

GEAPP CHILD AND YOUTH SAFEGUARDING POLICY

Effective: May 9, 2025

Policy Summary

Background	<p>Safeguarding is the responsibility that an organization has to ensure that their employees and volunteers, partners, vendors, operations and programmes do no harm to Children or Youth (together referred to as ‘vulnerable persons’ under this Policy); that they do not expose them to the risk of discrimination, neglect, harm, and abuse; and that any concerns an organization has about the safety of vulnerable persons within the communities in which they work, are dealt with and reported to the appropriate external authorities.</p> <p>Safeguarding is the process of protecting individual Children and Youth identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.</p> <p>Over recent years, there has been increasing recognition of the way in which Children and Youth can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international development activities. As a consequence, there has been a significant increase in the efforts made by development organizations to ensure that no harm results from the contact their employees, volunteers and other representatives have with their target populations or communities.</p> <p>Through our work, Global Energy Alliance for People and Planet (GEAPP) Inc. and all legal entities worldwide owned or controlled by GEAPP Inc. (collectively referred to, along with GEAPP Inc., as “GEAPP”) and managers, directors, officers, employees, volunteers, employees of partner organizations may engage with Children and Youth either directly or indirectly.</p> <p>GEAPP recognizes it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of Children and Youth including those with whom we work and those in the communities where GEAPP works.</p>
Applicability of the Policy	<p>All persons who perform services for or on behalf of Global Energy Alliance for People and Planet (GEAPP) Inc., and its group companies and subsidiaries (including for the avoidance of doubt, Global Energy Alliance for People and Planet (GEAPP) LLC, GEAPP UK Limited, GEAPP S’pore Pte. Limited, GEAPP SA (PTY) Ltd, GEAPP India Private Limited Company and GEAPP ServiceCo (KE) Ltd.) (“GEAPP”) or otherwise act for and on behalf of GEAPP are required to comply with this Safeguarding Policy.</p> <p>For the avoidance of doubt, this Policy applies to all directors, officers, employees, volunteers, contractors, sub-contractors, consultants, and any other person who performs duties involving Children or Youth either on a paid or on an unpaid capacity, whether on a full-time, part-time or temporary basis, for GEAPP (together, “GEAPP Personnel”) and all organizations, entities, agencies and individuals involved in carrying out GEAPP funded projects in general or programmes directed at assisting Children or Youth, which includes, but is not limited to, grantees, investees, contractors, sub-contractors, (including their employees, volunteers, directors and officers and any other personnel), as well as any consultants or affiliates that may work with such contractors or subcontractors, as applicable, (together, “GEAPP Partners”).</p>
Related policies	<ul style="list-style-type: none"> • Employee Handbook • Code of Conduct • Whistleblowing Policy • Data Protection Policy • Anti-bribery and Corruption Compliance Policy
Policy Reviewers	Director, Global Compliance & Risk
Policy Approvers	Chief Legal Officer, Chief People Officer & Chief Financial & Operations Officer

EXECUTIVE SUMMARY

The GEAPP Child and Youth Safeguarding Policy (the “**Policy**”), effective May 9, 2025, establishes GEAPP’s commitment to protecting children and youth from abuse, exploitation, and harm. The Policy emphasizes that safeguarding is a core responsibility of all personnel and partners involved in GEAPP’s operations, ensuring that vulnerable individuals are not subjected to discrimination, neglect, or violence.

Key Components:

1. **Background and Applicability.** The Policy outlines the organization’s obligation to safeguard Children and Youth, referencing international standards such as the UN Convention on the Rights of the Child. It applies to all GEAPP Personnel—including employees, volunteers, contractors, and partners—engaged in activities involving Children (up to 17 years) and Youth (18 to 34 years).
2. **Definitions of Abuse.** The document provides clear definitions of various forms of Abuse, including Physical, Sexual, Emotional Abuse, and Exploitation. It highlights the importance of understanding these terms to effectively identify and address safeguarding issues.
3. **Roles and Responsibilities.** All GEAPP Personnel are required to acknowledge their understanding of the Policy and comply with its provisions. This includes attending safeguarding training and being aware of reporting procedures.
4. **Reporting Requirements.**
 - Any allegations, reports, or concerns regarding potential Abuse or Exploitation must be reported immediately to the Local Designated Safeguarding Officer (Local DSO). If personnel are unsure about whether to report a concern, they may consult their immediate manager.
 - A dedicated email address, safeguarding@energyalliance.org, is provided for reporting safeguarding concerns. Additionally, there is a 24/7 safeguarding hotline available for reporting.
 - Concerns should be reported without delay, ideally within working hours, and all incidents must be documented and handled confidentially.
5. **Investigation Procedures.** Investigations into safeguarding allegations will be conducted promptly and fairly, led by the Chief Legal Officer in collaboration with the DLSO and the Local DSO, as applicable. Personnel accused of Abuse will be suspended during investigations to protect children and youth from further harm.
6. **Support for Survivors.** GEAPP commits to providing appropriate support to survivors of safeguarding incidents, which may include access to counseling services.
7. **Whistleblower Protections.** Reports made in good faith will not be considered malicious, and whistleblowers will not face penalties for unsubstantiated claims. However, deliberate false reporting will result in disciplinary action.
8. **Cultural Sensitivity and Gender Equality.** The Policy stresses the need for cultural sensitivity in safeguarding practices and recognizes that different risks may affect women and men differently.
9. **Regular Reviews.** The Policy will be reviewed every two (2) years or sooner if necessary, ensuring it remains relevant and effective in addressing safeguarding challenges.

In summary, the GEAPP Child and Youth Safeguarding Policy serves as a comprehensive framework aimed at fostering a safe environment for Children and Youth, promoting ethical engagement, and ensuring accountability across all levels of the organization and its partnerships. Regular training, clear reporting mechanisms, and a commitment to survivor support are central to its implementation.

1. Introduction

Article 19 of the UN Convention on the Rights of the Child asserts children's right to protection 'from all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has care of the child.'

The Universal Declaration of Human Rights recognizes fundamental human rights, the dignity and worth of people at any age and the equal rights of men and women.

GEAPP endorses the principles and articles of the UN Convention on the Rights of the Child and The Universal Declaration of Human Rights and is committed to supporting and respecting the rights of Children and Youth and protecting them from Physical, Sexual and Emotional Abuse and Exploitation. GEAPP takes its responsibility to protect Children and Youth from all forms of violence very seriously and will not tolerate any form of Abuse or Exploitation of Children and Youth in its programmes and/or operations.

2. Purpose

The purpose of this Policy and associated procedures is to provide guidance to all GEAPP Personnel and GEAPP Partners on how they should engage with Children and Youth when working for, on behalf of, or in partnership with GEAPP. This Policy and its associated procedures set out how GEAPP will deal with safeguarding issues which give cause for concern and the type of actions that GEAPP will take to manage issues and provide support to Children and Youth. This Policy also serves to ensure that all GEAPP Personnel and Partners have a common understanding of safeguarding issues, develop ethical practices across the diverse and complex areas in which GEAPP operates, thereby increasing accountability in this crucial aspect of GEAPP's work. This Policy also provides assurance that GEAPP will take any reported concerns seriously and will ensure that its Personnel are kept safe.

This Policy constitutes GEAPP's global Policy. Whilst it is recognized that local legislation may vary from country to country, this Policy identifies GEAPP's minimum standards and may exceed the requirements of local legislation.

Any breach of this Policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, termination of GEAPP funding, and reporting to the police, relevant regulatory authority or other body.

3. Definitions relevant to this Policy:

Abuse (includes Physical Abuse, Sexual Abuse, Emotional Abuse and Exploitation)	It includes Physical, Emotional or Sexual Abuse, neglect or negligent treatment or Exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a Child and/or Youth. Abuse and Exploitation can be a single act or repeated acts and can be unintentional or deliberate. Abuse and Exploitation often involves criminal acts.
Best Interests of Children and Youth	The principle of best interests applies to all actions concerning Children and Youth and requires active measures to protect them from Abuse. These measures will promote Child and Youth safety; physical, emotional and developmental needs; well-being of Children and Youth; and support and assist Children and Youth to ensure such safety and needs. This includes their participation to ensure that their opinions are heard in matters affecting them.
Child (or Children)	any person, of either sex who is under the age of 18 years, unless the national laws in which the Organization is carrying out the Children's programs prescribe a lower age of majority.
Designated Lead Safeguarding	shall mean the Director, Global Compliance & Risk

Officer or DLSO	
Emotional Abuse	involves actions towards a Child and/or Youth that cause or could cause serious behavioral, cognitive, emotional, or mental disorders in the Child and/or Youth. Emotional Abuse also occurs when a person (including Children, Youth or Other Persons) makes verbal threats, socially isolates a Child and/or Youth, intimidates, Exploits, terrorizes, or routinely makes unreasonable demands on a Child and/or Youth.
Exploitation	refers to situations whereby an abuser makes unfair profit and/or takes advantage of unequal power and/or economic status of a Child and/or Youth.
Local Designated Safeguarding Officer or Local DSO	refers to a GEAPP employee designated as safeguarding officers for a specific project/programme, as appointed by the Director, Global Compliance & Risk.
Neglect/Failure to provide	occurs when a Child's parent(s)/legal guardian(s) or caregivers do not provide the requisite attention to the Child's emotional, psychological, or physical development when they have the means, knowledge and access to services to do so; or failure to protect the Child from exposure to danger.
Other Person	means any person, of either sex, who is older than Youth as defined herein, i.e. "Other Person" means a person who is aged 35 years of age or older.
Partners or GEAPP Partners	refers to organizations and/or individuals who are involved in carrying out GEAPP funded programs which directly or indirectly assist Children and/or Youth, which includes, but is not limited to, grantees, contractors, sub-contractors, (including their employees, volunteers, directors and officers and any other personnel), as well as any consultants or affiliates that may work with such contractors or subcontractors, as applicable.
Personnel	includes directors, officers, employees, volunteers, contractors, sub-contractors, consultants, and any other person who performs duties involving Children or Youth either on a volunteer or on a paid basis, whether on a full-time, part-time or temporary basis, for GEAPP.
Physical Abuse	refers to the deliberate application of force by any person (including Children, Youth or Other Persons) to any part of the body of the Child and/or Youth, which results or may result in non-accidental harm or injury to a Child and/or Youth. Physical Abuse may include shaking, choking, biting, kicking, burning, poisoning, holding a Child and/or Youth under water, or any other harmful or dangerous use of force or restraint.
Protection of Children and Youth	refers to the responsibility, actions and measures taken to prevent and respond to Abuse, Exploitation and violence against Children and Youth.
Sexual Abuse	<p>Sexual abuse occurs when a person (including Children, Youth or Other Persons) uses a Child and/or Youth for sexual purposes, without the consent of the Child and/or Youth in question Sexual Abuse includes fondling, intercourse, incest, sodomy, exhibitionism, and Exploitation or the production of pornographic materials. Sexual Abuse may include, but is not limited to, permitting, encouraging or requiring a Child and/or Youth to engage in any of the following activities if they occur between a person (including Children, Youth or Other Persons) and a Child and/or Youth:</p> <ul style="list-style-type: none"> a) using or engaging in sexually provocative language, acts or conduct towards a Child and/or Youth; b) rough-housing or engaging in conduct which involves physical contact with a Child and/or Youth and which is sexually suggestive in nature; c) kissing, fondling, caressing, patting or pinching a Child and/or Youth or engaging in sexual intercourse or other sexual conduct designed to sexually stimulate either or both of Personnel and Child and/or Youth; d) using sexual remarks, jokes, innuendo or taunting about a Child and/or

	<p>Youth's body or sexual orientation or uttering, either verbally or in writing, invitations, requests or sexually suggestive remarks or displaying pornographic or sexually suggestive material to a Child and/or Youth;</p> <p>e) conduct of a sexual nature for the stimulation, gratification, profit and self-interest of Personnel who are in a position of trust or authority or with whom the Child and/or Youth are in a relationship of dependency; and/or</p> <p>f) prostitution or production of material of a pornographic nature.</p>
Sexual Exploitation	constitutes any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. It is a broad term, but it includes transactional sex, solicitation of transactional sex and exploitative relationships. It is a type of Exploitation.
Victim or Survivor	The person who has been abused or exploited.
Vulnerable person/people	for the purposes of this Policy this is an umbrella term which covers Children and Youth.
Youth	any person who is above the age of 18 years and under the age of 35 years.

4. Scope

This Policy applies to all directors, officers, employees, volunteers, contractors, sub-contractors, consultants, and any other person who performs duties involving Children and/or Youth either on a paid or on an unpaid capacity, whether on a full-time, part-time or temporary basis, for GEAPP (together, “**GEAPP Personnel**”) and all organizations, agencies and individuals involved in carrying out GEAPP funded projects and programmes directed at assisting Children and/or Youth, which includes, but is not limited to, grantees, investees, contractors, sub-contractors, (including their employees, volunteers, directors and officers and any other personnel), as well as any consultants or affiliates that may work with such contractors or subcontractors, as applicable, (together, “**GEAPP Partners**”).

All GEAPP Personnel are required to acknowledge that they are aware of, have understood, and will comply with the contents of this Policy by signing the form in **Appendix 1** hereto and returning it to the Director, Global Compliance and Risk. Such acknowledgment will be provided through their contractual arrangements with GEAPP which cross-refer to this policy in particular or GEAPP policies in general. The acknowledgement will also state the person understands that disciplinary action will be taken against anyone found guilty of Abuse or Exploitation of a Child or Youth. GEAPP Partners are expected to use a similar acknowledgement form with their personnel.

This Policy demonstrates how GEAPP will meet its legal obligations and reassures all GEAPP Personnel, GEAPP Partners and members of the public:

- a) on what they can expect GEAPP to do to protect and safeguard Children and Youth.
- b) that they are able to safely voice any concerns through an established procedure.
- c) that all reports of abuse or potential Abuse or Exploitation are dealt with in a serious and effective manner.
- d) that there is an efficient recording and monitoring system in place.
- e) that GEAPP Personnel and GEAPP Partner personnel receive appropriate induction on safeguarding.
- f) that a robust ‘safe’ recruitment procedure is in place.

5. Policy Statement

5.1 At GEAPP, we are committed to recognizing, promoting and protecting the rights of Children and

Youth. GEAPP upholds and promotes the core values of:

- a) prioritizing the welfare and Best Interests of Children and Youth;
- b) seeking to do no harm; and
- c) participatory safeguarding where the views of GEAPP Personnel and GEAPP Partner personnel are central to the development of safeguarding practices.

5.2 GEAPP recognizes that we have a responsibility, alongside our Personnel and Partners, to ensure that those we serve do not suffer Abuse or Exploitation. GEAPP also acknowledges its role in embedding safeguarding within its operations and programming.

5.3 This Policy sets out the following:

- a) GEAPP's commitments to safeguarding within GEAPP and our requirements of GEAPP Personnel and GEAPP Partners, reflecting our contact with Children and Youth.
- b) GEAPP's expectations of our Partners – many of whom work directly with Children and Youth – as part of our funding requirements.
- c) GEAPP's processes for reporting of incidents and investigation of allegations.

5.4 GEAPP seeks to achieve these commitments through rigorous enforcement of this Policy in our investment design, our grant-making processes and systems, as well through training, monitoring, compliance and review, communities of practice and our relationship with our Partners.

5.5 GEAPP will ensure that all policies and procedures to protect Children and Youth take into account gender equality and non-discrimination requirements. Recognizing that women and men may face different risks relating to their safety and protection and that all Children and Youth have the equal right to protection, irrespective of: race; colour; sex; language; sexuality; disability; religion; political or other opinions; national, social or indigenous origin; property; birth or other status.

5.6 GEAPP recognizes that safeguarding is everyone's responsibility and that GEAPP has a social, moral and legal responsibility to protect and safeguard the welfare of Children and Youth with whom its work brings it into contact. It will, therefore, ensure that the provisions of this Policy are cascaded to those associated with the delivery of its work.

5.7 In line with the above statement, GEAPP fully supports and will embed the following key principles in all its operations:

- a) Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- b) The Best Interests of Children and Youth are paramount and shall be the primary consideration in all decision making.
- c) GEAPP will take responsibility to meet its obligations regarding its duty of care towards Children and Youth and take action where it believes that a Child or Youth is at risk of Abuse or Exploitation or is actually Abused or Exploited.
- d) GEAPP will ensure that GEAPP Personnel are inducted in our safeguarding standards and procedures as a key part of the recruitment and on boarding process.
- e) GEAPP will ensure that all GEAPP Partners are informed and in compliance with our safeguarding standards.

- f) When working with or through GEAPP's Partners, GEAPP will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this Policy.
- g) GEAPP recognizes that an element of risk exists, and while we may never be able to totally remove this, we will do all we can to reduce it or limit its impact.
- h) GEAPP respects privacy and confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need-to-know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- i) GEAPP commits to monitoring the implementation of this Policy. This Policy will be reviewed every two years and earlier if necessary.
- j) GEAPP seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. GEAPP recognize that there are many different ways of thinking and taking care of Children and Youth and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work.

GEAPP's Legal Team and the Director, Global Compliance & Risk are available to give guidance on how to interpret this Policy and its application to the local context.

6. GEAPP's Safeguarding Commitment

6.1 Awareness: GEAPP commits to:

- a) Ensuring that GEAPP Personnel understand what safeguarding, what the risks are to Children and Youth, and how to support GEAPP Partners to safeguard effectively;
- b) Ensuring that GEAPP Personnel have read, understood, been trained on and agree to uphold this Policy before commencing employment / contracted work/ appointment by GEAPP;
- c) Ensuring that GEAPP Personnel know where to access this Policy and that it can be easily found on the GEAPP intranet and website;
- d) Ensuring that in all GEAPP operations and activities GEAPP Personnel and GEAPP Partners shall not Abuse or Exploit Children and Youth;
- e) Sharing this Policy and safeguarding lessons learnt with the broader alliance partners with whom GEAPP operates;
- f) Updating this Policy every two (2) years, or sooner if there are major changes to GEAPP as an organization, or legislative changes pertaining to safeguarding.

6.2 Prevention: GEAPP commits to:

- a) Ensuring that this Policy and its procedures will be applied taking into account gender equality and non-discrimination, which includes irrespective of race; colour; sex; language; sexuality; disability; religion; political or other opinions; national, social or indigenous origin; property; birth or other status.
- b) Working with Partners to ensure they also uphold strong safeguarding procedures and practices by having clear requirements and continuously discussing safeguarding with all Partners or potential Partners and ensuring that they take their obligations seriously;

- c) Working collaboratively with our Partners to promote Child and Youth safeguarding best practices and actively prevent any form of Abuse or Exploitation in GEAPP's work;
- d) Having robust recruitment and selection processes to check that, to the best of our knowledge, all GEAPP Personnel are safe to work for GEAPP (regardless of whether or not contact with Children and Youth will actually take place);
- e) Having safe storage of all confidential material, including material with personal data, in line with applicable laws and regulations and GEAPP policies.

6.3 Reporting: GEAPP commits to:

- a) Having a reporting procedure that is easy to use, including an anonymous reporting procedure, and supporting Partners to also have this in place;
- b) Training GEAPP Personnel to know of GEAPP's procedures for dealing with issues that arise concern Children and Youth;
- c) Ensuring that GEAPP Personnel are informed who their Local Designated Safeguarding Officer (Local DSO) is and how to contact them;
- d) Ensuring that all concerns, incidents or disclosures are reported to the Safeguarding Officers DSO (including Local DSOs, or DLSO) immediately or as soon as it is practicable;
- e) All Personnel knowing what steps to take if the concern, incident or disclosure arises outside of normal working hours, or if they cannot reach contact the relevant Safeguarding Officers (including Local DSOs, or DLSO) or if the concern is regarding a DSO (including Local DSOs or DLSO);
- f) Reporting to relevant authorities and regulators when there is a serious safeguarding incident.

6.4 Responding: GEAPP commits to:

- a) Ensuring the safety of Children and Youth is always the first priority and that action is taken to support and protect them;
- b) Applying the principle of 'Best Interests of Children and Youth' to all safeguarding concerns, incidents and disclosures;
- c) Taking all concerns, incidents and disclosures seriously and fully supporting any GEAPP Personnel who in good faith raises concerns;
- d) No form of coercion, intimidation, reprisal or retaliation against any GEAPP Personnel who reports any suspected form of Abuse or Exploitation shall be tolerated.
- e) Handling all concerns, incidents and disclosures in a confidential manner, with information shared on a 'need to know' basis;
- f) All incidents being dealt with promptly, and all cases relating to GEAPP Personnel or GEAPP Partners being investigated and reported to the Management Team within one (1) month of being reported to the Local DSO, unless additional time is warranted;
- g) Consulting with the Child and/or Youth on matters under GEAPP's review and ensuring that the Child and/or Youth is not treated simply as objects of concern but rather listened to and taken seriously and treated as individual people with their own views and that no further harm

comes to the Child and/or Youth as a result of actions taken by GEAPP;

- h) Working in conjunction with other service providers, specialists, parents, legal guardians, caregivers and others will be explored when appropriate upon the consent of the Child and/or Youth in question
- i) Ensuring Children and Youth are well-informed and participate in the decision-making and the types of intervention agreed upon.

6.5 Training and Education: GEAPP commits to:

- a) Providing robust safeguarding training by design, to all new GEAPP Personnel, within three months of starting with GEAPP or within one (1) month of starting where the GEAPP Personnel will be working directly with Children and Youth;
- b) Providing regular annual refresher training to all GEAPP Personnel;
- c) Ensuring GEAPP Personnel who have specific responsibilities for keeping Children and Youth safe (including Local DSOs or DLSO) have access to specialist advice, support and regular opportunities to update their skills and knowledge;
- d) Providing staff with access to materials, resources and updates that support understanding and implementation of the Policy and will also encourage sharing of experiences and examples of good practice in implementing the Policy across GEAPP;
- e) proper measures will be taken to ensure organizational learning, evaluation and follow up takes place after any incident or report of Abuse or Exploitation.

7. Expectations on our Partners to safeguard

7.1 The safeguarding and protection of Children and Youth is a non-negotiable in all projects and programmes funded by GEAPP. Therefore, it is a requirement that all Partners:

- a) Have their own tailored safeguarding policy appropriate for their activities;
- b) Have appropriate contextualized training procedures and reporting processes, depending on their activities, jurisdictions and level of contact with Children or Youth;
- c) Adhere to either GEAPP's Child and Youth Safeguarding Requirements or the Partner's safeguarding policy (as applicable) as set out in our standard agreements;
- d) Report all safeguarding incidents to the Local DSO and relevant authorities, and diligently manage them;
- e) Report all safeguarding incidents to their Local Designated Safeguarding Officer, pertaining to a member of the GEAPP Partner staff or GEAPP Partners activities irrespective of whether the incident has been reported to external authorities, and/or have been reported by the media, including where these occur outside of the GEAPP-funded project or programme;
- f) Work collaboratively with our designated Local DSO where there are safeguarding concerns or disclosures;
- g) Take any necessary organizational and operational steps to ensure safeguarding is considered and provided for from the outset of the programmes to their end;
- h) Undertake safeguarding by design, monitoring, evaluation, accountability and learning

procedures in their programmes, activities and operations;

- i) Flow-down these requirements to their personnel, partners and contractors performing project activities.

7.2 GEAPP is committed to working with Partners to ensure a GEAPP-funded project or programme has appropriate safeguarding policies and procedures in place, according to the level of safeguarding risk and contact with Children or Youth. Once a project has been approved, GEAPP will adopt a collaborative approach and work with Partners to develop and/or strengthen their safeguarding practices, as needed.

7.3 Once a GEAPP-funded project or programme begins, GEAPP will have open and regular dialogue with the Partner regarding safeguarding throughout the life of the programme. GEAPP will monitor the effectiveness of the Partner's safeguarding in accordance with this Policy and other GEAPP requirements.

7.4 If a concern or disclosure of Abuse is reported to a Partner, the Partner will address it in accordance with its own safeguarding policy and applicable laws and regulations. The Partner must also advise the Local DSO within three (3) days of the knowledge of the concern or disclosure. Partners are expected to provide regular updates to GEAPP as to the status of any investigation and the outcome of the process. At any time, GEAPP can request an independent review of any GEAPP or GEAPP-funded project or programme in relation to safeguarding.

7.5 Should any Partner fail to deal with safeguarding issues in line with their policy or their agreement with GEAPP, GEAPP may terminate its agreement with the Partner and any funding arrangements with immediate effect and, where appropriate, report the Partner to relevant external authorities.

8. Reporting a safeguarding concern

8.1 If GEAPP Personnel reasonably believe there could be an allegation or concern or have a reasonable suspicion that someone is experiencing or is likely to experience Abuse or Exploitation, no matter what the cause, they should seek the advice and assistance of the Local DSO and set out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns. A dedicated email address exists for this purpose – safeguarding@energyalliance.org. This email address routes messages to the Local DSOs and the DLSO, .

8.2 GEAPP Personnel who are unsure of whether to pass on a concern to the Local DSO may wish to talk first to their immediate manager. GEAPP Personnel may decide whether it is appropriate to pass on the concern to the Local DSO or to their immediate line manager only. However, if the immediate manager is the only person who has been informed of the concern, the immediate manager is now responsible for seeking the advice and assistance of the Local DSO.

8.3 If any GEAPP Partner or GEAPP Personnel who is not a full-time employee reasonably believes there could be an allegation or concern, or has a reasonable suspicion that someone is experiencing or is likely to experience Abuse or Exploitation, no matter what the cause, they should seek the advice and assistance of their main contact at GEAPP, setting out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns. However, if their main contact is implicated in the safeguarding matter, they should refer the matter instead to the Local DSO. Again, this should be done immediately without awaiting confirmation of concerns.

8.4 GEAPP Personnel who are not comfortable with raising concerns to the Local DSO are encouraged to use the GEAPP safeguarding hotline which provides anonymity. The hotline is available 24 hours a day and 7 days a week. Its details are provided on GEAPP's Intranet and GEAPP's website.

GEAPP Personnel may also report safeguarding or other concerns to:

safeguarding@energyalliance.org

8.5 GEAPP Personnel may also raise the concern directly with the Director, Global Compliance and Risk.

9. Handling a safeguarding concern

9.1 GEAPP Personnel who receive credible information of a safeguarding concern, whether emanating from GEAPP Personnel, GEAPP Partner or an external party, must immediately and without attempting to investigate concerns or allegations themselves report it through appropriate channels to the Local DSO or the DLSO.

9.2 All safeguarding concerns raised will be received in a culturally sensitive and confidential manner, in accordance with this Policy.

9.3 The Local DSO should immediately notify the DLSO unless either of those individuals is implicated in the concerns raised, in which case the matter should be escalated directly to the Chief People Officer. “Immediately” means without any delay and, at the latest, by close of business on the same day.

9.4 The DLSO, having received notifications of a safeguarding allegation, should move quickly to establish the basic facts of the allegation, including whether or not the allegation is likely to be true, before promptly escalating the matter to the Chairperson of the Audit & Risk Committee. “Promptly” means a few days at the most, although it is expected this would be within 48 hours maximum.

9.5 It is the remit of external authorities rather than anyone connected with GEAPP to investigate safeguarding concerns where it is suspected that a crime has been committed. GEAPP is not an investigating authority for safeguarding issues where a crime is suspected. GEAPP Personnel should not make referrals to external authorities other than in consultation with the Local DSO, who will liaise with the DLSO. Such referrals must be made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the Child or Youth and that any evidence is collected in accordance with the law.

9.6 GEAPP and GEAPP Partners will advise their insurance providers of a concern raised under this Policy or their own respective policy, as applicable.

10. Investigations

Investigations are an integral part of maintaining an ethical culture. All alleged violations of this Policy will be investigated. The scope and nature of those investigations will be determined by GEAPP’s Chief Legal Officer, working with the DLSO, and will vary depending on the specific details of the alleged violation. They will then develop an investigation plan that may require assembling a cross-functional investigative team with subject-matter expertise. The DLSO will lead safeguarding-related investigations, s/he may—at his/her discretion—direct a subject matter expert in a different pillar/business function to conduct all or part of an investigation in certain circumstances, although the Chief Legal Officer will retain oversight of the matter, nonetheless.

What you can expect from GEAPP:

- a) GEAPP will handle all investigations in an appropriate, confidential, and expeditious manner to ensure that individuals are treated fairly and with respect.
- b) where an allegation is made that GEAPP Personnel has committed Abuse of a Child or Youth, the accused personnel will be immediately suspended from all duties with GEAPP (with pay, if applicable) to protect Children and Youth from further potential harm.
- c) GEAPP has zero tolerance for retaliation. Retaliation is not allowed against any Personnel or Partner for reporting a suspected violation or for participation in a safeguarding violation investigation. Personnel, regardless of seniority or status, who take part in retaliatory activities will be subject to disciplinary action, including termination of employment with GEAPP.
- d) A safeguarding allegation, if upheld, will almost always result in the relevant Personnel being dismissed on grounds of gross misconduct with the relevant Personnel not being permitted to enter onto GEAPP’s premises or participate in any GEAPP activities following dismissal.

What GEAPP expects from its Personnel:

- a) Cooperate fully with the investigation when requested and answer questions truthfully and to the best of their ability.
- b) Respect the confidentiality of the investigation process.
- c) Do not submit false accusations. Just as retaliatory behavior is not permitted, knowingly submitting a false report will subject Personnel to disciplinary action.
- d) If asked to participate in an investigation, keep the investigation confidential. Do not spread information or participate in or perpetuate rumors related to any aspect of the matter.
- e) Do not carry out your own investigation. Report all suspected violations to the Local DSO.

11. Survivor Support

GEAPP will provide appropriate support to the survivor(s) of safeguarding incidents. This will be provided as a duty of care exists even if a safeguarding matter has not yet been investigated. Support will be provided on a case-by-case basis as needed and would entail aspects such as access to counselling services.

12. Malicious reporting

GEAPP Personnel are encouraged to make reports in good faith. Reports made in good faith, even though unsubstantiated or unproven following an investigation will not be considered malicious and GEAPP Personnel will not be penalized for having made them.

However, GEAPP Personnel who deliberately make malicious reports will be subject to disciplinary measures.

13. Safe recruitment

GEAPP will ensure safe recruitment and vetting processes are followed by GEAPP and its Partners when screening personnel who may come into contact with Children and Youth, as part of their professional duties. This includes but is not limited to the following, as may be applicable in each country: certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of Child offenders; a detailed application and interview process; references who support the applicant's suitability to work with Children and Youth. Any certificate of good conduct, police reference check or equivalent that is obtained will be updated by GEAPP on a regular basis, where possible.

Where GEAPP Personnel are engaged to work directly with Children or Youth, a criminal background check will be undertaken as part of the recruitment process. Candidates will also be asked specific safeguarding questions during the interview.

14. Induction and training

All GEAPP Personnel will receive an induction into safeguarding no later than three (3) months after joining GEAPP. GEAPP Personnel will also be expected to take mandatory safeguarding training and refresher courses annually. GEAPP Partners will be expected to demonstrate that their staff undertake safeguarding training on a regular basis (at least annually).

The DLSO will provide input into the development of GEAPP's approach to training and will provide assurance to the GEAPP Audit & Risk Committee that the safeguarding training is in compliance with this Policy.

15. Media and the use of images

All photos taken should respect human dignity and consider the rights, safety and well-being of the person or people being portrayed. In relation to safeguarding, GEAPP Personnel must not:

- a) Reproduce images and use names of Children and Youth unless they have clear written permission of their parents or guardians or from the Youth, whichever is applicable.
- b) Take pictures that expose Children and Youth to further vulnerability, e.g., degrading pictures or pictures that show naked Children/Youth or partly clothed Children or Youth.
- c) Use technology to access, produce or distribute any information or violent sexual images that are harmful to Children or Youth.

GEAPP Personnel will provide Children and Youth with all necessary details to make an informed decision regarding their participation in programs and activities, including any voice recordings, video or photographs of Children and/or Youth. Children and Youth will understand how their images may be used and be supported to identify and evaluate any associated risks.

16. Medication

GEAPP Personnel will not give or apply any medication to Children. GEAPP Personnel will not give or apply any medication to Youth, unless the GEAPP Personnel in question is a doctor, nurse or other professional medical personnel. GEAPP will also comply with all applicable laws of the jurisdiction with respect to access by Youth to prescribed medications (such as asthma inhalers).

17. Responsibilities

17.1 All GEAPP Personnel

All GEAPP Personnel have the responsibility to:

- a) Read, understand and adhere to this Policy.
- b) Strive to promote a zero-tolerance approach to Abuse and Exploitation.
- c) Consider the Best Interests of Children and Youth.
- d) Report any concerns that a Child or Youth is experiencing or is likely to experience Abuse or Exploitation.
- e) Report any concerns regarding the behavior of other GEAPP Personnel or Partners which may be causing likely to cause Abuse or Exploitation of a Child or Youth.
- f) Attend a safeguarding induction and/or training as availed by GEAPP.

17.2 GEAPP Board

The GEAPP Board holds ultimate accountability for this Policy. The Board of Directors plays an important role in safeguarding, not least in terms of setting the right tone for the organization and creating a culture and environment where people feel comfortable about raising safeguarding concerns.

The GEAPP Board of Directors holds ultimate responsibility for this Policy.

17.3 Audit & Risk Committee

The Audit and Risk Committee is responsible for ensuring the effective implementation of this Policy and associated procedures, and ensuring that everyone linked with GEAPP is equipped and supported to meet their responsibilities.

17.4 Chief Executive Officer

The GEAPP Chief Executive Officer is responsible for ensuring the effective implementation of this

Policy and associated procedures and ensuring that everyone associated with GEAPP is equipped and supported to meet their responsibilities.

17.5 Chief People Officer

The GEAPP Chief People Officer is responsible for receiving concerns regarding the possible implication of the DLSO in safeguarding incidents. The Chief People Officer and the Chief Legal Officer will then develop an investigation plan that may require assembling a cross-functional investigative team with subject-matter expertise. The Chief People Officer will lead safeguarding-related investigations, s/he may—at his/her discretion—direct a subject matter expert in a different pillar/business function to conduct all or part of an investigation in certain circumstances, although the Chief Legal Officer will retain oversight of the matter, nonetheless.

17.6 GEAPP Designated Safeguarding Officers

GEAPP has a Director, Global Compliance & Risk who shall at all times be the Designated Lead Safeguarding Officer (“DLSO”), to whom any safeguarding issues can be referred.

The Director, Global Compliance Risk is ultimately responsible and accountable for safeguarding standards including defining the safeguarding policies and procedures that must be in place.

The DLSO is responsible for:

- a) monitoring and recording safeguarding concerns
- b) ensuring referrals to the relevant external authorities happen without delay
- c) providing and updating safeguarding training for all GEAPP Personnel
- d) ensuring this Policy is reviewed every two (2) years or earlier if necessary
- e) ensuring this Policy is implemented throughout the organization
- f) ensuring monitoring and recording procedures are implemented
- g) appointing a Local Designated Safeguarding Officer for each project
- h) ensuring that there is a Board-level representative of safeguarding concerns
- i) ensuring that all GEAPP Partners comply with this Policy
- j) leading safeguarding-related investigations, s/he may—at his/her discretion—direct a subject matter expert in a different pillar/ business function to conduct all or part of an investigation in certain circumstances
- k) where appropriate, support internal reviews and investigations into safeguarding concerns
- l) liaising with GEAPP’s insurers, as appropriate.

The DLSO will also record all incidents relating to safeguarding concerns and will report them to the GEAPP Board on an annual basis (in an anonymized form). This report will be confidential and if any concerns or patterns of Abuse or Exploitation emerge these will be dealt with appropriately.

In addition to the DLSO, the legal team and the project leads assist with addressing safeguarding issues and escalating in accordance with this Policy.

17.7 GEAPP Directors

GEAPP Directors will also:

- a) Ensure that there are adequate systems in place to manage safeguarding risks. This includes policies and procedures, prevention, reporting and responding mechanisms.
- b) Ensure that GEAPP emphasizes victim support.
- c) Ensure that GEAPP achieves transparency and accountability concerning safeguarding while taking account of the sensitivities of the subject matter and the rights and welfare of those affected.
- d) Creating a management culture that encourages a focus on safeguarding.
- e) Ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns and supportive towards GEAPP Personnel who raise concerns about a safeguarding matter.

17.8 GEAPP Line Managers & Project Delivery Leads

Line Managers and Project Delivery Leads at all levels within GEAPP are responsible for:

- a) Ensuring that GEAPP Personnel who they supervise and GEAPP Partner that work on the Manager's projects/programmes are inducted into this Policy and are supported to implement and work in accordance with it.
- b) Ensuring GEAPP Partners (and prospective GEAPP Partners) are aware of the channels available to them for raising concerns and are encouraged to use them.
- c) Ensuring that a safeguarding risk assessment has been undertaken as part of programme delivery.
- d) Creating a management culture that encourages a focus on safeguarding.
- e) Ensuring that they are responsive, acting immediately if they become aware of any safeguarding concerns and supportive towards GEAPP Personnel who raise concerns about a safeguarding matter.

18. Record keeping

GEAPP will retain written records of all reports of Abuse of a Child or Youth, including, but not limited to the date of the report and the date of the alleged Abuse, the name and address of the Child and/or Youth and his/her parent(s) / legal Guardian(s) (if applicable); the name of GEAPP Personnel who made the report; the name of the governmental contact to whom the report was made and a clear description of the facts that led to the report; as well as any other available information.

19. Safeguarding and personnel associated with GEAPP's Partners

Associated persons including all partners, consultants and contractors of GEAPP are expected to abide by this Policy. They have a duty to:

- a) Prevent Abuse or Exploitation by or of their personnel.
- b) Ensure that their personnel and contractors associated with them understand and abide by the contents of this Policy.
- c) Notify GEAPP immediately of any actual incident of Abuse or Exploitation, or any allegation thereof, and advise GEAPP of how it intends to deal with the matter.
- d) To act without delay to bring allegations of Abuse or Exploitation where it is suspected that a crime has been committed to relevant external national authorities and to cooperate promptly and fully with any enquiry that national external authorities may pursue.
- e) Disclose to GEAPP whether the GEAPP Partner's personnel are or has been the subject of disciplinary proceedings in relation to Abuse or Exploitation of Children and Youth or convicted of crimes concerning Abuse or Exploitation.

A report made by an associated person or partner to GEAPP may not necessarily result in the ending of the relationship with GEAPP. However, breach of the Policy and deliberate non-disclosure of safeguarding concerns will present grounds for the immediate suspension or termination of a project and/or relationship, at GEAPP's sole discretion.

20. External reporting and legal compliance

20.1 GEAPP is subject to the laws and regulations of the countries in which it operates in and is committed to fully comply with them.

20.2 It is recognized that this Policy identifies minimum standards that may exceed the requirements of local legislation, and these standards must be upheld where they do not cause conflict with local law.

20.3 External reporting to donors, regulators or other bodies will be made in line with laws and

regulations and any agreements signed by GEAPP.

20.4 The Director, Global Compliance & Risk must ensure reports to external stakeholders are made in line with the relevant laws, regulations and agreements signed by GEAPP.

21. Data Protection

GEAPP respects privacy and confidentiality and has a responsibility to protect sensitive personal data. Information will only be shared on a 'need-to-know' basis, that means, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information can receive it. Express written consent will be obtained from an individual or in case of a Child, parent/guardian, as required.

22. Related policies

This Policy should be read in conjunction with:

- a) Whistleblowing Policy
- b) Employee Handbook
- c) Code of Conduct
- d) Data Protection Policy
- e) Anti-bribery and Corruption Policy

23. Review of this Policy

The Director, Compliance & Risk, is responsible for overseeing and updating this Policy and associated procedure taking into consideration any legal obligations and other external requirements. In the event of no external changes, this Policy will be reviewed initially after one year of operation and thereafter every two (2) years.

Appendix 1

Child and Youth Safeguarding Acknowledgement Form

I acknowledge that by signing in the space below, I have received and have read a copy of GEAPP's **Child and Youth Safeguarding Policy**.

I understand that I am responsible for understanding, knowing and complying with all applicable policies that are published as guidelines and are not intended to establish any express or implied contractual rights. I also understand that any policy may be amended, altered or discontinued by GEAPP at any time without prior notice, at the discretion of the GEAPP.

I further understand that disciplinary action will be taken against anyone found guilty of Abuse or Exploitation of a Child or Youth.

Initials Date

If I have questions regarding the content or interpretation of this Policy, I will ask the Director, Global Compliance and Risk.

.....

Name

.....

Date

.....

Employee signature