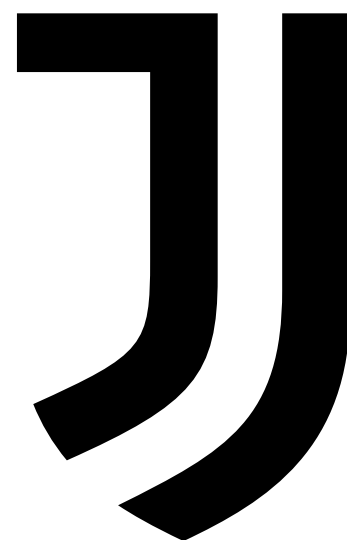


# SAFEGUARDING POLICY

Turin, June 2024





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## 1. Introduction

Juventus strives to promote an inclusive culture and environment, setting itself the following objectives:

- ensuring the dignity and respect for the rights of all Members, especially minors;
- guaranteeing equality and fairness by enhancing diversity;
- increasing the awareness in minors and Members of their rights, duties, obligations, responsibilities and protections;
- preventing and condemning harassment, gender-based violence and any other condition of discrimination, be it on the grounds of ethnicity, religion, belief, disability, age or sexual orientation.

Football, in particular, offers the opportunity to experience social interactions, fun and self-affirmation. Especially for young boys and girls and for adolescents, but also more generally for adults, it can be an opportunity to get to grips with the central issues that affect growth, such as cooperation, trust in oneself and in others, charisma and respect. A necessary condition in order to be able to experience these positive effects is a safe playing or training environment that offers protection against possible abuse or mistreatment.

Children have the **fundamental right to protection from all forms of abuse and exploitation**, as enshrined in national and international treaties<sup>1</sup>. Any form of abuse of children, or exploitation, involves a violation of their fundamental rights and is unacceptable.

Within this policy, therefore, reference will be made to “minors”, meaning all children and adolescents, up to the age of 18, and to “Members”, meaning, in a general sense, all Members of the Company, whether players, coaches or staff of various kinds, as better defined in Chapter 4. *Definitions*.

**Juventus has a zero-tolerance approach to the abuse of minors and all Members.**

**Safeguarding and respecting the rights of Members, but more specifically of children, in football is a primary objective for Juventus, which strives to ensure that all its employees/associates/partners and, in particular, those who work habitually and in close contact with minors, adopt the highest standards of behaviour in the field of education and sport, and take every possible measure to reduce the potential risks that minors involved in their activities may incur.**

For Juventus respect for gender equality is a fundamental priority. Nonetheless, in this document, for reasons linked to simplification, at times we have chosen to use male terms to refer to people, but the invitation is to consider them as “false neuter”, meaning that they refer to both females and males.

Football clubs have great responsibilities and expectations from their stakeholders, as well as from minors and their families; in fact, adults in a position of trust who come into daily contact with them in the sporting environment are perceived by minors as points of reference of great authority and trust. When this trust is disregarded, this causes immense damage to the victims and their families, even having long-term effects.

The Policy clarifies everyone's responsibility to protect minors from abuse or harm and to adopt the highest standards of behaviour towards minors, but it also expresses more general responsibilities to safeguard

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<sup>1</sup> Primarily by the *United Nations Convention on the Rights of the Child*.



Members from all forms of abuse, harassment, violence and all kinds of discrimination. These standards must be applied both in their professional and private lives. All activities or services of Juventus aimed at minors and Members must be managed with their protection being the absolute priority and in a manner that reflects the principles and standards of the *Safeguarding Policy* (hereinafter also referred to as *SP*).

The Juventus Safeguarding Policy is the transformation and evolution of the Child Safeguarding Framework, adopted by the Board of Directors of Juventus in November 2020, and of the related policies. The extension of the scope of application of the Policy more generally to all Company Members was made in accordance with the provisions of the “FIGC Guidelines” in the field of Safeguarding, issued in August 2023, following Italian Legislative Decree no. 39/2021 and CONI's relative decision no. 255 of July 2023. Within the document, there are specific references in some areas to the Safeguarding of Minors, as they represent the category that, given its nature, is most sensitive and subject to risks of abuse, violence and discrimination. From this perspective, this document represents, for the Company, the *Organisation and Control Model for sports activities* in compliance with the aforementioned “FIGC Guidelines”. The Safeguarding Policy is adopted by the Board of Directors of Juventus and is updated at least every four years or to implement any amendments, additions or provisions issued by the competent bodies.

The main reference of this document, in relation to internal and external stakeholders, is the **Manager responsible for protection against abuse, violence and discrimination**, identified in the person of Juventus' Chief People, Culture & Sustainability Officer and accordingly appointed as such. The responsibilities and duties of this position are better described in Chapter 8. *Roles and responsibilities*.

## 2. Scope and purpose

Through this Safeguarding Policy, Juventus intends to ensure that every possible measure is taken to minimise the potential risks that Members and minors, directly involved in its activities, or indirectly through the use of social and media tools, may incur. The aim, therefore, is to maximise the protection of children from any form of inappropriate conduct, abuse or exploitation.

In adopting this Policy, Juventus is committed to:

- **Raising awareness.** All personnel of the Company, its partners or anyone representing Juventus<sup>2</sup> must be aware of the problem of abuse towards minors and Members, exploitation and the risks to which children may be exposed. Minors and their families will be informed of the standards of behaviour and how they can report a concern.
- **Prevention:** by raising awareness, best practices and training, Juventus does whatever possible so that its staff, partners and anyone representing Juventus minimise risks for minors and Members, and guarantee an environment where their rights are respected and inappropriate conduct, abuse and exploitation is prevented.
- **Management.** the Company takes all necessary actions to protect minors and Members, where concerns arise about their possible abuse and exploitation; it also ensures that minors, families and anyone working with the Company are clearly aware of the **reporting procedures** be adopted in the event of concerns regarding the abuse or exploitation of minors.

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<sup>2</sup> Juventus requires its national and international partners/suppliers to comply with the Policy.



### 3. Reference legislation and related documents

This *Policy* also incorporates organically and develops operationally (according to the principles of *Save the Children Italy* and the *Keeping Children Safe Coalition*<sup>3</sup>) the child safeguarding principles already contained in some documents and guidelines adopted by Juventus: Code of Ethics<sup>4</sup>, the Organisation, Management and Control Model pursuant to Italian Leg. Decree 231/2001 (231 Model), *Soft Skills Manual* (UNESCO)<sup>5</sup>, *Child Protection Manual* for the Juventus Academies, as well as the *International Charter of Physical Education, Physical Activity and Sport*<sup>6</sup>.

It also includes specific indications and contents proposed by:

- **FIGC** | *Tools for the protection of minors*<sup>7</sup> and *FIGC Guidelines for Safeguarding Policies*<sup>8</sup>
- **UEFA** | *Child Safeguarding Toolkit for UEFA Member Associations*<sup>9</sup>
- **FIFA**<sup>10</sup> | *FIFA child safeguarding toolkit*<sup>11</sup>; Guidelines on gender equality in the world of football.

Lastly, the entire document is based (i) on principles that provide the foundations of the main international treaties that concern the rights of children and adolescents, first among them the *UN Convention on the Rights of the Child* (1989) and (ii) the current national and international legislation governing maltreatment and abuse of children.

### 4. Definitions

#### **Safeguarding**

This refers to the responsibility that organisations assume when guaranteeing that their personnel and their own programmes do not cause harm to Members and minors, meaning that they do not put them at risk of suffering mistreatment or abuse. Any concerns regarding the safety of Members and minors must be adequately managed and reported to the competent authorities.

#### **Safeguarding Policy** hereinafter also referred to as **SP**

This refers to the set of principles, rules and standards adopted by Juventus with this document, under which Safeguarding regulations are designed. The Policy, in its previous version called Child Safeguarding Policy, was adopted by the Juventus' Board of Directors on 18 November 2020.

#### **Member**

This term refers to the athletes, coaches and staff, whether minors or adults, who are correctly registered with the Company.

#### **Child/Minor**

This term refers to girls, boys and adolescents, until reaching 18 years of age.

#### **Inappropriate/inadequate conduct**

This means all behaviour or conduct, both acts and omissions, that although not suggesting the certainty of short- or long-term harmful effects or constituting crimes, do not adhere to agreed educational and value-based best practices, and are likely to have a negative effect on the psychological sphere of the minor or the Member. Such

<sup>3</sup> <https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/accountability/accountability>

<sup>4</sup> <https://www.juventus.com/en/club/corporate-governance/>

<sup>5</sup> <https://en.unesco.org/sites/default/files/unesco-mlw2018-concept-note-en.pdf>

<sup>6</sup> [https://www.sportosalute.eu/images/studi-e-dati-dello-sport/schede/2015/86-Carta\\_Internazionale\\_UNESCO\\_per\\_educazione\\_fisica\\_attivita\\_fisica\\_e\\_sport.pdf](https://www.sportosalute.eu/images/studi-e-dati-dello-sport/schede/2015/86-Carta_Internazionale_UNESCO_per_educazione_fisica_attivita_fisica_e_sport.pdf)

<sup>7</sup> <https://www.figc-tutelaminori.it/strumenti/>

<sup>8</sup> <https://www.figc.it/it/federazione/comunicati-ufficiali/comunicato-ufficiale-n-87a-2023-08-31/>

<sup>9</sup> <https://uefa-safeguarding.eu/toolkit>

<sup>10</sup> Women's Football Strategy, FIFA – [www.fifa.com/womens-football/strategy](http://www.fifa.com/womens-football/strategy).

<sup>11</sup> <https://www.fifa.com/social-impact/fifa-guardians>



behaviours often exploit a difference in power, role, strength or age (for example, coach and child, child on child) by using abusive methods such as: psychological pressure, denigration, blackmail, humiliation, or arbitrary restriction of the possibility of choice.

### **Abuse**

By abuse we refer to any act or failure to perform an act, which might physically or psychologically harm a minor or a Member, that directly or indirectly causes damage or impedes the prospect of a healthy and safe development towards adulthood, in the case of a minor, or more generally emotional and psychological harm. Abuse may take place through direct contact, online contact and even without the child/member being aware of it.

### **Child exploitation**

This means taking advantage, actual or attempted, of a condition of vulnerability, a differential of power or of trust in relation to a child to obtain an illegal advantage, merely by way of example, economic and/or for sexual purposes.

### **Company or Juventus**

This refers to Juventus FC SpA that is the owner of this *SP*.

### **Recipients**

This refers to the Recipients of this Policy, as better identified in the specific Section.

## **5. Principles**

The fundamental Principles of the Policy are the following:

1. Football must be a safe, positive and enjoyable sporting experience for all Members, minors and, more generally, the people involved.
2. All Members and children have an equal right to protection, the promotion of their well-being and participation, regardless of age, gender, sexual orientation, ethnic origin, social extraction and their different levels of ability and expertise.
3. All actions related to the protection of Members and minors must be undertaken in their greater interest.
4. Everyone is responsible for protecting Members and minors. They can even perform a role in helping to protect themselves and others, even if the ultimate responsibility for their protection rests, in the case of minors, with adults.
5. The measures introduced to guarantee child protection must be inclusive and non-discriminatory, acknowledging that some minors could be more at risk of inappropriate conduct and/or abuse.
6. A transparent and open environment is essential to guarantee the protection of Members and minors. Abuse and mistreatment can more easily be perpetrated when personnel, partners, families and community members do not feel in a position to voice their concerns.
7. All concerns related to the safety and the protection of a Member and a minor must be raised and considered carefully by the recipient.
8. No single organisation is able to protect Members and minors on its own, therefore it is essential to cooperate with other organisations and local agencies responsible for such protection.
9. In the event that a person decides to report alleged inappropriate conduct and/or abuse or maltreatment against a Member or a minor, confidentiality and privacy must always be guaranteed in accordance with all legal obligations.
10. All actions related to the protection of Members and minors must be carried out in accordance with the provisions foreseen by national and international legislation and regulations.



## 6. Recipients and beneficiaries

The SP applies to the following recipients:

- **PERSONNEL OF THE COMPANY AND OTHER ASSOCIATES, EVEN OCCASIONAL**

"Human resources" and "personnel" refer to all employees, temporary workers, associates and seconded workers (known as "personnel", as well as para-subordinate workers and other persons who are part of the Company's workforce (for example: technical, health and medical staff) regardless of their contractual arrangements or the fact that they are or are not members; associates also include accompanying managers and other occasional associates of the Company (regardless of their professional category and contractual form).

- **PERSONNEL OF THE NATIONAL ACADEMY AND ACADEMY ELITE PIEDMONT AND VALLE D'AOSTA**

These are Italian football schools with which Juventus has a sports collaboration relationship, known as "partners", including the personnel employed by them in any capacity (regardless of their contractual arrangements; hereinafter generically identified as "Partner personnel") and any of their commercial/corporate affiliates that have direct contacts with minors.

- **PERSONNEL OF JUVENTUS' PARTNERS**

These are Brand Development projects (e.g. Summer Camp, International Academies, Training Experience, World Cup, etc.), present in various geographical areas around the world, Fan Entertainment projects (e.g. Bimbi in Campo, Natale Bimbi, etc.), and ESG project (e.g. Gioca con Me, Paralympic Teams, etc.) with respect to which Juventus has a collaboration relationship with external organisations (e.g. licensees, Tour Operators, associations, non-profit organisations, etc.). These external organisations are identified below as "Partners"; the policy is also addressed to them, including the personnel employed by them for any reason and any of their commercial/corporate affiliates who have direct contacts with minors. The agreements between Juventus and the partner Organisations must include the obligation to protect minors through specific contractual clauses and the delivery of the reference SP. The external organisations that collaborate with Juventus are required to demonstrate the highest child protection standards and are required to adopt the Policy, through specific references to the child protection measures that are included in the collaboration agreements and contracts.

Ultimately, the Policy is addressed to whoever comes into contact with minors and Members, including Juventus suppliers or Partner suppliers, in environments managed and controlled directly or indirectly by Juventus or its Partners.

Recipients are required to comply with the principles set forth in the Policy, insofar as they are applicable.

The SP must be signed by any person who, having relations with minors, collaborates in any capacity with Juventus. Any failure to respect aspects concerning child protection of those agreements is considered a disciplinary offence.

The **beneficiaries** of the Policy are the Parents/guardians and minors, and more generally the Members, involved in the Juventus programmes.





## 7. Code of Conduct

The persons to whom the *SP* applies must avoid inappropriate or potentially abusive conduct, including:

- 1) hitting, physically attacking or physically or psychologically abusing a child or a Member;
- 2) behaving in a manner towards children or Members that - even from the psychological perspective - may negatively affect their harmonious development and ability to engage in social relationships;
- 3) engaging in conduct that provides a negative example for children or Members;
- 4) engaging in sexual activities or having a sexual relationship with individuals under the age of 18, regardless of the definition of legal adulthood or the legally approved methods of consent recognised in different countries. A mistaken belief regarding the age of a child is not considered an acceptable defence;
- 5) having relationships that may in some way be considered exploitation, ill-treatment or abuse;
- 6) using inappropriate, offensive or illegal language, giving inappropriate suggestions or providing inappropriate, offensive or illegal advice;
- 7) behaving in an inappropriate or sexually provocative manner;
- 8) establishing or engaging in "ongoing" contacts with children, using personal online communication tools (e-mails, chats, social networks, etc.). Only professional online tools and environments of which the organisation is aware should be used; where available, landline telephones and work mobile phones should be used for telephone contacts;
- 9) allowing one or more children to sleep in one's own home without supervision or prior authorisation from one's direct superior, except in exceptional circumstances;
- 10) allowing situations where an adult sleeps in the same room or in the same bed as a child;
- 11) helping the child in activities that are strictly personal without the child requiring it;
- 12) giving money or goods or other benefits to a child outside the parameters and purposes established by the project activities and without the knowledge of one's direct superior;
- 13) tolerating or participating in behaviours of children that are illicit and/or illegal or that jeopardise their safety;
- 14) acting in such a way as to shame, humiliate, diminish or scorn a Member/child or perpetrate any other form of emotional abuse;
- 15) discriminating.

The parties to whom the *SP* applies must:

- 1) always respect the principles of loyalty, honesty and fairness;
- 2) foster an environment that guarantees the performance of healthy sports practice, with particular reference to concepts such as inclusiveness, dignity, fairness and equality, and that is aimed at educating and training the minor and, more generally, the Member;
- 3) be vigilant in identifying situations that may entail risks for minors, and more generally for Members, and know how to handle them, being aware of all the rights and duties incumbent on them;
- 4) report all concerns, suspicions or certainties regarding a possible abuse or mistreatment of a Member or a minor, as set out in the "Reporting" section and in the reporting management procedure;
- 5) organise work and the workplace in such a way as to minimise the risks;
- 6) always be visible to other adults, insofar as possible, when with children;
- 7) ensure the spread and maintenance of a culture of openness that allows personnel, representatives, children and their guardians to raise and discuss openly any type of issue or concern;
- 8) ensure that inappropriate behaviours or conduct that may generate abuse against Members or children do not go undetected and are not tolerated;
- 9) develop the skills and abilities of children and discuss their rights with them, including what is acceptable and what is not, as well as what action they can take if any problem arises;
- 10) maintain a high personal and professional profile;



- 11) respect the rights of children and Members and treat them with dignity and respect;
- 12) promote diversity and prevent and combat all forms of abuse, violence and discrimination.

All Recipients of this Policy undertake to comply with the Policy and the “Code of Conduct” of Juventus, guaranteeing that they will never engage in inadequate or potentially abusive conduct.

The Company reserves the right to assess the application of disciplinary measures, in compliance with the provisions of the Regulations governing the employment relationship and the Prevention Model, against Juventus' employees/associates who fail to comply with the provisions of this Code of Conduct and other types of measures, to be assessed depending on the case, for recipients who are not employees/associates.

## 8. Roles and responsibilities

All those who collaborate in any capacity and/or work for or on behalf of the Juventus, shall approve the principles for the protection of minors and Members, promote their well-being and take every measure required to implement this Policy, adopting the highest protection and safeguarding standards.

Through its *People, Culture & Sustainability* and *Risk & Compliance* departments, Juventus is responsible for full compliance with the *SP*.

The roles and responsibilities regarding the protection of minors and Members are clearly identified and defined for each area of Juventus and at all levels, in particular with regard to the **reporting process** for which reference should be made to the specific Section.

Position	Responsibilities		
	Sports sector	National Academy	Brand Development Projects <sup>12</sup>
JUVENTUS BOARD OF DIRECTORS	adopts the <i>Safeguarding Policy</i> .		
CHIEF PEOPLE, CULTURE & SUSTAINABILITY OFFICER	They participate in the definition of the Guidelines and are responsible for the correct functioning of the Policy.		
RISK & COMPLIANCE and INTERNAL AUDIT MANAGER			
FOOTBALL AREA MANAGERS (MEN and WOMEN)			
REVENUE AREA MANAGER (for BRAND DEVELOPMENT PROJECTS)			
MANAGER RESPONSIBLE FOR PROTECTION AGAINST ABUSE, VIOLENCE AND DISCRIMINATION	The Manager responsible for protection against abuse, violence and discrimination, in line with the provisions of the Safeguarding Guidelines issued by the FIGC, is the main point of contact for internal and external stakeholders for Safeguarding issues. The Manager is also the main contact person for the management of reports relating to Safeguarding issues. The Manager has full access to information and sports facilities, including through unannounced auditions and inspections in order to ensure that the Safeguarding controls set out in the 231 Model, the Prevention Model, the Code of Ethics and the Safeguarding policies are implemented and fully complied with.		

<sup>12</sup> Brand Development projects include, for example: International Academies, Summer Camps, ESG Projects (e.g. Gioca con Me), Fan Engagement & Entertainment Projects (e.g. Bimbi in Campo), Natale Bimbi, etc.



	This responsibility is entrusted to the Chief People, Culture & Sustainability Officer. The functions, responsibilities and appointment requirements are better described in the Prevention Model.		
<b>SAFEGUARDING FOCAL POINT</b> (also referred to as FOCAL POINT)	The Safeguarding Focal Point steers the promotion of the Policy with regard to the adoption of good practices with specific reference to the protection of minors and Members as part of its activities, and supports the above figures in defining and updating the Policy, taking into consideration the management and organisational characteristics of its reference area, better described by Responsibility below.		
	The role is assigned to: - for Youth Sectors Men & Women to the respective Youth Managers; - 1st Team Team Manager; - Women 1st Team Manager; - Next Gen Team Manager; - Men U19s Team Manager.	The role is assigned to the National Academy Team Leader.	The Focal Point for Brand Development projects located abroad also has the task of delegating the responsibilities relating to the Policy, within the Partner functions including the establishment of the Safeguarding Local Referees in the geographical areas of reference.  The role is assigned to: - Academy Development Manager; - Sustainability Area Manager; - Customer & Fan Area Manager.
<b>SAFEGUARDING LOCAL REFEREE</b> (also referred to as LOCAL REFEREE)	N/A	The Local Referee is a necessary figure for projects in which the Focal Point is unable to be physically and consistently present in the performance of activities, for example when it is logistically impossible; therefore, it does not apply to Fan Engagement & Entertainment projects such as "Bimbi in campo". This figure is appointed by the Focal Point to promote, guide and monitor the timely application of Safeguarding measures at local level and is identified by completing a specific form.  Depending on the projects, the Local Referee can be identified: - for National Academy projects, in the Academy's Legal Representative; - for International Academy projects, in the Head Coaches and/or Area Managers and/or Camp Directors in the various countries/geographical areas; for ESG projects (e.g. Gioca con me) in the Association's Legal Representative.  The appointment is simultaneous with the inclusion of the aforementioned figures.	

## 9. Description of the main forms of inappropriate conduct and/or forms of abuse

In order to provide guidelines when assessing possible inappropriate conduct and/or forms of abuse, in the following paragraphs this Policy:

1. identifies risk situations typical of football programmes;
2. describes the four main categories of abuse on minors recognised by the World Health Organisation;
3. describes the phenomenon of bullying and cyberbullying;
4. lists some signs to be considered as possible indicators of abuse;
5. provides recommendations on how to handle such situations.

**Anyone who directly observes or becomes aware of inappropriate conduct and/or forms of abuse must proceed in accordance with the "Reporting" section.**

### 9.1 Focus on inappropriate conduct and/or forms of abuse in football

There are many forms of inappropriate conduct and/or abuse in football, for example:

- negligence: when an adult - coach or other staff member - fails to adequately provide for the needs and requirements of the Member or minor, during the practice of the sport or other activity (e.g. intensive



training or inappropriate workouts); fails to report behaviour that compromises the well-being of the individual (e.g. abuse or bullying);

- emotional or psychological abuse: ignoring, mocking, showing favouritism or excluding; placing minors or Members in compromising or embarrassing situations, for example making young referees or players share a locker room with adults; using aggressive or offensive language towards a minor or a Member;
- failure to comply with the Code of Conduct, for details please refer to Chapter 7 of this document.

Below are some specific situations that may occur in football programmes, with particular reference to relationships between adults and minors:

- **Highly asymmetrical relationships of power and trust.** The relationship between a minor and an adult who plays an important role in the minor's sporting life (e.g. coach and staff in various capacities) is among the most significant and valuable for physical, psychological and social development. However, these very close relationships, where the disparity of power is very strong, can on occasion provide an opportunity for the perpetration of abuses. When these situations take place, minors may not fully recognise them as forms of violence and not feel they are in a position to report what is happening.
- **Excessive pressure on the performance of minors** to achieve success beyond what is appropriate given the age, the appropriate time frame and the actual potential of the athletes. This situation can threaten the physical and psychological well-being of young athletes and can also undermine team spirit.
- **Team spirit.** Being part of a team and the feeling of belonging that goes with it is important for an individual's self-esteem and for good teamwork. This team spirit is created by the players, but it is also heavily influenced by the staff and the sports management. It is essential that these figures with their attitude make it clear that respect for others is a fundamental value and that no form of bullying will be tolerated. Conversely, if the attitude of the adults emphasises how performance and winning are paramount over everything else, the players may isolate team members who are not considered to be performing sufficiently well or may feel entitled to engage in verbal and/or physical violence against them.
- **Physical contact (e.g. physiotherapy) and the sharing of private quarters (e.g. changing rooms, showers, rooms).** Appropriate physical contact in sport is necessary and useful in order to develop ability and technical prowess in sport, as well as for protection and safety reasons (e.g. to prevent or tend to an injury), for comforting a minor or a Member in distress or celebrating his/her success. Physical contact during sport - particularly in the case of youth football - must always be intended to meet the needs and requirements of the minor. In general, it must always take place with the Member's consent, unless the situation is an emergency. The educational strategies in sport must be shaped around fairness and respect, and aligned to the stage of development of the athletes. In no instance may actions by engaged in that involve physical penalties or any treatment that may reasonably be considered degrading, cruel, frightening or humiliating.

Some environments, such as changing rooms, showers, physiotherapy rooms, residential rooms in boarding schools for boys and girls, boarding schools for camps or trips, lend themselves to being places of abuse in isolated situations. For this reason, access to these premises must be managed and monitored in such a way as to minimize the risks and guarantee full protection.

- **Discrimination and gender based violence** Gender discrimination includes a wide range of conducts, insults, sexual innuendo and hostile or degrading attitudes towards lesbian, gay, bisexual, transgender and generally LGBTQIA+ athletes. In the world of football, gender discrimination often originates from a macho and hetero sexist culture that sees a clear-cut and stereotyped separation between male and female in sport. For example, it leads young female athletes to having less opportunity to play football matches or hold technical roles (coaches, managers, referees) and having access to limited development and support paths (even of an economic nature). The media can magnify this kind of discrimination, rather than



focusing on the technical aspects, by focusing on irrelevant characteristics of the athletes such as their physical appearance. Discrimination against LGBTQIA+ athletes stems from the same cultural approach. Athletes are often hesitant to come out for fear of violent or discriminatory repercussions from their peers, and also their coaches.

Homophobic and transphobic harassment includes a whole range of verbal and physical violence, discriminatory, offensive, hostile and degrading attitudes towards those who receive them such as, by way of example:

- being subject to provocations and forced to undertake "initiation rituals" involving sexual or aggressive activities;
  - suffering violence or stigmatization from their peers;
  - being subject to discriminatory practices of an economic or organisational nature (forced and disrespectful logistic situations such as having to share lodging with coaches, other athletes, etc.).
- **Exploitation and trafficking of minors** Trafficking in a sports context involves the sale of minor athletes, usually beyond national borders for profit. This has been described as a new form of child slavery that leaves players in a very precarious legal predicament. Non-regulated official football training centres train the young players, who are then signed up or rejected. These players can be involved in illegal migration practices or exchanged between one club and another, without complying with established procedures.

The vulnerability factors that can be combined with the cases described above include the following:

- **Minors or Members from minority ethnic-cultural groups or with disabilities.** They may be more vulnerable than others and be insulted or abused by their peers or by those in positions of trust, even as a result of cultural or language barriers, making it harder for the victim to make a call for help.
- **Minors or Members who engage in leadership roles.** The individuals who take on positions of responsibility, (as for example assistant coaches or match officials or those taking on the role as "captain") are often at risk of being verbally, physically or emotionally abused, discriminated against by other adults, parents/guardians, and spectators of the sporting event. This behaviour is unacceptable and the damage it can cause cannot be underestimated. Instead, they must be encouraged and rewarded.

## 9.2 Forms of abuse recognised by the World Health Organisation

When assessing a possible form of abuse, with particular reference to minors, the following points must be taken into account:

- abuse generally takes place because an adult is deliberately choosing to exploit their trusted position against a minor, or could be the result of actions or omissions caused by a lack of awareness and training (e.g. not monitoring a minor appropriately or not taking action in the presence of a risk);
- even if abuse is typically viewed as a damaging form of conduct that an adult engages in to the detriment of a minor, even peers can perpetrate abuses;
- minors are generally abused by people they know, in a familiar environment or an institutional or community environment. Alternatively, the abuse can be committed by strangers (e.g. via the Internet);

The World Health Organisation recognises four main categories of abuse on minors, illustrated below:

### 9.2.1 Physical abuse

Physical abuse is often the most recognisable form. It includes actions such as: shaking, burning, pinching, biting, suffocating, yanking, hitting or other actions that cause physical harm, leave bruises or cause pain. Examples that apply to the world of football:



- hitting a minor because he/she has provocative behaviour (e.g. he/she disturbs the training);
- forcing a minor to play despite being injured.

### 9.2.2 Sexual abuse and harassment

This involves inducing or coercing minors into any type of sexual activity, by a third party or any unwanted and unwelcome act or behaviour of a sexual nature, resulting in nuisance, disturbance or annoyance. It may involve physical contact, as for example rape, or non penetrative acts such as kissing or touching intimate parts. Sexual abuse also includes harassment or sexual innuendo, involving minors in the production or viewing of sexual images, encouraging them to act in sexually inappropriate ways.

**Juventus believes that any involvement of an adult in sexual activities with a minor, regardless of any supposed consent, is to be considered an abuse.**

Examples that apply to the world of football:

- taking or asking for a photo of a naked minor while they take a shower;
- engaging in a sexual relationship with a minor;
- reproaching a minor with sentences that hint at the development of their physical sexual attributes;
- asking for strange or inappropriate physical contact claiming that it is for the minor's good.

### 9.2.3 Emotional, psychological and verbal abuse

Emotional abuse takes place when a person criticises, threatens or rejects another person to the point where their self-esteem and feelings are affected. Even making snide comments or jokes aimed at just one person can be harmful.

This does not mean that minors should not be criticised, or that jokes can't be made. Criticism is important, it can be an opportunity to learn and improve. By the same token, jokes and laughter help to form bonds between people that can help create a team spirit. However, the difference is that in emotional abuse the criticism stops being motivational and the jokes aren't funny.

Emotional abuse also includes "witnessing violence" meaning whenever the person experiences any form of ill-treatment, carried out through acts of physical, verbal, psychological, sexual or economic actions, on reference figures or on adult or minor figures that are emotionally significant.

Emotional abuse can hurt and cause damage, just as much as physical abuse. Examples that apply to the world of football:

- scolding a minor and constantly referring to him/her as a "loser" for not having played well in the match or failing to convert a penalty;
- mocking a minor and encouraging the other players to join in, if he/she proves not to be particularly capable;
- showing favouritism within a team making some feel excluded.

### 9.2.4 Neglect and negligence

*Neglect* takes place when a person does not provide sufficient emotional support for or pays little or no attention to another person. *Negligence* occurs when a child is not provided with food, shelter, clothing, medical care or supervision or when an adult fails to intervene and causes harm to the child. Examples that apply to the world of football:

- not being aware of the whereabouts of minors during the activities run by the organisation (e.g., summer football camps or away trips);
- not providing water during training;
- using transportation that is not up to regulatory standards or unsafe.



### 9.3 Bullying and Cyberbullying

Bullying is a form of violence that involves systematic oppressive and overbearing actions that are performed by a person, that is thus defined as a bully, against another person that is considered weak; this last subject is therefore the victim of bullying. Bullying actions can be carried out by a single subject or by a group.

Bullying can be divided into two types:

- **direct bullying** | refers to violent actions, which can be physical or verbal and are characterised by an explicit attack on the victim;
- **indirect bullying** | refers to actions that aim to harm the victim in his/her relations with others; typical examples of indirect bullying are the spreading of slanderous or false statements against a person, their exclusion from a group, their systematic isolation, etc.

Cyber-bullying is an increasingly common form of bullying that takes place via social networks and digital devices. It can include the publication and dissemination of embarrassing or offensive messages, images or videos.

Adults at times underestimate peer violence, believing it to be less serious because it takes place between minors. However it is a conduct that can lead to serious consequences. For this reason it is important that everyone knows that violence among peers is not acceptable and that it must be flagged and promptly opposed.

A person who is a victim of bullying can display indicators that the Recipients of this Policy must be familiar with. By way of example we here detail a few physical signs and types of behaviour that a minor might display if he/she is a victim of bullying.

- is reluctant to take part in training and matches;
- becomes introverted and anxious;
- leaves the match or the training with damaged or missing clothes/equipment;
- often "loses" money or constantly asks for/steals money;
- shows physical signs such as cuts or bruises;
- is afraid to express his/her opinion;
- provides unlikely excuses for any of the aforementioned forms of conduct.

In more extreme cases:

- starts to stutter;
- cries at night or has nightmares during an away trip;
- bullies his peers, friends or brothers;
- stops eating, engages in binge-eating or purging activities (self-induced vomiting, use of laxatives, etc.);
- *self-harms ("cutting")*;
- attempts or threatens to commit suicide;
- leaves the field or home without a valid reason.

Among the various reasons for which a minor may engage in bullying there may be a desire to exercise control or to gain attention; it could also be a response to envy for another person's success, or it may originate from personal distress or inappropriate relationship models assimilated in the family or social context. What follows are possible conduct indicators that might flag a potential bully:

- relates with others in an aggressive and overbearing way;
- verbally and physically intimidates his companions;
- damages objects and equipment;
- adopts violent forms of behaviour to express his opinions.



Forms of abuse include those of religious origin, understood as hindering, conditioning or limiting the right to freely profess one's religious faith and to worship in private or in public, as long as it does not involve rites contrary to morality.

#### 9.4 Indicators of inadequate conduct and / or forms of abuse

A person who suffers violence or abuse can develop kinds of behaviour that could be considered 'indicators' that it's important to be able to recognise. It is important to bear in mind that these signs are specific and shouldn't necessarily be taken as certainties. With particular reference to minors, some examples of indicator behaviours are reported below:

- worry and/or fear of being in unfamiliar environments or in the company of an adult with which the minor does not wish to be alone;
- frequent anger, sudden bouts of rage, self-aggressive conduct (causing self-harm) or aggressive to others (destructiveness, cruelty, provocation);
- inappropriate knowledge or sexual conduct for their age (lack of inhibition, seductiveness, refusal of physical contact);
- significant lack of social skills and a tendency to self-isolation;
- unexplained physical injuries, including bruising, wounds, burns, cuts or pain when walking;
- unexplained/constant illness, e.g. stomach pains, difficulty eating;
- attempted suicide;
- low self-esteem;
- inventing that other friends, even imaginary or teammates have been abused.

#### 9.5 Guidelines and recommendations for the management of inappropriate conduct and/or forms of abuse

The guidelines and recommendations for the management of inappropriate conduct and/or forms of abuse, with particular reference to minors, but which can be extended, with the due distinctions, also to all Members, are identified as follows:

- being aware of the dynamics of inappropriate conduct and forms of abuse and related indicators;
- not minimising the problem, creating a climate of active listening and trust;
- encouraging communication and dialogue by avoiding a blaming attitude;
- before taking action, getting a full understanding of the problem and the motivations that have induced each participant to behave accordingly, to get a real and thorough view of the problem;
- using a mediation-oriented approach to help reach a resolution, but only if there is informal consent and agreement by all parties;
- being aware of the minor's experience and the emotional burden of what has happened;
- urging the minor to ask for help from staff or one of his/her adult reference figures if he/she should find himself being the victim;
- listening to the minor by putting him/her at ease, possibly by two members of staff that he/she trusts;
- in cases involving minors, informing the parents/guardians of both parties at all stages and in all circumstances;





- informing coaches or other staff members in case of suspicion of inappropriate conduct and/or form of abuse;
- involving internal and external experts if necessary in order to manage the situation in the best way possible with the option of providing support to both the parties and the staff.

**The forms of abuse described in the previous chapter are the four main categories of abuse of minors recognised by the World Health Organisation (physical abuse, sexual abuse, emotional, psychological or verbal abuse, neglect), in addition to bullying and cyberbullying, particularly monitored by the Company.**

**Juventus does not tolerate in any way the aforementioned forms of abuse even if they are perpetrated by an adult against another adult.**

## 10. Prevention

To guarantee minors the right to be protected, it is essential to provide effective prevention measures to reduce the likelihood and the severity of the consequences of any inappropriate conduct and/or forms of abuse.

### 10.1 Personnel selection and recruitment

The process of selecting and recruiting personnel employed in activities that involve direct contact with minors must reflect Juventus' commitment to protect minors.

The selection and recruitment activities must therefore take place in compliance with:

- current legislation;
- UEFA instructions in the "*Child Safeguarding Toolkit for UEFA member associations*" (see following link<sup>13</sup>);
- tools developed by the FIGC Youth Sector to support local organisations in the field of safeguarding;
- Juventus Recruitment & Onboarding Policy.

All persons involved in the selection and recruitment of personnel must obtain from the candidates a **criminal record**<sup>14</sup> certificate as referred to in Article 24 of Italian Presidential Decree no. 313, in order to verify the absence of convictions for any of the offences envisaged by the Italian Criminal Code<sup>15</sup>, or the imposition of sanctions prohibiting the exercise of activities involving direct and regular contact with minors. The data must be processed in compliance with the applicable legislation *ratione temporis*.

It is understood that:

- no one may start working with minors until all the necessary checks have been completed;
- the selected candidates must sign - before commencing service - a commitment to respect the SP.

### 10.2 Raising awareness and training

Juventus develops SP information/training and awareness-raising plans, establishes systems to monitor its compliance and encourages participation in federal courses on the subject.

<sup>13</sup> <https://editorial.uefa.com/resources/025e-0f920dc4d3d5-600a1c849f53> 1000/uefa\_child\_safeguarding\_toolkit\_for\_uefa\_member\_associations.pdf

<sup>14</sup> In accordance with the provisions of art. 25 bis of Italian Presidential Decree no. 313,

<sup>15</sup> pursuant to articles 600-bis, 600-ter, 600-quater, 600-quinquies and 609-undecies



This SP is available and made public to all recipients, Members, minors and those who care for them, including their parents (Juventus also ensures that the SP and the procedures for managing reports can be understood by minors and the other parties involved).

In addition delivering the SP, in order to ensure as safe and secure an environment as possible, the name of the **Manager responsible for protection against abuse, violence and discrimination** is indicated, with the relevant contact for any reports.

Delivery is made by:

- **Sports Secretariat + Focal Point** | for the Youth Sector
- **Focal Point or Local Referee** | in the remaining cases

The dissemination of the Policy must be promoted as follows:

DISCLOSURE OF THE POLICY		
Sports sector	National Academy	Brand Development Projects
It is promoted by: <ul style="list-style-type: none"><li>• People, Culture &amp; Sustainability Department</li><li>• Sports Secretariat</li><li>• Safeguarding Focal Point</li></ul>	It is promoted by: <ul style="list-style-type: none"><li>• Safeguarding Focal Point</li><li>• Local Referee</li></ul>	

The aforementioned contact persons must ensure that the Members, minors and their parents/guardians are fully aware of:

- their right to be protected;
- what is meant by “inappropriate conduct” and/or “form of abuse” or “ill-treatment”;
- what behaviour they can expect from those who, in whatever capacity, have direct contact with minors in the course of their activities;
- how to ask for support or report concerns.

All recipients must be supported in developing the competence and knowledge related to the protection of minors, appropriate to the role they hold in the organisation. In general, the Company undertakes to encourage and promote internal and external training activities on Safeguarding issues.

The competent body of Juventus that manages reports of inappropriate conduct, abuse, exploitation of minors, as defined in chapter “11. Reporting”, must be trained and inspired by best practices and work in accordance with applicable regulations so as to respond appropriately and reduce the possibility of creating or intensifying damages for the minors involved. The superior interest and safety of the child and the witnesses is fundamental for any intervention to be made.

### 10.3 Risk assessment and mitigation

With specific reference to all the activities that involve the direct or indirect involvement of minors, it should be noted that these activities are subject to a specific risk assessment for the protection of minors, also by means of the completion of the Risk Assessment form, prepared by the Risk & Compliance Manager and used for assessing individual initiatives (see Annex A - Risk Assessment).

Risk assessment is an essential element of any Safeguarding process, especially when it comes to Child Safeguarding. It forms the basis for preventive and proactive action, ensuring that the risk profile of the activities



covered by the policy is assessed in advance and that the right countermeasures are taken to ensure that these activities are safe and risks are minimised.

The risk assessment is carried out according to shared methods approved at all levels of the organisation, with the coordination of the **Risk & Compliance and Internal Audit Department**.

#### **What Managers organising activities involving minors envisage:**

- the risk assessment must take into account the requirements of children who may have special needs, such as those with different psychomotor skills, different culture, religious belief, language, gender, sexual orientation, health conditions, etc.
- when organising activities, a risk assessment must be carried out to identify possible dangers, and plans must be defined to minimise the likelihood of occurrence of impact of such risks;
- if an assessment reveals a high number of risks, with an overall impact that is not acceptable for the specific area, the activity should not be continued with the same logic;
- emergency contacts and relevant medical information on every minor, in compliance with privacy legislation, have to be collected before taking part in the physical activities and must be available to everyone who is responsible for taking care of them;
- the risk management measures must be regularly reassessed, both during and at the end of the activities, so that the *lessons learnt* can be applied to future activities and help make any necessary adjustments.

the involvement of minors and their guardians for marketing and communication purposes requires their informed consent and must not increase their vulnerability or put them at risk. More specifically, the use of images or the dissemination of information that allows their precise identification is not permitted; instead, it is necessary to ensure that their full name, specific geographical location and image never appear at the same time.

### **10.4 Digital communication technologies**

With specific reference to all the activities that involve contact with children through the use of digital technologies, it is specified that they must be assessed in order to guarantee that the child protection risks are identified, mitigated and appropriate controls are implemented. Members and minors who use *Social Media* must comply with the measures envisaged at corporate and federal level in order to guarantee their proper use.

Based on the knowledge acquired, they are therefore responsible for taking all possible measures to minimise risks.

## **11. Reporting**

A **simple, clear and transparent** procedure is essential to promptly and correctly report concerns or any suspicions of inappropriate conduct and/or abuse against Members and/or minors.

Juventus has established in the Code of Ethics and its own Models (Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001 and Organization, Management and Control Model pursuant to art. 7, paragraph 5) , FIGC Articles of Association), as well as within the scope of the specific Reporting Management Procedure (known as *whistleblowing*, in line with the provisions of Italian Legislative Decree 24/2023), the rules for the correct management of reports.

In line with the aforementioned Models and related Procedure, reports will be handled in accordance with the following paragraphs, with the disciplinary measures of Juventus and with legislation in force.



## Guiding Principles

As indicated in the specific *Reporting Management Procedure*, Juventus personnel are required to comply with the provisions illustrated below, always drawing inspiration from criteria of transparency, integrity and fairness, and undertake to respect the following general principles of conduct:

- **Doing what is right:** Juventus supports and encourages Reports from anyone who in good faith has certain information or a reasonable suspicion, based on well-founded reasons, that a Breach as defined above has occurred or may occur. On the contrary, neither mere rumours, nor complaints/claims of a personal nature, nor any assessments, criticisms or complaints about the management and administration of the company, both in business and football-related terms, must be subject to reporting, unless factual elements are identified that may constitute a breach as defined above.
- **Whistleblower protection:** Juventus undertakes to keep confidential the identity of the Whistleblower and of the other subjects who, even though they did not make the report directly, are nonetheless deemed to deserve protection, subject to legal obligations and the protection of the rights of Juventus or of persons accused incorrectly and/or in bad faith. Juventus undertakes to protect the Whistleblower acting in good faith against any form of retaliation, discrimination or penalisation for reasons linked, directly or indirectly, to the Report. The Company prohibits direct or indirect acts of this form against the Whistleblower, and provides for disciplinary sanctions against those who breach this prohibition or the obligations to protect the confidentiality of the Whistleblower's identity. The Company also undertakes to provide adequate assistance, including *ex-post*, to the whistleblower/victim of abuse.
- **Liability of the Whistleblower and protection of the Reported Person:** the Whistleblower shall be liable for the Report made. The Company prohibits forms of *whistleblowing* "abuse," involving reports that are manifestly opportunistic and/or made for the sole purpose of damaging the Reported Person, and any other circumstance of improper or instrumental use of the reporting mechanism are prohibited. Disciplinary sanctions are envisaged against anyone who breaches this prohibition, by making reports with wilful misconduct or gross negligence that are found to be groundless, without prejudice to any ascertainment of civil liability (pursuant to Article 2043) or criminal liability (in cases involving a slanderous or defamatory report pursuant to the Italian Criminal Code). The same protection extends to any Reported Persons that are external to the Juventus organisation (e.g. other collaborators, suppliers, licensees, partners and "other parties", according to the definitions of the Code of Ethics).
- **Confidentiality:** all information provided in the report or acquired subsequently during the investigation/assessment phase, shall be managed confidentially and known only by a small number of individuals, from time to time, identified as necessary for the performance of investigative and assessment activities, based on the severity profile of the Report received.
- **Timeliness of investigation and action:** the Company ensures that the Report will be dealt with promptly and within seven days of receipt a message shall be sent to the Whistleblower. Once received, the report shall be subject to the necessary checks to ascertain the truthfulness of the facts and their relevance as a Breach. The proceedings shall be concluded promptly, within three months of receipt of the Report and in any case notification to the Whistleblower shall be guaranteed, within the terms specified, duly justified, for any cases involving extension of the proceedings due to in-depth investigations.
- **Respect, Impartiality and Collegiality:** the assessment of each reported situation and the resulting decisions/possible remedial actions/sanctions follow rigorous practices which involve searching for objective elements and are never assigned to a single subject/single function.

## What to report

It is essential to define with Members and minors, especially with their parents/guardians, what to report and how to do it. Infographics hanging in the places where minors gather could be used and meetings must be organised



to present the content of the posters or, in general, to clarify - in a simple but effective way - the content of the reporting process.

With respect to the subject of the report, two areas are generally distinguished:

**a) The behaviour of Juventus staff and representatives (or its Partners/Suppliers).**

Reports regarding staff behaviour may concern behaviour that violates the Code of Conduct and the Policy.

**b) The behaviour of community members (adults or minors).**

Reports may concern inappropriate behaviour, mistreatment and abuse by members of the community (family members, friends, acquaintances or strangers with whom minors come into contact).

In general, it is recommended to report any:

- concern, suspicion or certainty relating to possible situations of abuse or prejudice against a minor carried out by anyone;
- violation of the Code of Ethics,
- episode of inappropriate practices or bullying and cyberbullying.

Some typical situations that should certainly be reported (even if this list is not exhaustive) are detailed below:

- a minor reveals an abuse or discloses elements that lead to the suspicion that he/she or other minors are involved in an abusive or exploitative situation.
- one of the Recipients becomes aware or suspects that a minor has been abused, exploited or is at risk of being abused or exploited;
- one of the Recipients does not comply with the Code of Ethics or engages in inappropriate practices;
- one of the Recipients abuses a minor with whom he/she has come into contact within the working context;
- one of the Recipients abuses a minor outside the work context (e.g.: a member of their own family, a minor they are in contact with, or minors who are sexually exploited, etc.);
- a family member or a member of the community reports to the staff of Juventus or its Partner that a minor has been harmed or that there is a risk of this happening;
- situations that can potentially be linked to crimes in the country where the programme is taking place or seriously damaging situations, whether actual or potential, for a minor such as for example the voluntary removal, the threat of suicide, self-harm, disappearance;
- instances of bullying or cyber-bullying.

## How to report

The parties involved in the reporting process are summarised below:

<b>Suspected Abuser (i.e. Reported Person)</b>	<b>Who receives the report (i.e. Responsible party + Whistleblowing Committee)</b>	<b>Reporting party (i.e. whistleblower)</b>
Anyone (adult or minor) who is the subject of a report of violation of the Safeguarding Policy	Juventus personnel who receive the report and are responsible for its management and resolution	Minor or Member involved in Juventus' activities, or in general the Recipients of this Policy, who



		reports behaviour in violation of the Safeguarding Policy
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### STEP 1

It is essential to clarify to all Members and especially to minors the methods/means/instruments to be used to make the report.

In general, the mechanisms for receiving reports from minor beneficiaries include:

- reporting through the Whistleblowing platform, hereinafter referred to also as “portal” or “platform”) made available on the [JuventusFC](#) website, at the following link:
- communication, whether by interview, letters, drawings or any other form deemed suitable, with the reference person within the staff of Juventus (or its partners/suppliers).

In the latter case, the reference person receiving the report must assist in the process of entering it in the Juventus whistleblowing portal, in order to unify all the reports made in a single channel that guarantees compliance with the Guiding Principles. The support provided for entering the request in the portal may consist of operational support in accessing the dedicated section of the Juventus website and, where appropriate, practical help in filling in the various fields of the form.

### STEP 2

Generally speaking minors are more inclined to reveal concerns about their safety to an adult they trust and who they can rely on. In football environments, this person is likely to be a coach or a member of the technical staff, but also more generally doctors, physiotherapists, boarding school tutors and managers, psychologists, etc., with whom the minor has built a meaningful relationship. Minors or Members who suffer abuse generally need to feel listened to and believed so that, with the right support, action can be taken to stop the abuse.

If a Member or especially a minor expresses concern over the conduct of a member of staff or a volunteer towards them, the person receiving the account must:

- receive any allegation of abuse in a careful and competent way through listening, helping the person tell their story;
- remain calm and not show any excessive reaction to what the whistleblower is telling them;
- listen empathetically and take everything the whistleblower is telling them seriously;
- be honest with the whistleblower and explain to him/her the procedure that will be followed;
- not make judgemental statements about the person against whom the accusation has been made;
- not contradict, but rather ask them to be more precise about the information they are providing;
- use open ended and non-specific questions that can help to clarify things, such as "Can explain what you mean by this?";
- **verify the concerns with parents/guardians, in case of a minor, before making a report unless this may put the whistleblower in danger or further compromise any additional investigation of the case;**
- **accurately record the details on the Reporting Form (see annex B);**
- reassure the whistleblower that he/she has done the right thing in opening up, thanking him/her for the trust and the courage shown.

It is important to remember that it is not the duty of the person who receives the account to verify whether the abuses have taken place. The process requires that the subject of the report be promptly reported by the person



receiving the report to his/her direct manager<sup>16</sup> (within the same working day, but no later than 24 hours) and confidentially. The person in charge makes an initial assessment and if the report (message, drawing, story, etc.) falls within the scope of the Policy, informs the whistleblower to upload the report on the platform, possibly assisting him/her in this operation.

The **Reporting Form**, which is first completed in paper format, must be uploaded as an “Attachment” within the portal.

Each report must be completed:

- accurately and legibly;
- with the primary interest of the minor at heart;
- by reporting the exact words of the minor, or the whistleblower, if possible;
- by indicating the dates, times, places and contexts of the case.

As far as possible, judgmental language and own personal opinions should be avoided in the form.

This is without prejudice to the right of any minor/parent/guardian and/or employee of Juventus or of Partner organisations staff to immediately file a personal complaint in the presence of an event that they consider a crime (i.e. conduct of criminal relevance such as, for example, violence and sexual abuse, physical and verbal assaults, etc.).

In the presence of an emergency relating to the minor's state of health, it is a priority to contact the health services.

In the case of Brand Development Projects managed outside Italy, referrals to local authorities for the protection of minors and law enforcement agencies must be submitted in the manner and in the forms envisaged by current legislation.

### STEP 3

Once the report has been entered into the portal, the Whistleblowing Committee, as better defined in the Reporting Management Procedure, becomes responsible for engaging the Manager responsible for protection against abuse, violence and discrimination, in the event of reporting of Safeguarding matters, and to take charge of the file and manage it according to the process described below, which consists of the following steps:

- Transmission and receipt of the report
- Preliminary assessment
- Investigation/assessment and outcome of the investigation
- Definition of corrective actions/measures
- Reporting
- Archiving

After carrying out the preliminary assessment and, depending on the nature of the report, these persons assess the involvement of third parties, who will form the Assessment Team, as required by the Procedure.

By way of example, the following figures may be involved:

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<sup>16</sup> It is highly desirable that reports be made promptly, possibly within 24 hours, of becoming aware of one of the situations belonging to the categories of abuse specified above (i.e. physical abuse, sexual abuse, emotional, psychological or verbal abuse, neglect, bullying and cyberbullying) or otherwise relating to similar cases in terms of context and severity. Timeliness is essential in order to guarantee the minor's safety.



- Reference Focal Point;
- Local Referee
- Hierarchical superior of the resource engaging in the unlawful conduct.

#### **STEP 4**

After assessing the degree of urgency and severity, based on the information in its possession, the Assessment Team may:

- a) decide to mitigate or alleviate concerns, when for example at a first objective evaluation no substantial data has been confirmed;
- b) launch an *investigation* with the possible involvement of external professionals, who must comply with the Guiding Principles by signing specific confidentiality clauses;
- c) decide to initiate disciplinary measures against the person being reported. This decision will be communicated in advance to the direct manager and the Chief/Head of Reference of the person reported;
- d) consider whether to report the case to the Judicial Authorities, the Police Force and Social Services (to protect the minors involved).

In general, the Assessment Team is responsible for:

- primarily guaranteeing the safety of minors, Members and therefore of all persons involved, establishing specific measures and an action plan;
- assessing and defining how to inform and involve the parents and guardians, in the case of minors;
- deciding to what extent the suspected person's contact with minors or Members should to be limited until the case is closed, also taking into account any instructions received from third parties (e.g. Social Services, Police Force, Judicial Authorities, etc. if involved);
- establishing an internal plan of action to monitor the progress of the report (inclusive of the role allocation, tasks and scheduling) and carrying it forward to its conclusion;
- informing confidentially, according to the principle that only information essential for the purpose should be shared, the Head of Corporate Communication in order to define any necessary communication strategy;
- informing the members of the BoD of the decision to formalise the report or complaint against members of the Juventus staff or representatives.

#### **STEP 5**

During the process, care shall be taken to archive all documentation pertaining to the investigation, in a manner suitable to avoid third-party access to information and documents. The reports and the related documentation must also be kept for the time required to process them and in any case no later than five years from the notification date of the final outcome of the procedure, after which the reports will be anonymised and/or deleted.

At the end of the previous phases, the Committee archives and records all the information collected through the specific function of the reporting management platform.





## 12. Monitoring of the application of the Safeguarding Policy

Monitoring and a regular assessment of the Policy and how it is implemented is an essential step in order to be able to effectively guarantee the protection of minors.

Monitoring		
Sports sector	National Academy	Brand Development Projects
<p>The implementation of the Policy will be periodically monitored by the <b>FOCAL POINT</b> of Juventus in order to assess the progress in the implementation of the Policy and identify good practices and areas for improvement, according to the following procedures ("<b>Periodic Monitoring</b>").</p> <p>Based on the monitoring, an action plan may be drawn up to sort out any Policy implementation deficiencies and mitigate any identified risks.</p> <p>Juventus reserves the right to review the Policy <b>every three years</b> or as necessary, if deemed appropriate.</p> <p>These reviews will include <b>feedback from the personnel of the Youth Sector</b> and, where possible, the opinions of minors, their families and other persons involved in the activities.</p>	<p>The implementation of the Policy will be periodically monitored by the <b>FOCAL POINT</b> of Juventus in order to assess the progress in the implementation of the Policy and identify good practices and areas for improvement, according to the following procedures ("<b>Periodic Monitoring</b>").</p> <p>Based on the monitoring, an action plan may be drawn up with the <b>Local Referee</b> to sort out any Policy implementation deficiencies and mitigate any identified risks.</p> <p>Juventus reserves the right to review the Policy <b>every three years</b> or as necessary, if deemed appropriate.</p> <p>These reviews will include <b>feedback from the personnel of the National Academy</b> and, where possible, the opinions of minors, their families and other persons involved in the activities.</p>	<p>The implementation of the Policy will be periodically monitoring by the <b>Local Referee</b> of Juventus to assess the progress in the implementation of the Policy and identify good practices and areas for improvement, according to the following procedures ("<b>Periodic Monitoring</b>").</p> <p><b>Every year</b> (or at its discretion, every two years), the <b>FOCAL POINT</b> of Juventus may prepare a Periodic Monitoring plan to be sent to the <b>Local Referees</b> to verify the correct implementation of the verification activities on the adoption of the Policy at all the Partners' structures.</p> <p>The results of the above monitoring carried out by the Local Referee responsible for the geographical area will be periodically provided to the <b>FOCAL POINT</b> of Juventus for its information and assessment of the state of the art and of the counterparties.</p> <p>Based on the monitoring, an <u>action plan</u> may be drawn up with the <b>Local Referee</b> to sort out any Policy implementation deficiencies and mitigate any identified risks.</p>



		<p>Juventus reserves the right to review the Policy <b>every three years</b> or as necessary, if deemed appropriate.</p> <p>These reviews will include <b>feedback from the personnel of Juventus and the Partner</b> and, where possible, the opinions of minors, their families and other persons involved in the activities.</p>
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Juventus carries out internal and external audits, also using internal control functions, to monitor the correct application of the *area SP*.

Lastly, the Company guarantees that minors and their guardians are consulted in the monitoring and control processes.

## 12. Operating procedures

Without prejudice to the application of the regulations issued by the competent state, regional and sports authorities, this section illustrates some procedures governing specific areas in the football environment, concerning the protection of members, especially minors, as minimum requirements for Safeguarding.

### 21.1 Safety in residential activities

Juventus guarantees respect and full implementation of the current safety legislation in its Male and Female Youth Sectors and more generally in the management of sports activities. The premises, the lodgings and the structures supplied are maintained in such a way that the safety and well-being of resident minors are always guaranteed. For those premises Juventus guarantee a written assessment of the risks connected to the use of those premises, and that appropriate measures to mitigate identified risks are implemented. All personnel employed in various capacities and the resident minors must be informed about safety protocols and especially those in response to emergencies.

### 12.2 Premises used as changing rooms



With reference to the monitoring of changing rooms for minors, all persons involved are required to monitor what happens inside these rooms, balancing this requirement with their right to privacy. Furthermore, it is necessary to:

- avoid isolated situations between adults and minors;
- avoid female personnel entering the male changing rooms and vice versa;
- guarantee separate access and specific areas, in the event that the changing rooms and the toilet facilities are used by both adults and minors;
- forbid adults from getting undressed in the presence of minors, or getting changed or taking showers at the same time as minors using the same facilities;
- not place any pressure on a minor who feels ill at ease changing or taking a shower in public;
- forbid the improper use of mobile phones and/or photographic equipment with a video-recording capacity by personnel, volunteers or the minors themselves inside premises used as changing rooms;
- discourage parents/guardians from entering unless it is strictly necessary. In these circumstances, only one parent/guardian, preferably of the same gender as the son or daughter may enter the changing room, and the coach must be informed of their presence in advance. At least one personnel member of the same gender as the minor involved must be present with the parent in the changing room.

### 12.3 Use and abuse of alcohol or drugs

During the activity, all personnel, Members and minors must not:

- use, possess or be under the influence of drugs, illegal substances or alcohol;
- be incapacitated as a result of taking any other legal medication, such as prescription or over the counter medicines.
- supply alcohol or drugs (including tobacco) to minors.

Where possible, minors and Members must be made aware of the risks associated with the abuse of these substances, as better specified in paragraph 12.9 "Psychological assistance".

### 12.4 Transfers to/from the Boarding School and the JTC of Vinovo, Tournaments and travel

A careful assessment must always be made of the details relating to the travel of Members in general, but particularly of minors, both when traveling from the Boarding School to the JTC Vinovo and vice versa, and when travel is related to tournaments, trips or other types of activities (e.g. team building activities at external sites) that include transport and hotel accommodation, in order to assess and mitigate the potential risks involved. The agreed measures can be passed on to the minors involved and to their parents/guardians. In particular, also in line with the provisions of the FIGC Rules for away games, travel and logistics, during the planning phase it is necessary to provide that:

- the transportation of minors only takes place in circumstances directly connected to the sport activity, with prior authorisation from parents/guardians. This approval must be provided in writing and must contain specifications regarding the reason for travelling, the route to be followed, the means of transport used, the dates and times of departure and return, the details of whoever will be present on the trip besides the personnel.
- when travelling there must be at least one figure of reference per group, chosen among the personnel, of the same gender as the minors involved;
- all participants are provided with appropriate insurance coverage;
- if it is impossible to ensure the presence of the Focal Point, this function is clearly delegated to one of the members of the staff who is ready to perform such a role;



- the general Code of Conduct and the Behaviour Agreement for adults and minors has been underwritten by all participants;
- minors are clear about who they should contact if they are concerned and they are also informed about who the designated **Focal Point** or his/her delegate is and what his/her role is.
- a member of staff can always be reached 24 hours a day, 7 days a week, as a point of contact, who must always have the list of participants and their details in order to be able to communicate with them and their relative parents/guardians;
- there is already an initial agreement on lodging arrangements in the event of an overnight stay and the rooms assigned to the technical staff are divided up in a functional way in order to guarantee oversight;
- the staff personnel reach the location of the departure meeting point sufficiently in advance in order to avoid the minors having to wait on their own.

Travel and overnight stays ("Checklist for tournaments and away games" annex) are only allowed with the authorisation of the parents/guardians of the minors involved.

During travel, the following must be ensured:

- it must not be possible to access, introduce or consume alcohol or drugs in the rooms or any other shared premises;
- all devices that the Company places at the minors' disposal have active parental control systems;
- any external health and technical personnel shall work with minors in the presence of a Juventus staff member;
- everyone is informed about the location of the exits and the emergency procedures.
- in the event that a minor has to stay in the hotel due to an injury or illness, two members of staff must stay with him/her to provide the necessary care, if possible.
- in the event of a serious injury, the staff makes sure that the minors return to their domicile safely;
- no minor is left alone in the hotel;
- time must be set aside specifically with all players to share the details of the activities, reiterate the "Behaviour Agreement" and to voice any specific needs;
- privacy especially during personal hygiene operations is guaranteed;
- clear regulations on the activities and the use of common spaces are provided;
- children are able to contact their parents/guardians, or other significant figures, if they feel unsafe, distressed or anxious during their stay;
- parents/guardians can get in touch with their own children at any time;
- the accommodation rooms are divided for girls and boys based on gender.

## 12.5 Means of identification

When providing the service, all persons must wear identification such as branded clothing or badges and show a pass to access the reference facilities.

## 12.6 Supervision

All personnel whatever their role is responsible for supervising the minors and making sure the environment is safe and protected at all times. When supervising accommodation it's advisable that the personnel involved be of the same sex as the minor guests. Particular care will be paid in the safe selection and training of said personnel.

## 12.7 Supervision and working alone



In general one must avoid working alone with minors. **At least two adults must always be present when working with minors.** If this is not possible, the adults must be seen by other personnel or prefer group activities involving a number of minors. A sufficient number of staff members must always be present to guarantee an appropriate level of supervision for minors, also taking into consideration the context, the ages and the capacity of the minors involved. The following adult-minor ratios are recommended:

- 1 adult for every 10 minors between the ages of 13 and 18;
- 1 adult for every 8 minors between the ages of 9 and 12;
- 1 adult for every 6 minors between the ages of 5 and 8;

If the number of adults is not sufficient to reach the required level of supervision, the activity will be cancelled. If it is necessary to provide medical assistance, the minors can ask for the presence of an adult they trust.

In order to collect anti-doping samples from a minor specific arrangements and procedures have been drawn up. The minor athletes must be informed that they have been selected for an anti-doping test in the presence of an adult of the same gender and they can choose to be accompanied by one of their adult representatives of the same gender and/or by another minor teammate.

## 12.8 Physical contact

All physical contact with Members of minors must be inherent to the sporting activities and related to the needs of the athlete, rather than the needs of the personnel. In no instance must personnel have contact with Members or minors that:

- involves contact with intimate areas;
- is not justified by sports, health or connected services;
- has a sexual connotation;
- causes pain or anguish;
- is not necessary;
- takes place against the Member's or minor's will, unless they are in danger.

In this last instance physical immobilisation must be a final resort, the level of force used must be appropriate to the specific circumstances and its only purpose must be to hold the Member or minor to prevent damage to him/herself or to others and the incident must be reported to the Focal Point, the Local Referee and the coach as soon as possible. As far as possible, efforts should be made to ensure that, within the staff, so that the activities involving care or training that involve physical contact are performed by persons of the same gender as the minor. Particular care will be paid in the safe selection and training of said personnel.

Members, but especially minors, should be encouraged to voice their concerns regarding any form of physical contact, whoever engages in it (adult or peer), that makes them feel ill at ease or threatened. Even well meaning gestures, such as putting a hand on a shoulder or arm, can, if regularly repeated, raise doubts in observers. As a general principle, adults holding positions of responsibility should never have gratuitous or unnecessary physical contact with minors. A minors' resistance to contact must be respected. For minors with disabilities one can ask for specific support or assistance to guarantee safe inclusion and participation, with clear agreement on what is required. This role, especially if it involves intimate care, is not appropriate for coaches.

Juventus or, depending on the case, its Partners/Suppliers must provide the minors and their parents/guardians with information in order to agree what kind of physical contact will be required within the context of their activities and receive their formal consent.

## 12.9 Psychological assistance



The Company has set up a Psychological Area within the Sports Area, which provides psychological assistance and consulting services to minors and Juventus Members.

The aims of the Psychological Area, in particular for athletes in the youth sector, refer to general purposes of empowerment, prevention and targeted intervention and can be defined as follows:

promoting the expression of athletes' full sports potential; promoting individual/group well-being; preventing discomfort and deviant behavior; intervening in a targeted manner on any emerging problems.

Particular attention is paid to the prevention of any abuse, the risks of bullying and cyberbullying, various forms of addiction (use of drugs, smoking, alcohol, gambling, etc.) and eating disorders.

### 12.10 Guidelines for digital protection

Photographs, films, videos and social media are an excellent way to advertise football activities and programmes. For such processing, explicit prior written consent is required for the processing of images of Members and, for minors, by the minor's parent/guardian. The content may be used to celebrate results, promote activities and keep people updated.

Footage may also be recorded in order to analyse and improve performance, if in compliance with the *Digital Protection Guidelines* defined in this Policy.

In any case:

- all activities that involve contact with Members, and especially with minors, through the use of digital technologies must be assessed in order to guarantee that the risks for the protection of minors are identified, mitigated and appropriate controls are implemented;
- the involvement of minors and their guardians for marketing and communication purposes requires their informed consent and must not increase their vulnerability or put them at risk;
- Juventus or - depending on the case - its Partners/Suppliers will share instructions on the appropriate use of the technology (access to the Internet, use of mobile phones and other devices, social media, etc.);
- if offensive material and unsolicited messages are received, the relevant Focal Point and Local Referee must be notified, who shall promptly report the case to those who handle computer security and, if necessary, to the competent authorities and postal security authorities. **The material or the messages in question must not be forwarded electronically as part of the case reporting, as this may constitute a crime.**

#### 12.10.1 Possible risks and recommendations for Recipients

The possible risks that could be incurred in the *digital environment* are:

- digital communication can easily be misunderstood;
- use or sharing of personal data (for example names, e-mail addresses or phone numbers)
- undesired contacts with adults who have illicit intent (i.e. soliciting) or inappropriate requests;
- the sending of offensive or otherwise inappropriate material (e.g. sexting);
- instances of cyber-bullying.

In this regard, the following recommendations must be observed when promoting sports activities on digital channels:

- no content concerning a Member, especially if a minor, must be published on social media and in general on the Internet without specific prior written consent from the minor's parent/guardian;



- representatives, staff and volunteers may not act as “friends” with minors using their personal social media;
- all official communications must be made, where possible, directly with the parents or guardians if addressed to a minor, with the minor copied in;
- violent, discriminatory or sexually explicit messages, images or videos must never be put offered. If one becomes aware of or receives messages of this kind, the fact must be reported to the relevant Focal Point and Local Referee and to the competent Authorities. Likewise anyone behaving inappropriately, with regard to communications, filming or photographs of minors must be reported. The illicit material must NOT be sent to the relevant Focal Point and Local Referee, nor to anyone else seeing as it may be considered a crime. The messages or other materials must not be erased as they may constitute evidence to be provided to the competent Authorities;
- the anonymity of the minor involved in all communications must be guaranteed, even if the publication is designed to positively highlight the qualities of the minor and there is explicit consent by parents/guardians. The publication of all elements that may easily lead to the minor's identification and localisation (e.g. home or school address, unscreened texts, photos or videos) should also be avoided;
- every time images or videos of minors are used one should assess the potential risk of said material, considering potentially inappropriate usage;
- All personnel and volunteers are required to guarantee appropriate monitoring of minors when using their own digital communication devices to ensure that they don't inadvertently expose themselves to the risk of abuse or exploitation through social networks, online gaming, web searches, e-mails, calls or messages;
- the images (both digital and on paper) and the videos must be stored so as to prevent others from unauthorised access and must be destroyed or erased as soon as they are no longer required unless otherwise ordered by the competent authorities.

### 12.10.2 Recommendations for Recipients with regard to outsiders

It may be difficult to monitor and control outsiders other than the Recipients of this Policy. However, in addition to the provisions of paragraph 3.4 and, in general, this Policy, some indications may be provided on how they can cooperate to safeguard Members in general and minors in particular:

- ensure that parents/guardians and minors give consent for the use of their photos/videos. Persons who have not given their consent must be indicated to outsiders in advance for appropriate management;
- inform outsiders that Juventus aims to create a safe environment for all minors explaining their commitment to their protection;
- indicate the areas where access is not allowed and ask the outsiders to respect them, especially changing rooms;
- accompany outsiders at every stage during the visits;
- ask outsiders not to publish private information of minors (e.g. the addresses).

These arrangements with outsiders should preferably be provided in writing.

### 12.11 Presents and gifts

The handing out of presents or gifts by all Company personnel to Members and beneficiary minors is subject to:

- advance authorisation by the supervisor, who should be the person responsible for the project or facility;
- information given to the parents/guardians on what has been donated;

and is always consistent with the Guidelines for the management of gifts.



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