

NRECA International Policy on Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect

1. Purpose and Scope. This NRECA International Policy on Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, and Child Neglect (the “Policy”) describes NRECA International's commitment to prevent exploitation, sexual abuse, child abuse, and child neglect. This Policy expands on NRECA International's Supplemental Policies & Procedures for Overseas Assignments (“Policies & Procedures”). This Policy not only describes NRECA International's safeguarding commitments, but also informs Covered Individuals (as defined in Section 2 – Definitions below) of their safeguarding and reporting responsibilities and obligations.

NRECA International is committed to providing a safe environment for children, holding all Covered Individuals to high standards of conduct, implementing policies and procedures to prevent exploitation, sexual abuse, child abuse, child neglect, and responding to any issues or concerns related to a child's engagement with NRECA International, both in person and virtually.

All Covered Individuals must fully comply with the requirements of this Policy. All Covered Individuals must also comply with all requirements of the local country's child welfare and protection laws or international standards, whichever provides greater protection, as well as with U.S. law where applicable.

NRECA International has implemented appropriate preventive measures and will timely investigate complaints and take appropriate action to immediately stop any exploitation, sexual abuse, child abuse, or child neglect that may occur and prevent any future occurrence of such prohibited conduct. NRECA International is committed to a survivor-centered approach for responding to alleged violations regarding activities that are prohibited under this Policy, which is designed to ensure the survivor's dignity, experiences, considerations, needs, and resiliencies are placed at the center of the process. When allegations involve a child, NRECA International shall respond to any allegations by acting in the best interest of the child, which shall consider the best possible outcome for a vulnerable child who has been exposed to violence, abuse, exploitation, or neglect.

NRECA International crafted this Policy to comply with US law, and be consistent with international standards on safeguarding, including but not limited to the [Inter-Agency Standing Committee's Six Core Principles Relating to Sexual Exploitation and Abuse](https://psea.interagencystandingcommittee.org/update/iasc-six-core-principles), available at <https://psea.interagencystandingcommittee.org/update/iasc-six-core-principles>, and the [International Child Safeguarding Standards](https://www.keepingchildrensafe.global/international-child-safeguarding-standards/), available at <https://www.keepingchildrensafe.global/international-child-safeguarding-standards/>.

2. Definitions. For purposes of this Policy, the following terms shall have the meanings set forth below.

(a) “Agent” means any individual, including a director, officer, or an independent contractor, authorized to act on behalf of NRECA International.

(b) “Child” means a person younger than 18 years of age, regardless of the legal age of majority or consent in the local country or jurisdiction.

(c) “Child abuse” means emotional, physical, sexual, or any other abuse or ill-treatment carried out against a child by an adult.

(d) “Child neglect” means a failure to provide for a child’s basic needs in the absence of the child’s parent(s) or legal guardian(s) when the care of the child is associated with activities supported by or connected to an award.

(e) “Covered Individual” means any employee, officer, board of director member, agent, intern, volunteer, consultant, contractor, supplier, vendor, subcontractor, or subrecipient of NRECA International or of a NRECA International agent, contractor, supplier, vendor, subcontractor, or subrecipient.

(f) “Emotional child abuse or ill-treatment” means injury to the psychological capacity or emotional stability of the child caused by acts, threat of acts, or coercive tactics.

(g) “Employee” means an individual who is engaged in the performance of activities supported by or connected to an award in a capacity of a direct employee, consultant, or volunteer of the recipient, subrecipient, or a lower-tier subrecipient.

(h) “Exploitation” means any actual or attempted abuse of a position vulnerability, differential power, or trust, including for purposes of profiting monetarily, socially, politically, or otherwise. When carried out for a sexual purpose, such exploitation constitutes “sexual exploitation.”

(i) “Physical child abuse” means an act or failure to act resulting in injury (which need not be visible) or unnecessary or unjustified pain or suffering without causing injury, harm, or risk of harm to a child’s health, welfare, or death.

(j) “Sexual abuse” means any actual or threatened physical intrusion of a sexual nature toward another person whether by force or under unequal or coercive conditions. Any sexual activity between a child and an adult constitutes “child sexual abuse,” regardless of whether the adult uses force or unequal or coercive conditions.

(k) “Prohibited Activities” means any form of exploitation, sexual exploitation, sexual abuse, child sexual abuse, child abuse, physical child abuse, emotional child abuse or ill-treatment, or child neglect, as defined herein, supporting or advancing any of the foregoing prohibited acts, or intentionally ignoring or failing to act upon allegations of the foregoing prohibited acts.

3. Prohibited Conduct. NRECA International has a zero-tolerance policy regarding any Covered Individual who engages in Prohibited Activities. All Covered Individuals are strictly prohibited from engaging in any Prohibited Activities, which, for the avoidance of doubt, include exploitation, sexual exploitation, sexual abuse, child sexual abuse, child abuse, physical child abuse, emotional child abuse or ill-treatment, or child neglect. All Covered Individuals are strictly prohibited from engaging in any form of sexual activity with a child, regardless of the local country’s or

jurisdiction's law or customs regarding the age of consent. All Covered Individuals are strictly prohibited from violating local child welfare and protection laws or international standards, whichever provides greater protection to children. All Covered Individuals are strictly prohibited from violating U.S. law where applicable.

4. Reporting Requirements and Procedures. All Covered Individuals who observe, suspect, or otherwise receive allegations of any conduct prohibited under this Policy are required to report information regarding such prohibited conduct as soon as possible. Covered Individuals must report information regarding prohibited conduct to one or all of the following:

1. The Covered Individual's immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department;
2. Any NRECA International human resources (HR) representative;
3. Toll-Free Telephone Hotline: 1-855-653-7072; or
4. Web-Based Report:
<https://secure.ethicspoint.com/domain/media/en/gui/34555/index.html>(nreca.ethicspoint.com).

When reporting on allegations of prohibited conduct, all Covered Individuals should include as much detail as possible regarding the prohibited conduct at issue, including, but not limited to, identifying the person(s) who engaged in the prohibited conduct and any person(s) who witnessed the prohibited conduct.

If NRECA International becomes aware of any allegation that a Covered Individual has engaged in any prohibited conduct, NRECA International will timely conduct a thorough investigation into such allegations, take appropriate action under the circumstances, and make any required notifications to government agencies. When responding to alleged prohibited conduct and conducting investigations, NRECA International requires all Covered Individuals to use a survivor-centered approach, which ensures the survivor's dignity, experiences, considerations, needs, and resiliencies are placed at the center of the process. When a child is involved, NRECA International requires all Covered Individuals to make a best interest of the child determination, which considers the best possible outcome for a vulnerable child who has been exposed to violence, abuse, exploitation, or neglect, for responding to the allegations of prohibited conduct.

Whenever NRECA International receives credible information from any source that alleges that NRECA International's or a lower-tier subrecipient's employee, agent, intern, or any other person provided access or contact with beneficiaries under a federal award has engaged in any prohibited conduct, NRECA International shall immediately inform the designated U.S. federal government personnel of such information. As soon as practicable, NRECA International shall provide in writing to designated U.S. federal government personnel: (i) additional information on any actions planned or taken in response to the allegations; and (ii) any actions planned or taken to assess, address, or mitigate factors that contributed to the incident. When providing information to U.S.

federal government personnel, NRECA International shall not share personally identifiable information (PII), unless specifically requested by U.S. federal government personnel.

5. Retaliation Prohibited. NRECA International strictly prohibits any retaliation against anyone, including Covered Individuals, who provide information regarding allegations of conduct prohibited under this Policy, or who participate in any internal or external investigation into allegations of prohibited conduct. Retaliation occurs, but is not limited to instances, when an individual harms or threatens to harm another person in any way for reporting or expressing an intent to report what they believe in good faith to be a violation of this Policy, assisting others in reporting any such Policy violations, or participating in investigations related to this Policy.

All suspected or known instances of retaliation shall be promptly reported using the procedures set forth in Section 4 – Reporting Requirements and Procedures above. Any individual who engages in retaliation related to this Policy shall be subject to immediate disciplinary action up to and including termination of employment or other relationship with NRECA International.

6. Consequences of Policy Violations. Any Covered Individual who engages in any conduct prohibited under this Policy, fails to report or support an investigation regarding conduct prohibited under this Policy, or otherwise violates the requirements of this Policy or related procedures will be subject to immediate disciplinary action, up to and including immediate termination of employment or other relationship with NRECA International.

NRECA International may take or assist with legal action against any person who engages in conduct prohibited under this Policy, including, but not limited to, referring the matter to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.

When an individual working on behalf of a lower-tier subrecipient engages in conduct prohibited under this Policy, NRECA International may terminate the lower-tier subrecipient's contractual relationship with NRECA International. In such instance, NRECA International may pursue any contractual or other legal or equitable remedies that may be available.

7. Compliance Plan. For awards exceeding \$500,000, NRECA International shall develop, implement, and maintain a compliance plan, which details risk analysis and mitigation measures that will be implemented during the period of performance of said awards to prevent and address exploitation, sexual abuse, child sexual abuse, child abuse, physical child abuse, emotional child abuse or ill-treatment, or child neglect of any person.

NRECA International shall ensure that any required compliance plan is appropriate for the size and complexity of the award and the nature and scope of the activities, including the particular risks presented by the operating context. Any required compliance plan shall include, at a minimum, the following:

1. Reasonable measures to reduce the risk of exploitation, sexual abuse, child abuse, and child neglect;

- a. Where implementation of projects under an award may involve children, this includes limiting unsupervised interactions with children and complying with applicable laws, regulations, or customs regarding harmful image-generating activities of children;
2. An awareness program to inform employees, agents, interns, or any other person provided access or contact with beneficiaries about the requirements of this Policy and any applicable compliance plan, including the activities prohibited, the action that will be taken in response to violations, and the mechanism(s) for reporting allegations of prohibited conduct;
3. A description of how beneficiaries and local community members:
 - a. (A) are made aware of the prohibited activities,
 - b. (B) how they may report allegations of prohibited activities, and
 - c. how (A) and (B) are carried out in a manner that is inclusive, culturally appropriate, and sensitive to the context;
4. Safe, accessible, and publicly available reporting mechanism(s) that may be integrated with any existing or similar such mechanisms, for anyone to confidentially report exploitation, sexual abuse, child abuse, and child neglect, with appropriate safeguards to protect whistle-blowers and survivors, including express protection against retaliation for reporting, and documented procedures for protecting personally identifiable information (PII) from unauthorized access and disclosure; and
5. Appropriate measures to protect survivors of or witnesses to prohibited conduct and not prevent or hinder cooperating fully with U.S. Government authorities.

NRECA International shall provide a copy of any compliance plan to U.S. federal government personnel upon request.

8. Lower-Tier Subrecipients. All lower-tier subrecipients shall be required to submit to the requirements of this Policy. All lower-tier subrecipients and their personnel are strictly prohibited from engaging in conduct that violates this Policy. NRECA International requires that all lower-tier subrecipients uphold the commitments and principles of this Policy to prevent exploitation, sexual exploitation, sexual abuse, child sexual abuse, child abuse, physical child abuse, emotional child abuse and ill-treatment, and child neglect.

Lower-tier subrecipients who witness prohibited conduct or receive information regarding alleged prohibited conduct must promptly report such conduct in accordance with Section 4 – Reporting Requirements and Procedures.

NRECA International requires that lower-tier subrecipients fully cooperate in any investigation regarding prohibited conduct and provide truthful information to any investigators.

In any subaward to a lower-tier subrecipient, NRECA International shall include “If NRECA International receives information regarding individuals engaging in prohibited conduct, NRECA International shall timely provide such information to designated U.S. federal government personnel.”

NRECA International monitors lower-tier subrecipients and other third-parties that have access to federal award beneficiaries to ensure compliance with this Policy and other applicable requirements, obligations, and laws.

Violations of this Policy may result in the immediate termination of a lower-tier subrecipient’s contractual relationship with NRECA International.

9. Recruiting and References. NRECA International, in compliance with applicable laws, will take all appropriate steps to prevent perpetrators of exploitation, sexual exploitation, sexual abuse, child sexual abuse, child abuse, physical child abuse, emotional child abuse and ill-treatment, or child neglect from being hired, deployed, re-hired, or re-deployed by NRECA International, including conducting reference and background checks for job candidates to the extent possible.

Subject to compliance with any applicable laws, all Covered Individuals must immediately disclose convictions or guilty pleas of any offense that relates to exploitation, sexual exploitation, sexual abuse, child sexual abuse, child abuse, physical child abuse, emotional child abuse and ill-treatment, or child neglect.

10. Revisions. NRECA International, through its Board of Directors or designated representative, shall have sole authority to add, delete, or adopt revisions to the policy and/or compliance plan. Any written or oral statement by a supervisor, manager, or director contrary to the policy or compliance plan is invalid and should not be relied upon by anyone.