

**FONDAZIONE ORTYGIA IMPRESA SOCIALE**

**CHILD SAFEGUARDING POLICY  
AND CODE OF CONDUCT**

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## TABLE OF CONTENTS

1. Introduction and Policy Statement
2. Scope of Application
3. Legal and Normative References
4. Definitions
5. Fundamental Principles
6. Awareness and Sensitisation
7. Prevention
  - 7.1 Recruitment and Selection of Personnel
  - 7.2 Code of Conduct
  - 7.3 Training and Professional Development
  - 7.4 Partners, Suppliers, and Consultants
  - 7.5 Child Safeguarding in Programme Design
  - 7.6 Communication and Media
8. Reporting, Response, and Monitoring
  - 8.1 Roles and Responsibilities
  - 8.2 Child Protection Officer
  - 8.3 Reporting Procedures
  - 8.4 Response Procedures
9. Confidentiality and Data Protection
10. Monitoring and Review
11. Conclusion
- Annex 1: Code of Conduct

## 1. Introduction and Policy Statement

Fondazione Ortygia Impresa Sociale (hereinafter “the Foundation”) is a non-profit organisation dedicated to promoting social development, cultural exchange, and sustainable growth in the region of Sicily. Focused on addressing local challenges, the Foundation fosters community engagement, supports social entrepreneurship, and enhances the quality of life through innovative projects. By combining social impact with business strategies, the Foundation works to create lasting positive change, particularly in areas such as education, environment, and heritage preservation, with a deep commitment to the values of inclusion and sustainability.

The Foundation leads projects and social activities for minors; these activities are carried out by carefully selected and contracted project partners. The Foundation also supervises the implementation of the organised activities to ensure that all partners, suppliers, and consultants are suitable to work with this target group.

In this context, the Foundation recognises as its primary objective the prevention of abuse and violence against minors, by listening to their needs and creating a safe and inclusive environment where all boys and girls can learn, grow, and look toward the future.

**With this Child Safeguarding Policy (hereinafter the “Policy”), the Foundation affirms that:**

- Children and young people should never be subjected to abuse of any kind.
- The Foundation has the responsibility to promote the well-being of all children and young people, to keep them safe, and to operate in a manner that protects them.
- The welfare of children is paramount in all activities carried out by the Foundation and in all decisions it takes.
- Working in partnership with children, young people, their parents or guardians, and other agencies is essential to promoting the well-being of minors.
- All children, regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation, have an equal right to protection from all types of harm or abuse.
- Some children are more vulnerable due to the impact of previous experiences, their level of dependency, communication needs, or other factors, and may require additional safeguards.

This Policy outlines the principles, guidelines, and actions the Foundation adopts to protect children and ensure that it operates in a manner consistent with safeguarding best practices. It is complementary to the Foundation’s Code of Ethics and any other internal regulatory documents.

## 2. Scope of Application

This Policy applies to:

- All Foundation staff, including directors, employees, consultants, and temporary workers.
- All volunteers, interns, and trainees working with or on behalf of the Foundation.
- All project partners, suppliers, and any other individuals, groups, or organisations that have a formal or contractual relationship with the Foundation involving direct or indirect contact with minors.
- Authorised visitors to the Foundation’s programmes and activities, including family members of Foundation staff.

The principles set out in this Policy apply at all times, both during working hours and during personal time, without exception. Each member of staff represents, or may be identified with, the Foundation at all times.

Where project partners do not have their own child safeguarding policy, or have a policy with standards that are not compatible, the Foundation will ensure that they adhere to this Policy for the duration of the collaboration.

This Policy must also be presented and made known to all other non-Foundation actors that have relationships and collaborations with the Foundation, such as donors and institutional bodies.

## 3. Legal and Normative References

This Policy is drawn up in conformity with the following instruments:

- The United Nations Convention on the Rights of the Child (UNCRC).
- The Universal Declaration of Human Rights (UDHR).
- The United Nations Convention for the Elimination of All Forms of Discrimination Against Women (CEDAW).
- Italian legislation on the protection of minors and the international conventions concerning minors ratified by the Italian Republic.
- The European General Data Protection Regulation (EU) 2016/679 (“GDPR”).
- The Keeping Children Safe International Child Safeguarding Standards.

The Foundation is committed to guaranteeing the right of children to protection (Art. 19 UNCRC) and upholds the four guiding principles of the Convention: non-discrimination (Art. 2); the best interests of the child (Art. 3); the right to life, survival, and development (Art. 6); and the right to express their views freely (Art. 12).

## 4. Definitions

**Minor:** Any person under the age of 18, regardless of what specific legislation in a given jurisdiction may provide regarding the age of majority.

**Abuse against a minor:** Also referred to as “child maltreatment,” according to the World Health Organisation (WHO) this includes “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power.” The main categories of abuse identified by the WHO are as follows:

**Physical abuse:** The intentional use of physical force against a child that results in, or has a high likelihood of resulting in, harm to the child’s health, survival, development, or dignity. This includes hitting, shaking, burning, kicking, biting, strangling, scalding, and poisoning.

**Sexual abuse:** The involvement of a child in sexual activity that they do not fully comprehend, are unable to give informed consent to, or for which they are not developmentally prepared. Children can be sexually abused by adults or by other minors who, by reason of their age or level of development, are in a position of responsibility, trust, or power over the victim. Any sexual activity without consent is always an abuse and a crime. Any sexual activity with a person under 18 is never permitted, regardless of what local legislation may provide, regardless of the existence of consent, or of incorrect assumptions regarding the minor’s age. This includes the inappropriate use of technology and social media.

**Emotional and psychological abuse:** Includes both isolated incidents and patterns of behaviour by a caregiver that fail to provide a supportive environment for the child’s development. Acts in this category may include restricting movement, denigrating, blaming, threatening, intimidating, discriminating, rejecting, humiliating, and other non-physical forms of hostile treatment.

**Neglect:** Refers to both isolated situations and a sustained pattern of failure on the part of a parent, caregiver, or guardian to provide for the child’s development and well-being in areas including health, education, emotional development, nutrition, shelter, and safe living conditions, where the caregiver is in a position to do so.

**Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual exploitation of a minor.

**Harm:** The impact on a child’s physical or emotional well-being caused by any form of abuse or neglect, which may affect their growth, development, safety, and dignity.

## **5. Fundamental Principles**

### **5.1 Zero Tolerance for Child Abuse**

The Foundation does not tolerate any form of abuse against minors and will not knowingly engage anyone, in any capacity, who may represent a threat to children or adolescents.

### **5.2 Non-Discrimination**

The Foundation is committed to safeguarding minors in the implementation of all its activities, irrespective of their nationality, culture, ethnicity, gender, sexual orientation, religious or political belief, socio-economic status, family background, or physical or mental health condition.

### **5.3 Do No Harm**

The Foundation incorporates and maximises the “Do No Harm” principle in the implementation of its activities. This principle requires that the Foundation takes every reasonable step to minimise, and where possible eliminate, any harm that may inadvertently be caused through the provision of its services or the implementation of its projects.

### **5.4 Child Participation**

Every minor should be enabled to understand their rights, their responsibilities, and what to do if they have concerns. Children should be encouraged to make their voices heard to report violations of their rights, without fear of intimidation or retaliation.

### **5.5 Accountability and Transparency**

The Foundation guarantees the implementation and respect of the principles expressed in this Policy, the application of which is constantly monitored. This document is regularly reviewed on the basis of feedback received. In the event of an allegation of abuse, the Foundation is committed to promptly adopting the necessary measures, in compliance with reporting procedures, and ensuring that all relevant information is properly recorded. Every allegation is handled with the utmost seriousness and confidentiality.

### **5.6 Shared Responsibility**

Where projects or services are implemented by the Foundation in collaboration with institutions or partner organisations that do not have their own child safeguarding policy, the Foundation will ensure that these partners adhere to this Policy and respect the rules set out herein for the entire duration of the intervention.

### **5.7 Data Protection and Confidentiality**

All Foundation staff are required to maintain confidentiality and to comply with data management processes, including the collection, storage, transmission, and destruction of data, in accordance with the GDPR (EU) 2016/679. The sharing of information may nonetheless be necessary where it is in the best interest of the child or required by law.

## 6. Awareness and Sensitisation

The fight against child abuse requires a cultural transformation that challenges impunity and the normalisation of violence and leads to the recognition of the dignity of every person.

The Foundation is committed to raising awareness among its staff, partners, suppliers, consultants, beneficiary communities, and the minors themselves about the importance of child safeguarding.

To this end, the Foundation will:

- Ensure that all staff, volunteers, partners, suppliers, and consultants are made aware of this Policy and of the reporting procedures for any abuse perpetrated against minors.
- Provide each employee or collaborator with a copy of this Policy at the time of signing their contract or agreement with the Foundation.
- Publish the Policy on the Foundation's website.
- Make available clear and accessible materials summarising the Code of Conduct and reporting procedures in all Foundation offices and project sites.
- Where possible, produce child-friendly communication materials on children's rights and safeguarding.
- Ensure that children, young people, and their families know where to turn for help if they have concerns.

## 7. Prevention

### 7.1 Recruitment and Selection of Personnel

The Foundation ensures a robust recruitment procedure for all personnel, with particular attention to roles involving direct or indirect contact with minors. To verify the suitability of candidates to work with children, the Foundation will:

- Include in every job advertisement the Foundation's commitment to child safeguarding and a reference to this Policy.
- Clearly indicate in each job description the responsibilities assigned in the area of child safeguarding.

- Include in each interview a dedicated section on child safeguarding, assessing the candidate's understanding and commitment.
- In the reference verification process, include specific questions on the candidate's suitability to work directly or indirectly with minors.
- Include in the employment contract the Policy and the related Code of Conduct, which the employee must read and sign.

Selected candidates will be informed of the binding nature of this Policy and of the fact that it applies to both professional and personal conduct.

## 7.2 Code of Conduct

A detailed Code of Conduct is set out in Annex 1 to this Policy. It provides guidance on appropriate behaviour in all interactions between adults and minors. By signing the Policy and the related Code of Conduct, every member of staff, volunteer, partner, supplier, or consultant commits to upholding the highest standards of behaviour toward children.

The Code of Conduct is a strategic tool for ensuring the well-being and safety of all minors involved in the Foundation's activities.

## 7.3 Training and Professional Development

To ensure adequate implementation of this Policy:

- All new staff, volunteers, and collaborators will receive initial training on the child safeguarding policy and their responsibilities.
- Staff and volunteers will have the opportunity to receive regular updates on child safeguarding, both formally (e.g. through training sessions or supervision) and informally (e.g. through team meetings and discussions).
- Specific and advanced training opportunities will be facilitated for staff with direct responsibilities in child safeguarding.
- Each project or service will have regular supervision to support staff in carrying out their duties in an appropriate and professional manner.

## 7.4 Partners, Suppliers, and Consultants

The Foundation will:

- Include in every collaboration agreement a clause relating to the implementation of minimum child safeguarding standards.
- Promote the adoption and application of international safeguarding standards among partner organisations, accompanying them in developing their own capacities.
- Ensure that partners, suppliers, and consultants who have direct or indirect contact with minors understand and adhere to this Policy.
- Terminate any collaboration in the event of a substantiated violation of this Policy by a partner, supplier, or consultant.

## 7.5 Child Safeguarding in Programme Design

Each project and programme of the Foundation is designed to minimise the risk of causing harm to minors who may be directly or indirectly affected by its activities. To this end:

- Child safeguarding considerations, such as the potential increase in vulnerability and exposure to abuse and/or exploitation, are included in every risk analysis and at each stage of the project cycle.
- Before the start and throughout the duration of each project, activities are assessed and monitored to ensure they are in line with the fundamental principles expressed in this Policy.
- Proactive measures are adopted at every phase of project implementation to avoid inadvertently causing harm, while maximising and disseminating best practices.

## 7.6 Communication and Media

The Foundation's communication strategy is based on respect for the dignity of any person depicted, photographed, or interviewed, favouring a positive narrative and the deconstruction of dominant socio-cultural stereotypes. Minors must not be portrayed as passive victims or objectified, but as individuals recognised for their value and agency.

To guarantee ethical and respectful communication concerning children:

- Foundation staff will respect the privacy of children depicted in photos and videos.
- Before taking any photograph or video, staff will inform the minor and their parent or guardian about the intended use of the images, through an appropriate consent form prepared by the Foundation.
- Children who have suffered violence, exploitation, or abuse, or who are particularly vulnerable, must be made non-identifiable: their faces should be obscured or not filmed, their real names must be changed (with the change noted), and geographic references that could identify them must be omitted.
- Staff will not take or use images of children who are nude or in poses that may appear inappropriate.
- Particular care will be taken when using images of vulnerable subjects (persons with disabilities, refugee children, minorities), always ensuring respect for their dignity.
- Images and videos will be stored in the Foundation's designated archive, with access limited to authorised personnel.
- Staff and collaborators should avoid posting on personal social media channels photos of minors encountered through their work, without prior authorisation from the Foundation's management.
- These rules must be shared with all partners and respected in all activities for which the Foundation is responsible.

## 8. Reporting, Response, and Monitoring

### 8.1 Roles and Responsibilities

ROLE	RESPONSIBILITIES
<b>All Staff, Partners, Suppliers, Consultants</b>	Adhere to this Policy and the Code of Conduct. Report any concerns, suspicions, or allegations of abuse or neglect immediately. Ensure that beneficiary communities and minors are informed about the Policy and reporting mechanisms.
<b>Leadership and Management (Board / Senior Management)</b>	Ensure that this Policy is implemented across all areas of the Foundation's work. Approve the Policy and any updates. Ensure that safeguarding practices are reviewed regularly. Assume decisions on disciplinary action following substantiated allegations.
<b>Child Protection Officer (CPO)</b>	Supervise the implementation of this Policy. Establish and maintain a centralised reporting system. Receive, record, and manage all reports of alleged violations. Coordinate internal investigations and liaise with relevant authorities. Ensure that victims receive appropriate protection and support. Regularly review and update the Policy (at least every three years).
<b>Project Managers</b>	Ensure the application of the Policy and its procedures at project level. Receive and relay reports to the CPO where the CPO is not directly contactable. Integrate child safeguarding considerations into project design and monitoring.

It is important to note that the responsibility for preventing and responding to the exploitation and abuse of minors is shared. The designation of a Child Protection Officer does not absolve other staff of their own responsibilities under this Policy.

### 8.2 Child Protection Officer (CPO)

The Foundation appoints an internal Child Protection Officer (CPO) responsible for overseeing compliance with this Policy.

The CPO is a member of the Foundation's staff who possesses the professional competencies necessary to ensure the application and respect of the principles expressed in this Policy, as well as the supervision of its correct implementation. The CPO is also capable of managing and analysing, in the most appropriate manner, issues related to safeguarding, exploitation, abuse, or harassment.

**The CPO will:**

1. Establish and maintain a centralised reporting system, ensuring management control over cases involving alleged violations of this Policy.
2. Establish and maintain contacts with the managers of all Foundation projects and services for the safeguarding of children.
3. Regularly review and update this Policy, at least every three years or sooner if deemed necessary.

**The procedural actions undertaken by the CPO include, but are not limited to:**

1. Collecting information and documentation on the reported incident.
2. Conducting an internal investigation, including interviews with witnesses.
3. Proposing the temporary suspension of the person who is the subject of the report from their activities involving minors, for the duration of the investigation.
4. Informing the person concerned of the allegations that have been made against them.
5. Giving the suspected individual the opportunity to present their version of events before any determination of guilt or innocence is reached.
6. Ensuring that the victim receives protection and, where necessary, psychological and socio-economic support.
7. Ensuring that the person who made the report is kept informed about the progress of the procedure.
8. Where a criminal offence may have been committed, reporting the matter to the competent authorities.

## **FOUNDATION CHILD PROTECTION OFFICER**

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### **8.3 Reporting Procedures**

All staff, volunteers, partners, suppliers, and consultants have an obligation to report suspected abuse. No form of coercion, intimidation, retaliation, or reprisal will be tolerated against those who report concerns in good faith, including those who provide information or assistance during an investigation.

**The following steps must be followed:**

**Step 1 – Immediate safety:** If a minor is at immediate risk, staff should take steps to remove the child from danger and ensure their immediate safety.

**Step 2 – Report the concern:** All concerns, suspicions, or allegations of abuse or neglect must be reported immediately and in any case within 24 hours to the Child Protection Officer (CPO). Where the CPO is not contactable, the report should be

made to the relevant Project Manager, who must promptly relay it to the CPO. Reports may be submitted verbally, in writing, by telephone, or by e-mail.

**Step 3 – Document the concern:** A clear and accurate record of the concern must be made, noting the details including: date and place of the incident; type of abuse; description of the incident including any witnesses; information about the child involved and their state of health; information about the accused person; and any actions already taken. The Foundation will provide a standard incident report form.

**Step 4 – Referral to authorities:** Where necessary or where a criminal offence may have occurred, the Foundation will report the matter to the relevant local authorities to ensure appropriate investigations and interventions.

Reports may also be submitted by persons external to the Foundation, by e-mail, letter, telephone, or verbally. Anonymous reports will be considered only where they relate to matters of particular gravity and contain sufficiently detailed information to enable investigation.

The person receiving a report is responsible for ensuring that the incident report is accurate and sufficiently detailed. It is not the responsibility of the reporting person to investigate the matter.

## 8.4 Response Procedures

In the event of an allegation or incident of abuse, the following procedures will be followed:

- Immediate response: The Foundation will take immediate action to ensure the child's safety, including removing the alleged perpetrator from contact with the child and providing support to the child.
- Investigation: The CPO will evaluate the report and initiate an appropriate investigation in a sensitive and impartial manner. This may involve the immediate suspension of the accused from all activities involving minors for the duration of the investigation.
- Support for the child: The child involved will be provided with appropriate protection, emotional support, and psychological assistance as needed.
- Due process: The accused will be informed of the allegations and given the opportunity to present their version of events before any determination is made.
- Action on findings: Where abuse is substantiated, the Foundation's leadership will proceed with appropriate disciplinary action, which may include immediate termination of employment or collaboration and referral to the competent judicial authorities. The outcome will be documented and archived.
- Protection of reporters: The Foundation will ensure that all persons who have made reports are kept informed of the progress of the procedure and are protected from retaliation.

## 9. Confidentiality and Data Protection

Confidentiality of information about children and their families is a priority. Information should only be shared with individuals who have a legitimate need to know, such as child protection authorities, and only when it is necessary to ensure the safety and well-being of the child.

Information will be shared in a way that protects the identity of the child and their family, in compliance with the GDPR (EU) 2016/679 and relevant national data protection legislation.

All records relating to child safeguarding concerns, investigations, and outcomes will be stored securely, with access limited to authorised personnel.

## 10. Monitoring and Review

The Foundation will regularly review and update this Policy to ensure it remains effective and aligned with current best practices, legal requirements, and child protection standards. The Policy and its procedures will be reviewed at least every three years.

The implementation of safeguarding measures and compliance with this Policy are continuously monitored. Feedback from staff, beneficiary communities, and stakeholders is actively encouraged to improve and consolidate existing procedures.

The Policy will also be reviewed in response to changes in legislation, best practices, or after any significant incident. All staff and stakeholders will be notified of any updates or changes.

## 11. Conclusion

Fondazione Ortygia Impresa Sociale is committed to safeguarding minors involved in its activities and ensuring their rights are respected and protected. This Policy provides clear guidelines to prevent abuse, respond to concerns, and create a safe environment. All staff, partners, suppliers, consultants, and stakeholders are expected to adhere to this Policy and to work collaboratively to ensure the well-being of children in all Foundation activities.

By building a culture of safeguarding in which staff, volunteers, children, young people, and their families treat each other with respect and feel comfortable in sharing concerns, the Foundation aims to create an environment where every child can thrive.



Date of Adoption: 02/02/2026

Signed by: *Lucrezia Reichlin*

Position: President

**FONDAZIONE ORTYGIA**

***Il Presidente  
Lucrezia Reichlin***

## ANNEX 1: Code of Conduct

This Code of Conduct is addressed to all persons to whom this Policy applies, as defined in Section 2 (Scope of Application).

### A. Required Conduct

All staff and persons in contact with minors are required to:

1. Be aware of situations that may present risks and of what may constitute abuse or exploitation of minors, and be vigilant in identifying and managing such situations.
2. Report any reasonable suspicion of possible abuse or maltreatment of a minor to the Child Protection Officer (CPO), activating the procedures set out in this Policy. Where a criminal offence is suspected, report the matter to the competent judicial authorities.
3. Organise work and the workplace so as to eliminate or minimise foreseeable risks of any kind to minors, in strict compliance with applicable health and safety regulations.
4. Be visible and accessible to other adults, as far as possible, while working with minors.
5. Foster a culture of openness that allows staff, volunteers, minors, and their caregivers to raise and discuss any type of concern with ease.
6. Ensure that all staff members develop a sense of accountability for their own conduct, so that inappropriate actions or behaviours that may lead to abuse of minors do not go unnoticed or tolerated.
7. Communicate to minors what type of relationship they should expect with staff, and encourage them to report any concern or discomfort.
8. Value the capabilities and competencies of minors and discuss with them their rights, what is acceptable and what is not, and what they can do if a problem arises.
9. Respect the rights of minors and treat them fairly, honestly, and with dignity and respect at all times.
10. Promote the participation of minors in a way that also develops their capacity for self-protection.
11. Interact with minors in a respectful, professional, and positive manner, ensuring their dignity and rights are upheld.
12. Maintain appropriate boundaries: physical contact with minors should be limited to what is necessary and appropriate for the activity.

### B. Prohibited Conduct

All staff and persons in contact with minors are strictly prohibited from:

1. Hitting, physically assaulting, or physically or psychologically abusing a minor.
2. Adopting attitudes towards minors that, including from a psychological perspective, may negatively affect their harmonious and socio-relational development.
3. Acting in ways that may serve as a negative example for minors.
4. Having relationships with minors that may in any way be considered exploitative, abusive, or maltreating, even in implicit or merely evocative forms.
5. Engaging in sexual activities of any kind (including in virtual or evocative forms) or having a sexual relationship with any person under the age of 18, regardless of the definition of the age of majority or the forms of consent legally recognised in different countries. An incorrect belief regarding the age of a minor is not an acceptable defence.
6. Acting in ways that may be inappropriate, harmful, or that may constitute abuse or place minors at risk of exploitation, maltreatment, or abuse, including labour or other forms of exploitation, begging, or sexual grooming.
7. Using incorrect, vulgar, or offensive language with minors, or giving inappropriate, offensive, or abusive suggestions or advice.
8. Behaving in an inappropriate or sexually provocative manner, or in a way that could be improperly interpreted as such.
9. Producing, distributing, disseminating, or publicising, by any means (including electronic), any pornographic material involving minors, whether explicit or implicit, real or virtual.
10. Establishing or maintaining contacts with minor beneficiaries using personal online communication tools (e-mail, chat, social networks, etc.) outside the scope of project activities. Only professional tools and communication channels known to the Foundation may be used.
11. Allowing one or more minors with whom one works to sleep in one's home without supervision and prior authorisation from one's direct supervisor, except in exceptional circumstances.
12. Sleeping in the same room or the same bed with a minor with whom one works, except in exceptional and documented circumstances authorised by the responsible manager, always ensuring visibility to third parties where possible.
13. Adopting care practices (e.g. hygiene) that do not respect the minor's level of autonomy and personal integrity.
14. Giving money, goods, or other benefits to a minor outside the parameters and purposes established by the project activities, or without the knowledge of the direct activity manager.
15. Tolerating or participating in behaviour with minors that is illegal, offensive, or that puts their safety at risk.
16. Acting in a way that shames, humiliates, belittles, or degrades a minor, or perpetrating any other form of emotional maltreatment.

17. Discriminating against, or conversely, favouring certain minors while excluding others, on the basis of prejudice.

*This list is not exhaustive. The underlying principle is that all actions and behaviours that could be inappropriate or potentially abusive towards minors must be avoided.*

**I, the undersigned, declare that I have read, understood, and agree to comply with the Child Safeguarding Policy and this Code of Conduct of Fondazione Ortygia Impresa Sociale.**

Full Name: \_\_\_\_\_

Role/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_