, abuse, or harassment of a person under the age of 18. This includes:

- Any sexual contact with a person under 18.
- Engaging a person under 18 in sexual activity through electronic means (social media, messaging, video), whether or not the person appears to consent.
- Displaying, distributing, or possessing sexually explicit material involving persons under 18.
- Employing or using persons under 18 in any work connected with this project.

If I suspect that a child is being exploited or abused by anyone, I will report it immediately to the project GRM focal person or the CPA Gender/GBV Specialist.

5. Non-retaliation

I will not threaten, intimidate, demote, withhold wages or benefits from, or take any other retaliatory action against any person who reports a concern about SEA/SH, files a grievance, or participates in an investigation.

6. Confidentiality

I will not share the identity of anyone who has made a SEA/SH complaint or who has been identified as a survivor, except as strictly necessary to refer that person to services — and only with their informed consent.

7. Cooperation with project GRM and investigations

I will cooperate fully and honestly with any grievance or investigation process related to SEA/SH. Failure to cooperate, or attempts to obstruct or interfere with an investigation, will itself constitute a violation of this Code of Conduct.

8. Reporting obligations

If I witness, learn of, or have reasonable grounds to suspect any SEA/SH incident connected with this project — whether involving a colleague, contractor, community member, or any other person — I will report it to the project GRM focal person, the CPA Social Specialist (Gender/GBV Focal Point), or through any available reporting channel without delay. I understand that I am not required to investigate the matter myself. Reporting in good faith is expected and will not result in any adverse consequence to me.

9. I will comply with national laws and policies relevant to GBV/SEA/SH:

- The Bangladesh Labor Act, 2006.
- The Women and Children Repression Prevention Act, 2000 (as amended 2003).

- The Domestic Violence (Prevention and Protection) Act, 2010.
- The Bangladesh High Court Directive on Sexual Harassment, 2009 (BNWLA v. Government of Bangladesh), which defines sexual harassment and applies to all workplaces and public places.
- The Child Marriage Restraint Act, 2017.
- The ICT Act, 2006 (with respect to online harassment).
- The Constitution of Bangladesh (Article 28), which guarantees gender equality and non-discrimination.
- All other applicable national laws and the terms of my contract with the project.

10. Disciplinary Framework

Violations of this Code of Conduct will be subject to disciplinary action. The severity of the action will be proportionate to the nature and seriousness of the violation, as set out below. This framework does not preclude referral to law enforcement authorities, which may occur in parallel with or independently of internal disciplinary action.

Level	Nature of Violation	Disciplinary Action	Legal Referral
Level 1	A single incident of non-physical unwelcome behavior of a sexual nature — such as an unsolicited sexual comment, inappropriate joke, or sexually suggestive remark — that causes discomfort or offence but does not constitute persistent conduct or physical contact	Formal verbal warning; mandatory SEA/SH awareness training; written record maintained; if repeated, escalated to Level 2	If the incident involves a person under 18, mandatory referral to police regardless of severity
Level 2	Repeated non-physical unwelcome sexual conduct; sending unwanted sexual messages, images, or videos without consent; persistently approaching a person after rejection; creating a hostile or intimidating environment through sexual behavior	Formal written warning; temporary suspension; mandatory counselling and training; possible reassignment or demotion	Referral to police if the conduct amounts to criminal sexual harassment under the Bangladesh High Court Directive (2009) or the Penal Code (1860)
Level 3	Physical sexual harassment; sexual assault; rape; sexual exploitation; conditioning project benefits on sexual favors; any sexual act involving a person under 18; using project position or authority to coerce sexual compliance; possession or distribution of child sexual abuse material	Immediate suspension pending investigation; termination on confirmation of violation; permanent blacklisting from all CPA and World Bank-financed projects; mandatory criminal referral to police	Mandatory referral to police. Offenders are subject to prosecution under the Women and Children Repression Prevention Act 2000, the Penal Code 1860, and other applicable Bangladeshi law. Survivors have the right to medical care, psychosocial support, legal aid, and shelter. The project will facilitate access to these services through the Chittagong OCC at Chittagong Medical College Hospital.

11. How to Report

If you experience, witness, or learn of any SEA/SH incident connected with this project, you can report through any of the following channels:

- Project GRM Focal Person at your worksite or vessel (name and contact to be displayed at all worksites)

- CPA Social Specialist (Gender/GBV Focal Point):
- Project Complaint Box: Located at different worksites and campsites
- Project Hotline/SMS:
- National Women's Helpline: 10921 (toll-free, 24 hours, Ministry of Women and Children Affairs)
- Chittagong OCC at Chittagong Medical College Hospital:
- Local Women's NGO (project partner):

12. Declaration

I confirm that

- I have read this Code of Conduct in full, or it has been read and explained to me in Bengali / (or in any local language applicable) in a way that I fully understand.
- I understand what behaviors are required and what behaviors are prohibited.
- I understand the consequences of violating this Code of Conduct.
- I agree to comply with this Code of Conduct for the full duration of my engagement with the Bay Terminal Marine Infrastructure Development Project.

#	Full Name	Designation / Role	Contractor / Organization	Signature	Date
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					