



CHILD PROTECTION POLICY AND CODE OF CONDUCT

PART I – COMPANY POLICIES AND GUIDELINES FOR THE PROTECTION OF MINORS

1.0 Purpose and Scope

This policy is intended to ensure the due care and protection of minors in the performance of all company activities, starting from the socio-economic research and related communication activities that constitute the corporate purpose of **Digivis**.

Through this policy, **Digivis** is committed to safeguarding the well-being and dignity of minors — a commitment that must be regarded as binding at the corporate level and as a personal responsibility of every Digivis researcher or collaborator.

The protection of each minor shall never be subordinated to the pursuit of general corporate objectives or to the specific goals of social and economic research activities. To this end, **Digivis** undertakes to adopt measures aimed at preventing any risk of harm to minors during the conduct of company activities, and in particular within research and communication initiatives that represent Digivis's core business.

For the purposes of this document, the term “**harm**” is to be understood in its broadest sense, encompassing not only actions that constitute offences subject to civil or criminal sanctions, but also any form of neglect, carelessness, manipulation, exploitation, offence, undue pressure or constraint, or obstruction that causes or may cause negative consequences for a minor.

This policy is designed to protect the dignity, freedoms, rights, and interests of minors who are directly or indirectly involved in company activities, by establishing ethical criteria and safeguard procedures. The protection promoted and actively supported by this policy applies to **all minors as individuals**, regardless of age, gender, sexual orientation, disability, geographical origin, ethnic background, socio-economic status, religious faith, or personal belief.

Digivis, through this corporate policy, commits to avoiding all forms of discrimination or exploitation of minors and to recognising and addressing the needs arising from any special conditions of vulnerability.

The protection and duty of care towards minors to which **Digivis** is committed extend to all company activities in which minors are directly involved, or from which they may be indirectly affected. This includes the design phase of projects or research actions, the implementation of research and



intervention activities, the publication and dissemination of research results, as well as all communication and dissemination activities that constitute Digivis's corporate purpose, including those carried out in collaboration with third parties.

This policy is therefore an integral part of all project documentation, as potential contact with minors, or their possible involvement in communication activities, may occur.

The **project manager** and **each participant** — whether a researcher or collaborator, regardless of their contractual status — must sign this policy **before undertaking any activity**, thereby explicitly adhering to the **Code of Conduct**.

1.1 Ethical Principles Guiding Digivis

The ethical orientation guiding **Digivis** is based on the conviction that minors have the right to be treated with the same respect owed to adults and should always be regarded as **positive and valuable members of society**.

All interactions and activities involving minors must be inspired by the principles of **dignity, responsibility, respect for their autonomy** (within the limits of their development), **methodological rigour, attentiveness, and care**.

The research and communication activities that form Digivis's core business may involve ongoing interaction with minors — for example, in **social research using ethnographic approaches**, or in **communication activities**, particularly those conducted through **social networks**. For this reason, **Digivis pays special attention to the ethics of relationships**, grounded in consideration, attentive listening, and respectful dialogue with minors.

In order to respect the specific subjectivity of each minor, **Digivis** undertakes to always recognise and accept a minor's willingness or unwillingness to engage in interaction with adults — including those acting in the capacity of researchers or communicators — ensuring conduct that is fully responsive to such needs.

1.2 Definition of Minor

For the purposes of this document, the term "**minor**" is used in accordance with its **national (Italian) and international legal meaning**. It therefore includes **all individuals under the age of 18**.

PART II – CODE OF CONDUCT

2.0 General Commitments and Preventive Measures Against Possible Harmful Situations Involving Minors

2.1.1.1 During the Planning and Design Phase of Research and Communication Activities

The **Legal Representative of Digivis, project managers, researchers,** and all staff members — including **external collaborators** — commit to ensuring that:

- a) During the planning of projects and in all phases of research activities, the **dignity, freedom, rights, interests, needs, and physical and psychological well-being** of minors involved are duly respected and taken into account;
- b) In all interactions with minors, they are treated with **respect** and are **listened to**, including with regard to the expression of their wishes and emotions;
- c) Within project-related activities, minors are **protected from potential harm, manipulation, or exploitation** through appropriate **preventive and protective measures**;
- d) The Legal Representative of Digivis and the project managers also undertake to ensure that:
- e) **Research staff and collaborators** are adequately **informed and regularly updated** on child protection procedures and on **laws and regulations** safeguarding minors;
- f) For each project, the **Legal Representative** designates a **Child Protection Officer**, whose tasks include:
 - providing information on rules and codes of conduct;
 - verifying compliance with the Code of Conduct;
 - reviewing the profiles of personnel involved in activities involving direct contact with minors, including through criminal record checks;
 - acting as the **key contact person** for any issue or concern relating to the protection of minors arising during project activities;
 - **immediately activating the safeguarding and sanctioning procedures** established by the Code of Conduct and by law, in cooperation with the Legal Representative, or acting **directly and autonomously** in cases of serious legal violations by reporting them to the **judicial authorities**.

g) The **Child Protection Officer** — who may be responsible for one or more company projects, depending on their complexity, location, and number — shall be appointed **exclusively among individuals meeting the following criteria:**

- **Criminal lawyer** qualified to practise before the Juvenile Court, or
- **Honorary judge** with specific experience in juvenile matters, or
- **Magistrate.**

2.1 Specific Control and Enforcement Measures, and Sanctions Applicable to Internal Personnel in Case of Reported Misconduct in Research or Communication Activities (or in Any Company Activity) That May Undermine the Dignity and Well-being of Minors

The **Legal Representative of Digivis**, the **Child Protection Officer**, **project managers**, **researchers**, and all company personnel — including **external collaborators and professionals** — commit to ensuring that:

- a) The **reporting and emergence** of suspected cases of harm to a minor — whether caused intentionally, negligently, or through carelessness — within the organisation are **facilitated and encouraged**;
- b) In the event of a report of **misconduct** in research or in any company activity that may harm the dignity or well-being of minors, both the **Legal Representative of Digivis** and the **Child Protection Officer** are to be **promptly informed** and must act **immediately** in accordance with the **Code of Conduct**, adopting the necessary corrective measures. These may include the **suspension of the person involved** or the **temporary interruption of company activities**, pending fact verification. In cases of serious breaches of legal, ethical, or professional conduct, measures up to and including **termination for just cause** may be taken, in accordance with applicable law;
- c) In all cases involving a **suspected harm to a minor**, reports must be **handled promptly and appropriately**, involving internal stakeholders and, where there is reasonable suspicion of a criminal offence, ensuring that the **competent judicial or law enforcement authorities** are **immediately informed** or taking direct action in the event of organisational inaction;
- d) The **confidentiality** of the person making the report, the individual under investigation, and the minor(s) involved must be **safeguarded**. However, the **duty to report** any suspected criminal offence to the competent authorities shall **prevail over confidentiality**.

2.1.1 Scope of the Policy

The focus on and prevention of risks to minors apply to **all stages of research and communication**, and concern every phase of company operations — from the **design of research projects** and the **definition of target groups**, to the **selection and recruitment of professional resources** assigned to project activities, and the **methods of involving minors in studies**, including the **acquisition of parental or guardian consent**.

These safeguards extend through the **conduct of research**, the **publication and dissemination of results**, and all **communication and outreach activities**.

To this end, the **Legal Representative of Digivis**, the **Child Protection Officer**, **project managers**, **researchers**, and all personnel involved — including **collaborators** — undertake to ensure that:

2.1.1.1 During the Planning and Design Phase of Research and Communication Activities

a) The **involvement of minors** in research activities shall in all cases be **limited** and only foreseen when it serves **scientifically relevant objectives** or provides **indispensable knowledge support** for project activities;

b) **Risk assessment and management procedures** shall be established to identify, on a case-by-case basis, **effective indicators** of potential harm and to mitigate such risks accordingly.

2.1.1.2 During the Selection and Identification of Personnel Involved in Project Activities

a) Only **research and communication professionals** with **adequate experience** (minimum **10 years** for senior positions) and a **recognised and verifiable professional record** shall be assigned to activities involving direct contact with minors. In all cases — including for **support staff, interns, and volunteers** — the **criminal record certificate** shall be checked to verify the existence (or absence) of any **criminal convictions or disqualifications** related to roles involving direct and regular contact with minors, in compliance with **Legislative Decree No. 39/2014**, which implements **EU Directive 2011/93** of the European Parliament.

b) Personnel engaged in such activities shall participate, at the **start of the project** or whenever **policies or regulations on child safeguarding and protection** undergo significant changes, in **specific training sessions** on the company's **Child Protection Policy, Code of Conduct**, and on any **new legal provisions**.

2.1.1.3 During the Selection of Minors Participating in Surveys, Research, or Studies

- a) **Fairness and equity** in the treatment and involvement of minors shall be ensured, so as to prevent any risk of **stigmatisation, discrimination, or bias**, including **gender bias**;
- b) An appropriate **welcoming environment** and an **effective ability to communicate and engage** with minors shall be guaranteed, supported by **specific training** for research staff.

2.1.1.4 During the Expression and Acquisition of Consent for Participation in Research

- a) A **comprehensive information package** on the research project shall always be made available to all interested parties, in order to ensure the **informed participation** of minors and the **responsible involvement** of families or legal guardians;
- b) The **minor's will** shall always be given **primary consideration**; in cases where the minor **explicitly expresses unwillingness** to participate, such refusal shall **take precedence** over any contrary consent provided by parents or legal guardians;
- c) Communication with minors shall be **simple, clear, genuine, and free of technical jargon**, and adapted to each minor's **level of understanding**, taking into account **age** and any **disability** or condition affecting comprehension;
- d) Participants shall be informed of any **potential risks or discomforts**, as well as the **expected benefits** in terms of knowledge advancement or project outcomes;
- e) Participants shall be informed of the **names of project contacts**, starting with the **Child Protection Officer**, the **sources of project funding**, the **data controller** responsible for processing personal and sensitive data, the **privacy protection measures** adopted, and the **rights exercisable** by participating minors through their legal guardians, including how and when **research results will be disseminated**.

2.1.1.5 During the Operational Implementation Phase of the Research

- a) A **comprehensive information package** on the research project shall always be made available to all interested parties, to ensure the **informed participation** of minors and the **responsible involvement** of families or legal guardians;
- b) The **minor's will** shall always be given **primary consideration**, and in cases where the minor **clearly expresses refusal**, it shall **prevail** over parental or guardian consent;

- c) Communication with minors shall be **simple, clear, authentic, and free from technical terms**, suitable to the **minor's age and comprehension capacity**, and considerate of any **special needs or disabilities**;
- d) Participants shall be informed of any **potential risks or discomforts**, as well as the **expected benefits** in terms of knowledge progress or project goals;
- e) Participants shall be informed of the **project's key contacts**, including the **Child Protection Officer**, the **funding sources**, the **data controller** for personal and sensitive data, the **privacy protection measures** in place, and the **rights of minors** (exercisable through their legal guardians), along with the **methods and occasions for disseminating research results**.

2.1.1.6 In the Publication of Results and in All Communication Activities

- a) The **absolute non-identifiability of minors** must be guaranteed, including the omission of any elements that could indirectly allow their identification, such as the names of parents or references to places or individuals that could lead to their recognition. These restrictions apply to **all forms of publication** and to **all communication channels**, including **social media**;
- b) For the publication of any **images of minors**, permitted solely and exclusively for **project-related purposes**, **verbal consent** from the minors and **written consent** from their parents or legal guardians must be obtained and documented, clearly explaining how the photograph or video will be used;
- c) It must be ensured that **photographs, films, videos, and DVDs** portray minors in a **dignified and respectful manner**, without attitudes of vulnerability or submission, and avoiding poses that could be perceived as **sexually suggestive**;
- d) It must always be ensured that **depictions of situations and events** are **truthful and non-distorted**;
- e) It must be guaranteed that **images and data** are stored on **secure internal servers** of Digivis and are **accessible only** to authorised **Digivis staff members** who hold the appropriate credentials and have **signed the Child Protection Code of Conduct**;
- f) All personnel involved in **communication activities** (journalists, video operators, social media editors, photographers, etc.) must be **fully informed and trained** on the **Child Protection Policy (CPP)** and **Code of Conduct** before commencing their work. They must **formally sign a declaration of commitment** to comply with the Code of Conduct, which shall form an **integral part of their contractual obligations**;

g) Communication staff must **always be accompanied** by **research personnel, project managers, or designated child reference persons** during any direct contact with minors.

2.2 Review of the Policy and Code of Conduct, and Monitoring and Evaluation Procedures

This document forms part of a **continuous process of adaptation and improvement** and shall be **reviewed annually** in all its parts, based on internal **monitoring and evaluation processes**, or in response to **external inputs**, such as new legislation, or requests for revision and integration from **institutions, agencies, partners, or stakeholders** of Digivis.

The **latest updated version** of the **Child Protection Policy (CPP)** and **Code of Conduct** will always be **available online** at:

www.digivis.eu/child-protection-policy-code-of-conduct

As part of the **monitoring and evaluation process**, activities will be assessed through indicators such as:

- Number of projects in which the Policy has been applied during the year;
- Number of minors involved in the projects;
- Number of staff members engaged in projects involving minors;
- Number of training and information sessions delivered;
- Number of breaches identified or reports received.