

IPE GLOBAL LIMITED, NEW DELHI

CHILD PROTECTION (CP) POLICY

A. GENERAL

IPE Global Limited (IPE Global) (hereinafter referred to as “the Company”) has a zero tolerance approach towards child exploitation or abuse. The Company respects the rights of children and is committed to upholding & safeguarding their rights to protection against violence, exploitation and abuse. IPE Global expects its workforce including others who work with the Company to have children’s best interests at the heart of their involvement with the Company and conduct themselves ethically & with integrity and avoid any conduct that results in contradiction of this Policy, whether during normal course of conducting business or out of working hours.

B. ACKNOWLEDGEMENT

Each staff member is required to sign a declaration form annexed towards the end of this policy stating that:

1. S/he has read and understands the Child Protection Policy;
2. S/he will report to the Nodal Officer/ line manager and/or project manager any incident of child abuse or violation of child’s rights.

C. REFERENCES

1. The Protection of Children from Sexual Offences Act, 2012 (and related Rules, 2012);
2. The National Policy for Children, 2013;
3. United Nations Convention on the Rights of the Child (www.unicef.org/crc).

D. PURPOSE

The purpose of Child Protection policy (hereinafter referred to as “the Policy”) is to provide guidance on child protection issues and making the staff members aware of their responsibilities/ duties this Policy places on them.

E. SCOPE

This policy applies to the entire workforce in the Company involving employees, whatever their status (including those on contract), subcontractors, sub-consultants and/or any other parties having business relations with the Company. Also, this policy applies to all operations, dealings and transactions in all countries where the Company operates.

F. DEFINITIONS

1. Child

For the purpose of this Policy, a **Child** is defined as any person below the age of 18 (eighteen) years.

2. Child Abuse

Child Abuse or ‘maltreatment’ constitutes all forms of physical abuse, sexual abuse, emotional ill-treatment, neglect and negligent treatment, commercial or other exploitation of a child and includes any actions that result in actual or potential harm to a child.

Child abuse may be a deliberate act, or it may be failing to act to prevent harm. Child abuse consists of anything which individuals, institutions or processes do, or fail to do, intentionally or unintentionally, which harms a child, or damages their prospect of safe and healthy development into adulthood. Refer Annexure A, for possible signs of child abuse.

3. Child Protection

Child Protection refers to preventing and responding to violence, exploitation and abuse against children – including commercial and sexual exploitation, trafficking, child labour and harmful traditional practices, such as female genital mutilation and child marriage.

Within the context of this Policy, **Child Protection** defines preventative and responsive measures IPE Global undertakes to ensure that no child is subjected to child abuse and addresses additional responsibilities of IPE Global workforce (for definition of Workforce, refer 'E. Scope' above) to ensure that work of the Company including programmes/ projects, do not expose children to risk.

G. POLICY

1. Policy Statement

IPE Global is committed to the dignity and equality of all people in all the programmes and projects we undertake - and especially to the principle that our projects should 'do no harm'. We are committed to create a safe environment for children and, in line with their rights under the UN Convention on the Rights of the Child and related statutes of Government of India to prevent their physical, sexual or emotional abuse.

2. Principles

This Policy is informed by set of principles which include:

- i. Zero tolerance of child exploitation or abuse.
- ii. All children have equal rights to protection from abuse and exploitation.
- iii. Each child has a fundamental right to life, survival and development.
- iv. All children should be encouraged to fulfil their potential, and inequality and discrimination should be challenged.
- v. Children will be assured the right to express their views freely and this will be given 'due weight' in accordance with their age and level of maturity. We will not discriminate against the child. The child will be treated with respect irrespective of gender, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law.
- vi. Everybody has a responsibility to support the care and protection of children.
- vii. No child must come to harm as a result of their engagement with IPE Global as a sponsored child, a participant in programme/ project or as part of any advocacy campaign of the Company.

The above principles also extend to those individuals or organisation(s) associated with the Company. Therefore, everyone working for or associated with IPE Global's work must be aware of and adhere to the provisions of this policy.

H. ROLES AND RESPONSIBILITIES

1. Managing Director

As the custodian of IPE Global Child Protection Policy, Managing Director approves the Policy and its subsequent revisions.

2. Human Resource (HR)

Human Resource Department is responsible for implementation and monitoring the obligations under this Policy and is accountable for establishing and maintaining ethical culture. HR must ensure that it applies highest standards in its recruitment and vetting policies across the Company.

3. Department Heads/ Managers

Department heads/ managers are required to take active steps to ensure that every individual staff member(s) who are responsible to them are aware of the Policy and ensure their adherence to this policy.

4. Individual Staff Member

Individual staff members have a responsibility to ensure that children are protected.

5. Subcontractor/ Sub-consultant

All written agreements between IPE Global and Subcontractor(s)/ Sub-consultant(s) (both individuals and firms) shall reflect a shared commitment to child protection. Subcontractor(s)/ Sub-consultant(s) have a responsibility to ensure proper behaviour towards children that is appropriate to their engagement with IPE Global.

If requested by the Client, each subcontractor must prepare and follow an appropriate Child Protection Policy and Procedures.

Where a member of workforce develops concerns or suspicions regarding child abuse or exploitation by fellow worker, whether in the Company or not, s/he must immediately report such concerns via established reporting mechanisms.

I. CHILD PROTECTION – CODE OF BEHAVIOUR

- ☺ Act in good faith and treat all children with respect, without discrimination, harassment, abuse or neglect;
- ☺ Ensure that personal and professional conduct is, and is seen to be, of the highest standard and in keeping with IPE Global's Vision, Mission and Core Values and does not bring the Company into disrepute;
- ☺ Take reasonable action to protect others from harm and to challenge infringements of the rights of others. The duty to protect others is greater in the case of children;
- ☺ Take measures to protect children, young people and vulnerable adults, including refraining from physically and verbally abusing children (even where this is culturally acceptable) and use non-violent methods to manage children's behaviour (both within and outside the workplace);
- ☺ Always create and maintain an environment that prevents all forms of abuse and exploitation. Managers at all levels have a particular responsibility to support systems that maintain this environment;
- ☺ Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- ☺ Not engage in any type of sexual relationships with any person under the age of 18 regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense;
- ☺ Never exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour;
- ☺ The Company's expectation is that all contact with children and young people (whether by phone, email or direct contact) should be supervised, accompanied, or at least in sight of other adults. We recognise that situations may arise where this cannot be the case for urgent or for practical reasons. Where there is a lone adult working with one or more children, the line manager should be informed upfront or as soon as possible;
- ☺ Never take children with whom the staff member has established contact through their work to their home where they will potentially have lone contact with the child; never sleep in the same room as a child and staff or share the same bed as a child with whom they have contact through their work.
- ☺ Staff member will not do things of a personal nature for a child that they can do for themselves;
- ☺ Staff member will not be intoxicated under the influence of alcohol or drugs while child/ren is/are in their care;
- ☺ Not condone the employment or employ any children in the "worst forms of child labour" i.e. all forms of slavery, trafficking of children, forced or compulsory labour, recruitment of children for use

in armed conflict, commercial sexual exploitation of children, children used by adults in the commission of crime (including the trafficking or production of drugs) and any work which by its nature is likely to harm the health, safety or morals of children;

- ☺ Never employ children to work to the detriment of the completion of their education;
- ☺ Never shame, belittle or degrade a child;
- ☺ Refrain from showing favouritism to particular children to the exclusion of others, or inconsistent application of rules, nor will they engage in any corrupt practice that may bring favour or disfavour onto particular children;
- ☺ Never stigmatise children (for example, based on gender, race, ability, class or any other factor);
- ☺ Always challenge bullying and child-to-child abuse in all its forms.
- ☺ Take permission from child and her/his parent/ guardian before clicking photos or taking videos of them.

The above behaviours are not intended to interfere with normal family interactions.

J. PREVENTIVE MEASURES

i. Recruitment

The Company strives to ensure that it applies highest standards in its recruitment and vetting policies across the organisation, as laid out in HR Manual. Recruitment and selection procedures reflect our commitment to child protection.

- ☺ All adverts for recruitment state that IPE Global is an equal opportunity employer.
- ☺ All appointments are subject to reference checks including where relevant, suitability to work with children.
- ☺ IPE Global does not employ any staff member (including those on contract) below the age of 18 years and where, during or upon recruitment, concerns come to light in relation to the applicant's unfavourable conduct with children.

ii. Training/ Awareness

All staff members receive child protection training to make them aware of the importance of protecting children and to be fully aware of procedure for reporting the concerns. The trainings in the following stages:

- a. Induction of new employees;
- b. Universal training/ awareness programme for all staff members;
- c. Tailored training as per the requirement of programme/ project.

iii. Risk Assessment

In the projects/ programmes involving potential contact with children, we undertake risk assessment in the 'Risk Register', to identify and manage risk(s) to children appropriately. The Corporate Risk and Compliance (CRC) Department reviews the risk registers on half yearly basis.

iv. Commitment from Suppliers

All agreements with Suppliers shall reflect Supplier's commitment to Child Protection, including an undertaking that Supplier does not employ any staff member below the age of 18 years/ in contravention of the law of land (as applicable).

K. REPORTING PROCEDURE

Staff members and other personnel are duty bound to disclose any Child Abuse and Child Protection concerns, including non-compliance of this Policy by anyone within the scope of this Policy in connection with official duties or business, immediately upon identification.

Whom to report?

An individual can get in touch with following nodal officer for recording the possible Child Abuse and Child Protection concern:

Ms. Kavita Fadnis

Vice President – Human Resources

Direct : +91 11 40755904
Mobile : +91 9958003076
Email : kfadnis@ipeglobal.com

Where the concern has been submitted with MD/ COO/ Department Head, the same will be duly forwarded to Nodal Officer for investigations.

What to report?

If any staff member suspects abuse, or if a person external to the Company reports to the Company a suspicion or allegation relating to IPE Global staff or activities, the following steps should be taken:

- ☺ Avoid any delay;
- ☺ Write down what you've heard or seen;
- ☺ Email or record the suspicion/ concern with the nodal officer (refer above – **Whom to Report?**)

The report must specify the nature of the suspicion/ concern and name(s) of the alleged abuser. The suspicion/ concern should include date and time of specific event(s), names of witnesses, if any and/or any evidence that support the allegation(s).

L. INVESTIGATIONS

The Company will act without delay, prioritising the safety of the child/ren involved, in the event of a concern or allegation of child abuse being reported.

The nodal officer will convene a meeting within 24 hours – which can be face to face, by phone, skype or email (all emails should be signalled as confidential). The following (apart from nodal officer) member shall be present in the meeting:

1. For local oversight – the Head of Department/ Project Manager (it may also include branch head);
2. For risk ownership and HR expertise – Head – CRC and Head – HR, respectively;
3. Representative of management – Chief Executive Officer (COO).

The members will instigate and investigate if there has been a breach of this policy by subject staff member (alleged perpetrator). An investigation will gather evidence and interview relevant parties in order to establish the probable facts in relation to the complaint/ disclosure. If needed, the members will record the statement of the child in the presence of parents of the child, at a place where the Child resides or at a place of his choice.

The members of the meeting may recommend management of the Company through Head – HR to serve the suspension notice to the subject staff member (alleged perpetrator), until the investigation has been completed.

In case the members of the committee records serious malpractice against the subject staff member in its report, appropriate action shall be initiated, which shall include termination from IPE Global and may involve informing statutory authorities, as per the law of land.

Confidentiality

Given the sensitive nature of investigations and its impact on the child/ren as well as the person against whom such allegations are levelled, the Company is committed to maintaining strict confidentiality in relation to such complaints and the resultant investigations/ inquiry.

All proceedings, including the statements and other material adduced as evidence before the investigating members shall be strictly confidential and the members shall not divulge the details to any other employee within the Company or to any person outside. This includes Minutes of the Meetings, findings, recommendations, decisions of the members and any document or any verbal communication. Also, to other Employees involved in such discussions, the members should emphasize the necessity for confidentiality and the consequences of possible disciplinary action in case of transgression.

Appropriate sanctions will be applied in cases of malicious and deliberate false accusations of Child abuse/ exploitation, which may include, but not limited to, termination.

M. DISCIPLINARY ACTION

While it will be ensured that staff member(s) who raises genuine disclosure are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection or this Policy will warrant disciplinary action.

Any person, who negligently or malafidely broadcasts confidential information in relation to investigations shall warrant disciplinary action.

Any person who makes any disclosure malafidely and knowingly that it was incorrect or false or misleading or frivolous or reported otherwise than in good faith, shall invite disciplinary action including initiation of civil or criminal proceedings and/ or termination from employment with IPE Global and its subsidiaries.

N. PROTECTION AGAINST RETALIATION

The Company takes reports of retaliation seriously. We will not tolerate any attempt to deter anyone from reporting suspicions of Child Abuse or incidents of repercussions/ victimisation against anyone who, in good faith, reports/ discloses a concern or cooperates with investigations even when allegations are found to be unsubstantiated. Any employee of IPE Global who retaliates against another employee in violation of this Policy is subject to disciplinary action, upto and including termination. This also includes attempts to deter anyone from reporting suspicions of Child Abuse.

O. COMPLIANCE

This Policy cannot describe all Child Abuse situations that may arise. Therefore, employees (and other individuals) must use their respective good judgment to avoid any appearance of impropriety.

If any staff member has any question whether a course of conduct constitutes Child Abuse, it is the responsibility of that individual to obtain an advice from his/her line manager and act in accordance with that advice. Alternatively, the concerned individual can get in touch with the nodal officer listed under point (K) above to clear any misconceptions.

P. MONITORING AND REVIEW

Head – HR will monitor the effectiveness and review the implementation of this Policy, on annual basis.

IPE Global reserves right to modify this Policy unilaterally at any time, without notice. Modifications may be necessary to maintain compliance with local regulations and/ or accommodate organisational changes in the company. Any revisions in this Policy including amendments or changes under respective clauses will be duly notified to employees through email communication. Also, such revised Policy or notification/ circular/ internal communication on such revisions will be updated in the library section of EmployWise (HR ERP) and Corporate Website (www.ipeglobal.com). The employee shall be deemed to have read, understood and acknowledged the changes thereof which will supersede the terms of current Policy or any subsequent document/communication related to the Policy.

ANNEXURE A

POSSIBLE SIGNS OF CHILD ABUSE

PHYSICAL ABUSE	EMOTIONAL ABUSE
<ul style="list-style-type: none"> ▪ Bruises, burns, sprains, dislocations, bites, cuts ▪ Improbable excuses given to explain injuries ▪ Injuries that have not received medical attention ▪ Injuries that occur to the body in places that are not normally exposed to falls, rough games, or play (for example, on the stomach, neck, back, and genitals) ▪ Repeated urinary tract infections or unexplained stomach pains ▪ Refusal to discuss injuries ▪ Withdrawal from physical contact ▪ Arms and legs kept covered in hot weather ▪ Fear of returning home or of parents being contacted ▪ Showing wariness or distrust of adults ▪ Self-destructive tendencies ▪ Being aggressive toward others ▪ Being very passive and compliant ▪ Chronic running away 	<ul style="list-style-type: none"> ▪ Delayed physical, mental, or emotional development ▪ High anxiety ▪ Delayed speech or sudden speech disorder ▪ Fear of new situations ▪ Low self-esteem ▪ Inappropriate emotional responses to painful situations ▪ Extremes of passivity or aggression ▪ Drug or alcohol abuse ▪ Chronic running away ▪ Compulsive stealing ▪ Obsessions or phobias ▪ Sudden under-achievement or lack of concentration ▪ Persistent tiredness ▪ Lying
SIGNS OF NEGLECT	SEXUAL ABUSE
<ul style="list-style-type: none"> ▪ Frequent hunger ▪ Failure to grow ▪ Stealing or gorging on food ▪ Poor personal hygiene ▪ Constant tiredness ▪ Inappropriate clothing (for example, wearing summer clothes in winter) ▪ Frequent lateness or non-attendance at school ▪ Untreated medical issues ▪ Low self-esteem ▪ Poor social relationships ▪ Compulsive stealing ▪ Drug or alcohol abuse 	<ul style="list-style-type: none"> ▪ Age-inappropriate sexualised behaviour ▪ Physical trauma (general and in genital and anal areas) ▪ Behavioural indicators (general and sexual), which must be interpreted with regard to the individual child's level of functioning and developmental stage ▪ Signs that are similar to physical abuse signs

DECLARATION

I hereby declare that I have read and understood IPE Global Limited's Child Protection Policy and I hereby agree to abide by it.

I also declare that I have never been convicted of any offence nor there is any civil or criminal proceeding of any nature pending against me at the date of this declaration involving any type of harm to a child or children. In addition, I have not undergone disciplinary action relating to child abuse, neglect or violence of any type.

Name :

Designation :

Signature :

Date :

Place :