



CHILD PROTECTION POLICY



VERSION CONTROL			
VERSION	DATE	RESPONSIBLE PARTY	REMARKS
1.0	04/11/2022	Legal Department	Creation
	11/11/2022	Board of Directors	Approval
	19/04/2024	Criminal Compliance	Review
	06/01/2024	Criminal Compliance	Review and adaptation to inclusive language
	19/12/2025	Criminal Compliance	Review

The following is a translation of this policy provided for informational purposes only. In the event of any discrepancy or inconsistency, the Spanish version shall prevail and be considered the sole legally valid and binding text.

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1. INTRODUCTION

For the purposes of this Policy, a minor shall mean any person under the age of 18.

The purpose of this Policy is to establish a set of standards of conduct designed to guide the employees and collaborators of Grupo Fedola in the event that they observe any indication of activities or conduct that are, or may be, harmful, whether physically or emotionally, to any minors present within the company's facilities.

This Policy shall apply to all companies forming part of Grupo Fedola, particularly those operating within the tourism sector.

Furthermore, this Policy is binding upon all employees and collaborators of the Group across all its establishments, workplaces and facilities of any kind.

It also applies to suppliers, external companies with which the Group maintains business relationships, and to customers who receive services provided by the organisation in the course of its activities.

2. DEFINITIONS

2.1. Definition of Harmful Conduct Towards Minors

Harmful conduct towards minors is defined as any conduct that undermines the dignity, psychological integrity or physical integrity of minors present within Grupo Fedola's facilities.

This therefore includes discrimination, abuse, neglect, mistreatment, humiliation, threats and similar conduct.

Accordingly, the following shall be considered harmful conduct towards minors:

Physical Abuse: golpear, agitar, empujar, envenenar, quemar, ahogar, sofocar o cualquier otra acción que cause daño físico a un/a menor.

Emotional Abuse: the persistent mistreatment of a minor that adversely affects their development, including belittling them, causing fear, or preventing them from participating in normal social activities

Sexual Abuse: Forcing a minor to participate in sexual activities, including pornography or prostitution, regardless of whether they understand what is taking place. According to **Directive 2002/73/EC of September 2002**, **"sexual harassment"** means any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, particularly when creating an intimidating, hostile, degrading, humiliating or offensive environment

Neglect: the persistent failure to meet a minor's basic physical or psychological needs, which is likely to have an adverse impact on their development. Neglect includes, among other situations: Leaving a minor alone in a room for extended periods; Leaving a minor unsupervised; Restricting access to medical treatment; Failing to respond to 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 respond to any conduct that may be harmful to them.

The Group shall work to implement policies, together with the dissemination of clear rules and values at all levels of the organisation, aimed at guaranteeing and maintaining safe environments for minors present within any of its facilities.

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

- Ensure that its employees do not engage in any activity that may be harmful to minors.
- Seek to include a clause in contracts with suppliers through which they declare their shared commitment to rejecting any form of abuse or mistreatment of minors.
- Promote awareness among employees and customers through brochures, catalogues, posters, informational videos, tickets, websites or any other communication methods considered appropriate.

Accordingly, the Company's Management expressly undertakes to regulate, through the procedure set out below, any potential 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 abuse suffered by a minor within its facilities.



3.2. Procedure for Action

Where any conduct is observed that may constitute harmful treatment of a minor, all persons and entities to whom this Policy applies must immediately inform their line manager or supervisor.

The responsible manager shall monitor the situation and remain alert in order to detect any suspicious conduct.

Where such conduct is confirmed, the matter shall be reported to the Human Resources Department or the Company Director, who shall adopt the appropriate measures.

The measures to be taken shall consist of notifying the competent law enforcement authorities so that they may investigate the facts and determine the appropriate course of action.

4. APPROVAL

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