



## Child Protection Policy

*Effective June 30, 2025*

### I. Purpose Statement

Rocky Mountain Institute (RMI) seeks to protect the rights of all children and ensure that children are safeguarded and protected in any circumstance in which they may be involved in any of RMI's programs or activities. Though RMI's work is not specifically targeted for children, some of RMI's work involves working with communities where children receive indirect benefits. By implementing this policy, RMI's goals are to safeguard and protect children from any harm and provide a clear path of response for RMI personnel in the event of suspected abuse or neglect of children. RMI provides this Child Protection Policy to all employees and contractors.

### II. Definitions

**Child/Children:** any person(s) under the age of eighteen (18).

**Child Abuse:** physical, sexual, emotional abuse and/or neglect. Abuse can take place in person and online, by other Children and/or adults, including those in positions of trust.

**Child Labor:** work that deprives Children of their childhood, their potential, and their dignity, and that is harmful to a Child's physical or mental development. It is work that:

- Is mentally, physically, socially or morally dangerous and harmful to Children
- Interferes with a Child's schooling by:
  - Depriving them of the opportunity to attend school;
  - Obliging them to leave school prematurely;
  - Requiring them to attempt to combine school attendance with excessively long and heavy work.

**Child Safeguarding:** proactive steps taken to prevent violence against Children including all forms of physical or mental violence, injury and abuse, Neglect or negligent treatment, maltreatment or Exploitation, including Sexual Abuse.

**Child Protection:** responding to concerns and/or disclosures that a Child may be experiencing or may be at risk of experiencing physical and/or mental violence, injury and/or abuse, Neglect and/or negligent treatment, maltreatment and/or Exploitation, and/or Sexual Abuse.

**Emotional Abuse:** actions towards a Child that cause or could cause serious behavioral, cognitive, emotional, or mental disorders in the Child. Emotional Abuse also occurs when a person makes verbal threats, socially isolates a Child, intimidates, Exploits, terrorizes, or routinely makes unreasonable demands on a Child.

**Exploitation:** situations whereby an abuser makes unfair profit and/or takes advantage of unequal power and/or economic status of a Child.

**Neglect:** 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.

**Personnel:** includes all RMI employees, trustees, volunteers, interns, contractors and all those with whom a business relationship is established.

**Physical Abuse:** the deliberate application of force by any person to any part of the body of the Child, which results or may result in non-accidental harm or injury to a Child. Physical Abuse may include shaking, choking, biting, kicking, burning, poisoning, holding a Child under water, or any other harmful or dangerous use of force or restraint.

**Sexual Abuse:** the involvement of a Child in sexual activity that they do not fully comprehend, is unable to give informed consent to, or for which the Child is not developmentally prepared, or that violates the laws or social taboos of society. This includes:

- Engaging in sexual activities with a Child (including contact and non-contact acts such as touching, penetration, or exposure to sexual acts or materials).
- Persuading or coercing a Child to engage in sexual activities.
- Using a Child for the production of sexual materials (e.g., pornography).
- Exploiting a Child through prostitution or other forms of commercial sexual exploitation.

Sexual abuse can be committed by adults or by other Children and may occur in person or via digital platforms.

### **III. Policy**

#### **Code of Conduct**

Personnel are prohibited from hiring Children under the age of 15 – regardless of any perceived benefit to the Child or family – and prohibited from funding programs in which Child Labor is occurring. Hazardous work, including construction and manufacturing work, is prohibited for all Children.

To ensure Child Safeguarding and Child Protection, Personnel must also abide by the following standards of Professional Conduct when interacting with Children:

- Personnel are prohibited from having unsupervised interactions with a Child; encouraging a Child to meet outside of work-related activities; or befriending or sending private messages to a Child via email or any social media platform.
- Personnel shall treat Children with dignity and respect and do not engage in any form of harassment, intimidation, victimization, Child Abuse or Exploitation.
- Personnel shall use appropriate language and behavior and avoid any language or behavior that could be deemed offensive, abusive, exploitative, or demeaning.
- Sexual activity of any kind with a Children is prohibited. This applies regardless of the age of consent. A mistaken belief regarding the age of the Child is not a defense.
- Use of any device to access, view, create, download, or distribute sexual images of Children is prohibited.
- Physical punishment, discipline, or use of physical force of any kind is prohibited.

### **Designated Person for Child Protection**

In the event there is a Child Abuse or Child Labor concern, it should be reported immediately to RMI's Chief People Officer.

### **Reporting Procedures**

Personnel must report concerns or allegations of any forms of Child Abuse or Child Labor to RMI's Designated Person for Child Protection at the first possible opportunity to best ensure Child Protection and Child Safeguarding. If the Designated Person for Child Protection is unavailable, then concerns should be reported to RMI's CEO, General Counsel or Legal Director. Reports of suspected or alleged violations of this policy should contain as much information as is readily available, such as date, time and location of incident; nature of what happened; and any immediate help or actions required. Intentional false or malicious reporting may result in disciplinary action.

### **Procedures for Dealing with Reports**

Upon receipt of any report of Child Labor or Child Abuse, RMI will take immediate steps to investigate the report and ensure compliance with this policy. The best interest of the Child is the highest priority in any investigation. Where a report of Child Abuse or Child Labor includes allegations against Personnel, the accused Personnel shall be immediately suspended from all duties pending the investigation. Where an allegation of Child Abuse or Child Labor against Personnel is substantiated, said Personnel will be terminated and will be prohibited from entering into any RMI premises or participating in RMI activities following termination.

### **Confidentiality and No Retaliation**

RMI understands that confidentiality can be critical to safety/security, reputation, and wellbeing. Therefore, reports of concerns or allegations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. In instances where there is legitimate belief that an investigation could put the reporter, Child, witnesses or anyone else in danger, RMI will take reasonable steps to protect the safety and security of those perceived to

be at risk.

No Personnel who, in good faith, reports on concerns or allegations of child labor or abuse shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, employees, interns or volunteers who retaliate against someone who has submitted a report in good faith will be subject to discipline up to and including dismissal from the volunteer or intern position or termination of employment. Complaints of retaliation should be reported pursuant to the reporting procedure set forth above,

### **Informed Consent**

RMI will provide Children with all necessary details to make an informed decision regarding their participation in programs and activities, including any voice recordings, videos or photographs. Children will understand how their images may be used and be supported to identify and evaluate any associated risks. Personal information and/or images of a Child will only be used after informed consent has been obtained in writing from the Child and/or their parent(s) / legal guardian(s) as applicable.

### **Protection of Personal Information.**

Personal information regarding a Child, whether or not such information is obtained as part of a program involving Children, will not be disclosed to any third party, except in accordance with the policies of RMI or as required by applicable laws. Personal information includes, but is not limited to, any information that can be linked to a Child or used to identify a Child.

## **IV. Owner & Revision History**

**Owner:** Legal & People Team

<b>REVISION DATE</b>	<b>KEY REVISION(S) MADE</b>
2021	Original Policy approved
1/29/2024	Revised to specifically prohibit Child Labor and instruct Personnel to avoid unsupervised interactions with child program participants
6/30/2025	Revised to add definitions of emotional abuse, sexual abuse and exploitation; expand code of conduct and procedures for dealing with reports of Child Abuse; and add sections addressing informed consent and protection of personal information.