

Child Safeguarding Policy



VERSION N. 1

Approved by the Management Board

of Fondazione Compagnia di San Paolo
on 18 November 2024 and approved by
the Board of Directors of the consortium
company Xkè? ZeroTredici on November
27 2025



Fondazione
Compagnia
di San Paolo



Fondazione
1563



Fondazione
Ufficio Pio



Fondazione
per la
Scuola



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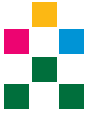
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Letter from the Chair

The Child Safeguarding Policy adopted by Fondazione Compagnia di San Paolo and Group entities is the cornerstone of our commitment to promote the rights, welfare, education and protection of the children involved in activities that we support or carry out.

This Policy stems from our awareness that safeguarding children is the shared responsibility of all those who participate, whatever their role, in activities dedicated to boys, girls and adolescents. The ambition of the Foundation is to contribute to the creation of social, cultural and educational contexts for young people that are inclusive and safe, respectful of their dignity and capable of listening with authentic attention.

The document is based on universal principles that are widely recognised - including the overriding interests of the child, non-discrimination, participation and transparency - and applies to all recipients: employees, collaborators, volunteers and suppliers who, in various contexts, come into direct or indirect contact with children.

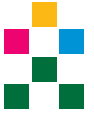
The Policy also provides practical operational tools: criteria for personnel selection, dedicated training paths, guidelines for conduct, risk management protocols and an electronic platform for reporting any infringements.

This document seeks to be a daily reference source for all Foundation activities. Effective implementation will depend on the aware and responsible efforts made by each of us, with the shared objective of creating environments capable of protecting, appreciating and supporting the growth of new generations.

At the same time, our Policy may encourage all institutions and organisations collaborating with the Foundation to adopt practices and policies that respect the rights and dignity of children.

Marco Gilli

Chair Fondazione Compagnia di San Paolo



Introduction

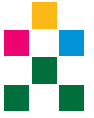
1.1 Fondazione Compagnia di San Paolo

Fondazione Compagnia di San Paolo (hereinafter as referred to as “Compagnia” or the “Foundation”) is a philanthropic foundation with banking roots, based in Turin, that pursues social objectives focused on the promotion of civil, cultural and economic development by working in the relevant sectors. Since its foundation on 25 January 1563 as a charitable confraternity, Compagnia has been an institution at the service of the society in which it has its roots. Today, Compagnia is a private, independent, non-profit entity: an institutional expression of the social freedoms guaranteed by the constitution, open to dialogue and collaboration with relevant European, national and local public institutions.

Compagnia pursues its objectives via the management and administration of the wealth accumulated over centuries, which it is committed to transmitting intact to future generations, by acting - within the established regulatory framework - in accordance with the principles of subsidiarity and solidarity. In this regard, Compagnia has steadily diversified its assets with a view to balancing their composition and profitability, thus maintaining a stable flow of giving for the common good.

True to this tradition, the Foundation is a people-centric organisation that, by its actions, seeks to promote their development within society, in full recognition of their rights and responsibilities. The Foundation embraces the values and principles of development, sustainability, interdependence, solidarity, equity and the equal dignity of all human beings, as declared by the United Nations, the European Union and the Republic of Italy. An emphasis on sustainable development and care for the eco-system reflects the focus of the Foundation on the welfare of current and future generations. Its intergenerational responsibility also finds expression in the principle of maintaining and increasing the asset portfolio and adopting responsible investment policies, in accordance with recognised international environmental, social and governance standards.

The philanthropic activities of the Foundation have also been developed by creating auxiliary bodies and consortia (together with Compagnia, hereinafter referred to as the “Entities”).



1.2 Commitment of the Foundation and its entities to children

The Entities have defined and agreed a strategy in the field of education that promotes, renders systemic and maximises the effects of their extensive daily efforts to pursue quality learning paths, supporting the harmonic growth, welfare, dynamism and active participation of the youngest generations.

Accordingly, a common challenge has been identified, placing the welfare and growth of boys, girls and adolescents - as persons with rights - at the centre of their activities.

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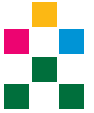
Using the knowledge and skills they acquire at school and in other settings throughout their lives, boys and girls, adolescents and young people fulfil their aspirations freely and contribute, consciously and with critical spirit, to change and to a fair and sustainable future, where everyone has access to the same opportunities.

Starting from the needs, potential and aspirations of everyone in participatory educational contexts, often with the aid of data and technology; competent people with up-to-date skills enable bespoke, innovative and inclusive educational relationships and pathways in schools, families and local communities, thus helping to support the social, digital and ecological transition.

”

Tackling this challenge required the adoption of a long-term strategy of diversified, consistent and synergistic actions, drawing on the diverse wealth of expertise accumulated by the Entities. Accordingly, a systemic, multi-dimensional view was adopted, focusing on harmonic growth and the development tasks appropriate at different ages for boys, girls and adolescents¹, favouring educational alliances among young people, adults and their communities.

1. For the sake of simplicity, consistency and brevity, the term 'children' will be used from now on to refer to boys, girls and adolescents.

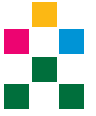


As an initial, worthwhile step in the execution of this strategy, the Entities have decided to adopt a ***Child Safeguarding Policy*** that includes procedures and practices for the protection of children, in the context of the projects developed and/or supported by them.

This Policy ensures that the children involved in various formal and informal contexts (educational, social, health-related, cultural, recreational, sporting etc.) are always protected against possible maltreatment or abuse by personnel belonging to the Foundation and its entities, and that each Entity knows how to respond appropriately to allegations of maltreatment or abuse by its personnel. The Foundation and its entities are also committed to recognising and responding to any situations of abuse and violence against minors that occur beyond the boundaries of their activities, arranging promptly for appropriate action and protection by the relevant territorial agencies.

The Entities have agreed to include the practical standards and criteria described in this Policy in their own operational and managerial processes, within one year of its introduction.



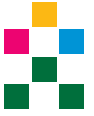


Regulatory framework

This ***Child Safeguarding Policy*** has been adopted in the context of the principles and values that underpin the principal international treaties governing the rights of children and adolescents, as primarily represented by the UN Convention on the Rights of the Child (1989) and the current Italian and international regulations governing the maltreatment and abuse of children.

The Policy falls within the framework of values that distinguish the activities of the Entities, as embedded most recently in the Code of Ethics agreed and adopted by them. In particular, the Policy responds most closely to the “Fundamental principles” section of the Code of Ethics (and, principally, to the concepts of “Dignity of the person, equity and inclusion”), defining rules of conduct for the Entities in order to safeguard and protect the children involved in their initiatives and projects and, in general, in the conduct of their activities.





Scope of application

The Foundation and the following organisations that Compagnia founded, was co-founder or of which is a consortium member:

- Fondazione 1563 per l'Arte e la Cultura;
- Fondazione per la Scuola;
- Fondazione Ufficio Pio;
- Fondazione LINKS;
- Fondazione Collegio Carlo Alberto;
- IIGM (Italian Institute for Genomic Medicine);
- Xké? ZeroTredici SCRL

have decided to adopt this **Child Safeguarding Policy** (hereinafter, the "Policy").

The following are recipients of the Policy (hereinafter, the Recipients):

- all members of the governance² and all personnel³ of the Entities;
- all volunteers and civil service operators who work at the Entities;
- students who participate in learning activities or training paths organised by the Entities, if they are involved by the Entities in activities that involve direct or indirect contact with children;
- consultants, collaborators, even on a temporary basis, and service providers who maintain contractual relations with the Entities, if their work for the Entities involves direct or indirect contact with children.

PR.I.S.MA. must comply with the requirements of the Policy in relation to any work, falling within the scope of application of the Policy, that it performs on behalf the Entities.



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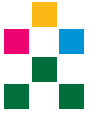
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2. Governance includes all Statutory Bodies.

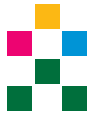
3. This category comprises the employees of the Entities (including executives) with any type of employment contract, the employees of institutions and organisations other the Entities who work for the last mentioned on secondment or pursuant to agreements, other workers present at the Entities for reasons different to the above (e.g. interns/apprentices/temporary staff).



Objectives and purposes

The Policy contains rules and procedures intended to safeguard children involved in the activities of the Entities, as well as to protect them from possible maltreatment and/or abuse perpetrated to their detriment in the context of said activities.





Roles and responsibilities

5.1 Obligations of the Recipients

All Recipients must comply with the Policy and align their conduct with the principles and rules of conduct specified in the Policy; furthermore, each of them, based on their role within the Entity concerned or their relationship with that Entity, must contribute to proper implementation of the Policy.

Recipients agree to comply with the principles and rules of conduct specified in the Policy by confirming in writing that they have read and accepted them.

Recipients also agree to attend mandatory training on the contents of the Policy specified by the Entities, based on their role within the Entity(ies) concerned and/or their involvement in projects that benefit children.

Lastly, Recipients must report promptly (in the manner described later) all suspected maltreatment and/or abuse of children that comes to their attention while working for the Entities, or in the context of their activities or projects.

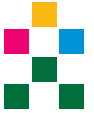
5.2 Roles responsible for implementing the Policy

The senior decision maker at each Entity with responsibility for its organisational management⁴ (hereinafter, the “senior decision maker”) guarantees application of the Policy and creates a working environment that facilitates implementation and development of the principles embodied in the Policy.

For this purpose, the senior decision maker, possibly assisted by other functions within the Entity, adopts suitable organisational measures to ensure that:

- Recipients receive the necessary information about, and training on, the contents of the Policy;
- parents, guardians and children involved in initiatives and projects of the Entities are adequately informed about how to report any maltreatment or abuse that comes to their attention, or is observed or perceived by them;
- all necessary action is implemented at Entity level to guarantee proper application of the Policy.

4. The person responsible for the organisational management of the Entity is normally the Secretary General/Director or a person at the Entity who, albeit with a different title (e.g. Operations Director), performs that function; in the absence of that role and/or if mandates are assigned differently within the Entity, the role of the senior decision maker is understood to refer to the person within the Entity to whom its Administrative Body has granted operational mandates (e.g. Chairman or Executive Director).

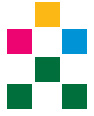


In order to facilitate the most effective functioning of the reporting process described in **section 8** below, the Entities jointly appoint a
Child Safeguarding Policy Counselor
(hereinafter CSPC).

The CSPC possesses specific expertise in the area of child protection legislation and may be appointed from outside of the Entities.

The CSPC is responsible for collecting, managing and assessing allegations of abuse reported to the Entities via the dedicated digital platform.





Application criteria

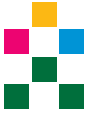
6.1 Key principles

The entire Policy framework is based on the following key principles:

- all children have equal rights to protection, the promotion of their welfare and participation, regardless of their age, gender, sexual orientation, ethnicity, social status, and level of ability or disability;
- all child protection actions must be taken in their overriding interest;
- the responsibility to protect children is shared by everyone; in turn, children can help to protect themselves and other children, even though final responsibility for their safety rests with adults;
- the measures taken to protect children must be inclusive without discrimination, recognising that certain children may be at greater risk of abuse;
- a transparent and open climate is essential in order to ensure the protection of children; maltreatment and abuse can occur more easily when the persons involved do not feel able to express their concerns;
- all concerns about the safety and protection of children must be considered carefully;
- no single organisation can protect children when acting alone; accordingly, is it necessary to work and collaborate with other organisations, institutions and local child protection agencies;
- should persons decide to report possible maltreatment or abuse to the detriment of child, they must be guaranteed confidentiality and privacy throughout the entire case management process;
- all child protection actions must be taken in compliance with the provisions of the related domestic and international legislation.

6.2 Operating pillars

The key principles, described above, translate into four operating pillars that support the system of rules and requirements defined in the Policy, each of which is essential to guarantee its proper and effective application, as well as to check over time that it is kept updated.



The four operating pillars are:

Awareness

The children involved in the activities of the Entities and their families are informed about the rules of conduct adopted by the Entities to prevent the risks of maltreatment and abuse to the detriment of children.

Prevention

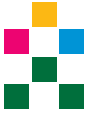
Via awareness, good practices and training, the Entities strive to guarantee an environment that respects the rights of children and prevents inappropriate conduct, abuse and exploitation.

Reporting

The Entities specify clearly the measures to be adopted and the conduct required if child abuse or exploitation is suspected.

Response

The Entities take appropriate, timely action to assist and protect children if there are concerns that they may be subject to abuse or exploitation.



Prevention and awareness

Prevention and awareness are the principal tools by which the Entities facilitate proper application of the Policy.

Prevention seeks to reduce the risks faced by children involved in the activities of the Entities, and is achieved by precise analysis of these risks and implementation of the mitigation measures identified.

Awareness derives from the work carried out to make known, to the children involved in the activities of the Entities and their respective families, the rules and tools adopted by the Entities to prevent the risks of maltreatment and abuse to the detriment of children.

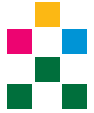
7.1 Rules of conduct

The prevention and awareness tools include rules of conduct that Recipients must follow to ensure proper application of the Policy; these rules are presented below, organised by context.

Recipients must:

PROFESSIONAL ASPECTS

- develop a sense of responsibility for their work, so actions and conduct that are inappropriate or that might result in the abuse of children are not missed or tolerated;
- maintain high personal and professional standards that, where necessary, may include specific training and updates; take great care to identify situations that might expose children to risks, obtaining adequate training in their management;
- report all concerns, suspicions or certainties about the abuse or maltreatment of children;
- organise work processes, spaces and times that minimise the risks and promote the safety of children;
- take care to listen to children and consider their needs, even with regard to the organisation of their own work and projects;
- promote the elimination of all physical, mental and structural “obstacles” that might hinder the full development of children, their inclusion and their access to all scholastic and educational opportunities.



RELATIONS WITH THE CHILDREN INVOLVED IN ACTIVITIES

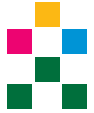
- align their conduct in their relations with children, considering their age, level of maturity and other determining factors, with full respect for their dignity; use language and ways of communicating that are appropriate for their age, gender identity, religious orientation, mental condition and cognitive capacity;
- ensure the promotion of a safe and inclusive culture that is open to dialogue;
- communicate their role clearly to children and encourage them to raise any concerns that they might have, appreciating their skills and encouraging the development of their capacity to protect themselves from any form of abuse or malpractice;
- take the wishes of children into account;
- appreciate the capabilities and skills of children and talk with them about their rights, what is acceptable and what is not, and what they can do should any problems arise.

RELATIONS WITH THE FAMILIES OF CHILDREN INVOLVED IN ACTIVITIES

- maintain open and collaborative relations with the families of children involved in activities, involving them too in a spirit of shared responsibility, where necessary applying tools that facilitate their active involvement (e.g. cross-cultural mediation);
- make sure to inform families adequately about all activities that involve their children, in order to guarantee their participation and receive the related permissions and authorisations.

Recipients must never behave inappropriately or, in any case, in breach of the principles and rules of conduct specified in the Policy, such as but without limitation:

- attitudes towards children that - even in psychological terms - might adversely influence or impede their harmonic and socio-relational development. In particular:
 - hit, physically assault, or physically or psychologically abuse a child;
 - use an unsuitable tone of voice, too high pitched or aggressive;
 - use aggressive, violent or discriminatory language;
 - set a negative example for children, via inappropriate actions or statements;
- tolerate, or fail to raise, any problems or suspected infringements of this Policy, the procedures or the code of conduct;
- maintain relations with children that might, in any way, be considered exploitation, maltreatment, abuse, malpractice or manipulation. In particular:
 - engage in relations or conduct with children involving physical contact that, objectively, could be misunderstood;
 - sleep in the same room, same bed or same home as a child involved in the activities, unless this required by the nature of the work or for safety reasons;
 - perform personal care or grooming activities for a child who is capable of doing them alone;
 - lend, gift or accept money or personal presents from children or their families, except for those of modest value;



- facilitate situations in which the child might be embarrassed or feel humiliated or disdained by another child or adult, or that might result - directly or indirectly - in any other form of emotional or psychological abuse. In particular, it is forbidden to:
 - discriminate against or favour any child to the exclusion of others;
 - tolerate or allow conduct by children that is illegal or abusive or that jeopardises their safety;
- put at risk the privacy of children or expose them to the risk that their personal data might be used by third parties. In particular, it is forbidden to:
 - share, in most cases, their private contact details (mobile, e-mail, personal social network accounts etc.) with children involved in activities, agreeing - if made available - to use the digital environments and applications of the Entity concerned when making direct contact with the children involved in projects and initiatives;
 - retain on personal devices or make inappropriate use of photographs or films of the children involved in activities;
 - violate the authorisations given by parents regarding the management of photographs and films.

7.2 Assessment of risks

To reduce risks and mitigate the consequences of critical situations, Entities require all activities involving children to be assessed in advance, in order to guarantee that all risks to their safety are identified and managed in each phase of the work, applying suitable systems of control.

When assessing and managing risks, the following fundamental actions are required:

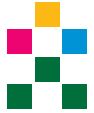
- assessment of risks when preparing each project and activity that will involve children, identifying any existing or necessary mitigation measures;
- development of risk management strategies when implementing projects and activities, in order to minimise any risks detrimental to children;
- suspend development and/or implementation of the project if, following the risk assessment, too many risks are identified that cannot be reduced or mitigated.

7.3 Information and involvement of children and their families

Entities ensure that children, their families and the communities involved in their activities are aware of the Policy and the measures envisaged for the protection of children.

The Entities adopt various tools/channels of information for this purpose, including:

- digital platforms (websites, social media networks);
- informative materials (even of a child-friendly nature, prepared using language appropriate to a child reader);
- periodic presentations of different types for different age groups;
- translation of the Policy into the languages used in practice.



7.4 Selection of employees, volunteers and consultants / collaborators / suppliers

The policy for the selection and hiring of employees reflects the commitment of Entities to protect children, ensuring that procedures and controls are adopted to ensure, for relevant positions, their suitability for work with children.

In particular, the procedures followed by Entities when selecting employees include the following measures:

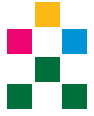
- Reference to the Policy in all job vacancies published by the Entities, specifying its binding nature.
- For positions that involve (or might involve) contact with children:
 - requests for information from candidates so that their suitability to work in contact with children can be checked;
 - interviews with candidates conducted in the presence of at least two persons, of whom at least one has demonstrated experience in the educational field;
 - requests - where deemed important - for references from the former employers of candidates, including a specific question about their conduct in their previous employment;
 - checks of their court record certificates for the absence of convictions for the offences envisaged in art. 25-bis of Presidential Decree 313/2002.

All new hires agree to comply with the Policy by confirming in writing that they have read and accepted it.

If Entities expect projects that involve children to include participation by volunteers, apprentices or persons performing their national service in civil society, they must first interview those candidates in the presence of at least two persons, and check for the absence of convictions for the offences envisaged in art. 25-bis of Presidential Decree 313/2002, even by obtaining self-certifications from them.

Every contract signed with consultants and suppliers that offer services and activities requiring continuous, direct involvement with children must make explicit reference to this Policy and contain commitments to comply with its provisions and, where applicable, to employ persons in the contracted activities whose absence of convictions for the offences envisaged in art. 25-bis of Presidential Decree 313/2002 has been verified.

All volunteers, apprentices, persons performing their national service in civil society and consultants/ collaborators/service providers involved in projects for children are made aware of this Policy and that they are bound by it.



7.5 Initial and continuous training

The Entities recognise the importance of continuous training on the topic of *Child Safeguarding* that helps Recipients to develop skills, knowledge and experience in the protection of children, appropriate to their roles within the organisation.

In particular, all Recipients are offered initial training on the basic contents of the Policy, to be refreshed over time via updates. For this purpose, a common language has also been established by creating a Glossary that is attached to the Policy ([Attachment 1](#)).

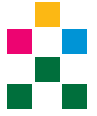


7.6 Information and communication technologies

The Entities promote the appropriate use of information technologies and, in particular, such communication tools as websites and social media networks, with a view to ensuring that children are not exposed to risks.

Entities may involve children in their digital technology projects. This requires the adoption of tools and procedures to prevent risks deriving from the irresponsible use of digital tools and the on-line environment in general.





8. Procedure for submitting and managing reports of abuse to the detriment of children

8.1 General aspects

The procedure for submitting and managing reports of abuse to the detriment of children (hereinafter, the “Procedure”) defines responsibilities and rules for managing reports about possible infringements of the principles and rules of conduct contained in the Policy by its Recipients.

The Procedure is based on the following presumptions:

SAFETY AND WELFARE OF THE CHILD

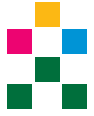
The safety and welfare of the child are paramount throughout the entire reporting process. Any action taken must not put the child at risk.

CONFIDENTIALITY

All reports are processed in a professional, confidential and timely manner. The victims of abuse, witnesses and the accused are entitled to confidentiality and their identities will only be made known to the roles indicated in the Policy, on a “Need to Know” basis.

RESPECT FOR ALL PARTIES INVOLVED

Those who submit malicious or untrue reports about maltreatment or abuse may face disciplinary action, as envisaged in the Policy, or - if they are not Recipients of the Policy (e.g. the families of the children concerned) - may be reported to the competent authorities. All parties involved, including the accused, must be treated with respect, dignity and empathy. The accused must be informed as soon as possible about the start of an internal Procedure and kept updated at all times, unless instructions to the contrary are received from the police or the courts, or if this is not deemed to be in the overriding interests of the child.



DISSEMINATION OF THE PROCEDURE

All parties involved in the initiatives and/or projects of Entities that include children must be informed appropriately about the reporting methods to be used.

GOOD PRACTICES

The parties involved in the management of reports receive training on how to implement with professionalism the actions envisaged in the Policy. Reports must be recorded immediately, with precision, using the dedicated digital platform.

ACCESS TO THE COMPETENT AUTHORITIES

If crime is suspected, consideration must always be given to involving the competent authorities.

8.2 Roles and responsibilities

The CSPC is responsible for:

- collecting all reports received at Entity level;
- investigating the reports received and informing the Entity concerned about the outcome;
- filing the reports received, together with all related documentation.

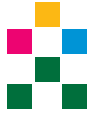
8.3 Situations reported

Reports can be submitted about abuse or prejudicial situations involving children and, more generally, about infringements of the principles and rules of conduct specified in the Policy perpetrated by Recipients in the “working environment of the Entities”. This concept covers all areas of their operations, including work performed in their offices or on their premises, as well as initiatives and projects carried out under their responsibility (even in collaboration with third parties) at other locations.

Abuses and maltreatment outside of the working environment may be referred to the CSPC, who will activate the territorial child protection agencies.

The following situations (examples, without limitation) represent infringements:

- abuse during a project carried out by an Entity that is reported by the child concerned;
- exploitation to the detriment of a child that comes to the attention of a Recipient in the context of the Entity to which that person belongs;
- possible violence that a child may have suffered, in the context of one of the projects carried out by the Entities, that comes to the attention of a family member or a Recipient;
- a Recipient is responsible for personal conduct inconsistent with the Policy in his/her working environment.



8.4 Context and methods of reporting

WHO MAY SUBMIT REPORTS

Reports may be submitted, in the manner envisaged in the Procedure, by all Recipients, the children concerned, and the family members or guardians of children who may have been abused.

HOW TO REPORT AND TO WHOM

Reports must be submitted using the dedicated digital platform, accessible from the websites of the Entities.

The process of submitting reports via the platform involves the completion of an on-line form that, in addition to the data and contact details of the reporter, requests essential information about the fact reported (description, parties involved, place and date of the event etc.); the procedure also allows for the attachment of supporting materials. Once submitted, each report is recorded, assigned an ID code and processed by the CSPC.

In urgent cases and/or in the event of difficulty using the digital platform, family members/guardians may also submit verbal reports to the contact person identified for that purpose by each Entity; in these cases, the Entity contact person must submit the report on behalf of the reporter using the dedicated digital platform, indicating the details of the reporter on the on-line form.

Should the CSPC have a conflict of interest with regard to the report and/or the situation reported, the CSPC must report it to the senior decision maker of the Entity concerned, who will adopt any measures deemed necessary.

All persons who become aware of abuse to the detriment of a child in the context of an initiative or project carried out by an Entity are entitled, if an alleged crime has been committed, to file a personal complaint with the competent judicial authorities. In that case, they must also inform promptly the Entity concerned by submitting a report in the manner described above.

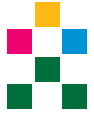
8.5 Timing of reports and obligations of the reporter

Reports must be submitted as quickly as possible and, at least, within 24 hours of becoming aware of the alleged infringement; timeliness is essential in order to guarantee the safety of the children concerned.

In emergencies in which the safety of a child is at risk, the health services and competent authorities must be alerted immediately, together with (or as soon as possible) the Entity concerned.

Persons submitting reports are required to:

- keep the report strictly confidential, making disclosures solely on a “need to know” basis, meaning: “only those closely involved in managing the case must know”;
- help the CSPC check the facts reported, if they are involved by the Counsellor.



8.6 Examination of the report

After receiving a report, the CSPC checks promptly whether the child concerned needs medical, psychological or social assistance and, if necessary, takes steps - even with support from other functions within the Entity - to ensure that the child receives the care needed.

At the same time, the CSPC opens an investigation into the report received, involving the reporter - where possible - in order to examine the contents of the report in more detail.

The CSPC then evaluates the information collected, involving the manager of the function/activity in the context of which the alleged infringement occurred; if deemed necessary, the CSPC may ask other departments to help examine the report.

After these checks, the CSPC informs the senior decision maker about the considerations made, so that next steps can be determined.

8.7 Outcome of the report and next steps

Based on the information collected, the senior decision maker may:

- decide, in the absence of significant supporting evidence, that the report was not justified and that no further action is needed;
- request additional checks, including by recourse to external expertise, in the absence of sufficient elements to obtain a clear picture of the situation;
- decide that the report is justified and, accordingly, determine the next steps.

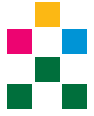
In this last case, having regard for the seriousness of the infringement, the senior decision maker identifies and ensures implementation - with help from the CSPC and, if needed, other departments within the Entity - of the measures considered necessary, including:

- action to mitigate the risk of reiteration of the malpractice, including support for the staff concerned or changes to their working conditions;
- activation of disciplinary measures against the accused;
- if a crime has been committed, submission of a complaint to the judicial authorities, the police and the social services (to protect the children involved), following their instructions.

In all cases, should the checks made by the CSPC result in justified suspicions of unlawful conduct and/or infringements of the Code of Ethics, the senior decision maker informs promptly the Supervisory Body of the Entity concerned, keeping it updated about further developments.

The CSPC is responsible for documenting adequately both the investigative work carried out and the outcome, preparing a close-out report.

All the documentation for each report is filed by the CSPC in a manner that guarantees its protection and confidentiality, in compliance with the privacy regulations.



8.8 Reports submitted by children

In general, children are more willing to reveal concerns about their safety to adults they trust and who they can count on. In a socio-educational context, this person is probably an educator, a member of staff or a volunteer with whom the child has established a meaningful relationship. Children who suffer abuse often only need to be heard and believed, and for the abuse to stop.

Should a child express concern in this regard in the context of project work carried out by the Entities, **the Recipient** informed about the situation **must**:

- receive any allegations of abuse in an attentive and competent manner by listening and helping the child to explain the problem, rather than by asking questions about the details of what happened;
- keep calm, without reacting excessively to what the child is saying;
- listen with empathy, taking seriously what the child is saying;
- be honest with the child and explain that the information given cannot be kept secret;
- avoid passing judgement on the accused;
- avoid contradicting the child, requesting instead further clarification of the information provided;
- ask open, non-specific questions intended to clarify, such as “Can you explain to me what you mean when you say that?”;
- give the child some idea about what will happen next, such as notification of parents/guardians or the competent services - be aware that s/he might have been threatened and may feel vulnerable in this phase;
- reassure the child that s/he has done the right thing by choosing to open up, thanking him/her for the trust and courage shown;
- report the situation to the CSPC, in the manner described in the previous point.

Conversely, **the Recipient** who received the report from a child **must avoid**:

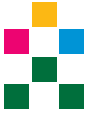
- asking questions, unless needed to obtain clarification;
- promising to keep the secret;
- taking hurried action that might be inadequate;
- expressing opinions about the alleged abuse and abuser;
- taking sole responsibility, without involving the CSPC.

It is important to stress that the Recipient who receives the report is not responsible for establishing whether or not abuse has occurred. Indeed, the responsibility of the Recipient is to report to the CSPC all relevant concerns or suspicions in the established manner.

8.9 Privacy

In the report management context, personal data is processed in compliance with the GDPR, as well as with all other applicable laws and/or regulations.

The Entities are each autonomous Controllers to the extent of their respective responsibilities for the reports relating to them.



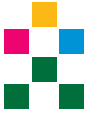
Monitoring

Monitoring and periodic evaluation of the Policy and the way it is implemented are essential, in order to guarantee effective protection for children.

Entities monitor periodically the proper application of the Policy, as well as its updates over time.

Each Entity defines the most suitable monitoring tools and procedures including, for example where possible, the opinions of children, their families and other significant stakeholders.



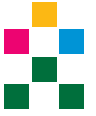


Disciplinary system

If the principles and rules of conduct contained in the Policy are found to have been infringed by persons required to respect them, penalties may be applied in compliance with the disciplinary systems adopted by the Entities concerned as part of their respective 231 Models.

These penalties may be imposed regardless of whether or not criminal action is initiated and/or in progress and, in all cases, the Entities concerned reserve the right to request the reimbursement of any losses incurred by them as a consequence of the infringements committed.





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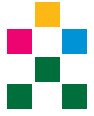
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*Child
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Glossary

It is important that all persons who work for Compagnia and its entities, for whatever reason, assign a common meaning to their actions in order to avoid misunderstandings and different interpretations of similar conduct. The following basic definitions are provided in relation to child protection.

B



CHILD ABUSE

Any deliberate conduct by anyone who seriously damages the psychological - physical - sexual development of children. Any act or omission that impedes the serene and harmonic development of children, failing to respect their needs or protect them on a psycho-physical level and causing them direct or indirect damage. Such abuse may take many forms, but the common elements are: intention, exercise of power or control, and risk of reiteration. "Consultation on Child Abuse Prevention" (1999: Geneva, Switzerland), World Health Organization. According to the World Health Organization (WHO) definition, child abuse - sometimes referred to as the maltreatment of children - refers to "all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power".

PHYSICAL ABUSE

Physical abuse: actual or potential physical harm and injury caused by another person (adult or child) that subject the child to the risk of physical injuries (not accidental or caused by organic illnesses). Physical abuse includes hitting, slapping, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating.

ABUSE IN ORGANISATIONAL CONTEXTS

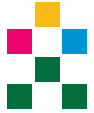
Abuse in organisational contexts: this refers to physical, sexual or psychological abuse perpetrated to the detriment of a child by an adult in a position of trust. This may occur in the context of a public or private sector organisation, in residential (e.g. communities) or non-residential (e.g. schools, kindergartens or sports clubs) contexts. The abuser may work directly with the children (e.g. a teacher in an ancillary role or a cleaner). The abuse may occur physically on the premises of the organisation, or the perpetrators may obtain access to the children via the organisation, but carry out the abuse elsewhere.

PSYCHOLOGICAL ABUSE

This comprises words and conduct - used continuously by those who, in various ways, take care of the child - that are highly likely to damage his/her health and physical, mental, spiritual, moral and social development. Such abuse includes: forced segregation, protracted criticism and scolding, assignment of blame, verbal threats, intimidation, discriminatory attitudes, rejections, exposure to violence (against others) or to criminal or immoral influences.

SEXUAL ABUSE

Any sexual activity involving a child who, as a consequence of psychological and/or emotional immaturity, or dependency on adults (or subject to their influence), is not deemed able to make informed decisions or understand adequately the meaning and importance of the sexual activities in which s/he is involved. The term "sexual activity" means both actual sexual relations and forms of erotic contact, as well as deeds that do not involve direct contact, such as causing the child to observe sexual activity.



ACCOUNTABILITY

This refers to the process by which (at a social, political, corporate, accounting or, in any case, collective level) persons are called upon to report on the consequences of their actions. This is the English term for the Italian concept of *responsabilità*, but with greater emphasis on the public nature or, at least, traceability of the process, which goes beyond the moral punishment of individual ethical decisions.

SAFE ENVIRONMENTS

For children, a safe environment - both physically and on-line - is one that guarantees strategies intended to protect children from any kind of abuse, maltreatment or malpractice. A safe organisation is capable of identifying and evaluating the risk factors existing in the physical, digital and interpersonal environment, and adopting measures to mitigate such risks. A safe environment for children is one that guarantees an attentive and complete selection process, suitable child protection policies, clear guidelines and functional management systems and procedures, including strategies for the early identification and internal investigation of suspected infringements/concerns, and timely reporting processes.

REPORTER

A person who reports a concern, a suspicion or a certainty about an infringement of the Code of Conduct or an abuse, in compliance with the established procedures. This person may be the victim of the abuse, or another person who is aware of the unlawful conduct. Both the victim and the reporter, if not the victim, must be protected from reprisals consequent to reporting the abuse.

PERPETRATOR OF VIOLENCE

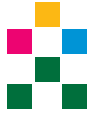
The person who intentionally acts with physical force or power, whether actual or threatened, against him/herself, another person, or against a group or community, which results in - or is very likely to result in - injuries, death, psychological damage, poor development, malpractice or deprivation.

CHILD

In line with Article 1 of the UN Convention on the Rights of the Child (1989), a child is defined as a “person under 18”. NB: the Italian language does not have a term corresponding to “child” in English, which covers both genders.

CHILD SAFEGUARDING

A protection system that specifies the responsibility of an organisation to ensure that its staff, operators, volunteers, consultants and collaborators, as well as its activities and programmes, do no harm to the children with whom they come into contact or, in other words, do not expose children to the risk of maltreatment or abuse.



CHILD SAFEGUARDING POLICY COUNSELOR

The person designated by the Entities to receive reports of alleged infringements of the Policy and/or the code of conduct and concerns about suspected cases of child abuse or maltreatment.

CODE OF CONDUCT

Mandatory set of rules of conduct that the personnel of an organisation must respect.

INAPPROPRIATE CONDUCT

This refers to practices that are inconsistent with the needs of children, jeopardising their welfare.

CRC

Acronym for *Convention on the Rights of the Child*, the text also refers to the Convention on the rights of children and adolescents, which is commonly-used terminology. For further information, see www.gruppocrc.net/.



RISK FACTORS

Events, situations or circumstances that may hinder the healthy development of children.

LACK OF CARE

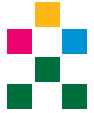
This refers to the provision of inadequate or insufficient care with respect to the physical, psychological, medical and educational needs of children at their respective stages of development. The definition includes neglect (poor care), inappropriate care (not consistent with the stage of development and needs of children) and hyper care (excessive care).

CHILD

A person who is not yet an adult, being under 18 years of age. From a strictly legal standpoint, a person under 18 is not yet entitled to act independently, but may have rights that cannot be exercised alone and, accordingly, who needs a legal representative (parents or, in their absence, a guardian).

CHILD PORNOGRAPHY

This means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes (art. 2 (c) of the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography). Although used in Italian legislation, the international community does not consider the term “child pornography” to be appropriate, preferring instead to make reference to materials (images, videos etc.) indicative of abuse and sexual exploitation. The acronyms CSAM (Child sexual abuse material) and CSEM (Child sexual exploitation material) are more appropriate, providing a precise and comprehensive definition of the phenomenon.



PREVENTION

A set of actions and activities that seek to minimise the risks for children via secure selection procedures, as well as to create an environment in which the rights of children are always protected and promoted.

AWARENESS BUILDING

A set of actions and activities that seek to improve knowledge of the issues surrounding abuse, maltreatment and sexual exploitation, and the related risks these pose for children.

SEXUAL EXPLOITATION

A type of sexual abuse that involves children in any type of sexual activity in exchange for money, gifts, food, hospitality or other benefits for them or their families. Adults and children may erroneously interpret this type of sexual abuse as consensual.

PREJUDICIAL SITUATION

Situation in which children derive, from their familial or extra-familial circumstances, forms of suffering, discomfort or disadvantage that may adversely affect their opportunities to grow and develop.

This is serious if it jeopardises their psycho-physical safety in the short term, if it may result in significant or lasting damage to them, or if it actually represents a crime.

HOLDER OF RIGHTS

Holders of rights are individuals or social groups that have specific rights in their relations with persons who have duties in their regard. In general, all human beings are holders of rights, as specified in the “Universal declaration of human rights”.

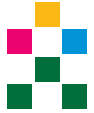
PHYSICAL OR EMOTIONAL NEGLECT

This consists in the serious and/or persistent failure to care for children, or major failures when looking after them that result in significant damage to their health or development and/or delayed growth, in the absence of organic causes.

This includes both isolated situations and carelessness, reiterated over time, by parents or other members of the family that, although capable, do not contribute to the development and welfare of children in one or more of the following areas: health, education, emotional development, nutrition, shelter and safety.

CHILD PROTECTION

The set of actions taken to promote the welfare of children and protect them from abuse. Child protection is part of a broader range of safeguards, comprising actions taken to protect specific children who are suffering or are at risk of suffering significant damage.



VICTIM OF VIOLENCE

A person who, regardless of their sex or gender, unless determined otherwise, has suffered damage caused directly by deeds of violence envisaged in this Policy, including the children who witness said violence. The victim must be protected from reprisals consequent to reporting the abuse. If there is any conflict of interest between the victim and another interested party, the wishes of the victim must be given priority when managing the case, especially when there is a risk of further physical and/or emotional damage.

SECONDARY VICTIMISATION

Situation in which victims suffer further damage due to the way they are treated by the institutions and individuals. Secondary victimisation may be provoked, for example, by repeated exposure of the victim to the perpetrator of the crime, by repeated questioning about the same facts, or by the use of inappropriate, hostile or insensitive language by those who come into contact with the victim.

VIOLENCE

The intentional use of physical force or power, whether actual or threatened, against oneself, other persons, or against a group or community, which results in - or is very likely to result in - injuries, death, psychological damage, poor development or deprivation.

OBSERVED VIOLENCE

Situation in which, directly or indirectly, children observe acts of violence against persons with whom they have an emotional attachment, or perceive their effects.

GENDER VIOLENCE

Violence perpetrated specifically against women and girls, understood as any act of violence that causes - or might cause - injury or physical, sexual, psychological or economic suffering, including the threat of such acts, coercion or the arbitrary deprivation of freedom, whether in public or in private.

This Child Safeguarding Policy has
been prepared in collaboration with



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