



Grupo
fedola

CHILD PROTECTION POLICY

GRUPO FEDOLA

GF-JURIDICO

VERSION CONTROL

| VERSION | DATE | RESPONSIBLE | COMMENTS |
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| | 11/11/2022 | Board of Directors | Approval |
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1. Introduction

For the purposes of this protocol, a **minor** shall be understood as any person under **18 years of age**.

The purpose of this policy is to establish a set of standards of conduct aimed at guiding the employees and collaborators of **Grupo Fedola** in the event they observe any indication of activities or conduct that are or may be harmful, both physically and emotionally, to any minors present within the company's premises.

The policy shall apply to all companies forming part of **Grupo Fedola**, especially those companies engaged in the tourism sector. In addition, the policy is binding on all employees and collaborators of the Group in all of its establishments, workplaces, and facilities of any kind. It also affects suppliers, external companies with which the corporation has dealings, and clients who receive the services offered by the organisation in the course of its activity.

2. Definitions

2.1. Definition of harmful conduct towards minors

Harmful conduct towards minors is defined as any conduct that undermines the dignity or the psychological or physical integrity of minors present in the Group's facilities.

It therefore includes discrimination, abuse, neglect, mistreatment, humiliation, threats, among others.

The following shall therefore be considered harmful conduct towards minors:

Physical abuse: hitting, shaking, pushing, poisoning, burning, drowning, suffocating, or any other action that causes physical harm to a minor.

Emotional abuse: continuous mistreatment of a minor that affects their development, including belittling them, causing them fear, or preventing them from taking part in normal social activities.

Sexual abuse: forcing a minor to participate in sexual activities such as pornography or prostitution, regardless of whether or not they understand what is happening. According to **Community Directive 2002/73/EC of September 2002**, "**sexual harassment**" is the situation in which any unwanted verbal, non-verbal, or physical conduct of a sexual nature occurs with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Neglect: persistent failure to attend to a minor's basic needs, whether physical or psychological, which is foreseeably likely to have an impact on their development.

Neglect includes everything from locking a minor alone in a room for relatively long periods of time or leaving them unsupervised, to restricting access to medical treatment or failing to respond to their emotional or educational needs.

3. Measures

3.1. Statement of Principles

It is the responsibility of the Group to ensure a safe environment for minors and to be prepared to detect and act in response to any harmful treatment of minors.

The Group must work to implement policies, together with the dissemination of clear rules and values at all levels of the organisation, that guarantee and maintain safe environments for minors present in each of the company's facilities.

In view of the potentially existing risk of situations or conduct that are or may be harmful to minors, the Group undertakes to carry out the following actions in order to prevent conflicts of this nature:

- **To ensure that its employees do not engage in any harmful activity towards minors**
- **To seek to introduce a clause in contracts with suppliers in which they declare their common rejection of any type of mistreatment towards minors**
- **To promote information for staff and clients through catalogues, leaflets, posters, informative videos, tickets, websites, or by any other means deemed appropriate**

For all these reasons, the company's management states its commitment to regulating, by means of an action procedure set out below, any possible harmful treatment of minors.

The company's management also guarantees that it will make every possible effort to detect and report to the relevant authorities any mistreatment suffered by a minor on its premises.

3.2. Procedure for Action

If any possible conduct involving harmful action towards a minor is observed, the persons and entities to whom this policy applies must immediately inform their responsible superior, who shall supervise and remain alert in order to detect any suspicious conduct.

If such conduct is in fact confirmed, the **Human Resources Department** or the **company director** shall be informed so that they may adopt the appropriate measures.

The measures to be adopted shall consist of notifying the competent police authorities so that they may investigate what has occurred and determine the measures to be taken.

4. Approval

This policy was approved by the **Board of Directors of Grupo Fedola, S.L.** on **11 November 2022**.