



COURTESY TRANSLATION

POLICY
IN THE AREA OF SAFEGUARDING
BY
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Updated and in effect as per Board of Directors' resolution

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1. Foreword

- 1.1. A.S. Roma S.r.l. ("**AS Roma**" or the "**Company**") is committed to safeguarding the well-being of all registered players, as well as of all individuals who have a working relationship with the Company, and to promote their right to be treated with the utmost respect and dignity, preventing and combating 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. Lgs. n. 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**").
- 1.2. The Company has therefore adopted this *Safeguarding Policy* (hereinafter "**Policy**") to establish the general principles and rules of conduct for preventing and combating the phenomena of abuse, harassment, violence or discrimination, as well as for promoting an inclusive culture and environment that ensures the well-being of all members of the Company, with particular regard to minors.
- 1.3. Although this *Policy* is expressly addressed to members of the Company, the general principles and rules of conduct contained herein must also be considered applicable to all members of the Company, in respect of whom all the principles of conduct set forth below must therefore be observed.

2. Scope of application

- 2.1. This *Policy* applies to the personnel of the Company, as well as to all those who, on behalf of the Company, carry out their work activities in direct contact with its members, as well as to Associate Companies (as defined *below*) and Business Partners (as defined *below*), regardless of where they perform their work activities.

3. Definitions

- 3.1. The following definitions from the FIGC Guidelines apply to this *Policy*:
 - "**Religious abuse**" means the hindering, conditioning or restricting of the right to freely profess one's religious faith or to worship in private or in public, as long as the rites are not contrary to morality;
 - "**Physical abuse**" means any consummated or attempted conduct (including beating, punching, beating, choking, slapping, kicking, or throwing of objects), which is capable in an actual or potential sense of directly or indirectly causing harm to health, trauma, physical injury, or damaging the mental and physical development of the child/children so as to impair healthy and peaceful growth;



- "**Psychological abuse**" means any unwanted act, including disrespect, confinement, overpowering, isolation, or any other treatment that may affect the member's sense of identity, dignity, and self-esteem, or such as to intimidate, disrupt, or alter the serenity of the member, even if perpetrated through the use of digital tools;
- "**Sexual abuse**" means any behavior or conduct having sexual connotations, without contact, or with contact and considered unwanted, or whose consent is coerced, manipulated, not given or denied;
- "**Associate**" means any member of the corporate bodies, senior management, and employees at any level of the Company and the Company's subsidiaries;
- "**Bullying, cyberbullying**" means any abusive and/or aggressive behavior that a single individual or multiple individuals may engage in, personally, through *social networks* or other communication tools, either in isolation or repeatedly over time, against one or more members with the purpose of exerting power or dominance over the same;
- "**Discriminatory behavior**" means any behavior designed to achieve a discriminatory effect based on ethnicity, color, physical characteristics, gender, social-economic status, athletic performance and ability, religion, belief, disability, age, or sexual orientation;
- "**Recipients**": means all members and non-members of the Company, including third parties who, while not belonging to the Company, are nevertheless employed by the Company or perform any activity within or in the interest of the Company (*e.g.*, agents, suppliers of goods and services, consultants and contractors);
- "**Carelessness**" indicates the failure to meet basic physical, medical, educational and emotional needs;
- "**Sexual harassment**" means any unwanted and unwelcome act or behavior of a sexual nature, whether verbal, nonverbal, or physical that results in serious annoyance, discomfort, or disturbance;
- "**MOP**" means the Model of Organization, Management and Control suitable for preventing acts contrary to the principles of loyalty, fairness and probity adopted by AS Roma;
- "**Negligence**" means the failure to intervene on the part of any officer or member of the technical staff, or any member of the technical staff, including by reason of the duties arising from his or her role, who, having become aware of any of the events, or conduct, or conduct, or acts referred to herein, fails to take action by causing harm, allowing harm to be caused, or creating imminent danger of harm;
- "**Business Partner**" means any third individual or entity working with or on behalf of the Company, including *joint venture partners*, agents, brokers, contractors, subcontractors, consultants, professional advisors,



representatives, wholesalers, distributors, supply chain partners, and any other person or organization performing services for or on behalf of the Company;

- **"Abuse, Violence and Discrimination Officer"** or **"Officer"** means the person in charge of receiving and handling *Safeguarding* reports, with the requirements of autonomy, independence and competence. The Officer has to have free access to sports information and facilities, and, in accordance with the FIGC Guidelines, must not have had a criminal conviction, even if not final, for non-culpable offenses.

4. Roles and responsibilities

4.1. The Company has provided a specific organizational structure for preventing and combating the phenomena of abuse, harassment, violence or discrimination, as well as for the promotion of an inclusive culture and environment that ensures the well-being of all female and male members, with particular regard to minors.

4.2. This organizational structure involves the following Departments/Functions:

- Board of Directors, which
 - o Approves this *Policy*;
 - o ensures that additional internal regulatory documents are consistent with the content of this *Policy*;
 - o Receives and submits for review the measures taken on *Safeguarding*;
 - o arranges, where necessary, for adequate resources to be allocated and assigned for effective implementation of this *Policy*;
 - o Appoints the Abuse, Violence and Discrimination Officer (hereinafter referred to as **"Officer"**);
- General Manager and the CEO ("*Chief Executive Officer*") who directly, or through the Departments/Functions reporting to them:
 - o communicate internally the importance of acting in accordance with this *Policy*;
 - o Plan training and information activities to disseminate this *Policy*;
 - o encourage staff to contribute to the effective implementation of this *Policy*;
 - o consider taking proportionate disciplinary measures against those responsible for violations of this *Policy*;
 - o encourage the use of the system for reporting violations of this *Policy*.
- CFOO ("*Chief Football Operating Officer*");
- CFO ("*Chief Financial Officer*");



- Youth and women's sector managers;
- Medical Staff;
- Department of Psychology;
- Sports Secretary;
- Internal Audit;
- Coaches;
- Athletic trainers;
- Legal Area, who, directly or through the Departments/Functions reporting to them:
 - o implement the behavioral norms set forth in this *Policy*;
 - o Monitor compliance with this *Policy*;
 - o propose any changes and/or additions they may deem necessary taking into account the circumstances of the specific case.

5. General principles of behavior

- 5.1. All Recipients of the *Policy* are expected to abide by the following principles of conduct:
- Conducting themselves in a manner appropriate to their role and to the professional relationship with the players;
 - Ensuring an environment inspired by principles of equality and protection of freedom, dignity and inviolability of the person;
 - Promoting the use of neutral and inclusive language in all corporate regulatory documents;
 - Raising awareness of the use of correct language among users of the space in which the sports activity is taking place;
 - Creating, maintaining and promoting a healthy balance between personal and sports spheres, enhancing the playful, relational and social profiles of sports activity;
 - Reserving adequate attention, commitment, respect and dignity for each member;
 - Supporting members in educational and training paths in various capacities related to sports activities;
 - communicating and sharing with the members, especially when they are minors, the educational and training objectives, explaining the ways in which these objectives are to be pursued and involving those who exercise parental responsibility or their proxies in the choices;



- Planning congruous and appropriate trainings with respect to the physical and athletic development of the players, also taking into account their interests and needs;
- Adopting appropriate logistical solutions when traveling to prevent uncomfortable situations and/or inappropriate behavior;
- Adopting non-discriminatory conduct, avoiding any inappropriate and/or offensive attitude with reference to ethnicity, gender, sexual orientation, language, religion, political or other opinion, nationality, social origin and economic availability;
- Paying the utmost attention to any situation of discomfort, perceived or known even indirectly, reporting, in such a case and without delay, the circumstance to the appropriate individuals;
- When situations of anxiety, fear or discomfort resulting from one's conduct are encountered, discontinue contact with the member where possible, reporting this to the relevant figures;
- Participating in all mandatory *Safeguarding* training courses organized by the FIGC, as well as additional training and awareness-raising activities on the subject promoted and programmed by the Company.

5.2. All Recipients are prohibited from:

- Making improper use of one's position of trust, power, or influence with respect to male and female members;
- Adopting attitudes that may negatively affect the personal, social and relational development of female and male members;
- Treating differently or otherwise favor some subjects while excluding or marginalizing others;
- Adopting attitudes or engaging in relationships with female and male members that could, in any way, be considered sexual in nature, or otherwise constitute conduct of abuse, harassment or exploitation;
- Having physical contact with male and/or female members that is not justified by the conduct of the sporting activity;
- Organizing non-institutional convivial events with underage members in the absence of prior consent given in writing by the exercising parental responsibility;
- Engaging in conversations with male and female players/minors using means of communication for personal use beyond those strictly functional to the performance of institutional activities;



- Using, reproducing or disseminating multimedia content having as its subject matter member(s) who are minors, when this is not necessary for educational and training purposes and in the absence of prior written authorization from the exercising parental responsibility;
- Improperly using cell phones, cameras, and video cameras inside locker rooms and/or in other places not freely accessible to unauthorized personnel.

6. Specific principles of behavior

6.1. The Company implements specific measures for the promotion of the mental and physical well-being of its members/family members and the prevention and combating of any form of abuse, violence and/or discrimination. Specifically, the Company:

- promotes and supports initiatives for the cultural education of male and female members, consistent with the needs of sports activities;
- periodically submits to all the players sports activity enjoyment questionnaires validated by the World Health Organization, arranging personalized interviews based on the answers provided;
- ensures on an ongoing basis the conduct of observational activities in the field by the team of psychologists and psychotherapists afferent to the Department of Psychology, in order to detect any distress situation in a timely manner;
- organizes, with the support of the team of psychologists and psychotherapists afferent to the Department of Psychology, specific match analysis activities of a psychological nature at the conclusion of sports events;
- programs, with the support of the team of psychologists and psychotherapists afferent to the Department of Psychology, meetings involving the whole team, dealing with issues of preventing and combating violence and discrimination;
- Provides psychological assistance, with the support of the team of psychologists and psychotherapists afferent to the Department of Psychology, in the area of gender identity and affectivity discovery paths;
- organizes, with the support of the team of psychologists and psychotherapists afferent to the Department of Psychology, specific training and information activities on issues pertaining to sexual and affective education and gender identity, in order to promote a culture of valuing and including diversity;
- guarantees female members in a state of pregnancy or puerperium the right to determine the beginning and end of maternity leave, as well as the



right to continue sports activities, subject to the approval of the medical staff, including by agreeing on a differentiated work plan for the greater protection of the member's condition.

6.2. With particular reference to the management of practice and access to the locker room, the Company:

- organizes sports activities in the presence of at least two members of the technical staff;
- organizes training sessions in outdoors and open-access locations whenever possible;
- schedules individual or restricted training sessions only when there is a proven competitive need and with prior authorization from the exercising parental responsibility, where the activity involves underage players;
- ensures the separation of locker rooms between members of different gender, ensuring adequate cleanliness and sanitation of the rooms where the same are used in multiple shifts of training;
- ensures that locker rooms and showers are supervised and that access to the premises and related area is allowed only to those entitled to do so;
- ensures that the parents of underage male and female members do not have free access to the locker room unless there are specific personal care needs, proven by showing appropriate documentation;
- ensures the presence, within the technical staff, of at least one person of the same sex as the person using the locker rooms, who can provide assistance by accessing those rooms when needed.

6.3. In preventing and combating eating disorders, the Company:

- identifies, within the medical staff, figures with specific expertise in the area of nutrition;
- ensures that any indication of diets or dietary regimens aimed at weight loss of a player is carried out with the support of the Company's medical staff;
- involves the Department of Psychology in prescribing any diets or dietary regimens where deemed necessary in the case;
- in the case of underage member(s), involves the exercisers of parental responsibility should any symptoms of eating disorders emerge.

6.4. In case of travel, the Company:

- draws up specific procedures for the behavior of male and female members during travel and requires compliance with them;
- ensures, in the case of overnight stays, that at least one member of the technical staff has the room allocated on the same floor as the team;



- Prohibits room sharing between members of different gender;
- when possible, taking into account logistical needs, prefers to stay overnight at facilities that ensure separation between players and members of the technical staff and other guests at such facilities;
- Prohibits the sharing of the room between players and members of the technical staff, with particular reference to the hypothesis of trips involving minors, unless there are specific and proven needs and, in the case of minors, with the prior written request of the individuals exercising parental responsibility;
- Ensures that all documentation related to travel management is maintained and archived.

6.5. In particular, with reference to the management of sports activities involving minors, the Company:

- selects only specialized personnel who are in possession of the documents and self-certifications required by the FIGC, requiring the transmission of self-declarations in lieu of a criminal record certificate and a certificate of pending charges for all members of the technical staff;
- includes specialized psychologists and/or psychotherapists on the technical staff of all Company teams;
- ensures that all training plans are appropriate to the age, sex, development and physical ability of the players, and that the players are not induced to undergo training in case of injury or illness;
- Ensures the presence of an adequate number of technicians in relation to the composition of each group of member(s);
- Arranges rosters and training arrangements that ensure adequate participation of all male and female members in activities;
- requires, at least annually, the completion of a coach/trainer satisfaction test, the results of which are shared with the technical staff in order to identify any profiles for improvement;
- holds periodic meetings with technical staff in order to explain the safeguard policies adopted by the Company and any actions taken;
- programs, with the support of the Department of Psychology of the Company, supervisory activities of the technical staff, so that all members are able to understand and handle any situations of distress manifested by the male and female members;
- guarantees that deserving individuals, even those without means, access to sports activities by providing subsidized rates for enrollment in the *AS Roma Academy*;



- offers school support activities for male and female members who attend the AS Roma Scientific Sports High School, also preparing specific educational and recreational spaces;
- Ensures the preservation and storage of all documentation related to the prevention and combating of abuse, violence and discrimination in the sports activities involving minors, including through the use of special tools in use by the Company.

6.6. With regard to the management of medical examinations and health care of the players and of the underage players, the Company:

- ensures that male and female members who request it can be accompanied by a peer or an adult designated by them in the performance of medical treatment;
- where urgent action is required, ensures that individuals exercising parental responsibility are promptly contacted, providing their consent to the administration of medical treatment;
- informs adult players and 14 years of age or older players and individuals exercising parental responsibility about the possibility of doping controls on players;
- ensures the presence of a person from the medical staff during the sample collection procedure related to doping control;
- ensures that medical staff who should find the signs and indicators of injuries, violence and abuse contact without delay the team of psychologists and psychotherapists afferent to the Department of Psychology for appropriate action to be taken, subject to further legal obligations;
- ensures the preservation and storage of all documentation related to the management of medical examinations and health care, including through specific tool in use by the Company.

6.7. With reference to the management of relations with the parents and family members of underage male and female members, the Company:

- organizes, at the beginning of the season and periodically, where there is a need, moments of dialogue with parents and members of the Company in order to explain the safeguard policies adopted by the Company and any actions taken;
- organizes, at least monthly, training seminars on specific topics deemed relevant with reference to the needs of the particular case;
- does not allow interference of a technical-sporting nature having to do with the activity carried out by the male and female players;



- prohibits direct contact between such individuals and the teams' technicians, directing any interlocution or request for clarification to the Company's Managers;
- places an express prohibition on such individuals from adopting, during training and/or during sports events, attitudes or language that is unsportsmanlike, offensive, abusive, and discriminatory and/or otherwise detrimental to the participants in the activity and to the name and image of the Company;
- provides a system of penalties for violations of the above conducts, in consideration of the seriousness of the violations, from a verbal warning to a ban on sports events for the duration of the season;
- Ensures the preservation and storage of all documentation related to the management of relations with parents and family members of underage members.

7. Reporting requirements

- 7.1. Anyone, within his or her own work context, who becomes aware of or has a well-founded suspicion of violations of the *Policy* may make a report to the Abuse, Violence and Discrimination Officer (hereinafter "**Officer**") in the following ways:
- A. orally, through a request by the reporter for a meeting with the Manager, to be scheduled no later than 10 working days from the date of receipt of the request, to be held:
- On company premises that ensure the full confidentiality of the reporter;
 - with the consent of the reporter, through a videoconference link that ensures the utmost confidentiality of the interview, in which only those entitled to do so may participate;
- B. in writing by sending an *email* to the address of the Officer: marco.nicolini@alma-led.com and odv@asroma.it.
- 7.2. Reports must be substantiated, based on precise and concordant facts, and have the widest possible degree of completeness and comprehensiveness.
- 7.3. Whenever possible, the reporter should provide:
- A clear and complete description of the facts being reported;
 - An indication of the circumstances of time and place in which the event that is the subject of the report occurred;
 - Personal details or other elements that would allow the reported person(s) to be identified;
 - Any documentation supporting the Report;



- Any other useful information to ascertain the existence of the reported facts.

8. Appointment of the Abuse, Violence and Discrimination Officer, management of the report and protection of the reporter

- 8.1. The Company appoints the Chairman of the Supervisory Board of AS Roma, in the person of Lawyer Marco Nicolini, as the person in charge, who treats the reports received in a confidential manner, protecting the reporter and all those involved in the report.
- 8.2. The reporting management process consists of the five steps listed below, each of which must be adequately documented:
 - A. Preliminary assessment: an action aimed at determining whether the report falls within the scope of the *Policy*, whether it is sufficiently detailed - also following any supplementary requests, made where necessary, to the reporter - and whether to proceed to the next investigative stage; in the absence of these conditions, the report is dismissed by notifying the reporter;
 - B. preliminary investigation: investigations carried out by the Officer to ascertain the merits of the same, also with the possible involvement of competent company functions or external consultants/professionals, who are required to guarantee the confidentiality of the information transmitted to them and the confidentiality of all those involved within the scope of the report;
 - C. decision: formal action to complete the investigation phase which may be followed by any disciplinary action deemed appropriate according to company procedures and contractual agreements;
 - D. Record keeping: keeping information securely and confidentially in accordance with relevant privacy regulations;
 - E. corrective action reporting and monitoring: monitoring by the relevant functions on the implementation of any recommendations/corrective actions and information on the management of reporting to the relevant bodies when required by the case history.
- 8.3. The Company shall protect against any form of retaliation and/or secondary victimization for members and all other individuals who, in good faith, have:
 - filed a complaint or report;
 - expressed an intention to file a complaint or report;
 - assisted or supported another member in filing a complaint or report;
 - given testimony or hearing in abuse, violence or discrimination proceedings;
 - undertaken any other action or initiative to promote and/or implement this *Policy*.



9. Sanctions

9.1. In case of established violations of this *Policy*, the disciplinary system set forth in paragraph 3.4. of the MOP adopted by the Company will be applied.

10. Dissemination and updating of the Policy

10.1. This *Policy* is sent to all Recipients and is available on the company internet site.

10.2. The Company also provides the following disclosure requirements:

- Posting of the *Policy* at the Company's registered office and publication on its website of the *Policy* and the name and contact details of the Officer;
- Communication of the adoption of the *Policy* to the Federal Safeguarding Policy Commission established at the FIGC;
- notification to the players, or, if applicable, to the exercising parental responsibility - or additional individuals entrusted with the care of the athletes - of the adoption of the *Policy* and the name and contact information of the Officer;
- communication to the Federal Safeguarding Policy Commission established at the FIGC of any major event related to the Officer.

10.3. This *Policy* is disseminated to all Recipients through specific information and training activities, including with the support of external consultants.

10.4. This *Policy* will be evaluated for updating at least once every four years, i.e., in conjunction with the updating of the FIGC Guidelines, as well as when deemed necessary in light of evidence from the above reporting and monitoring activities.

11. Procedures and other related documents

11.1. This *Policy* shall be read and complied with in conjunction with the MOP adopted by the Company and the Company's other internal procedures, including in particular at least the following other procedures and related documents:

- Code of Ethics;
- Compliance *Policy*;
- Child Protection *Policy*;
- *Policy* against harassment;
- Equal Opportunity *Policy*;
- *Policy* on Whistleblowing and Relevant Events.