

REPP Safeguarding Policy

Purpose	This Policy establishes the policy by which REPP seeks to protect the rights and well-being of those implementing REPP transactions (the staff of the REPP Manager) and all those impacted by REPP activities.
Safeguarding Principles	The guiding principle of the REPP Safeguarding Policy is Do No Harm. Recognizing the historical imbalances that exist, special focus is placed on vulnerable and/ or disadvantaged groups. This Policy is prepared in light of IFC Performance Standard 4 (Community Health, Safety and Security), the EHS Guidelines of the World Bank, the Equator Principles and the general principles of transparency, proportionality and accountability.
Safe and Trusted Environment	The goal of the REPP Safeguarding Policy is the creation of a safe and trusted environment for those implementing REPP transactions and, to the extent possible, those vulnerable and/or disadvantaged groups impacted by these transactions. As discussed below, the achievement of this goal is based on a multi-pronged approach of risk assessment and mitigation, working with partners, training and interaction with other policies of REPP.
Risk Assessment	It is the responsibility of the Board and the senior leadership team of the Manager to be fully aware of the contents of this Policy and ensure that safeguarding risk assessment is a continuous activity integrated into the operations of REPP.

The Safeguarding risks identified by REPP include:

- **Physical harm:** The risks of physical harm for persons implementing REPP projects include accidents, terrorism and violent crime. Concerning vulnerable groups, especially women and indigenous communities, additional risks of physical harm arise from conflict over land and resources which may be exacerbated by the implementation of REPP projects.
- **Emotional abuse:** Bullying and emotionally abusive conduct are risks in any organization and include issues of work-life balance that may arise in an expert-led dedicated team such as REPP. Emotional abuse may also arise towards staff implementing REPP from developers and other stakeholders, especially when faced with a negative funding decision by REPP.
- **Sexual misconduct:** Sexual misconduct is a broad range of behaviour that includes but is not limited to sexual harassment, sexual assault, non-consensual sexual contact, sexual exploitation, intimate partner violence (domestic and dating violence) and stalking.

- **Exchanging of benefits:** Of particular concern to REPP, in light of recent events, is the risk of exchange of benefits whereby goods, employment, food and/or money are exchanged for sexual favours.
- **Discrimination:** Discrimination based on gender, age, disability, ethnicity, sexual orientation and/or religion is illegal under the Equality Act 2010 and will not be tolerated by REPP. The risk of discrimination exists internally and also in the implementation of REPP projects.
- **Neglect and acts of omission:** Vulnerable groups, particularly women, children and indigenous communities, are at risk from acts of omission, i.e., not receiving benefits they are entitled to. This risk occurs during the stakeholder engagement and allocation of community benefits when implementing REPP projects.

The appropriate and proportionate mitigation of these risks will vary from project to project but shall be based on the principles set out above.

Risk Mitigation

Primary risk mitigation tools include:

- **Code of Ethical Conduct:** Adherence to the Code of Ethical Conduct is mandatory for all staff of the Manager.¹
- **Contractual provisions:** Compliance with this Safeguarding Policy is mandatory under the contractual terms of REPP financial support and is required to be inserted into any contract for technical assistance funded indirectly by REPP.
- **Recruitment processes:** The REPP Manager shall ensure that the recruitment of key staff of the REPP Manager has the necessary experience to ensure the implementation of this Safeguarding Policy.
- **Approval processes:** The REPP Manager shall ensure that safeguarding issues are addressed in the selection, design, approval and implementation of REPP transactions. The Investment Committee shall explicitly consider the impact of each REPP transaction on vulnerable groups, particularly women, children and indigenous communities.
- **Procurement processes:** The Procurement Policy shall be implemented to ensure that safeguarding issues are adequately addressed by all service providers to REPP.
- **Integrity Checks:** The integrity checks commissioned directly by the Board (as to the integrity of Manager's application of REPP policies and procedures), shall give specific consideration of compliance with this Safeguarding Policy.

Working with Investees and REPP Partners

The financial support provided to small-scale renewable energy projects by REPP is channelled to Investees for Development Capital and/or Flexible Gap Funding. Accordingly, it is essential to ensure that these stakeholders share REPP's commitment to safeguarding and protecting vulnerable and/or disadvantaged groups. The inclusion of contractual terms requiring compliance with this Policy by Investees and

¹ REPP itself has no employees or volunteers.

those providing technical assistance to REPP and/or its projects will be mandatory. Similarly, REPP will utilize its network of REPP Partners² to understand and promote best-in-class safeguarding policies.

Training and Compliance

The Compliance Officer of the Manager is appointed to be the Compliance Officer of REPP. The role of the Compliance Officer includes:

- Being responsible for safeguarding issues within REPP and proactively monitoring safeguarding risks;
- Ensuring training on the Safeguarding Policy for those implementing REPP projects and awareness raising on communities' rights as part of the stakeholder engagement process;
- Serving as the initial point of contact for incident reporting;
- Reviewing the Safeguarding Policy at least annually; and
- Making referrals to relevant regulatory authorities and/or law enforcement agencies as appropriate, including to the Donor.

Training of staff of the Manager on safeguarding shall be conducted at least annually.

Incident Reporting

Safeguarding concerns shall be immediately reported to the Compliance Officer (or in the event that they concern the Compliance Officer directly to the Managing Director of the Manager and/or a member of the Board). The rights of staff of the Manager to report concerns are protected by the Public Interest Disclosure Act 2013. In addition, REPP has a 24hr anonymous whistleblowing hotline on +44 191 516 7764 or camco@safecall.co.uk and an anonymous grievance online form: <https://www.safecall.co.uk/en/file-a-report/> that can serve as an initial point for reporting safeguarding concerns.

All reports of safeguarding concerns will be documented, treated in confidence and reported to the Board by the Compliance Officer. In certain circumstances, matters may be referred to the police or other authorities in the relevant jurisdiction and may also serve as the basis for disciplinary action, including termination of employment.

Receiving Complaints

- (i) Complaints submitted by email, via the complaints website form or through other channels of the REPP shall be forwarded to REPP Compliance Officer and registered within 14 business days in safeguarding complaints for projects and programmes register maintained by REPP's Compliance Officer.
- (ii) REPP's Compliance Officer shall notify the complainant within 14 business days that their complaint has been received.

The problem-solving process

REPP's Compliance Officer together with the relevant team members shall follow the following steps when resolving issues:

- (i) Collect all evidence and information about the issue, visit the site, if relevant, and conduct a thorough analysis regarding the issue in a way suitable to the nature of the issue raised. In this stage, the REPP

² As at 4 June 2018: OPIC, FMO, ElectriFi, PTA Bank, Inspired Evolution, West African Development Bank, Oikocredit, Finnfund and Noble Capital

can seek assistance from an independent professional or consulting company to determine, if the harm has been caused or could be caused by a project or programme with REPP involvement. If, in this stage, it is concluded that:

- a) there cannot be more done to solve the issue, or,
 - b) is proven that the harm has not been caused by a project or programme where REPP is involved,
- then the complaint shall be dismissed. The REPP Compliance Officer shall inform the complainant of the decision to dismiss the complaint.
- (ii) Explanation, clarification and evidence shall be collected from the relevant parties. If in this stage, it is found that the issue is being addressed by the project implementer and the relevant parties, it shall be taken into consideration.
 - (iv) Upon discussing the issue with the relevant parties, REPP shall determine the actions to be taken to reduce or mitigate the negative impact that has been caused or is expected to be caused by a project or programme and to redress the grievances of the complainant.
 - (v) The final decision shall be made upon approval by all of the parties involved.
 - (vi) If harm has been caused or it is proven that a situation has arisen where harm could be caused because of the REPP's non-compliance with its policy and procedures, corrective measures shall be taken to ensure the same breaches shall not be repeated.
 - (vii) If the issue has been caused by the employee's unethical behaviour, the issue shall be dealt with through the appropriate disciplinary measures as per the HR policy of the REPP.
 - (viii) REPP's Compliance Officer shall contact the complainant and present the proposed solutions to resolve the complaint as the outcome of the previous steps. The implementation shall be initiated if the complainant agrees to the solutions offered. If the complainant objects to the solutions offered by the complaint mechanism for projects and programmes, further solutions shall be offered based on discussion with the relevant parties.
 - (ix) After the complaint has been resolved, REPP's Compliance Officer prepares a Complaint resolution report on complaint resolution, the outcome, and the next steps to take.
 - (x) The report shall be delivered to relevant parties for their approval.
 - (xi) REPP's Compliance Officer Shall present any material findings to the REPP Board.
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