



CHILD SAFEGUARDING POLICY

NG-CTO-012

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01. INTRODUCTION AND PURPOSE.

LALIGA is firmly committed to upholding the highest standards of conduct across all its activities and to safeguarding the protection and well-being of all individuals, with particular focus on children.

This Child Safeguarding Policy sets out that commitment and aims to establish clear principles and standards of conduct to:

- a. Ensure that all activities and projects involving children are carried out in safe, supportive and protective environments that foster their full development.
- b. Prevent any form of violence against children and adolescents, irrespective of who may perpetrate it, by clearly defining the behaviors and practices expected of all those involved.
- c. Put in place effective and efficient mechanisms to identify situations of risk, abuse of violence affecting children participating in LALIGA's activities and projects.
- d. Establish safe and coordinated procedures to appropriately respond to any situation of risk, abuse or violence involving children.

This Policy adopts a comprehensive safeguarding approach, prioritizing not only the prevention, identification and management of risks or incidents of violence affecting children, but also their overall development and well-being. Particular importance is placed on always promoting the best interests of each child.

02. SCOPE OF APPLICATION.

This Policy applies, without exception, to all entities within the LALIGA Organization¹ and is mandatory for all personnel, regardless of their geographical location, hierarchical level or role. In particular, it applies to all individuals who are directly or indirectly involved in activities with children.

03. CONCEPTUAL AND THEORETICAL FRAMEWORK.

For the effective implementation of this Policy, it is essential to establish a shared understanding of basic terminology and the key concepts associated with child safeguarding, in particular the following:

3.1. Definition of childhood: In accordance with the United Nations Convention on the Rights of the Child, the term childhood refers to any person under the age of 18, unless, under applicable national legislation, the age of majority is attained earlier.

3.2. Violence against children: Any act, omission or negligent treatment that deprives children of their rights or well-being or that threatens or interferes with their physical, psychological or social development, regardless of its form or how it is carried out. This includes violence perpetrated through information and communication technologies.

3.3. Forms of violence against children: Four main forms of violence are identified:

- a. **Physical violence:** Any action that causes physical harm. In the sporting context, physical violence may take the form of behaviors adapted to that environment, such as causing injury through direct physical aggression, imposing excessive physical demands or forcing a child to train or compete while injured.

¹ The LALIGA Organization shall be understood to mean the National Professional Football League and all other entities wholly or majority-owned by it, including the LALIGA Foundation.

b. Psychological violence: Verbal attacks or emotional abuse that undermine the well-being of children. In sport, psychological violence may include insults, threats, ridicule, discrimination or undue pressure arising from excessive expectations, leading to anxiety or emotional distress.

c. Sexual violence: Any sexual act, with or without physical contact, carried out without valid consent or where consent is coerced, manipulated or absent. It may be physical² or non-physical³ in nature. In sport, this may include behaviors such as leering, inappropriate touching, sexual comments, propositions or remarks about a child's body.

d. Neglect: Situations in which a child's basic needs are not adequately met by the adults responsible for their care. In sport, neglect may include requiring children to train or compete in unsafe or inappropriate conditions, failing to ensure adequate hydration or physical well-being or compelling participation against their will.

3.4. Safe and protective environments for children: Safe and protective environments are those in which children are able to develop securely, while being cared for and treated with dignity and respect. Such environments must safeguard their psychological and emotional well-being, be free from violence, abuse or exploitation and actively promote respect for human rights.

04. GENERAL PRINCIPLES OF CONDUCT.

Any adult who is directly or indirectly involved in LALIGA's professional activities and projects with children has both a moral duty and a legal obligation to safeguard their overall well-being. Accordingly, all such activities and responsibilities must be carried out in line with the following principles of conduct:

4.1. Mandatory standards of behavior.

- a. Be familiar with and ensure compliance with all applicable internal regulations, including this LALIGA Child Safeguarding Policy.
- b. Participate in mandatory corporate training activities on child safeguarding as promoted by LALIGA
- c. Take the necessary measures to ensure that the spaces in which activities and projects involving children are carried out are safe and protective.
- d. Act as a positive role model by demonstrating respectful, inclusive and appropriate behavior towards children.
- e. Respect the rights of children by encouraging their participation and ensuring their voices are heard.
- f. Address and resolve conflicts in a constructive and non-violent manner, both with adults and with children.
- g. Work collaboratively with individuals and entities, and cooperate in the implementation of prevention, detection and response measures to protect children, in accordance with the guidelines issued by LALIGA's Child Safeguarding Office and, where applicable, by the competent authorities.
- h. Maintain appropriate confidentiality regarding information obtained in the course of

²For example, abuse or inappropriate touching.

³For example, exhibitionism or pornography.

professional duties, respecting the privacy and personal data of children and of their families or legal guardians and disclosing such information only to the relevant individuals or authorities where strictly necessary.

i. Use private spaces appropriately, ensuring that any one-to-one sessions with children take place in public or open, visible areas and, wherever possible, in the presence of another adult. In all cases, prior notice must be given before entering sensitive areas such as toilets, changing rooms or bedrooms.

j. Use only the official communication channels designated by LALIGA to communicate with children and their families or legal guardians.

4.2. Prohibited behaviors.

The following behaviors are strictly prohibited for any adult with professional responsibilities in activities and projects involving children:

- a. Engaging in any form of physical, psychological or sexual violence against children, including when such conduct is presented as having an educational or disciplinary purpose.
- b. Engaging in sexualized behaviors or relationships with children, whether in person or through digital means, both within the professional context and in private life.
- c. Carrying out, permitting or encouraging any form of discrimination.
- d. Allowing situations of violence, abuse, discrimination or violations of rights to occur between children. Adults must intervene to prevent harmful power dynamics and to restore an environment of respect and positive coexistence among children.
- e. Tolerating or failing to act in response to breaches of this Policy by other individuals involved in activities with children.
- f. Questioning a child involved in a situation of violence, conducting investigations or determining whether a specific behavior constitutes a criminal offence. Such actions must only be carried out by the designated professionals or competent authorities.
- g. Transporting children in private vehicles. Only institutionally authorized vehicles or public transport services may be used.
- h. Taking photographs or making recordings of children using personal devices. Only institutional devices belonging to LALIGA or collaborating entities may be used, and solely where the appropriate consent of parents or legal guardians has been obtained.
- i. Contacting children through personal devices or private social media accounts.
- j. Promoting, facilitating or allowing access or exposure to content that may cause harm or be inappropriate or distressing for children.
- k. Tolerating, facilitating or promoting the use of illegal substances by minors or consuming such substances as an adult while performing professional duties.

05. CHILD SAFEGUARDING MANAGEMENT SYSTEM.

LALIGA's Child Safeguarding Management System comprises all interrelated policies, processes and actions designed to ensure compliance with applicable regulations on the prevention of violence against children and the effective management of related risks.

The governance, coordination and oversight of this Management System are structured across several levels, each with specific roles and responsibilities, as outlined below:

5.1. Child Safeguarding Officer.

The Child Safeguarding Officer is the role appointed by LALIGA's Governing Body to manage and coordinate the organization's Child Safeguarding Management System. This role acts as LALIGA's institutional representative and primary point of reference for matters relating to child safeguarding⁴. In summary, the main responsibilities of the Child Safeguarding Officer are as follows:

- a. To manage and coordinate the overall operations of LALIGA's Child Safeguarding Office.
- b. To lead strategic decision-making regarding the implementation, oversight, development and continuous improvement of the Child Safeguarding Management System.
- c. To represent LALIGA before authorities and public and private bodies, acting as the main liaison on matters related to child safeguarding.
- d. To report on a regular basis to LALIGA's Audit and Internal Control Committee on activities carried out in relation to the prevention of violence against children and on the status of the organization's Child Safeguarding Management System.

5.2. Child Safeguarding Office.

LALIGA's Child Safeguarding Office (hereinafter, CSO) is composed of: (i) specialized technical staff, (ii) LALIGA's Child Safeguarding Officer, and (iii) the Compliance Body. It is the operational unit responsible for the executive development and practical implementation of the prevention, identification and response measures that form part of the organization's Child Safeguarding Management System.

In summary, the main responsibilities of LALIGA's Child Safeguarding⁴ Office are as follows:

- a. To coordinate the practical implementation and operational management of LALIGA's Child Safeguarding Management System.
- b. To carry out risk assessments as required, which shall be conducted at least on an annual basis, as well as audits and ongoing monitoring activities.
- c. To oversee the suitability and safety of spaces and activities organized by LALIGA in which children participate.
- d. To develop, implement, monitor and oversee compliance with applicable regulations relating to the prevention of violence against children.
- e. To design and deliver annual training and awareness-raising programs on the prevention of violence against children.
- f. To manage incidents and response protocols in cases of suspected or confirmed violence against children in activities and projects organized by LALIGA, including, where appropriate, the proposal of disciplinary measures.

⁴In Spain, Organic Law 8/2021 of 4 June, on the comprehensive protection of children and adolescents against violence (LOPIVI), establishes the obligation for all entities that carry out activities involving minors, including sports, leisure and recreational activities, to appoint a Child Protection Officer.

- g. To provide advisory services on child safeguarding matters in relation to any activity or project involving or aimed at children.
- h. To implement collaborative projects with other public or private entities.

5.3. Child Safeguarding Focal Points.

Child Safeguarding Focal Points are individuals with specific training in child safeguarding who are appointed within the departments, directorates or entities of the LALIGA Organization that manage activities or projects involving children. They act as the direct operational link with the Child Safeguarding Office, facilitating the flow of information and coordinating safeguarding needs within their respective areas of responsibility.

Within this framework, Child Safeguarding Focal Points maintain two-way communication with the Child Safeguarding Office, sharing information, raising questions or reporting incidents and receiving guidance tailored to their specific area of activity. Their key responsibilities include:

- a. Acting as the operational liaison between their department, project or subsidiary and LALIGA's Child Safeguarding Office.
- b. Reporting to the Child Safeguarding Office any suspicion or evidence of violence against children.
- c. Supporting and advising working teams in the implementation of prevention, identification and protection measures.
- d. Contributing to the evaluation and continuous improvement of the Child Safeguarding Management System by providing information and proposals based on their practical experience.

06. INTERPRETATION AND QUERIES.

Any questions regarding the interpretation or application of this Policy should be addressed to LALIGA's Child Safeguarding Office (safeguarding@laliga.es).

07. NON-COMPLIANCE.

Any breach of this Child Safeguarding Policy may be considered a violation subject to disciplinary action in accordance with the applicable sanctioning or disciplinary regime in each case.

Furthermore, non-compliance with this Child Safeguarding Policy may give rise to liability, including criminal liability, for the individual or entity responsible. Violence against children may result in the imposition of different types of sanctions depending on its severity, which may include custodial sentences, fines and disqualifications that may affect the exercise of professional activities by both the individuals involved and the companies concerned.

08. ENTRY INTO FORCE.

This Child Safeguarding Policy has been approved by LALIGA's Delegated Committee and shall enter into force on the day following its communication through LALIGA's internal digital communication channels.

LALIGA