



Philadelphia Union

Minor Athlete Safety Policy

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Philadelphia Union may update this Minor Athlete Safety Policy at any time. Unless otherwise stated, any such updates are effective immediately upon publication.

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GLOSSARY OF TERMS

“Covered Persons” means (i) Philadelphia Union’s employees and board members, (ii) child participants in Philadelphia Union Activities, and (iii) Participating Adults.

“Philadelphia Union” or “Union” means Philadelphia Union.

“Philadelphia Union Activity” means any event controlled and/or operated by Philadelphia Union.

“Philadelphia Union Facility” means a facility controlled and/or operated by Philadelphia Union.

“Participating Adult” means any person that Philadelphia Union authorizes, approves, or appoints, whether in a paid or voluntary capacity, to have contact with a person under the age of 18 during a Philadelphia Union Activity or at a Philadelphia Union Facility, which may, in certain cases, include Philadelphia Union’s First Team players, coaches, staff, and other personnel.

“Policy” means this Philadelphia Union Minor Athlete Safety Policy.

“Prohibited Conduct” means any conduct prohibited by the Prohibited Conduct Policy in Section B of this Policy.

“SafeSport Center” means the U.S. Center for SafeSport.

A. PURPOSE

Safeguarding is a duty of care and commitment to creating an environment that is free from child abuse. Through legislation called the Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017 or “The SafeSport Act”, all national sporting organizations that serve child athletes are required to comply with regulations to protect child athletes from the risks of abuse, misconduct, and harassment, and to develop reporting procedures to quickly and efficiently respond to any concerns about conduct and/or conditions that endanger the welfare of minors. Major League Soccer (MLS) has developed safeguarding provisions as part of the MLS NEXT National Youth competitions and all MLS clubs are required to develop minor protection policies.

The Philadelphia Union has established a “Safeguarding Lead” who will serve as the point of contact for formulating safeguarding policies and processing safeguarding concerns. The Director of Player Safeguarding and Welfare is the Safeguarding Lead tasked with administering this Policy, as well as developing and delivering training and education for Covered Persons and other personnel on all matters pertaining to safeguarding of minors participating in Philadelphia Union Activities and in Philadelphia Union Facilities.

This Policy is a statement of ethical and protective practice standards, principles, values, and behaviors expected for all Covered Persons with the goal of protecting and promoting the welfare of all child athletes and participants in Philadelphia Union Activities and at Philadelphia Union Facilities. This Policy’s purpose is to inform Covered Persons and implement standards at Philadelphia Union Activities and in Philadelphia Union Facilities to:

- Promote the safety and welfare of all children.
- Minimize the risk of harm and abuse occurring to children.
- Ensure compliance with applicable law and regulation.
- Implement and execute safe recruitment principles to ensure that unsuitable individuals are not recruited into positions working with children.
- Outline Philadelphia Union reporting protocol to activate prompt responses to concerns, complaints, and allegations relating to the potential abuse of or harm to any child or violation of applicable laws or regulations.
- Establish clear roles and responsibilities relevant to safeguarding child athletes and participants in Philadelphia Union Activities and at Philadelphia Union Facilities.

In addition to this Policy, any Covered Person that has contact with participants through the Philadelphia Union Academy is required to comply with the MLS Next Safety and Wellbeing Policy which is attached as Appendix A (or any policy that replaces such or amends that policy).

If you have any questions related to this Policy, please contact Sheldon Phillips, Director of Player Safeguarding and Welfare at sphillips@philadelphiaunion.com.

B. PROHIBITED CONDUCT POLICY

The Philadelphia Union is committed to ensuring that all children and adults who participate in any Philadelphia Union Activity have a safe and positive experience. This includes promoting positive

behaviors and attitudes towards children and adults and protecting the welfare of all participants in Philadelphia Union Activities or at Philadelphia Union Facilities, while delivering safe and high-quality activities. As such, all Covered Persons are prohibited from engaging in the conduct outlined below.

Philadelphia Union places a special emphasis on protecting child athletes and participants in Philadelphia Union Activities or who are present in Philadelphia Union Facilities. This is achieved by maintaining a youth activity, training, and competition environment that is free from abuse, misconduct, and other inappropriate behavior. Philadelphia Union has a zero-tolerance approach to abuse, misconduct and other inappropriate behavior towards children. All Participating Adults are prohibited from engaging in, facilitating, or permitting, and should take steps to prevent, any of the conduct outlined below.

Child Sexual Abuse

Any sexual activity with a child is prohibited. This includes sexual contact with a child that is accomplished by deception, manipulation, force or threat of force, regardless of the age of the participants, and all sexual interactions between an adult and a child, regardless of whether there is deception, or the child understands the sexual nature of the activity.

Sexual Misconduct

Any sexual interaction between an athlete and an individual with evaluative, direct or indirect authority is prohibited. Such relationships involve an imbalance of power and are likely to impair judgment or be exploitative.

Grooming

Grooming involves someone building an emotional connection with an individual to gain their trust for the purposes of abuse or exploitation. The following are examples of grooming behaviors that are prohibited but are not all-inclusive:

- Buying personal gifts for a participant.
- Showing favoritism towards a particular child.
- Using professional position or reputation to manipulate a young person's trust.
- Taking participants on trips, outings or holidays outside of Philadelphia Union Activities.
- Using secrets or intimidation to control children.

Emotional Misconduct

Emotional misconduct in all forms is prohibited. Emotional misconduct is a pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to another person. Non-contact behaviors include verbal acts, physical acts, or acts that deny attention or support; or any act or conduct described as emotional abuse or misconduct under federal or state law (e.g. child abuse, child neglect, etc.). Emotional misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline, or improving athletic performance.

Physical Misconduct

Physical misconduct in all forms is prohibited. Physical misconduct is defined as contact or non-contact conduct that results in, or reasonably threatens to, cause physical harm to another person; or any act or conduct described as physical abuse or misconduct under federal or state law (e.g. child abuse, child neglect, assault, etc.). Physical misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline, or improving athletic performance. For example, hitting and punching are well-regulated forms of contact in combat sports but have no place in soccer.

Bullying

Intentional, persistent and repeated pattern of committing or willfully tolerating physical and non-physical behaviors that are intended, or have the reasonable potential, to cause fear, humiliation or physical harm in an attempt to socially exclude, diminish or isolate the targeted participant, as a condition of membership are prohibited. Bullying does not include group or team behaviors that are meant to establish normative team behaviors or promote team cohesion.

Hazing

Coercing, requiring, forcing, or willfully tolerating any humiliating, unwelcome, or dangerous activity that serves as a condition for joining a group or being socially accepted by a group's members are prohibited. Hazing does not include group or team activities that are meant to establish normative team behaviors or promote team cohesion.

Harassment

Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person's protected status. Protected status includes race, color, age, religion, marital status, sex, ancestry, national origin, citizenship, veteran's status, pregnancy, disability, sexual orientation, protected activity, or any other characteristic protected by federal, state or local law. Harassment on the basis of the protected status of an individual's relatives, friends or associates is also prohibited. Philadelphia Union will not tolerate conduct that interferes with the safety of any child participating in a Philadelphia Union Activity or present in a Philadelphia Union Facility, or that creates an intimidating, hostile, or offensive environment.

Prohibited conduct includes epithets, slurs, negative stereotyping, or intimidating acts based on an individual's protected status and the circulation or posting of written or graphic materials that show hostility toward an individual because of his or her protected status.

Prohibited conduct can also include jokes, kidding, or teasing about another person's protected status. While harassing conduct is unlawful only if it affects tangible job benefits and/or interferes unreasonably with work performance and creates an abusive or hostile work environment, harassing conduct of any kind is forbidden even when it does not rise to the level of a violation of law.

Sexual Harassment

Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, and other verbal, written, or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of the individual's employment.
- Submission to or rejection of such conduct by an individual is used as the basis for an employment decision affecting that individual.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance and creating an intimidating, hostile, or offensive working environment.

Sexual harassment may involve individuals of the same or different gender. It may also occur between individuals of any employment status.

Examples of conduct which may constitute sexual harassment and are prohibited by this Policy include, but are not limited to:

- Unnecessary touching, patting, hugging, pinching, or brushing against a person's body.
- Staring, ogling, leering, or whistling at a person.
- Continued or repeated verbal abuse of a sexual nature.
- Sexually explicit statements, sexual flirtations, advances, propositions, subtle pressure for sexual activity, comments, questions, jokes, or anecdotes.
- Graphic or degrading comments about a person's clothing, body or sexual activity.
- Sexually suggestive objects, cartoons, posters, calendars, or pictures in the workplace.
- Suggestive or obscene letters, notes or invitations.
- Harassing use of electronic mail, electronic or instant messaging, or telephone communication systems.
- Other physical or verbal conduct of a sexual nature.

Philadelphia Union prohibits managers and supervisors from threatening or insinuating, either explicitly or implicitly, that an employee's submission to or rejection of sexual advances will in any way influence any personnel decision regarding that employee's wages, assigned duties, advancement, evaluation, shifts, career development, or any other condition of employment.

Racial, Religious, or National Origin Harassment

Racial, religious, or national origin harassment deserves special mention as well, and is expressly prohibited by Philadelphia Union. Racial, religious, or national origin harassment includes any verbal, written, or physical act in which race, religion, or national origin is used or implied in a manner which would make a reasonable person uncomfortable in the work environment or which would interfere with the person's ability to perform the job. Examples of race, religious or national origin harassment may include, but are not limited to:

- Jokes, which include reference to race, religion, or national origin.
- The display or use of objects or pictures which adversely reflect on a person's race, religion, or

national origin.

- Use of pejorative or demeaning language regarding a person's race, religion, or national origin.

C. LIMITING ONE-ON-ONE INTERACTIONS

The majority of child sexual abuse is perpetrated in isolated, one-on-one situations. By reducing such interactions between children and adults, the risk of child sexual abuse is reduced. Although appropriate physical contact and one-on-one interaction between minor athletes and coaches/trainers, etc. may be conducive to improving physical skills, the Philadelphia Union believes prudent limitations on one-on-one interactions can reduce the potential for abuse and misconduct without negatively impacting player development or unnecessarily limiting one-on-one time with trusted adults that is healthy and valuable for a child. Participating Adults should adhere to the following guidelines related to one-on-one interactions with child athletes and participants. For the avoidance of doubt, for the purposes of these guidelines, a child athlete who reaches the age of majority and obtains a position that involves interacting with children in a supervisory position (e.g., coach or referee) during Philadelphia Union Activities or at a Philadelphia Union Facility is considered a Participating Adult.

1. Establishing Boundaries: Avoiding Gifts

Individuals who groom children will often provide special gifts or privileges, as one strategy to gain the child's trust and fill a need in their life, in advance of sexually abusing the child. Accordingly, Philadelphia Union discourages Participating Adults from giving gifts or granting special privileges to athletes and prohibits any such gift or privilege when not available to the entire team.

2. Appropriate Physical Contact

Philadelphia Union adheres to the following principles and guidelines in regard to physical contact with our child athletes and participants.

Common Criteria for Appropriate Physical Contact

Physical contact with athletes — for safety, consolation and celebration — has multiple criteria in common which makes it both safe and appropriate. These criteria include:

- The physical contact takes place in public
- There is no potential for, or actual, physical or sexual contact during the physical contact
- The physical contact is for the benefit of the athlete, not to meet an emotional or other need of an adult

Safety

The safety of the children participating in Philadelphia Union Activities is paramount, and in many instances, Participating Adults make the athletic space safer through appropriate physical contact. Examples include:

- Spotting an athlete so that they will not be injured by a fall or piece of equipment.

- Positioning a child’s body so that they more quickly acquire an athletic skill, get a better sense of where their body is in space, or improve their balance and coordination.
- Making children aware that they might be in harm’s way because of other children practicing around them or because of equipment in use.

Celebration

Sports are physical by definition and Philadelphia Union recognizes that children often express their joy of participation, competition, achievement and victory through physical acts. Philadelphia Union encourages these public expressions of celebration, which include:

- Greeting gestures such as high-fives, fist bumps, and brief “side hugs.”
- Congratulatory gestures such as celebratory hugs, “jump-arounds” and pats on the back for any form of athletic or personal accomplishment.

Consolation

It may be appropriate to console an emotionally distressed child (e.g., a child who has been injured or has just lost a competition). Appropriate consolation includes publicly:

- Embracing a crying child (in a public place or circumstance).
- Putting an arm around a child while verbally engaging them in an effort to calm them down (“side hugs”).
- Lifting a fallen child off the playing surface and “dusting them off” to encourage them to continue competition.

Supervision Generally

No child should be left alone at a training session or at any other time until they are picked up by their parent, older sibling, or other designated adult. It is recommended that the last adult in addition to the coach or athletic trainer wait at the site until the child is picked up.

3. One-on-One Interactions/Individual Meetings

An individual meeting may be necessary to address a child’s concerns, training program, or competition schedule. Under these circumstances, Participating Adults are to observe the following guidelines when dealing with children:

Interactions Should Be Observable and Interruptible

One-on-one interactions between a child and an adult (who is not the child’s legal guardian) are permitted if they occur at an observable and interruptible distance by another adult and the Participating Adult completes and submits a post-action verification report to the Safeguarding Lead. Isolated, one-on-one interactions between a child and an adult (who is not the minor’s legal guardian) are prohibited, except under emergency circumstances.

Interactions are Monitored

When one-on-one interactions between a Participating Adult and a child occurs at a Philadelphia Union Facility, a second Participating Adult will monitor these interactions. Monitoring includes knowing that the one-on-one interaction is occurring, the approximate planned duration of the interaction, and randomly dropping in on the one-on-one.

Meetings

- Meetings between a Participating Adult and a child at a Philadelphia Union Facility may only occur if another adult is present, except under emergency circumstances. Such meetings must occur where interactions can be easily observed and at an interruptible distance from another adult.
- If a one-on-one meeting takes place in an office, the door to the office must remain unlocked and open. If available, it will occur in an office that (if available) has windows, with the windows, blinds, and/or curtains remaining open during the meeting.
- If a mental health care professional meets with a child at a Philadelphia Union Facility, a closed-door meeting may be permitted to protect patient privacy; provided that (1) the door remains unlocked, (2) another adult is present at such Philadelphia Union Facility, (3) the other adult is advised that a closed-door meeting is occurring, and (4) the mental health care professional obtains written consent from the child's legal guardian and provides a copy to Philadelphia Union.

Individual Training Sessions

An individual training session with a child (meaning not a team training, but training involving one child and one coach) may be necessary in order to further player development. Under these circumstances, the individual training session should be open and observable by others. Additionally, parent/guardian permission is required in advance of the individual training session(s). Parents, guardians and other caretakers are encouraged to attend and must be allowed to observe individual training sessions. Permission for individual training sessions must be obtained at least every six months.

Out-of-Program Contacts

Participating Adults are prohibited from interacting one-on-one with unrelated children in private settings outside of Philadelphia Union Activities (e.g., interaction with a child at a Participating Adult's home or individual transportation), unless parent/legal guardian consent is provided for each out-of-program contact. These arrangements are nonetheless strongly discouraged.

4. Massage and Other Athletic Training Interactions

- Any massage or other athletic training therapy or modality must be provided by a non-coach licensed athletic trainer or other certified professional. Such activities should never be done with only the child and adult in the room. Where possible without compromising an athlete's privacy, such activities should be performed in open/public areas (e.g., but not limited to, in a training room but not behind a screen) and in any

event should be in an interruptible location.

- Even if a coach is a licensed professional provider, the coach shall not perform a massage or athletic training therapy or modality on a child under any circumstances.
- Icing and taping, though not limited to certified professionals, should, where possible without compromising an athlete's privacy, be performed in open/public areas (e.g., on the bench; in locker room with others present).
- ***Icing and taping near the intimate areas of the body (i.e., "bathing suit areas") is not permitted*** by a non-licensed medical professional and in any event cannot be done with only the child and professional alone in a room.

5. Electronic Communications / Social Media

Electronic communications are an ever-changing aspect of the way we communicate today. The specific rules below may reference certain forms of electronic communication and the specific application of principles may change with regard to a given application, platform or method of communication. Regardless of the means, the following principles apply across all manner of electronic communication and should be used to guide behavior when communicating with children:

- **Content Must be Professional in Nature:** All electronic communications between a Participating Adult and a child must be professional in nature (i.e., soccer-related) and for the purpose of communicating information about team activities or team-oriented communication (i.e., motivation, instruction).
 - Communication or conversation regarding illegal or age inappropriate topics (drugs, alcohol use, sexually explicit language or imagery, or discussion of adult personal life, social activities, relationship or family issues) is not permitted.
 - All communications must comply with the Prohibited Conduct Policy.
 - Philadelphia Union actively monitors relevant social media posts and reserves the right to require the removal of posts that violate our policies and practices for appropriate behavior and/or to notify the applicable legal guardian of prohibited posts by any child.
- **Communications Must be Open and Transparent:** The content of any electronic communication should generally be group-based and should always be readily available to share with the child's family, the applicable club or team, and Philadelphia Union.
 - Administrators, coaches, staff and/or volunteers may not use SnapChat (or any similar application that automatically deletes the content of a communication) to communicate with children.
 - If a Participating Adult needs to communicate directly with a child via electronic communications, a second Participating Adult or the child's legal guardian must be copied.

- A Participating Adult communicating electronically to the entire team will copy a second Participating Adult.
- Consider using group-focused platforms under team administrative control (e.g., Teamworks and Kairos).
- **Keep Imagery Public:** In posting imagery, Participating Adults are expected to be sensitive to the status of children. This means any imagery posted to a team website or social media should be soccer-related, not private (e.g., taken in public view), and age appropriate.
 - Under no circumstances should imagery depict any conduct that would violate this Policy.
 - Requests of parents/guardians of children to remove imagery in which their child is recognizable and individually featured will be honored to the extent practicable.

Prohibited Electronic Communications - Direct Messaging

- Participating Adults are not permitted:
 - to communicate privately via electronic communications with children, except under emergency circumstances.
 - to “private message,” “instant message,” “direct message,” or send photos to a child privately, regardless of what platform is used.
 - to maintain social media connections with child athletes and participants; such members are not permitted to accept new personal page requests on social media platforms from child athletes and participants and existing social media connections with child athletes and participants shall be discontinued. Instead, children and parents can “friend” the official organization’s team page and a Participating Adult can communicate to athletes through the site or through similar group-focused methods of communication.
- Children and a Participating Adult may use email to communicate, provided that:
 - the Participating Adult is using only his or Philadelphia Union-issued email account (i.e., @philadelphiaunion.com);
 - all email content between such Participating Adult and child otherwise complies with this Policy;
 - when communicating with a child through email, another Participating Adult or parent must be copied.

Requests to Discontinue

Legal guardians may request in writing that their child not be contacted through electronic communication by Philadelphia Union or by a Participating Adult. Participating Adults shall abide by any such request by a legal guardian that their child not be contacted via electronic communication, absent emergency circumstances.

Social Media (including Texting, WhatsApp, GroupMe and Similar Applications)

- **Keep personal pages personal.** Participating Adults may not invite or allow children to join a personal social media page unless they are directly related to that child and have the permission of the child’s parent/guardian. Children should be reminded that initiating a “friend” request with a Participating Adult is not permitted.
 - Participating Adults are encouraged to set their social media pages to private settings.
 - Similarly, those who work with children are reminded that they set an example for the children. If a page is not private, Philadelphia Union expects Participating Adults to refrain from posting inappropriate, off-color content or content that would violate the Prohibited Conduct Policy or otherwise commenting on posts that would violate the Prohibited Conduct Policy.
- **Choose applications that support group-based communication.** Applications such as TeamWorks and Kairos often provide a helpful way to communicate, but again, individual messages should be avoided.
- **Respect reasonable “soccer” hours:** Real-time electronic communications (e.g., texting via SMS, applications, etc.) between Participating Adults and children on a group basis is generally allowed between *8 am - 9 pm*, unless there is a specific safety- or soccer-related need to communicate.

6. Locker Rooms/Changing Areas

Children are particularly vulnerable in locker rooms and changing areas due to various stages of dress/undress and because athletes are less supervised than at many other times. The risk of athlete-to-athlete problems, such as child sexual abuse and bullying, harassment, and hazing, is present when coaches or staff members are not monitoring athletes. This is especially true in locker rooms. Adherence to a locker room and changing areas policy enhances privacy and reduces the likelihood of misconduct.

The following guidelines are designed to maintain personal privacy as well as to reduce the risk of misconduct in locker rooms and changing areas.

Use of Cell Phones and Other Mobile Recording Devices is Prohibited

Cell phones and other mobile devices with recording capabilities, including voice recording, still cameras and video cameras increase the risk for different forms of misconduct in locker rooms and changing areas. As a result, use of a device’s recording capabilities in the locker rooms, rest rooms, changing areas or similar spaces is prohibited.

Undress

Under no circumstances shall an unrelated adult at a Philadelphia Union Facility be undressed (disrobed or partial or full nudity where private body parts are exposed) in front of children.

Isolated One-on-One Interactions/Monitoring

- At no time are unrelated adults permitted to be alone with a child in a locker room,

restroom, or changing area at a Philadelphia Union Facility, except under emergency circumstances.

- If a Philadelphia Union Activity takes place at a facility that has, or a Philadelphia Union Facility only has, access to a single locker room, restroom, or changing area, times will be designated for use by each respective group (e.g., adults, children, etc.)
- Locker rooms, rest rooms, and changing areas at Philadelphia Union Facilities or during a Philadelphia Union Activity should be regularly and randomly monitored to ensure compliance with these policies.
- Participating Adults will make every effort to recognize when a child goes to the locker room or changing area during practice and competition and, if they do not return in a timely fashion, will check on the child's whereabouts.
- Philadelphia Union discourages parents from entering locker rooms and changing areas unless it is truly necessary. In those instances, it should only be a same-sex parent. If this is necessary, parents should let a coach or administrator know about this in advance.

Non-Exclusive Facility

If Philadelphia Union uses a facility for a Philadelphia Union Activity other than a Philadelphia Union Facility (e.g., for training, competition or similar events) and the facility is used by parties other than Philadelphia Union, Participating Adults are nonetheless required to adhere to the rules set forth in this Policy.

7. Local Travel

Local travel consists of travel to training, practice, and competition that does not include coordinated overnight stay(s).

Transportation

- Philadelphia Union generally does not arrange for local travel for individual players from home to training/practice/competition.
- Participating Adults who are not also acting as a legal guardian, shall not ride in a vehicle alone with an unrelated child athlete or participant, absent emergency circumstances, and may only drive with at least two other child athletes or participants or another adult at all times, unless otherwise agreed to in writing by the child's parent/legal guardian in advance of each local travel.
- In any case where a Participating Adult is involved in a child athlete's or participant's local travel, a release from the child's parent or legal guardian is required in advance. Parents/legal guardians are advised to consult the Safesport Center's Parental Toolkit, available at <https://www.usef.org/forms-pubs/9gSPTAMFn2g/parent-complete-toolkit>, concerning child abuse prevention before providing consent for their minor to travel alone with an unrelated adult.

Shared or Carpool Travel Arrangement

Philadelphia Union encourages parents/legal guardians to pick up their own children first and drop off their own children last in any shared or carpool travel arrangement.

8. Team Travel/Overnight Stays

Team travel is travel that requires overnight stays away from home and occurs when Philadelphia Union sponsors, coordinates, or arranges for travel so that teams can compete locally, regionally, nationally, or internationally. Because of the greater distances, coaches, staff, volunteers, and chaperones will often travel with the athletes.

Participating Adult Requirements

Participating Adults who travel with a team (whether coach, trainer, referee, staff member, or volunteer/parent) must successfully pass a criminal background check and other screening requirements consistent with U.S. Soccer's screening policies and complete the Core SafeSport Training.

Travel to Competition

When only one Participating Adult and one minor athlete travel to a competition, (including, but not limited to, youth referees) the minor athlete must provide evidence of his/her legal guardian's written permission in advance, and for each competition, before traveling alone with the Participating Adult.

Travel Arrangements

For team travel, hotels and air travel will be booked in advance by Philadelphia Union. Athletes typically will share rooms, with 2-4 athletes assigned per room depending on accommodations. Philadelphia Union will also notify hotel management if any special arrangements are warranted. For instance, depending on the ages in travel parties, Philadelphia Union may ask hotels to block pay per view channels or clear mini-bar areas. Depending on the size of the group, Philadelphia Union may also request an additional large room or suite so that Participating Adults and athletes may socialize as a group. Meetings do not occur in individual hotel rooms, and Philadelphia Union will reserve a separate space for adults and athletes to socialize and/or to support appropriate athletic training appointments.

Hotel Rooms

Adults shall not share a hotel room or other sleeping arrangement with a child (unless the Participating Adult is the legal guardian, sibling, or is otherwise related to the child). In addition, no adult should enter the hotel room or other sleeping arrangement with a child unless necessary for the safety of the child (e.g., in the event of emergency). Team meetings should never be conducted in a hotel room used for sleeping.

Meetings/Supervision

- Meetings will be conducted consistent with Philadelphia Union's policy for one-on-one interactions — i.e., any such meeting shall be observable and interruptible.

- Meetings may not be conducted in a hotel room used for sleeping.
- During team travel, when doing room checks, attending team meetings, and/or other activities, two adults should be present at all times and observable and interruptible environments should be maintained.

Mixed-Gender and Mixed-Age Travel

Children may only share a room with other children of the same age group (e.g., minors with minors, adults with adults). Children will also be further grouped by age (and gender, if applicable) for the purposes of assigning an appropriate chaperone. We will make every effort to provide these groups at least one chaperone of the same gender.

Regardless of gender or age, Participating Adults shall not share a hotel room or other sleeping arrangement with a child (unless the Participating Adult is the parent, guardian, or sibling, of that particular athlete).

Coach and Staff Responsibilities

During team travel, coaches and staff members will help athletes, fellow coaches and staff members adhere to policy guidelines in this Policy.

When not practicing, training, competing, or preparing for competition, coaches and staff will monitor the safety and activities of athletes, fellow coaches and staff during team travel.

Coaches and other Participating Adults will:

- Prepare athletes for team travel and make athletes aware of all expectations. Supplemental information will be given to parents/guardians of children who are considered inexperienced travelers, new or relatively new to team travel, or who are under the age of 14 to familiarize themselves with all travel itineraries and schedules before the initiation of team travel.
- Conform, and monitor for others' adherence, to all policies during team travel.
- Encourage children to participate in regular, at least daily, scheduled communications with their parents/guardians.
- Ensure children are not alone in a hotel room with any adult apart from a family member.
- Immediately report any concerns about physical or sexual abuse, misconduct, or violations of this Policy to Philadelphia Union and the appropriate authorities.

D. PHILADELPHIA UNION REPORTING PROCEDURES

What Types of Concerns and Incidents Need to be Raised?

There are a broad range of concerns that should be raised with and/or reported to the appropriate internal and/or external authorities. These concerns typically fall into one of the following categories:

- Behavior of an adult towards a child.
- Behavior of a young person towards other children (including bullying by peers).
- Risks identified in the Philadelphia Union’s Employee Handbook.
- Allegations of child abuse or mistreatment.
- Concerns about harm to a child that have taken place *outside* of a Philadelphia Union Activity (e.g. at home or school) but identified *within* a Philadelphia Union Activity.
- Behavior that is considered Prohibited Conduct.

There are two distinct paths for such concerns – those requiring external reporting (see Section E) and those which are managed through internal Philadelphia Union procedures.

Raising Concerns and Reporting Incidents

All Covered Persons are required to comply with this Policy and keep safe all children who are participating in Philadelphia Union Activities or present in Philadelphia Union Facilities. Certain types of concerns require a report to be made to an external authority, such as when there is suspicion or knowledge of child abuse or mistreatment, immediate risk of harm, a serious injury, or when there is knowledge of criminal activity. Any concerns that are reported to an external authority should also be reported to Philadelphia Union, preferably before, but in any event promptly following, the external report. Other concerns may not reach the threshold for the involvement of an external authority. However, these types of concerns also need to be reported to Safeguarding Lead. Please note, any such report may be made anonymously.

If there is a reasonable suspicion or direct knowledge of child abuse or mistreatment, immediate risk of harm, a serious injury, or that a criminal offense may have been committed, then the police, child protective services and/or other emergency services must be informed as soon as possible.

Covered Persons have a duty to report this to the appropriate authorities as set forth in Section E. Additionally, Covered Persons must also promptly report these concerns to their supervisor and the Safeguarding Lead. Alternatively, the employee may directly contact the Safeguarding Lead, Human Resources, or Legal (see Philadelphia Union Key Contacts below). If an employee reports a complaint to any supervisor, that supervisor must immediately (i.e., no later than 24 hours) report the conduct to the Safeguarding Lead, Human Resources or Legal.

After Philadelphia Union has reviewed the report internally, the Safeguarding Lead may request that you submit an Incident Report using the Philadelphia Union’s online portal, available at <https://www.philadelphiaunion.com/safeguard>, to properly document the concern.

If there is uncertainty in the need to report a concern, all Covered Persons are encouraged to contact the Safeguarding Lead, Human Resources and/or Legal to explore further. The Safeguarding Lead is available to consult on any concerns and to provide support if formal procedures are necessary when an incident requires the involvement of external authorities. When there is uncertainty over whether an incident meets the threshold requiring a report of such incident to external authorities, the Safeguarding Lead will consult with Legal (and/or outside counsel if appropriate) to determine whether a report to an outside authority is required by law.

More frequently there may be low-level incidents that occur that do not reach the threshold for a report to outside authorities but remain important to report to Safeguarding Lead for additional support. The Safeguarding Lead is available for consultation and the provision of resources related to the well-being of children.

All information shared with Philadelphia Union will be treated with utmost sensitivity. All reported concerns will be kept confidential to the extent practicable, except when specific disclosures are required by law. Depending on the concern, relevant Philadelphia Union departments may need to be involved in a coordinated response, including Soccer Operations, Communications, Legal and Human Resources.

Any concern that is reported to Philadelphia Union will be handled as set forth below:

- Concern comes in to Safeguarding Lead via email, phone, in person, or any other method of communication.
- Report is reviewed, including, if not already reported to an external authority, consideration of whether reporting such concern to an external authority is required by law. Covered Persons are required to report to the SafeSport Center actual or suspected sexual misconduct and any other misconduct that is reasonably related to an underlying allegation of sexual misconduct.
- After internal review, the Safeguarding Lead may request that the individual reporting the concern submit an Incident Report using the Philadelphia Union's online portal, available at philadelphiaunion.com/safeguard, to properly document the concern.
- Next steps will be determined based on the concern. This could include internal investigation, external investigation, and/or advisory conversations.
- An action plan for responding to the concern is created in collaboration with relevant departments.

Protection Against Retaliation

Unlawful retaliation can be any action that would discourage a worker or participant from coming forward to make or support a concern. Philadelphia Union prohibits any form of retaliation, including harassment, or any adverse employment consequence, as a result of making a good faith report or cooperation in an investigation pursuant to this Policy.

Key Contact Information

Any concerns relating to the safety and well-being of any individual participating in a Philadelphia Union Activity or taking place at a Philadelphia Union Facility must be directed to any of the Philadelphia Union contacts listed below and any external agencies, as necessary and required by law, which may include local law enforcement, the FBI, or local child protective services. When Prohibited Conduct is involved, additional reports may be required to be made to the MLS Next's Player Development LLC hotline, US Soccer Integrity hotline and U.S. Center for Safe Sport hotline. All Covered Persons are encouraged to consult Philadelphia Union when making such a report. However, Covered Persons are not required to consult with Philadelphia Union and if an individual feels uncomfortable doing so, they may report such concern directly to the appropriate hotline.

If, at any time, Covered Persons are uncomfortable reporting any such concern to their supervisor or

Safeguarding Lead, such individual may instead report such concern to their department head, Human Resources, Legal, or the Sporting Director, President, COO, or any other executive officer of Philadelphia Union.

Philadelphia Union Key Contacts

Safeguarding Lead: Sheldon Phillips, Director of Player Safeguarding and Welfare
sphillips@philadelphiaunion.com

Incident Report Portal: <https://www.philadelphiaunion.com/safeguard>

Human Resources: Ashlee Maunz, Senior Director of Human Resources
amaunz@philadelphiaunion.com

Legal: Carlos Montoya, SVP & General Counsel
cmontoya@philadelphiaunion.com

External Key Contacts

National Child Abuse ChildHelp Hotline: 1-800-4-A-Child

FBI: 1-800-CALLFBI

US Soccer Integrity Hotline: (312) 528-7004

U.S. Center for SafeSport (report child abuse or any sexual misconduct): 720-531-0340

MLS Next's Player Development LLC Hotline: 646-682-5200; SafeSport@mlsplayerdevelopment.com

E. MANDATED REPORTING FOR CHILD ABUSE

Philadelphia Union expects all Covered Persons to report concerns related to the abuse or mistreatment of a child to the appropriate local and legal authorities immediately. In addition, it is Philadelphia Union's preference that Covered Persons inform their supervisor and the Safeguarding Lead of any such concerns, but Covered Persons are under no obligation to do so and any such reports may be made anonymously.

Philadelphia Union's preferred method of being informed of a concern under this Policy is by submitting an Incident Report using the Philadelphia Union's online portal, available at <https://www.philadelphiaunion.com/safeguard>, but a concern may be reported through any other appropriate means, including in person, by phone, or by email. Consultation is always advised, however in urgent situations when the Safeguarding Lead cannot be reached, immediate contact to external agencies is required. If the agency is unknown, contact Child Protective Services in the local jurisdiction.

Additionally, there is a legal requirement known as "mandated reporting," which creates an obligation for Covered Persons to report suspected child abuse and mistreatment to the appropriate authorities. Both federal and state laws define who falls under the category of "mandated reporters."

Federal Mandated Reporting

With the passage of the federal Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017 (“Safe Sport Act”), all adults with regular contact with minors are mandated reporters and have an obligation to report suspected child abuse to the local law enforcement agency or child protective services agency that has jurisdiction to investigate reports of child abuse or to protect child abuse victims or to the FBI within 24 hours of becoming aware of such information. Failure to do so could result in criminal penalties.

State-Specific Mandated Reporting

While the federal law supersedes state law where applicable, each state additionally defines their own laws around mandated reporting to potentially expand which individuals fall under the category of ‘mandated reporter’. As Philadelphia Union operates in multiple states in the greater Philadelphia metropolitan area, Covered Persons are responsible for becoming familiar with the state specific mandated reporter information relevant to where Philadelphia Union Activities take place.

Delaware: Delaware’s mandatory reporting law requires any person, agency, organization or entity to make an immediate oral report to the Department of Services for Children, Youth and Their Families, Division of Family Services, when they know of, or suspect, child abuse or neglect. Therefore, Covered Persons at a Philadelphia Union Activity in Delaware fall under the mandatory reporting category.

New Jersey: New Jersey’s mandated reporting law classifies “any person having reasonable cause to believe that a child has been subjected to child abuse or acts of child abuse” as a mandated reporter, therefore Covered Persons at a Philadelphia Union Activity in New Jersey fall under the mandatory reporting category.

Pennsylvania: Pennsylvania law requires adults identified as Mandatory Reporters shall make a report of suspected child abuse if the person has reasonable cause to suspect that a child is a victim of child abuse. For more information, please visit <https://www.compass.state.pa.us/CWIS/Public/ReferralsLearnMore>.

Mandated Reporting Hotlines

Delaware Child Abuse and Neglect Reporting Hotline: 1-800-292-9582

Pennsylvania Child Abuse Hotline, ChildLine: 1-800-932-0313

New Jersey Child Abuse Hotline: 1-877-NJ

F. EDUCATION, TRAINING AND CERTIFICATION

To ensure Covered Persons have the tools and support needed to provide a safe, positive environment across all Philadelphia Union Activities and at Philadelphia Union Facilities, prior to participating in any Philadelphia Union Activity that requires working with any children, Covered Persons will be required to complete training concerning child abuse prevention. Covered Persons required to undergo these trainings include:

- Philadelphia Union employees who will have regular contact with children
- Philadelphia Union team coaches; technical staff and administrators; ATCs, sport scientists,

physicians, massage therapists, or other medical personnel/Qualified Medical Personnel (QMPs)

- Contractors and vendors with access to children (e.g., security, other medical personnel not employed directly by Club)
- YSC Academy faculty, staff, and administrators
- Chaperones, volunteers, and individuals who have access to children

These Covered Persons will be required to complete the U.S. Center for SafeSport's Core SafeSport Training or other similar training as determined by Philadelphia Union and must participate in refresher courses on an annual basis. Philadelphia Union offers such training to Covered Persons under the age of 18 whose parent or legal guardian has consented to the minor receiving the training.

In addition to maintaining up-to-date SafeSport certification and undergoing background checks (see Section G. below), these Covered Persons must comply with applicable clearances and other requirements under state and federal law.

G. BACKGROUND CHECKS

Any Covered Person who is also an employee of Philadelphia Union or any of its affiliates is required to undergo background checks as a condition of employment.

Any Adult Participant who is not an employee of Philadelphia Union or any of its affiliates, but who Philadelphia Union authorizes to have contact with minors is required to undergo a background screening. These Adult Participants may include, but are not limited to, contractors and vendors with access to Minors (e.g., security, other medical personnel not employed directly by Philadelphia Union). Scouts who wish to have access to child athletes, chaperones, volunteers, and individuals advising with respect to various aspects of team functions who have access to child athletes must also submit to background check requirements.

All Covered Persons have a mandatory self-disclosure obligation of information germane to their ability to qualify for working with minors, which means that if at any point during their association with Philadelphia Union a Covered Person has been disqualified or declared by another sport organization or league to be temporarily or permanently ineligible, the Covered Person is required to self-disclose this information immediately. Failure to disclose is a basis for discipline/disqualification.

Philadelphia Union contracts with a third-party vendor to conduct a robust background check on all Covered Persons. These background checks will include checks and/or reviews of:

- All available state sex offender registries.
- The Department of Justice Sex Offender Registry
- Individual's Social Security number and address.
- Available federal sanctions and government watch list databases.
- County criminal records by county
- The Center's Centralized Disciplinary Database.

H. DRUGS AND ALCOHOL

Covered Persons may not (1) use drugs or alcohol in the presence of minors or be under the influence of

alcohol or drugs while performing any coaching/staff duties (this applies 24/7 throughout a camp or travel trip); (2) provide alcohol to a person under the legal drinking age; or (3) provide illegal drugs or non-prescribed medications to another person.

I. POLICY ENFORCEMENT

Any Covered Person who is also an employee of Philadelphia Union or any of its affiliates that breaches any policy or procedure set forth in this Policy may be subject to discipline, up to and including termination of employment. All alleged violations of this Policy will be subject to an appropriate grievance process that will be free of bias and conflicts of interest. Any individual who is being investigated for a potential violation will have fair notice and an opportunity to be heard prior to any final determination. Where such breaches reach criminal threshold, external referrals will be made to local and relevant authorities as required by law.

APPENDIX A

MLS Next Safety and Wellbeing Policy

See attached.