

CROWWE

A Product of IPI Group

CHILD PROTECTION POLICY

Document Title	Child Protection Policy – Crowwe Platform
Issued By	IPI Group / IPI Solutions Nigeria Limited
Policy Custodian	Chief Compliance & Trust Officer, IPI Group Limited
Effective Date	1 June 2026
Review Date	1 June 2027
Version	1.0
Classification	Public
Jurisdiction	Federal Republic of Nigeria & International

FOREWORD FROM IPI GROUP LEADERSHIP

IPI Group is unwavering in its belief that every child deserves to grow, connect, and thrive in a safe environment — online and offline. Crowwe is our flagship social commerce and communication platform, designed to serve millions of Nigerians and Africans. We recognise that among our users are children and young persons who are entitled to the fullest protection the law provides. This Child Protection Policy is not merely a compliance document. It is a moral covenant between Crowwe, its users, and the societies we serve.

This Policy is anchored in the United Nations Convention on the Rights of the Child (UNCRC, 1989), the AU African Charter on the Rights and Welfare of the Child (ACRWC, 1990), the Child's Rights Act of Nigeria 2003 (CRA), the Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015 (NAPTIP Act), the Nigeria Data Protection Act 2023, the Cybercrimes (Prohibition, Prevention, etc.) Act 2015, and all other applicable international and domestic instruments. It applies to every person, team, partner, and technology that operates within or on behalf of the Crowwe platform.

1. POLICY STATEMENT AND COMMITMENT

Crowwe ("the Platform") operated by IPI Solutions Nigeria Limited ("the Company") adopts this Child Protection Policy ("CPP" or "this Policy") as a binding, enforceable, and publicly accessible commitment to the safety, dignity, privacy, and wellbeing of all children who access or are otherwise affected by our services.

The Company is unequivocally committed to:

- Preventing any form of child abuse, exploitation, trafficking, grooming, cyberbullying, or harm from occurring on or through the Crowwe platform;
- Detecting, reporting, and responding swiftly to any incident or suspicion involving a child that comes to our attention;
- Complying fully and in good faith with all applicable Nigerian laws and international instruments governing child protection;
- Embedding child safety considerations into every product, feature, update, and operational decision made in relation to the Platform;
- Cooperating unreservedly with NAPTIP, the Nigeria Police Force, the Ministry of Women Affairs and Social Development, the National Human Rights Commission, and all other competent authorities in matters relating to child protection.

This Policy applies to all Crowwe users, employees, contractors, agents, platform partners, content creators, advertisers, and third parties operating within the Crowwe ecosystem.

2. GOVERNING LEGAL FRAMEWORK

2.1 International Instruments

UNCRC (1989)	United Nations Convention on the Rights of the Child — the foundational global treaty ratified by 196 states including Nigeria. Articles 2, 3, 6, 12, 13, 16, 17, 19, 32, 34, 35, 36, and 37 directly govern this Policy. UN General Comment 25 (2021) extends UNCRC obligations to the digital environment.
ACRWC (1990)	African Charter on the Rights and Welfare of the Child — adopted by the African Union, ratified by Nigeria. Articles 15 (child labour), 16 (abuse/exploitation), 27 (sexual exploitation), and 29 (sale/trafficking).
Palermo Protocol (2000)	UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children. Nigeria signed on 13 December 2000. Defines trafficking and mandates criminalisation, victim protection, and international cooperation.
ILO Convention 182	Worst Forms of Child Labour Convention — prohibits child trafficking, child prostitution, debt bondage, and hazardous work for persons under 18.
Budapest Convention	Council of Europe Convention on Cybercrime — provides the framework for addressing child sexual abuse material (CSAM) and online exploitation.

2.2 Nigerian Domestic Law

Constitution 1999 (as amended)	Sections 17, 34, and 42 — guarantee freedom from slavery, forced labour, sexual exploitation, and discrimination. Section 46 entitles any victim to challenge violations in the High Court.
Child's Rights Act 2003 (CRA)	The principal domestic child protection statute. Section 1 (best interests paramount); Sections 31–32 (sexual exploitation prohibited, minimum 14 years imprisonment); Part III (protection from harmful practices); Part IV (child abuse reporting).
NAPTIP Act 2015	Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015. Criminalises all forms of child trafficking. Penalties: 10 years to life imprisonment. Hotline: 0800-NAPTIP (08002255627874).
Cybercrimes Act 2015	Sections 23–24: Criminalises production, distribution, or possession of child sexual abuse material (CSAM); cyberbullying and cyberstalking of children. Penalties up to 10 years imprisonment.
Nigeria Data Protection Act 2023	Imposes heightened obligations on processors of children's personal data. Requires parental consent; mandates data minimisation and right to erasure for children.
VAPP Act 2015	Violence Against Persons Prohibition Act — prohibits physical, sexual, psychological, and economic violence against children.
Criminal Code / Penal Code	Chapter 21 protects children from unlawful killing, assault, and sexual violence. Sections 306–328 are directly applicable.

3. DEFINITIONS

Child / Minor	Any person under the age of eighteen (18) years, consistent with Section 277 of the Child Rights Act 2003, Article 1 of the UNCRC, and Article 2 of the ACRWC.
Child Abuse	Any act or omission causing or likely to cause harm to a child's physical, sexual, psychological, or emotional health and development.
CSAM	Child Sexual Abuse Material — any visual, audio, written, or digital content depicting a minor in a sexual or sexually explicit manner. Possession, production, or distribution is a criminal offence under Nigerian and international law.
Grooming	Actions taken by an adult to build trust with a child and/or their family with the intent of facilitating sexual abuse, trafficking, or other exploitation.
Child Trafficking	The recruitment, transportation, transfer, harbouring or receipt of a person under 18 for purposes of exploitation, as defined in Section 64 of the NAPTIP Act 2015.
Cyberbullying	Repeated, intentional harassment, humiliation, or intimidation of a child through digital means.
Online Exploitation	Use of digital platforms to exploit children economically, sexually, or otherwise, including through sextortion, live-streaming abuse, or online recruitment for trafficking.

Safeguarding	The proactive responsibility to promote the welfare of children and protect them from harm, abuse, and exploitation.
Designated Safeguarding Officer (DSO)	The senior Company official appointed with primary responsibility for child protection matters, reporting obligations, and policy implementation.
Competent Authority	NAPTIP, the Nigeria Police Force, the Ministry of Women Affairs, State Social Welfare Authorities, the National Human Rights Commission, or any court of competent jurisdiction.

4. SCOPE OF APPLICATION

This Policy applies to:

- All users of the Crowwe platform, regardless of age, nationality, or location;
- All employees, officers, directors, contractors, and interns of IPI Group and IPI Solutions Nigeria Limited;
- All third-party vendors, technology partners, API integrators, advertisers, and content moderators operating within the Crowwe ecosystem;
- All content, data, communications, transactions, and interactions conducted on or through the Crowwe platform;
- All physical premises, events, and activities associated with the Crowwe brand where children may be present.

Geographic scope extends to all jurisdictions where Crowwe is accessible, subject always to the minimum standards set by Nigerian law and the UNCRC.

5. MINIMUM AGE, AGE VERIFICATION AND PARENTAL CONSENT

5.1 Minimum Age of Registration

The minimum age for independent registration and use of the Crowwe platform is thirteen (13) years. Users between the ages of 13 and 17 are classified as "Minor Users" and are subject to enhanced protections under this Policy. Users below 13 are not permitted to register or use the platform independently.

5.2 Age Verification

Crowwe shall implement the following age verification measures:

- Mandatory date of birth declaration at the point of registration;
- Integration with the NIMC National Identity Number (NIN) verification system to confirm user age;
- Risk-based age estimation signals that flag anomalous age declarations for human review;
- Parental or guardian consent mechanisms for users aged 13–17;

- Clear and prominent disclosure of the minimum age requirement on all registration interfaces.

5.3 Parental Consent and Controls

Where a Minor User is registered on the Platform, Crowwe shall:

- Obtain verifiable parental or guardian consent prior to activating the Minor User's account;
- Provide parents and guardians with a dedicated parental dashboard to monitor, restrict, or pause their child's account activity;
- Notify parents and guardians of any material change to the Platform's features that affects Minor Users;
- Offer a dedicated parental helpline and email address for child safety concerns.

6. PROHIBITED CONTENT AND CONDUCT

6.1 Absolute Prohibitions (Zero Tolerance)

- Production, distribution, storage, solicitation, or sharing of any Child Sexual Abuse Material (CSAM) in any format;
- Grooming of a child or soliciting a child for sexual purposes;
- Recruitment, facilitation, or enablement of child trafficking in any form;
- Engaging a child in any sexually explicit communication, including soliciting sexual images or videos from a minor;
- Using the Platform to arrange physical contact with a child for exploitative or abusive purposes;
- Live-streaming of any sexual act involving a minor;
- Sharing personal identifying information of a child without verifiable parental consent;
- Any act that constitutes an offence under the CRA 2003, the NAPTIP Act 2015, or the Cybercrimes Act 2015.

6.2 Additional Prohibited Conduct

- Cyberbullying, harassment, intimidation, or humiliation of any child using the Platform;
- Exposing Minor Users to age-inappropriate content, including graphic violence, pornography, or self-harm content;
- Targeted advertising directed at children that exploits their vulnerability or credulity;
- Collecting personal data from Minor Users beyond what is strictly necessary;
- Facilitating child labour or economic exploitation of minors through the Platform's commercial features.

7. CHILD SAFETY FEATURES AND PLATFORM SAFEGUARDS

7.1 Default Safety Settings for Minor Users

All accounts identified as belonging to Minor Users shall, by default, have the following safety configurations:

- Private account mode — only approved followers can view the Minor User's profile and content;
- Direct messaging disabled from unknown or unapproved accounts;
- Location sharing disabled by default;
- Content filtering enabled to restrict access to age-inappropriate material;
- No targeted advertising based on behavioural profiling of Minor Users.

7.2 Content Moderation

Crowwe shall maintain a robust, multi-layered content moderation system comprising:

- Automated detection tools — including AI-based image hashing (PhotoDNA or equivalent) to detect and block known CSAM;
- Human moderation — trained content reviewers supported by psychological care resources;
- User reporting tools — a prominent, accessible, and anonymous reporting mechanism for all users;
- Escalation protocols — automatic escalation of any CSAM-related report to the DSO within one (1) hour of receipt;
- Zero re-upload policy — any content identified as CSAM is immediately and permanently removed.

7.3 Reporting Tools

Crowwe shall provide users with:

- A dedicated "Report Child Safety Concern" button accessible on every piece of content and every user profile;
- A dedicated child safety email: childsafety@crowwe.ng;
- An in-platform emergency link connecting users to NAPTIP's toll-free hotline: 0800-NAPTIP (08002255627874);
- A link to the Nigeria Police Force emergency line: 112.

8. MANDATORY REPORTING OBLIGATIONS

8.1 Reporting to Competent Authorities

Any employee, contractor, or officer of Crowwe who becomes aware of, or reasonably suspects:

1. The production, distribution, or possession of CSAM on the Platform;
2. Any case of child trafficking facilitated through the Platform;

3. Any child being groomed for sexual exploitation or abuse;
4. Any child appearing to be in immediate danger;

must report such knowledge or suspicion to the Designated Safeguarding Officer immediately. The DSO shall notify NAPTIP and/or the Nigeria Police Force within twenty-four (24) hours. CSAM shall additionally be reported to the Internet Watch Foundation (IWF) for global URL takedown coordination.

8.2 Preservation of Evidence

Upon becoming aware of any child safety incident, the Platform shall:

- Immediately preserve all relevant data, communications, metadata, and account information;
- Restrict access to such data to the DSO and authorised personnel only;
- Not delete or alter any evidence pending investigation by competent authorities;
- Cooperate fully with any lawful request for data from NAPTIP, the Police, or any court of competent jurisdiction;
- Maintain a secure, auditable log of all child safety incidents and actions taken.

8.3 Non-Retaliation

No employee, contractor, or user shall suffer any adverse consequence for making a good-faith report of a child safety concern. Retaliation against a whistleblower in child safety matters constitutes a serious disciplinary offence.

9. DATA PROTECTION AND PRIVACY OF CHILDREN

Crowwe's collection and processing of children's personal data is governed by the Nigeria Data Protection Act 2023 and the UNCRC Articles 16 and 17. The following principles apply:

Lawfulness & Consent	Data relating to Minor Users shall only be processed on the basis of verifiable parental/guardian consent or where strictly necessary for the provision of the contracted service.
Data Minimisation	Only personal data strictly necessary for the Platform's legitimate functions shall be collected from or about Minor Users.
Purpose Limitation	Data collected from Minor Users shall not be used for behavioural advertising, profiling, or data brokerage.
Storage Limitation	Personal data of Minor Users shall be retained no longer than is necessary and securely deleted upon account closure or parental request.
Right to Erasure	Parents, guardians, and Minor Users who have attained majority shall have the absolute right to request deletion of all personal data held by Crowwe.
Security	Personal data of children shall be protected by end-to-end encryption, access controls, and regular security audits. Any data

	breach affecting children's data shall be reported to the NDPC within 72 hours.
No Data Sales	Crowwe shall never sell, lease, or commercially transfer personal data of Minor Users to any third party.

10. DESIGNATED SAFEGUARDING OFFICER (DSO)

IPI Group shall appoint a Designated Safeguarding Officer (DSO) at Director level or above, with the following responsibilities:

- Serve as the primary point of contact for all child protection matters within the Company and with external authorities;
- Maintain, update, and implement this Policy;
- Oversee and coordinate the response to every child safety incident, including reporting to NAPTIP;
- Ensure all new products and features undergo a Child Rights Impact Assessment (CRIA) before launch;
- Conduct an annual review of this Policy in consultation with child rights experts;
- Ensure all staff with child-facing responsibilities complete mandatory child protection training;
- Liaise with NAPTIP, UNICEF Nigeria, and civil society organisations on child protection best practices.

The DSO's contact details shall be published on the Platform and on the Company's website, and the DSO shall be contactable 24/7 for urgent child safety matters.

11. TRAINING AND AWARENESS

- All new employees shall complete a mandatory child protection induction module within the first two (2) weeks of employment;
- All employees in content moderation, user support, product development, or platform safety roles shall undertake advanced child protection training at least once per year;
- Content moderators shall receive specialised trauma-informed care training to manage exposure to CSAM and other harmful content;
- The Company shall engage NAPTIP-certified trainers for staff sensitisation programmes at least once per year;
- Child protection training shall be a mandatory criterion in the onboarding process for all third-party vendors and platform partners;
- Training records shall be maintained by Human Resources and reviewed by the DSO annually.

12. CHILD RIGHTS IMPACT ASSESSMENT (CRIA)

In line with UN General Comment 25 (2021), Crowwe shall conduct a formal Child Rights Impact Assessment (CRIA) for:

- Every new feature or product module before public release;
- Any material change to existing features that could affect Minor Users;
- Any new third-party integration or API partnership;
- Any new data processing activity involving Minor Users;
- Any new advertising format or commercial arrangement that may reach Minor Users.

The CRIA shall assess potential impacts on children's rights under the UNCRC, ACRWC, and CRA 2003; risks of harm or privacy violations; appropriate mitigations; and whether the proposed change is in the best interests of children under Article 3 of the UNCRC.

13. INCIDENT RESPONSE PROTOCOL

STEP	TIMEFRAME	ACTION
1	Immediately	Content flagged or reported. Automated systems or human reviewer identifies potential child safety incident.
2	Within 1 hr	Content removed or access restricted. DSO notified. Evidence preserved.
3	Within 3 hrs	DSO assesses the incident. If confirmed or reasonably suspected CSAM or trafficking: Police and NAPTIP notified.
4	Within 24 hrs	Formal written report submitted to NAPTIP. If data is involved, NDPC notified within 72 hours.
5	Within 48 hrs	Associated account permanently suspended. Linked accounts investigated.
6	Ongoing	Full cooperation with law enforcement investigation. Legal hold on all relevant data maintained.
7	Post-incident	Incident logged. Root cause analysis conducted. Policy and system improvements implemented.

14. ENFORCEMENT AND SANCTIONS

14.1 User Sanctions

Violations of this Policy by users shall result in:

- Immediate content removal;
- Formal warning;
- Temporary suspension of account access;
- Permanent account termination and ban;

- Reporting to NAPTIP and/or the Nigeria Police Force;
- Disclosure of relevant user information to law enforcement pursuant to a lawful request or in cases of imminent danger to a child.

14.2 Employee and Staff Sanctions

Any employee, officer, contractor, or agent who violates this Policy, fails to report a known child safety incident, or actively facilitates harm to a child shall be subject to:

- Immediate suspension pending investigation;
- Summary dismissal without notice where the violation is confirmed;
- Criminal referral to NAPTIP and/or the Nigeria Police Force;
- Civil liability for any damage caused.

14.3 Statutory Penalties under Nigerian Law

Child trafficking (NAPTIP Act 2015)	10 years to life imprisonment; forfeiture of assets. Corporate bodies: N2 million fine and closure of premises.
Child sexual abuse (CRA 2003, Sections 31–32)	Minimum 14 years imprisonment without option of fine.
CSAM offences (Cybercrimes Act 2015)	Up to 10 years imprisonment and/or a fine.
Child forced begging / hawking (NAPTIP Act)	10 years imprisonment.
NDPA 2023 — breach affecting children	Fines up to 2% of annual turnover or N10 million, whichever is greater.

15. STAKEHOLDER PARTNERSHIPS

Crowwe is committed to active partnership with:

- NAPTIP — as the primary national law enforcement agency for trafficking and exploitation; Crowwe commits to designating a NAPTIP liaison officer and participating in public awareness campaigns;
- Federal Ministry of Women Affairs and Social Development — coordination on child welfare programmes;
- UNICEF Nigeria — collaboration on child rights education and digital literacy for children;
- National Human Rights Commission — engagement on systemic child rights issues;
- Internet Watch Foundation (IWF) — participation in global CSAM detection and URL blocklist programmes;

- WePROTECT Global Alliance — commitment to technology industry standards for child online protection;
- Civil Society Organisations — engagement with NACTAL, WOTCLEF, and comparable bodies.

16. POLICY REVIEW AND AMENDMENT

This Policy shall be reviewed annually by the DSO in consultation with legal counsel and child rights experts. Reviews shall be triggered earlier in the event of:

- A material change in applicable Nigerian or international law;
- A significant child safety incident on the Platform;
- New guidance from NAPTIP, the NDPC, UNICEF, or the UN Committee on the Rights of the Child;
- A material change to the Platform's features, user base, or business model.

Any material amendment to this Policy shall be publicly disclosed on the Crowwe platform and on the IPI Group website with a minimum of thirty (30) days' notice, except where immediate amendment is required by law or to address an emergency child safety risk.

17. KEY CONTACTS AND EMERGENCY RESOURCES

Crowwe Child Safety Team	childsafety@crowwe.net
Designated Safeguarding Officer	dso@ipi.ng Available 24/7 for emergencies
IPI Group Compliance Office	compliance@ipi.ng
NAPTIP Toll-Free Hotline	0800-NAPTIP / 08002255627874 (24 hours)
Nigeria Police Force	112 (Emergency)
Ministry of Women Affairs	+234 (0)9 523 4281
UNICEF Nigeria	www.unicef.org/nigeria
Internet Watch Foundation	report.iwf.org.uk

CERTIFICATION OF ADOPTION

This Child Protection Policy has been reviewed, approved, and adopted by the Board of Directors of IPI Solutions Nigeria Limited on behalf of IPI Group.

 Group Chief Executive Officer IPI Solutions Nigeria Limited	 Designated Safeguarding Officer IPI Group
--	---

© 2025 IPI Solutions Nigeria Limited. All rights reserved. Crowwe is a registered trademark of IPI Group.
This document may be reproduced for child protection, regulatory, or educational purposes with attribution to IPI Group.

Crowwe Protection Policyv2.1

June 29, 2026 at 11:29 AM

Scan to verify
authenticity

✓ VERIFIED AUTHENTIC

Verify at: <https://envelope.crater365.net/verify/4cb08d94-14ce-471e-b0e4-a498fdc3f855>

Envelope ID: 4cb08d94-14ce-471e-b0e4-a498fdc3f855

Document SHA-256:

70c94d2b6d06b6833c4bc1c963bceaa148b91aee241bdbda06f6796b4e3888e2



SIGNATORIES

1 Adamu B. Garba II (Signer)

SIGNED

adamu.garba@ipi.ng

Signed: Jun 29, 2026, 11:25 AM · IP: 102.91.105.102

Signature

2 Anya C. Ifunanya (Signer)

SIGNED

anya.ifunanya@ipi.ng

Signed: Jun 29, 2026, 11:29 AM · IP: 102.91.103.254

Signature

Legal Notice & Authenticity · Generated: June 29, 2026 at 11:29 AM

This document was electronically signed using Crater365 Digital Transformation. Electronic signatures applied through this platform are legally recognised under: Nigeria's Evidence Act 2011 (as amended), Companies and Allied Matters Act 2020, and the National Digital Economy and E-Governance (Enabling) Act 2024; the US Electronic Signatures in Global and National Commerce Act (ESIGN) and Uniform Electronic Transactions Act (UETA); the EU eIDAS Regulation (EU) No 910/2014 as a Simple Electronic Signature; and the UNCITRAL Model Law on Electronic Commerce. Envelope Reference: 4cb08d94-14ce-471e-b0e4-a498fdc3f855. Verify authenticity at: <https://envelope.crater365.net/verify/4cb08d94-14ce-471e-b0e4-a498fdc3f855>