



FNATIC:
GLOBAL
SAFEGUARDING
POLICIES

INTRODUCTION

OUR RESPONSIBILITIES

The Fnatic Group (**Fnatic**) connects or engages with children, young people and adults at risk on a regular basis. We talk with them online, through social media and community platforms; they are under our care when physically present at events that we attend (like gaming events, tournaments and bootcamps, and activities taking place at team accommodation); and, as we increase our digital product range, they share their data with us.

We have a responsibility to promote the welfare of all children, young people and adults at risk that we engage with and care for. We must keep them safe and operate in a way that protects them. We are responsible for, and are committing to, safeguarding at any time and any place.

The welfare of children, young people and adults at risk is paramount to Fnatic, and to the esports ecosystem as a whole. We will lead esports in the standard of care and risk management for children, young people and adults at risk who interact with us.

WHAT IS SAFEGUARDING?

Safeguarding is an umbrella term which refers to the process of ensuring the health and wellbeing of children, young people and adults at risk. In this regard, safeguarding forms part of Fnatic's commitment to further performance in esports.

WE HELP TO ENSURE HEALTH AND WELLBEING BY:

- encouraging those under our care to be mindful of their physical and mental health - for example, by eating healthy foods, maintaining a work-life balance, sleeping a sufficient number of hours, and maintaining healthy relationships

- preventing harm to children's health or development
- taking action to enable children, young people and adults at risk to have the best outcomes in a safe and effective environment

Our focus on safeguarding does not mean a ban on tough conversations. It does not mean that we should tolerate indiscipline or, within the esports context specifically, poor performance by pro gamers who are children, young people or adults at risk. What it means is that we will actively differentiate between, on the one hand, the stresses which all elite athletes face in pursuing greatness and, on the other, acts of neglect, emotional abuse, physical abuse and sexual abuse towards people under our care.

WHAT IS A CHILD / ADULT AT RISK?

Fnatic considers any person under 18 years of age to be a **child**.

An **adult at risk** is any person who is:

- aged 18 years or over and
- at risk of abuse or neglect because of their needs for care and support

THIS DOCUMENT

OUR RESPONSIBILITIES

This document comprises Fnatic's Children and Young People Safeguarding Policy and Fnatic's Adults at Risk Safeguarding Policy (together the **Policies**).

THE FUNCTION OF THESE POLICIES IS TO:

- outline safeguarding risks facing children, young people and adults at risk
- state Fnatic's approach in relation to safeguarding
- assign responsibility for safeguarding processes within Fnatic
- assist in the proactive management of safeguarding risks
- guide and protect Fnatic's staff and contractors if a safeguarding incident occurs

THIS DOCUMENT IS ARRANGED IN FIVE PARTS:

A | CHILDREN AND YOUNG PEOPLE

Outlines the safeguarding risks facing children and young people

B | ADULTS AT RISK

Outlines the safeguarding risks facing vulnerable adults

C | CORE SAFEGUARDING PROTECTION TEAM

States the individuals with specific responsibilities for safeguarding at Fnatic

D | CODE OF CONDUCT STATEMENT

Sets out Fnatic's Safeguarding Code of Conduct (the **Code**), to which each member of Fnatic's Core Safeguarding Team must commit annually

E | DEALING WITH A SAFEGUARDING ISSUE

Guidance on how Fnatic will respond to a safeguarding complaint

CONFIDENTIALITY

Fnatic will ensure that every effort is made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a **need to know** basis only, which would not normally include anyone other than the following:

- the Internal Advisory Board and, where applicable, the External Advisory Board (both detailed below)
- the child, young person or adult at risk or the person raising the concern
- the member of the Fnatic team who received the concern or disclosure
- the parents/guardians of the child, young person or adult at risk who is alleged to have been abused, where appropriate and where we are permitted to do so
- external bodies with a duty of care to children, young people or adults at risk, such as the police

Members of the Fnatic team may have access to confidential information about children, young people or adults at risk in order to undertake their responsibilities. In some circumstances, members of the Fnatic team may be given highly sensitive or private information.

Fnatic team members must never use confidential or personal information about a child, young person or adult at risk or their family for their own or others' advantage. Confidential information about a child, young person or adult at risk will never be used casually in conversation, or shared with any person other than on a need to know basis. In circumstances where the adult at risk, or young person's identity does not need to be disclosed, the information will be handled anonymously.

There are some circumstances in which a Fnatic team member may be expected to share information with other Fnatic team members about a child, young person or adult at risk - for example, when abuse is alleged or suspected. In such cases, the relevant Fnatic team members have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

Fnatic team members will aim to obtain consent from children, young people or adults at risk to share information, but will be mindful of situations where doing so may place the child, young person or adult at risk at increased risk of harm. Information can be shared without consent if the Core Safeguarding Team believes that there is good reason to do so, and that sharing information will enhance the

safeguarding of children, young people and adults at risk in a timely manner.

THIS POLICY VS THE FNATIC HANDBOOK

Incidents involving discrimination, harassment and violence fall within this Policy only where the incident involves a child, young person or adult at risk. All other such incidents of discrimination etc should be referred to and be resolved by reference to the Fnatic Handbook.

Information arising from or relating to safeguarding matters should be stored by reference to Fnatic's privacy and data retention policies, which are also available in the Fnatic Handbook.

THE FNATIC SAFEGUARDING PLEDGE | OUR COMMITMENT

Our responsibility to children, young people and adults at risk is captured in a five point, safeguarding pledge.

As an organisation, Fnatic is committed to uphold the pledge, and encourage other sports and esports organisations to do the same.



RIGHTS

We act with due consideration towards the rights of children and adults at risk who interact with Fnatic (and their parents and guardians).



RESPONSIBILITY

We accept our responsibility to safeguard children and adults at risk who interact with Fnatic. We will promote and protect their rights and well-being.



RESPECT

We create an atmosphere of respect for self and others. This includes supporting those under our care to be mindful of their physical and mental health - for example, by eating healthy foods, maintaining a work-life balance, sleeping a sufficient number of hours, and maintaining healthy relationships.



REPORTING

We encourage reporting of safeguarding concerns. We will take reports seriously. We will respond sensitively and proactively to the reports we receive.



RISKS

We will understand and address risk presented in those digital and physical environments which we can influence and control - especially those risks which have the potential to cause harm to the health or development of children and adults at risk.

A | CHILDREN AND YOUNG PEOPLE

There are four main types of abuse from which a child or young person may suffer, and that we must look out for: neglect; physical abuse; emotional abuse; and sexual abuse.

A child or young person may also be suffering from:

- bullying and cyberbullying
- criminal exploitation and gangs
- domestic abuse
- female genital mutilation
- grooming
- online abuse
- extremism
- discriminatory abuse
- hazing
- peer-on-peer abuse
- child criminal exploitation
- poor practice

IDENTIFYING POOR PRACTICE

Poor practice is behaviour that falls short of abuse but is nevertheless unacceptable. Incidents of poor practice occur when children, young people and adults at risk are not afforded the necessary priority, comprising their welfare.

For instance, this could be:

- the allowance of abuse or concerning practices to go unreported
- placing children, young people and adults at risk in potentially compromising and uncomfortable situations
- ignoring health and safety guidelines
- failing to ensure safety of children, young people or adults at risk
- giving continued and unnecessary preferential treatment to individuals

CHILDREN: TYPES OF ABUSE

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological and emotional needs, where such failure is likely to result in the serious impairment of the child's health or development. Physical signs of neglect may include constant hunger, weight loss, being constantly dirty or 'smelly'. A child suffering from neglect may also change their behaviour - they may complain of being tired all the time, fail to attend work/obligations and have few friends.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause negative effects on the child's health and emotional development. This could involve telling the child that they are worthless or inadequate; bullying or threatening them; ignoring them completely; or encouraging them to develop behaviours that are self-destructive.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Emotional abuse can be difficult to measure as there are often no outward physical signs. However, children who are being, or have been, emotionally abused might seem unconfident or lack self-assurance, struggle to control their emotions, have difficulty making or maintaining relationships and may act in a way that is inappropriate for their age.

Sexual abuse*In general*

Sexual abuse is the forcing or enticing of a child to take part in sexual activities. This may also include non-contact activities, such as: encouraging children to behave in sexually inappropriate ways; involving children in looking at, or in the production of, sexual images; and grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

B | ADULTS AT RISK

INTRODUCTION

Fnatic recognises that both adults and children can be at risk of a safeguarding issue. An adult at risk is any person aged over 18 and at risk of abuse or neglect due to either personal characteristics or circumstances. Personal characteristics may include (but are not limited to) age, disability, special educational needs, illness, mental or physical impairment/ disturbance of the functioning of the mind or brain. Life circumstances may include (but are not limited to) isolation, socio-economic factors and living conditions.

Safeguarding adults can be complex. Adults have a right to self-determination and may choose not to act to protect themselves. Safeguarding adults means creating a culture that informs the adult and consults them on all decisions affecting them and works in partnership with them.

Occasionally, consulting with the adult at risk may not be possible or safe. If in doubt, seek advice from

safeguarding@fnatic.com.

An adult at risk may also be suffering from:

- discriminatory abuse
- organisational abuse
- modern slavery
- county lines (gang involvement)
- grooming
- radicalisation
- hazing
- peer-on-peer abuse
- poor practice

ADULTS AT RISK: TYPES OF ABUSE

Physical abuse

Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/ or that may harm them or application of inappropriate restraint measures.

Sexual abuse

Adults with care and support needs can consent to sexual activity but can still be abused. This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts or indecent exposure.

Emotional abuse

Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Neglect

Ongoing failure to meet the basic needs of an Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks.

Financial or material abuse

Including theft, fraud, internet scamming or coercion in relation to an adult's financial affairs or arrangements.

Self-neglect

Not looking after own personal hygiene, health or surroundings or hoarding.

C | CORE SAFEGUARDING PROTECTION TEAM

KEY PERSONNEL

Fnatic's core safeguarding protection team (the **Core Safeguarding Team**) comprises:

Group	Members	Disclosure and Barring Service (DBS) Checked?
External Advisory Board (the EAB)	Lucien Boyer, Chairman Sam Mathews, CEO & Founder	No
Internal Advisory Board (the IAB)	Nicola Packer, General Counsel (IAB Chair) Brad Richards, Director, People & Culture (IAB Deputy) Patrik Sattermon, CGO	Yes
Lead Safeguarding Officer (the LSO)	Stuart Brown, Esports Operation Lead	Yes
National Safeguarding Officers (the NSOs)	UK/ other territories: Stuart Brown Germany: Javier Zafra de Jaudenes Japan, Australia: Jayden Saunders Malaysia: Paolo Bago Serbia: Marija Vukcevic	Where UK based / local equivalent available
Team Directors (the TDs)	Colin Johnson (FIFA / Valorant) Javier Zafra de Jaudenes (League of Legends) Andreas Samuelsson (CS:GO) Jayden Saunders (Rainbow 6) Paolo Bago (DOTA2)	Where UK based / local equivalent available
Creator Managers (the CMs)	James Browning	Yes
Technical Advisors (TAs)	Currently unfilled	No

HEADLINE RESPONSIBILITIES

The Core Safeguarding Team has the following responsibilities under these Policies:

EAB

- Comply with the Code
 - Provide guidance to, and ensure the integrity of, the IAB and the safeguarding process in Fnatic as a whole
 - Review and approve for public distribution Fnatic's annual safeguarding report
 - Propose any variations to the Policy or the Code as may result from changes to best practice or 'lessons learned' from the EAB's experiences outside of Fnatic
 - Drive awareness of safeguarding issues in esports and encourage other organisations to take the #saferesports pledge
-

IAB

- Comply with the Code
 - Provide guidance to and monitor the activities of the LSO
 - Procure regular training for the Core Safeguarding Team, particularly regarding the practicalities of how to manage a safeguarding issue
 - Consider any breaches of the Code which may arise (including any failure in functional compliance by a department head) and ensure that appropriate enforcement action is taken in accordance with Fnatic's Handbook
 - Amend and reissue this Policy and the Code as reasonably necessary in accordance with the LSO's recommendations
 - Share resources with other sports and esports organisations to improve understanding of safeguarding issues (including via fnatic.com/safeguarding)
 - Drive awareness of safeguarding issues in esports and encourage other organisations to take the #saferesports pledge
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LSO

- Comply with the Code
- Drive awareness of the Code across Fnatic Group
- Regularly (and at least quarterly) assess the fitness for purpose of this Policy and the Code (in all jurisdictions in which Fnatic has a physical presence) and propose to the IAB any such changes as may be required
- Monitor functional compliance by Core Safeguarding Team members with the Code (as set out in Part C)
- Put in place whistleblowing and other notification mechanisms to encourage and facilitate disclosure under this Policy

- Monitor, track and (where applicable) escalate to the IAB any safeguarding issues which arise
 - Interact with parents/guardians of the child, young person or adult at risk in the event of an incident
-

NSOs

- Comply with the Code
 - Police functional compliance by Fnatic personnel in their territory
 - Monitor, track and (where applicable) escalate to the LSO any safeguarding issues which arise
-

TDs

- Comply with the Code
 - Ensure that all players comply with the Code
 - Ensure that any safeguarding incident is communicated immediately to the LSO or NSO where available
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CMs

- Comply with the Code
 - Ensure that any safeguarding incident is communicated immediately to the LSO or NSO where available
-

TAs

- Comply with the Code
 - Ensure that the appropriate technical measures are in place (on a “privacy by design” basis) to comply with the Age Appropriate Design Code and to protect minors against the unauthorised harvesting or disclosure of their personal data (including, without limitation, ensuring that health and other sensitive personal data relating to young Pro Gaming personnel is subject to extremely high levels of protection)
 - Monitor the efficacy of technical measures and advise the IAB immediately in the event of an incident relating to children’s data
-

D | CODE OF CONDUCT STATEMENT

All members of the Fnatic team share responsibility for safeguarding and promoting the welfare of children, young people and adults at risk.

ALL TEAM MEMBERS

If you are concerned about the lifestyle, safety or welfare of a child, young person or adult at risk, or you are concerned about an adult's behaviour towards a child, young person or adult at risk, you must act. Taking positive action is the only option.

Don't assume that someone else will help. Safeguarding children, young people and adults at risk is everyone's responsibility. If you become aware of poor practice or a possible safeguarding issue, **follow the guidance at Part E**.

THE CORE SAFEGUARDING TEAM

The Core Safeguarding Team bears particular responsibility to control such safeguarding risks.

For that reason, while all team members must comply with the Safeguarding Code of Conduct (the **Code**), each Core Safeguarding Team member is required to confirm adherence in writing on an annual basis. This Code shall also be made available via Fnatic's website.

THE CODE

I have read Fnatic's safeguarding policies. I accept that my primary duties under the policies are to:

- *behave in a way that avoids safeguarding issues arising, particularly in relation to children, young people and adults at risk.*
- *report any concerns that I have (or I become aware of) regarding possible risk of harm or misconduct in relation to adults at risk, young people and children so that action can be taken to address that risk*

I understand that I am a role model for children, young people and adults at risk, and a representative of the Fnatic brand.

I WILL NEVER:

- A. Use my position to intimidate, bully, threaten, discriminate against, coerce or undermine children, young people or adults at risk.*
- B. Behave or communicate with children, young people or adults at risk in ways which seek to build inappropriate relationships in order to abuse or put them at risk.*
- C. Use a relationship with a child, young person or adult at risk or their family for personal gain (and I am aware of Fnatic's Conflict of Interest and Doing Business With Integrity policies).*
- D. Give special rewards or privileges in an attempt to build inappropriate relationships with children, young people or adults at risk.*
- E. Engage in, or attempt to engage in, sexual or inappropriate relationships with children, young people or adults at risk for whatever reason, including the use of suggestive conversations, comments, or messages.*
- F. Possess indecent images of children; this will always be reported to the police regardless of the explanation provided.*
- G. Encourage or assist others to break the law in any way.*

CHILDREN | APPROPRIATE BEHAVIOURS

To ensure all children, young people or adults at risk have the most positive and safe experience when engaging with Fnatic, I will adhere to the following principles and actions to reduce the risk of allegations, abuse and neglect occurring:

- A. Listen carefully to children, young people or adults at risk about their needs, wishes, ideas and concerns and take them seriously.
- B. Treat all children, young people or adults at risk equally, not showing favouritism.
- C. Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets). Never spend excessive amounts of time individually with a child, young person or adult at risk away from others, and never be alone in toilet facilities or showers used by adults at risk, children or young people.
- D. Confront and deal with bullying. Dealing with bullying includes challenging any use of inappropriate language by children, young people or adults at risk when it first occurs.
- E. Maintain a safe and appropriate distance with children, young people or adults at risk and avoid unnecessary physical contact. Where any form of manual/ physical support is required, it should be provided openly and with the consent of the child, young person or adult at risk.
- F. Always give constructive feedback rather than negative criticism, and reward effort as well as performance.
- G. Challenge unacceptable or inappropriate behaviour wherever I see it, including online.
- H. Escalate any concerns I may have regarding a child, young person or adult at risk's clinical or physical needs to the LSO as soon as I become aware of them.
- I. Keep a written record of any incident or injury that occurs of which I become aware, along with details of

any treatment given or action taken, and escalate that record to the LSO or any member of the IAB.

- J. Not to smoke/vape, drink alcohol or take any other substances which are legally controlled or which would affect a child/young person's health if ingested (e.g. caffeine tablets) if I am in the company of children or young people.
- K. Request written consent from the parents/guardians of children, young people or adults at risk for any activities, events or significant travel arrangements, e.g. overnight stays, and while on trips, ensure that adults do not enter a child, young person or adult at risk's room unless there is a safety concern, in which case two adults will enter and will not invite children, young people or adults at risk into their rooms.

ADULTS | APPROPRIATE BEHAVIOURS

Adults can also be at risk. This may be because of specific clinical or medical needs; but it may also be because a person suffers physical, psychological, sexual or discriminatory abuse, or is placed in a position of danger or stress in consequence of the demands placed upon them by other staff members or the organisation as a whole. Allowing a situation to arise where an adult no longer acts in their best interests (e.g. because they neglect their wellbeing) would lead to a breach of this Policy.

I understand that the obligations under items A - I above apply equally to adults as they do to children. However, in handling incidents arising in relation to adults, I will support and encourage adults at risk to make their own decisions about how they want those matters to be handled.

E | DEALING WITH A SAFEGUARDING ISSUE

How Fnatic team members respond to a safeguarding issue is crucial. When a child, young person or adult at risk makes a disclosure, they may feel:

- **guilt:** they may blame themselves for the incident and feel guilty or embarrassed for reporting it.
- **ashamed:** they may feel ashamed about the abuse itself.
- **confused:** they may be confused about his/her feelings for the alleged abuser.
- **scared:** they may be fearful of the repercussions of disclosing, and scared of the alleged abuser.

Fnatic team members' obligation is to act in the best interest of the child, young person or adult at risk, who may be at risk. This means: manage, inform and support.

MANAGE

Deal with the disclosure as it happens. Ensure that the child, young person or adult at risk's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that team members must not investigate the disclosure. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the validity of the disclosure is uncertain.

Do	Don't
<ul style="list-style-type: none"> ■ Do put your own feelings aside and listen as if the information is not dramatic. ■ Do allow the child, young person or adult at risk to lead the discussion and to talk freely. ■ Do listen to what the child, young person or adult at risk is saying without investigating. ■ Do allow the child, young person or adult at risk to tell you at their own pace. Don't worry if the child, young person or adult at risk stops talking for a while - silences are ok. You don't have to rush in to fill the gaps. ■ Do accept what the child, young person or adult at risk says without challenge. ■ Do allow the child, young person or adult at risk to talk but protect them from sharing the information with too many other people. 	<ul style="list-style-type: none"> ■ Don't ask leading questions - for example "Did the coach hit you?". ■ Don't interrupt the adult at risk, child or young person, or ask lots of questions. Being asked a lot of questions can feel like being interrogated. ■ Don't ask questions that may make the adult at risk, child or young person feel guilty or inadequate. ■ Don't share the information with anyone other than those who need to know. ■ Don't panic or show that you are shocked. It is important to remain calm and in control of your feelings. ■ Don't document the conversation while the child, young person or adult at risk is disclosing. This should be done as soon as possible after the child, young person or adult at risk has given their account.

Do	Don't
<ul style="list-style-type: none"> ■ Do provide reassurance that you are taking the child, young person or adult at risk seriously and that they have done the right thing by disclosing. ■ Do let the child, young person or adult at risk know it is recognised how hard it is for them to tell you. It is ok to let them know if you are unable to answer all of their questions. ■ Do tell the child, young person or adult at risk what happens next, i.e. who you will be contacting and that you will support them through that process. 	<p>In documenting the conversation you must record what happened as accurately as you can (using the words and phrases used by the child, young person or adult at risk to describe what happened to him/her).</p> <ul style="list-style-type: none"> ■ Don't give the impression that you might blame the child, young person or adult at risk. E.g. don't ask: "Why did you let him?", "What were you doing there anyway?" or "Why didn't you tell me before?". ■ Don't pass judgement on what is said. ■ Don't make false promises and/or promise total confidentiality – it should be explained that the child, young person or adult at risk has done the right thing, outline who will need to be told and why. ■ Don't approach the alleged abuser yourself.

INFORM

As soon as possible, once the immediate comfort and safety of the child, young person or adult at risk is secured, inform the NSO in your territory of the disclosure. It is the responsibility of the NSO to contact parents or guardians in relation to an incident, copying the IAB.

IF:

- the NSO is the subject of an allegation, team members will refer to the LSO
- the LSO is the subject of an allegation, team members will refer the matter to a member of the IAB
- team members are concerned that the parents or guardians of the child, young person or adult at risk are involved in any safety or welfare issue, they must contact the IAB immediately, who will take the matter forward

There are a number of circumstances whereby an external referral can be made (e.g. to the police). The IAB Chair and the IAB Deputy are the only two individuals authorised to represent Fnatic before the police in England & Wales. In any other country, the IAB Chair and the IAB Deputy will be consulted before any contact with the police regarding an incident **unless a delay in contact would likely lead to a serious crime or harm to a child, young person or adult at risk** or if **the IAB Chair or the IAB Deputy is implicated in the incident**.

Any allegation against an individual who works with children, young people or adults at risk will be reported immediately to the NSO. The NSO will be informed within one working day of all allegations that come to Fnatic's attention. If that individual is removed (or would have been removed had the individual not left first), the IAB will make a referral to the UK's government's Disclosure and Barring Service (the **DBS**) (or national equivalent) to consider whether to add the individual to the 'barred list'.

SUPPORT

Fnatic team members will complete any forms that the NSO requests. They will record information as it was relayed to you using the language of the child, young person or adult at risk rather than their own interpretation of it.

The LSO is responsible for commencing an investigation into any matter you raise, reporting to the IAB. The IAB may consult with the EAB for any matters which are particularly complex or sensitive. Fnatic team members will cooperate with LSO and the IAB in their investigation.

The IAB will determine what action should follow from the investigation. This may include sanctions against individual employees in accordance with Fnatic's HR Handbook; referrals to the DBS or other external agencies; or any other actions which the IAB considers appropriate.

The IAB may make a referral to local authority children's social care service, and must follow up their concerns if not satisfied with the response. If the IAB remains dissatisfied, the IAB may escalate their concerns.

Dealing with a non-recent safeguarding issue

There may be instances where Fnatic team members take a disclosure from a child, young person or adult at risk who has suffered a safeguarding incident in the past. Whilst the immediate comfort and safety of the child, young person or adult at risk may no longer be at risk, it is still important that Fnatic team members manage, inform and support as set out above.



FNATIC is a global esports performance brand headquartered in London, laser-focused on seeking out, levelling up and amplifying gamers and creators.

Our history is unparalleled. Founded in 2004, we are the most successful esports brand of the last decade, winning more than 200 championships across 30 different games.

Today, driven by performance, Fnatic is the channel through which the most forward-thinking brands communicate with young people. We deliver industry-leading content, experiences and activations through offices and facilities in cities between Los Angeles and Tokyo.



Thank you for reading.

Any questions, please send them to:

safeguarding@fnatic.com