



# FTI GROUP

## GROUP-POLICY

### FTI GROUP Child Protection Policy

**Department:** Corporate Social Responsibility  
**Prepared by:** SEV  
**Document-No.:** CSR-2024-01  
**Creation Date:** 05.02.2024

**Checked by:**  
Caroline Steimle  
Head of Corporate Social Responsibility

**Released by:**  
Karl Markgraf  
Chief Executive Officer

08.02.2024

*Caroline Steimle*

.....  
Date and Signature

08.02.2024

*Karl Markgraf*

.....  
Date and Signature



## Table of Contents

<b>A. Preliminary Remark .....</b>	<b>3</b>
1. Purpose, Scope and Target .....	3
2. Applicability .....	3
3. Effective date .....	3
4. Definitions .....	4
<b>B. Measures .....</b>	<b>4</b>
1. Evaluation of business processes: .....	4
2. Incorporation in contracts: .....	4
3. Criteria catalogue based on a checklist .....	5
4. Sensitization through training: .....	5
5. Handling suspicions and the FTI GROUP reporting procedure (IntegrityLine): .....	5
6. Partnerships.....	5
<b>C. Responsibilities.....</b>	<b>5</b>
<b>D. Change History .....</b>	<b>6</b>



FTI GROUP Child Protection Policy – Document No. CSR-2024-01

## **A. Preliminary Remark**

### **1. Purpose, Scope and Target**

Holiday travel is among the most beautiful experiences of the year. Tourism represents intercultural encounters and the exploration and understanding of other countries, cultures, and traditions. It also signifies the safeguarding of jobs, economic strength, and a contribution to prosperity - especially for countries in the Global South.

The interaction between tourists and locals can create environments where children may be exposed to risks not encountered in other contexts. Therefore, the protection of children in the tourism sector is more than a moral obligation. As one of Europe's largest tourism companies, the FTI GROUP is aware of its social responsibility. Hence, we actively take measures to uphold human and children's rights and prevent their violation. We are committed to ensuring the safety and wellbeing of children and adolescents, particularly within our operations and our sphere of influence. Therefore, we ensure a protected environment in which suspicions cases can be reported without fear. We collaborate closely with our partners, suppliers, and service providers to protect and promote the rights of children and adolescents.

We comply with international and national laws and adhere to them in our own operational activities and product development. Additionally, we are actively committed to protecting children, adolescents, and adults from all types of abuse. This includes, but is not limited to, neglect, physical, sexual or emotional abuse, mistreatment, and any form of exploitation. We have established minimum standards in our Business Partner Code of Conduct based on the core values of integrity, respect, and responsibility that our business partners are expected to adhere to.

In terms of child protection and upholding workers' rights, we align with the guidelines of the International Labour Organization ([ILO Core Labour Standards](#)), the World Tourism Organization of the United Nations ([UNWTO](#)), and the United Nations Children's Fund (UNICEF – [Child Rights and Business Principles](#)). Our actions are developed in compliance with these international standards, involving employees, service providers, partners, and guests.

We aim to promote the principles of child protection and prevent violations of children's rights. We are committed to contributing to children and adolescents having the best possible chances for a self-determined life and preventing any form of child labor and exploitation.

### **2. Applicability**

This policy applies to all employees of the FTI GROUP as well as all business partners, guests and all other persons who are on the premises of the FTI GROUP.

### **3. Effective date**

The policy comes into effect on 15.02.2024.



FTI GROUP Child Protection Policy – Document No. CSR-2024-01

#### 4. Definitions

**The FTI GROUP adheres to the following definitions:**

- **Child:** According to the UN Convention on the Rights of the Child, a child is any person who has not yet reached the age of eighteen, unless majority is attained earlier under the law applicable to the child (Source: UN Convention on the Rights of the Child, Article 1).
- **Child labor:** Child labor refers to work for which children are too young, that is dangerous or exploitative, harms the physical or mental development of the child or prevents children from attending school (Source: UN Convention on the Rights of the Child, Article 32).
- **Forced labor:** The Forced Labour Convention of 1930 (No. 29) by the International Labour Organization (ILO) defines forced or compulsory labor as "all work or service which is exacted from any person under the menace of any penalty and for which said person has not offered himself voluntarily."
- **UN Convention on the Rights of the Child (CRC):** The CRC is the primary international framework dealing with children's rights. It contains provisions to protect children from exploitation, especially Articles 32, 34, and 35 which offer protection against sexual exploitation, sale, and trafficking. Moreover, the Convention emphasizes the physical and mental wellbeing of the child (Articles 19 and 27) and their psychosocial, emotional and spiritual development (Articles 31 and 32). The CRC is distinguished by its specific focus on children's rights and needs compared to other international legal instruments.

#### B. Measures

We have embarked on a journey towards more sustainable, responsible tourism and are continually evaluating and improving our processes and standards. With a focus on compliance, protection, and the promotion of the rights of children and adolescents, we are progressively implementing the following measures:

##### 1. Evaluation of business processes:

- Regular review of our business processes to identify potential risks to children and adolescents and take appropriate preventive measures.
- Assessment of potential risks in collaboration with our partners to safeguard children and adolescents and implement suitable preventive measures.

##### 2. Incorporation in contracts:

- Embedding our Business Partner Code of Conduct in new partnership contracts to ensure compliance with minimum standards regarding child labor, forced labor and (sexual) exploitation. For existing partnerships, the Business Partner Code of Conduct is to be signed separately.



FTI GROUP Child Protection Policy – Document No. CSR-2024-01

### **3. Criteria catalogue based on a checklist**

- Providing internal checklists covering all relevant aspects of child protection, e.g. in selecting suppliers, service providers and business partners.

### **4. Sensitisation through training:**

- Conducting training and workshops to educate and sensitise our employees.
- Offering training and workshops for employees of external business partners, suppliers, and service providers.
- Implementing measures to raise awareness and educate travelers to prevent child endangerment, such as by highlighting the potential harm caused by photographing children or visiting orphanages.
- Accessibility and sensitization of employees and travelers to the FTI GROUP complaint procedure (see item 5).

### **5. Handling suspicions and the FTI GROUP reporting procedure (IntegrityLine):**

- If employees or guests become aware of or suspect violations of children's rights, such as child abuse, they must immediately report it via the [FTI GROUP IntegrityLine](#) or another appropriate internal channel. Anonymous reporting is possible. An environment is created where suspicions can be expressed without fear of negative consequences. It is ensured that whistleblowers are protected and that violations are addressed decisively.

### **6. Partnerships**

- FTI GROUP is an active member of the "Child Protection" working group of the German Travel Association (DRV AG Kinderschutz). This keeps the organization informed about established practices and contributes to industry-wide initiatives.
- FTI GROUP is a founding member of an industry initiative dedicated to developing online training to promote human rights compliance in the tourism value chain. This project is led by Futouris e. V. and the Roundtable Human Rights in Tourism.
- FTI GROUP supports and participates in the "Don't look away" campaign by ECPAT International. The campaign aims to sensitise travelers to situations that may indicate sexual exploitation of children and empowers them to report suspicions. The campaign is connected to ECPAT's reporting platform, where suspected cases of sexual exploitation of children can be reported worldwide. The reports are then forwarded to the responsible authorities.

## **C. Responsibilities**

The responsibility for content and actuality of the guideline lies within the Corporate Social Responsibility department, which closely collaborates with the departments of Governance & Compliance, Talent & Culture.



FTI GROUP Child Protection Policy – Document No. CSR-2024-01

**D. Change History**

Edition	Date	Author	Change Description
1.0	05.02.2024	SEV	Creation