



COURTESY TRANSLATION

**MINORS PROTECTION POLICY
BY
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Updated and in effect as per Board of Directors' resolution

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1. FOREWORD

Our society particularly cares about the welfare, development and protection of minors. In recent years, we have undertaken various initiatives, from the soccer school dedicated to boys and girls with intellectual disabilities, to educational programs on fair play and tolerance aimed at compulsory school students, to the collection of toys for children in hospitals.

A.S. ROMA is engaged in activities in favor of the local community through projects and campaigns aimed primarily at the support and growth of children and young people in disadvantaged situations, recognizing in sport a primary and irreplaceable social educational function. For these reasons, we have enthusiastically joined this policy for the protection of minors that has been developed by the *Settore Giovanile e Scolastico della Federazione Italiana Giuoco Calcio* (hereafter "**SGS**"), in close collaboration with UEFA and *Terre des Hommes*.

A.S. ROMA also undertakes to safeguard the well-being of every girl and boy in every sphere, including sports, and to promote their right to be treated with the utmost respect and dignity, preventing and opposing any form of abuse, harassment, violence and discrimination on the grounds of gender, sexual orientation, ethnicity, religion, belief, disability or age, as well as to promote the values set forth in D. Legislative Decree No. 198 of April 11, 2006 ("**Code of equal opportunities between men and women**"), in accordance with the Guidelines published by *Federazione Italiana Giuoco Calcio* on August 31, 2023 (hereinafter "**FIGC Guidelines**").

This Minors Protection *Policy* (hereinafter "**Policy**") is based on the documents and projects mentioned above, as well as others that aim to protect minors, and manifests **A.S. ROMA's** commitment to ensuring that soccer is a safe sport, a positive and enjoyable experience for all minors and youth involved, regardless of their age, gender, sexual orientation, ethnic and social background, religion and level of ability or disability.

This *Policy* describes the general principles and rules of conduct that underpin SGS and UEFA's shared approach to the protection of minors, as well as the FIGC Guidelines, formalizing the actions and commitments made by the Company to implement this approach and comply with the aforementioned legislation.

The content of this *Policy* is thus the visible manifestation of the importance attributed to soccer as a vehicle for the promotion of personal and athletic development, physical and mental health and well-being of young people, posing itself as a fundamental context of observation and vigilance in order to detect any signs of suffering and discomfort, preventing and countering those hypotheses in which - as confirmed by certain cases at the global level - sports and football activity can fuel the spread of potentially dangerous and harmful situations for minors.

This *Policy* must be interpreted in conjunction with the set of additional *Policies*, Guidelines, templates, information and background material, codes of conduct and training activities, made



with the aim of supporting SGS Regional Coordinations, Clubs involved in youth soccer and all those involved in the growth and care of young male and female soccer players.

It is important to carry out ongoing monitoring activities of the above-mentioned documentation, as well as to acquire and share feedback and direct experience that will be valuable for the future development of child protection tools and help refine the SGS and UEFA approach and FIGC Guidelines.

Constant attention to the protection and safeguarding of minors and a commitment to the reduction of related risks form the basis of all activities proposed and implemented in youth soccer: from the recruitment of collaborators, to the selection of business *partners*, to the conduct of training sessions and matches.

The objective of this *Policy* is therefore to provide a comprehensive and exhaustive tool to deal with all the needs that may arise in the management of sports activities towards young people. In the case of specific situations that are not directly governed by this *Policy*, it is necessary to seek guidance from one's Functional Managers or other relevant individuals, depending on the circumstances of the specific case, on the most correct course of action.



Figure 1 "Every time a child kicks something in the street, there the story of soccer begins again," said Jorge Luis Borges. A child plays in the street in Milan at the end of lockdown, wearing the jersey of his idol Zaniolo - Milan, "Corriere della Sera," March 29, 2020 edition



"Every time a child kicks something in the street, there the story of soccer begins again."

Jorges Luis Borges

2. GENERAL PROVISIONS

2.1 Scope of application

This *Policy* applies to all those who play a role or are involved in any capacity in the growth and training of young men and women soccer players, whether they are Clubs, Soccer Schools or individuals.

2.2 Purpose

The purpose of this *Policy* is to define the general principles and rules of conduct governing the activities of all those who work with and for minors in football, referring, to the extent compatible, to other internal regulatory documents available on the platform, among which particular relevance is assumed by the *Safeguarding Policy*.

2.3 Glossary

Abuse

Any act, which physically or psychologically injures a minor, which directly or indirectly causes harm or precludes the prospects of healthy and safe development into adulthood. It may also consist of the improper, excessive, unlawful or arbitrary use of something or inability to act in the proper manner that results in harm, or the risk of causing harm, to a minor such that his or her development is impaired. The following are considered to be included in the definition: physical, emotional/psychological and sexual abuse, even if perpetrated through the use of digital (online) tools.

AS Roma or the Company

A.S. Roma S.r.l., with registered office in Rome, Piazzale Dino Viola, 1.

Bullying

Offensive and/or aggressive behaviors that an individual or several persons engage in, repeatedly over time, against one or more persons with the aim of exercising power or dominance over the victim. Repeated prevaricating and overpowering behaviors designed to intimidate or upset a person that result in a condition of discomfort, insecurity, fear (e.g., insults), exclusion or isolation, spreading unfounded news, threatening physical repercussions or damaging objects owned by the victim. These are, in general, behaviors that cause the victim to feel uncomfortable in relation to a larger or smaller group, mostly composed of peers.

**Parameter controls**

Checks and verifications carried out for screening and status quo assessments for the purpose of implementing this *Policy*.

Damage

Any action or omission that may compromise, even potentially, the safety and well-being of a person.

Child Protection Delegate or Delegate.

Person in charge of and responsible for the implementation and proper application of this *Policy*, as well as for the protection of minors and compliance with all rules and procedures related to it.

Emotional

Repeated emotional maltreatment such that it causes severe and persistent effects on the child's emotional development through verbal aggression and violence or psychological pressure. It may include attempts to convey and generate a feeling of worthlessness, of not being loved, of being inadequate or valued only as being useful in meeting the needs of a third party. It can also affect development by generating, throughout the ages, frequent statuses of fear or feeling of constant danger. Emotional abuse is characteristic of all types of abuse but can also occur independently of them.

Physical

Physical harm inflicted on a minor. Included in this casuistry but not exhausting it are actions aimed at: striking, hitting, shaking, throwing, scalding, choking. Physical harm is also caused when a parent or guardian simulates symptoms related to health problems, illnesses or injuries or deliberately causes them to the detriment of the minor they are required to care for.

Minors

Any person under the age of eighteen years. This term refers to both the child and the adolescent, with the implication that this *Policy* gives protection to all minors.

MOP

The Organization, Management and Control Model suitable for preventing acts contrary to the principles of loyalty, fairness and probity adopted by AS Roma.

Negligence



Persistent and systematic neglect of the child's physical or psychological needs and their adequate fulfillment. It can have physical and emotional consequences especially affecting psychological and cognitive development.

Operator

Coach, manager, referee, assistant, aide, physician, staff member, or any other person responsible for an event or activity from a technical, medical, or administrative/management standpoint.

Protection

Part of welfare protection and promotion. Refers to actions taken to protect particular categories of children/minors who suffer or are likely to suffer significant harm.

Responsible Against Abuse, Violence and Discrimination o ResponsibleSafeguard/Protect.

Set of rules of conduct designed to ensure that soccer and related activities are conducted in a safe and positive environment so that they can always be an enjoyable experience for all children/minors and young people who must be made safe from potential harm, mistreatment or abuse.

SGS

Youth and School Sector of the Italian Football Federation (Federazione Italiana Giuoco Calcio) organ of development and service for the promotion, organization and discipline of sports and training activities of young male and female football players throughout the country.

Sexual

The involvement, intentional and interpersonal, of a child in forced or otherwise developmentally inappropriate sexual experiences. Such experiences may not involve explicit violence or injury; they may occur without physical contact and/or be experienced as observers. Sexual abuse encompasses all acts involving sexual activity with minors (with reference to the age thresholds stipulated in Article 609 of the Italian Penal Code), exploitation of prostitution, child pornography, corruption of minors, and solicitation of minors on the Internet. A particular type of sexual abuse is sexual exploitation, consisting of the behavior of those who receive money or other benefits, by individuals or organized criminal groups.

Child protection

The set of rules of conduct designed to ensure that soccer is a safe, positive, and enjoyable experience for all children/minors and young people and that minors are placed safe from harm or abuse when involved, in any capacity, in the game of soccer and SGS activities.



3. THE FIVE GOALS IN CHILD PROTECTION

This Policy for the Protection of Minors constitutes a set of rules and tools centered, in accordance with the provisions of UEFA as well as the FIGC Guidelines, on five objectives or areas of intervention, the achievement of which is fundamental both for the promotion of the protection of minors and for a more complete and widespread respect for the values of soccer. In the course of this section, each objective will be discussed in specific detail.

GOAL 1: Define roles and responsibilities related to the protection of minors and identify situations of greater risk taking into account the football activity

1.1. Responsibility

1.1.1. The protection of minors is everyone's responsibility. The purpose of this *Policy* is to promote, in their best interest, the creation of an environment that supports, safeguards, and protects the child(ren), in accordance with the principles of fairness, probity, and propriety.

1.1.2. All those who are engaged, at any level, title and with any job, in the organization and conduct of SGS activities and events, or in any further activity that puts them in direct contact with minors, whether they are federal employees or members of the company, or parents, must have full knowledge and awareness of their duties in the area of the protection of minors/children, and must act in such a way as to actively promote their welfare and specific needs, taking, to the extent of their competence, appropriate and targeted actions and measures to implement this *Policy*.

1.1.3. Without prejudice to the common and shared responsibility in the protection of minors, FIGC and SGS encourage and actively support AS Roma and the Affiliated Companies in the development of operational procedures and in the definition of an organizational structure consistent with the content of this *Policy*.

1.2. Minor/Child protection

1.2.1 The protection of the children/minors can be achieved through actions of awareness raising, prevention to reduce the possibility of danger or harm, timely reporting of any incident to the competent parties, as well as response in order to ensure effective intervention in reaction to any report of harm, discrimination, violence and abuse, supporting, protecting and safeguarding the child/children/minor/minors involved. The Company promotes the welfare and interests of the child/children/minor/minors in any sphere, including sports, in compliance with both international standards and national legislation, with particular reference to criminal law.

1.3 Situations of "harm" and "abuse"

1.3.1 All members of the Company must be aware that violence, abuse, harm, discrimination, and any issue related to the protection of minors are difficult to classify in a unified way,



frequently presenting themselves as phenomena detrimental to the personal sphere in several profiles. In most cases there is an overlapping and/or co-presence of several types of abuse or harm caused.

1.3.2 Harm can occur in different ways and generically involves the impairment of the health, safety, and mental and physical well-being of the child/children/minor/minors. This circumstance may be the consequence of either conscious conduct of abuse or of deficient and ineffective training that renders that person lacking the necessary sensitivity to address the formative and educational needs of the child/children/minor/minors.

1.3.3 With particular reference to the conduct of abuse, the same is defined as any act that physically or psychologically injures a child/children/minor/minors, that can directly or indirectly cause harm, or that can negatively affect the psycho-physical development of the child/children/minor/minors. It should be pointed out that the conduct of abuse can take various forms: physical, emotional/psychological, sexual, may also include neglect or negligence, up to and including episodes of violence.

1.3.4 Minors may be abused or mistreated by individuals known to them, either at home or in a family environment or at places they frequent in their daily lives. In addition, abuse and maltreatment may be perpetrated by strangers and in contexts that ensure anonymity (e.g., on the web). Abuse and mistreatment can be perpetrated by an adult or by minors.

1.3.5. With specific reference to conduct of harm, abuse, mistreatment or episodes of violence against minors perpetrated by other minor subjects, this may occur, for example, in cases where the minor is in a position of power or influence over his/her peers (e.g., because he/she is older or invested with special authority-where he/she is the team captain) and often qualifies as bullying.

1.4 Higher risk situations related to football activity

1.4.1 There are several specific situations in which harm, abuse, mistreatment, or violence against minors may occur in the context of football activity.

1.4.2 Physical Injury: every contact sport carries a risk of physical injury and accidents, and soccer is no exception. However, the excessive desire to achieve the hoped-for sporting result and obtain a victory can lead to pressure on the minor(s), who are pressured to adopt inappropriate attitudes, beyond what is reasonably demanded given their age and ability, to the point of conduct that violates the rules of *fair play* and respect for the opponent. Such conduct may result in the occurrence or aggravation of injuries or illnesses.

1.4.3 Pressures on performance: winning is an important part of soccer. However, subjecting male and female soccer players to excessive pressure with the intent of achieving success or showing off may constitute conduct that is psychologically, emotionally, and physically



damaging or abusive. Such pressure may also manifest itself in the induction of the use of prohibited substances or methods to enhance sports performance.

1.4.4 Personal care: locker rooms, showers, and all situations involving close physical contact in enclosed places (e.g., physical therapy and medical treatment) can lead to bullying behavior, sexual abuse even through inappropriate and unauthorized photography or filming, or outright sexual violence. Confrontation with others may also result in an altered perception of one's own person and be an occasion for the development of possible eating disorders.

1.4.5 Travel, trips, and overnight stays: Travel and trips involving overnight stays present numerous potential risks, including an inadequate supervision of the number or the age of subjects, hypothesis of removal of minors(s), abusive access to alcohol or media content prohibited in relation to the age of the subjects, situations of inappropriate use of social media, and the possibility of abuse, with particular reference to sexual abuse.

1.4.6 Coaches and personal relationships: the relationships that within a team group come to be built with the coach or with other staff members (such as managers, physiotherapists, and doctors) are an important and positive aspect of football activity, resulting, in many contexts, in deep trusting relationships with their coaches who often play a significant role in the lives of young athletes, especially if the latter do not have healthy and positive relationships with other adults. However, while many coaches in turn build positive relationships in the best interest of the minors in their care, there may be instances where the authority of such individuals and the trust placed in them can become potentially harmful to the minor(s) and become a source of harm, abuse, mistreatment, and incidents of violence.

1.5 The main normative references

This *Policy* establishes the minimum requirements and *standards for the* protection of minors/children. All actions taken in this area must be carried out in full compliance with the relevant regulations. This *Policy* is also adopted in accordance with the FIGC Guidelines. For matters not expressly governed by this *Policy*, please refer to the *Safeguarding Policy*.

1.6 Extra-football situations

This *Policy* is primarily concerned with situations of harm, abuse, mistreatment, or violence that may occur and involve minors in the course of FIGC-SGS soccer activities directly organized by the Sector or carried out by affiliated clubs. However, inappropriate or harmful behaviors occurring outside of soccer activities, whether individual or group, may in turn have a significant impact on the mental and physical development and well-being of the minor, violate the principles established in this *Policy*, and run counter to the values that soccer promotes. It is therefore appropriate to be vigilant about potentially dangerous situations that may also produce harmful effects on soccer and the game, involving the adults who have a trusting relationship with the minor(s) and coordinating, in dealing with the issue, where necessary, with other associations or institutions in charge.



1.7 General principles underlying this Policy

1.7.1 Soccer should be a safe, positive and fun experience for all male and female soccer players.

1.7.2 All male and female soccer players have an equal right to guardianship, protection, promotion of their welfare, and participation in activities, regardless of their age, sex, gender, sexual orientation, ethnic or social background, religion, and physical or intellectual ability.

1.7.3 All actions put in place in the area of the protection of minors must pursue the best interest for them, promoting their education, training and the performance of healthy sports practice.

1.7.4 Everyone has the responsibility for safeguarding and protecting minors. Children/minors themselves can also play an important role by helping to create a positive culture for the protection of themselves and other children/minors and young people and by preventing disputes, quarrels or disagreements through healthy, effective and constructive communication and through the use of correct language, although the ultimate responsibility for adopting conduct to prevent and suppress harm, abuse, mistreatment and violence remains with the adults.

1.7.5. All minors must be educated in the use of appropriate language on any occasion, including in playful or joking contexts.

1.7.6 Protective measures should be inclusive and non-discriminatory, and ensure greater protection for children, minors and young people who, given their specific individual situations, are found to be at greater risk of abuse.

1.7.7 All those involved must have, as their primary objective, the promotion of diversity and the removal of obstacles that impede the promotion of children's/minors' well-being, and their psycho-physical development while respecting their relative aspirations, potentialities, abilities and specificities.

1.7.8 Transparency and openness are essential in the journey aimed at child protection. Abuse and harm can occur most frequently when staff, volunteers, sports workers, children, minors, young people and families are not sufficiently prepared and informed.

1.7.9 The issue of child protection and safeguarding must be addressed seriously and professionally. If necessary, protective measures must be put in place by also involving the authorities and associations responsible for the protection of minors.

1.7.10 Child protection is a shared responsibility that must be addressed in synergy by all parties who, in any capacity, work closely with children and minors, including organizations, agencies, associations, and government agencies.

1.7.11 It is necessary to maintain the confidentiality of personal data of the people involved in any incidents of harm, abuse, discrimination, violence, or mistreatment (including the name of the person reporting the abuse, the child victim of the abuse, and the alleged perpetrator). Such



information, as well as all actions taken to verify the substantiation of these incidents, as well as corrective measures, may not be disclosed, subject to compliance with the relevant legislation in force, unless it is necessary to refer the case to the competent authorities.

1.7.12 All actions taken must be conducted in an environment of legality and in compliance with all applicable regulations.

GOAL 2: Adoption of the *Policy* and code of conduct in the performance of sports activities

2.1 Adoption of the *Policy*

2.1.1 The Youth and School Sector, as the sector in charge of organizing activities dedicated to children, minors and young people and therefore as the entity that must also take care of their protection, has adopted this *Policy* jointly with other instruments such as guidelines and codes of conduct. In particular, this *Policy* also complies with the FIGC Guidelines.

2.1.2 All FIGC-affiliated clubs operating in the field of youth activities are required to adopt and comply with this *Policy*, which applies to all FIGC-SGS members, FIGC-SGS collaborators and all those who are employed in any capacity and in any role in activities directly or indirectly organized by the Youth and School Sector.

2.1.3 Affiliated societies are encouraged to implement all the tools made available, adapting procedures and contents to different territorial realities.

2.2 Identification of Child Protection Delegates.

2.2.1 SGS shall designate a Child Protection Delegate at the national level to ensure compliance with this *Policy* and the guidance contained herein. Regional Child Protection Delegates will be identified from all SGS Regional Coordinations. These individuals will work closely with Affiliated Societies and any third parties involved (agencies, associations, entities...).

2.2.2 All Affiliated Societies will be encouraged to designate their own internal Child Protection Delegate (the "**Child Protection Delegate**") to serve as a liaison with the regional and national structure and as a first point of collection and analysis of reports and issues.

2.2.3 The role of the Delegate is to acquire reports and provide initial support about the response and the process to be followed in compliance with established procedures, as well as to oversee the proper application of the policy and other tools, in compliance with the guidelines on the roles and responsibilities of the Child Protection Delegate.

2.2.4 It is recommended that the role of Delegate be entrusted to individuals who have been duly trained on the issues of protection and safeguard of minors, taking into account skills, competencies acquired in the youth sector, experience and personal aptitude. As far as affiliated clubs are concerned, the role can be taken on by anyone who is in a position to carry it out efficiently and effectively given the relationships with sports workers and young athletes,



in accordance with the guidelines on the roles and responsibilities of the Child Protection Delegate.

2.3 Selection process of sports workers

2.3.1 The Society selects sports workers who work in contact with minors, whether SGS employees or members of the Staffs of Affiliated Societies, in safer ways to ensure that candidates are suitable to work in the field of youth activities and in direct contact with minors.

2.3.2 The selection procedures provide for the acquisition of specific documentation attesting to the professional suitability of the subjects, as well as self-certifications (including self-declarations in lieu of criminal record certificate and certificate of pending charges), also providing for pre- and post-employment and placement checks, to be repeated periodically if necessary.

2.3.3 To prevent ineligible individuals from working with children, minors and young people, no sports operator shall be engaged in activities before all necessary verifications are completed and all required documentation is acquired. Upon completion of the selection process, specific training and information activities on issues pertaining to the protection of minors will be provided towards the sports operator. During the training period, it can also be planned to carry out additional activities that are deemed necessary, under the supervision of specialized subjects.

2.3.4 The roles and responsibilities assigned to sports operators must be such as to avoid the accumulation of positions under one person. All sports operators are also required to promptly report any conflicts of interest in the practice of the activity.

2.3.5 The Company ensures the preservation and storage of documentation related to the selection process in accordance with current legislation on privacy and personal data protection, in order to ensure the traceability of the process and the possibility of consulting all the data of the selected profiles.

2.4 Codes of conduct for the protection of minors and the prevention of harassment, gender-based violence and any other discriminatory conditions

2.4.1 Clear Codes of Conduct will be applied to all activities involving minors, indicating the behaviors to be adopted and the procedures to be followed for the protection of minors in all situations and areas pertaining to the game of soccer and the practice of sports by children, minors and young people, also in accordance with the FIGC Guidelines.

2.4.2 All persons engaged in any capacity and in any role in the organization and implementation of FIGC-SGS activities, as well as, more generally, all persons working in direct contact with minors, must read and sign the codes of conduct that will be attached to any collaboration agreement or census/membership form.



2.4.3 SGS encourages Affiliated Companies to adopt and subscribe to codes of conduct as a tool for the protection of minors and for the formalization of the commitment of all parties in any capacity involved in this area.

2.4.4 Any violation of the codes of conduct must be promptly reported to the Delegate for the Protection of Minors, as well as to the Manager against Abuse, Violence and Discrimination appointed in accordance with the FIGC Guidelines. The relevant reports must be, as much as possible, circumstantiated and accurate, as well as accompanied by the information necessary for a timely and optimal resolution of the issue.

2.4.5 In the event of a report of a suspected violation of the code of conduct, fact-finding shall be conducted by the Manager, with the possible assistance of the Delegate.

2.4.6 As the entity engaged in the front line of the protection of minors, FIGC/SGS will take all necessary measures to prevent any instances of violations of the codes of conduct by any person who puts them in place. Should violations occur, the necessary actions will be taken to ensure their cessation, as well as to ensure appropriate sanctions for those identified as responsible. Likewise, SGS will support companies in the correct application of the Codes of Conduct and in resolving any doubts of interpretation.

2.4.7 In case of violations, suspension from the reported person's activities until the facts are established should be considered where possible.

2.4.8 Codes of conduct may contain specific disciplinary measures in case of violation, without prejudice to the disciplinary measures generally provided for in the MOP. The measures and sanctions provided may range from a verbal warning to suspension and termination of cooperation, which could add up to additional training and awareness-raising moments.

2.4.9 Sanctions imposed for violations of codes of conduct do not exclude any additional civil or criminal sanctions imposed by the competent authorities, if these have also taken on civil or criminal significance.

2.5 Supervision and employment of sports workers in activities

2.5.1 In no activity involving minors may there be only one sports worker present. When the activity involves children, minors and young people it must always take place in the presence of at least two adults, and in any case in open places with free access and where it is always possible to observe the activities being carried out. Group activities should always be preferred over individual work involving a single minor or a limited number of minors and one adult.

2.5.2 The number of sports operators must always be such as to ensure, on one hand, the full participation of all minors in the proposed activities and, on the other hand, adequate supervision of the athletes, taking into account the context, age and ability of the children, minors and young people involved. When planning and organizing, the number of minors and



sports workers involved and employed should always be considered as a part of the risk assessment of a given activity or event.

2.5.3 AS Roma ensures compliance with the ratio of sports operators to minors recommended by SGS, specifically: 1 adult per 10 children aged 13 to 18 years, 1 adult per 8 children aged 9 to 12 years, 1 adult per 6 children aged 5 to 8 years, and 1 adult per 3 children aged 4 years or younger.

2.5.4 If the number of adults is insufficient to achieve the required level of supervision, a rescheduling of the activity or, in extreme cases, cancellation of the activity must be considered.

2.5.5 In the case of health care (e.g., medical examination, post-injury care, physiotherapy treatment), minors are entitled to the presence of a peer or adult designated by them to accompany the doctor or health care provider who is administering the care or treatment.

2.5.6 Any planning and/or management of dietary regimens must be done with the ongoing support of nutrition specialists.

2.5.7 For doping control to be carried out on underage athletes, certain specific modalities must be observed. In particular, underage athletes 14 years of age or older, and in any case their parents or guardians or legal representatives, must be informed about their selection for doping control in the presence of an adult and may choose to be accompanied by a sports worker during all sample collection procedures, or, in his or her stead, to be assisted by another witness who must be present throughout the course of the activities.

2.5.8 Children, minors and young people should not receive personal care (e.g., assistance while showering) from sports workers. If they are unable to complete such activities independently, it must always be a parent, guardian or other person authorized by them, preferably of the same sex, who takes charge of the care. During medical examinations and/or in any context minors must be educated to repudiate prohibited substances or methods that may alter sports performance.

2.5.9 Locker rooms, showers, etc. must be supervised, as well as access to the relevant premises, in such a way as to ensure the confidentiality of the minor(s). Only adults responsible for supervising the minor(s) may have access to the locker room area, when necessary and with timelines defined and shared in advance by the Company.

2.5.10 In the case of activities involving overnight stays (e.g., in the course of away trips), there should never be any provision for a minor(s) to be assigned a room shared with a sports operator (except in special and proven needs and with prior written authorization from parents or guardians) unless there is a family relationship between the minor(s) and the adult, written authorization from the parent or guardian being required even in such a case.



2.5.11 In the event of unavailability, removal or disappearance of a minor, immediate notification shall be given to the parent or guardian, and an emergency contact shall be provided when such parents or guardians will not take charge of picking up the minor at the end of an activity or are untraceable or unable to be located.

2.5.12 If, in order to take part in the activities, the minor travel unaccompanied or with someone other than the parent/guardian, an authorization signed by the parent or guardian authorizing the travel or taking charge of the minor must be provided.

2.6 Visitors and spectators

2.6.1 AS Roma shares with any visitors and spectators to the sporting event, prior to the start of activities and competitions involving free access to the facility hosting the event, the principles of this *Policy* of which the conditions must be accepted, specifying that any abusive, discriminatory or violent conduct may result in the removal of such individuals from the facility, even for multiple events.

2.6.2 Visitors and spectators (including any journalists/press or communication officers) are never allowed to be alone with children, minors and young people and a supervisor must always be present, except in cases where the adult involved is a relative of the minor(s).

2.6.3 The safety and well-being of children and minors must not be compromised in dealings with outside parties such as visitors or spectators. Private information such as contact details or addresses of the child(ren), or any further means of reaching them, must not be given to any party who is not expressly authorized to do so.

2.7 Video/photographic materials and online safety

2.7.1 In the case of possession and/or acquisition of photographic or video material depicting an underage person, it is always necessary to acquire the relevant disclaimer signed by the parents or guardians in order to be able to keep and/or use such material produced.

2.7.2 Images that could be offensive, that could cause in the minor discomfort, embarrassment or that could abstractly be qualified as exploitative (e.g. images in which the minor is not fully clothed) must never be acquired, and when acquired by mistake, must be deleted immediately and not to be disseminated or shared in any way. In any case, the minor who is 14 years of age or older who feels offended by the publication of material referring to his or her person, or the parents or guardians or legal representatives, in the case of a minor, may forward a request for the obscuring, removal or blocking of any personal data of the minor disseminated online to the person responsible for the publication and/or sharing. In case of continued inaction, this is without prejudice to the right to initiate the reporting procedure.

2.7.3 A risk assessment must be carried out regarding the influence of the use of technology and *social media* on the protection and safety of the children and minors to take the necessary measures to reduce any risks.



2.7.4 AS Roma adheres to the guidance formulated by SGS on the appropriate use of technology (Internet, cell phones, *social media*, etc.) in relation to the protection of minors and the implementation of this *Policy*.

2.7.5 When minors have free access to the *Internet* at facilities where SGS activities or events are taking place, it must be ensured that unsuitable or offensive material cannot be accessed. Internet sites that promote discriminatory and/or abusive conduct against minors or contain images or information potentially harmful to minors must be blocked on devices provided by SGS or Affiliated Companies and used by sports operators during SGS activities or events.

2.7.6 Should offensive materials or inappropriate unsolicited messages be received via the web, the referring Child Protection Delegate(s) must report the incident to allow for possible resolution by experts.

2.8 Collaborations, partnerships, sponsorships

2.8.1 Great attention must be paid to the protection of minors in all relationships that are established for the organization and conduct of activities, including any partnership agreements with associations, agencies or companies. Specific references to the protection of minors and the relevant *Policy* must be included in the agreements entered into.

2.8.2 Should any doubts arise about the reliability of third parties involved in the activity with regard to the protection of the child(ren), all necessary measures shall be taken to assess the merits of such doubts and resolve any issues that may arise, even in consultation with such parties.

GOAL 3: Awareness, implementation and dissemination of this *Policy*.

3.1 Awareness raising and training

3.1.1 All those who are engaged in activities that take place in close contact with minors, whether they are sports operators, SGS employees or staff members of Affiliated Societies, as well as communities, families, children, minors and young people, must be informed about the contents of the *policy* and enabled to recognize and report situations of violation of codes of conduct or abuse.

3.1.2 SGS will create and make usable training content dedicated to the protection of minors (both online and offline) to support sports operators and affiliated clubs.

3.1.3 Particular attention will be paid to actions to be taken to increase the awareness of children, minors and young people about the issues covered in this *Policy* and the ways in which they can contribute to make the practice of sports and the game of soccer safe. To this end, materials and content usable by/for children, minors will be prepared with specific language and *format*.



3.1.4 Ad hoc training materials and content may be provided depending on the role held and the tasks performed as part of SGS activities.

3.1.5 SGS will provide continuous updating of available materials and documents regarding the protection of minors through different ways and means.

3.1.6 In parallel with the Youth and Scholastic Sector's commitment to providing assistance and training about the topics covered in the *policy*, AS Roma provides additional training activities and specific courses dealing with the protection of minors, in which all representatives of the Company are required to participate.

3.1.7 All the people in various capacities involved in activities in contact with minors have the right and the duty to request clarification, insight and advice on the topics covered and other tools for the protection of minors. The Delegate and Manager as defined above, together with the Legal Area, are the first point of contact for such requests.

3.1.8 All webinars and all training interventions are, where possible, recorded, and informational materials, including related programming, are stored and made available to users in a manner that ensures accessibility and usability of the same by all authorized parties.

3.2 Risk assessment

3.2.1 Risk assessment is an important tool for any minor protection process. The importance of this tool lies in its ability to lay the foundation for all preventive actions to ensure that activities can take place safely by identifying and minimizing, through targeted actions, possible risks and issues about the protection of the minors.

3.2.2 Responsibility about risk assessment lies with the person responsible for organizing and carrying out the activity. [See Section Tools for Risk Assessment Model].

3.2.3 If, as a result of the risk assessment, it is concluded that it is not possible to provide sufficient assurance about the activity or event, and if it is difficult to put in place adequate preventive activities, the activity or event should be rescheduled, postponed, or cancelled.

3.2.4 Emergency contacts and medical records of players must be collected before they take part in activities. This information must be made available to all those involved in the protection of the minors during activities and events if the information is necessary for the prevention of risks or the management of any emergencies or problems.

3.2.5 Measures prepared for risk management should be continually updated, when deemed necessary, and may be updated both during and after activities or events in order to make the actions taken and solutions identified available for future activities or events.

3.3 Reports of violations



3.3.1 AS Roma identifies, within the *Safeguarding Policy*, to which full reference is made, a clear and accessible procedure for reports of situations of violation of the general principles and rules of conduct for the protection of minors, as well as hypotheses of harm, abuse, discrimination, mistreatment or violence by all those involved, whether victims, witnesses or individuals who have become aware of the facts.

3.3.2 The *Safeguarding Policy* also outlines the process for handling reports. The point of contact for all processes is always identified as the Manager, and, in the event that the violation is about this *Policy*, the Delegate [See Tools Section].

3.3.3 The scheme illustrating the management process, with related procedures and responsible parties should be discussed with any third parties (institutions, associations, etc.) for which there may be a possible implication in the management of reports (e.g., law enforcement) [see also objective 4].

3.3.4 FIGC has also set up a platform to make reports about violations of codes of conduct, mistreatment or abuse, including anonymously, which can also be made directly to SGS.

3.3.5 SGS guarantees complete confidentiality of the process and of documents to which it should have access in the course of carrying out the required procedures.

3.3.6 If the facts brought to light through the reports are not substantiated, no sanctioning action can be taken against the person who made the report that turned out to be unfounded, unless there is otherwise harmful behavior on the part of that person.

3.3.7 All documents or records acquired as a result of or in conjunction with the report must be stored, in accordance with relevant regulations, and handled with the utmost discretion by the delegates in charge.

3.3.8 All reports must be taken care of. Timely and adequate feedback must also be provided to all reports, in accordance with the provisions of this *Policy* [see also Objective 4].

GOAL 4: Sharing ways and solutions for identifying and reporting any improvement profiles

4.1 Creating moments of dialogue with other parties involved in child protection

4.1.1 It is necessary to engage in fruitful dialogue, discussion, and collaboration with law enforcement, child protection agencies and associations in order to facilitate possible referrals of doubtful cases and to be able to benefit from counseling and support where such interventions become necessary.

4.1.2 Local contacts should be identified in advance in order to facilitate referral procedures for any cases that require management by authorities/agencies.



4.1.3 Parents, guardians and others involved in the care of the minors must be sensitized and trained on specific issues pertaining to the protection of the minors, even through the organization of training seminars to be provided on a regular basis.

4.1.4 Child protection delegates are expected to continue their training by attending meetings or courses given by other institution, associations, agencies, and organizations in order to deepen their knowledge on the subject.

4.2 Reporting and follow-up measures

4.2.1 All referrals, investigations, and handling of child protection issues shall comply with the standards adopted by SGS as well as current relevant legislation. When consideration is given to referring a child to an outside party for the purpose of obtaining guardianship and protection, the legal framework and the best interests of the minor must always take priority.

4.2.2 Therefore, specialized figures, such as physicians or psychologists whose intervention must still be recorded, may be involved in the process of reporting and supporting the child.

4.2.3 In cases of extreme seriousness of violations, the case may be referred to the local child protection authorities and law enforcement agencies, in accordance with the procedures and forms provided for in the applicable regulations.

GOAL 5: Monitoring and reviewing initiatives and tools used in the field of child protection

5.1 Responsibilities

5.1.1 The ultimate responsibility for the implementation of the Policy and Codes of Conduct remains with FIGC and SGS, without prejudice to the further responsibility of AS Roma.

5.2 Evaluation of this *Policy*

5.2.1 At least once a year FIGC will conduct an evaluation of the policy it has issued and of the codes of conduct and their implementation on the ground.

5.3 Action Plan

5.3.1 Based on the assessment referred to in the previous point, AS Roma will develop an annual action plan in order to assess the compliance of this *Policy* with any amendments made by the FIGC, and fill any gaps in its implementation, with the aim of reducing risks and resolving any issues encountered.

5.4 This Child Protection *Policy* is intended to be a dynamic document, liable to be reviewed and possibly updated periodically.

5.5 Periodically SGS may request an external evaluation about the implementation of this *Policy* and related procedures.



FINAL PROVISIONS

This policy is adopted by A.S. ROMA S.r.l. on 02/04/2021 and comes into force on the same day. A.S. ROMA S.r.l. may adopt guidelines or other documents deemed necessary to implement this policy.

For questions regarding this policy, please contact:

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