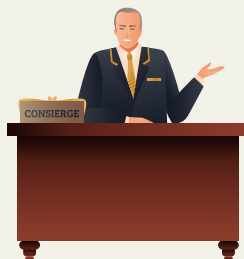


ochroniarz
security guard



księgowy
accountant



bellboy
bellboy



pokojówka
maid



Każda z tych osób pomoże dziecku w każdej sytuacji
Each of these people will help a child in any situation

repcjonistka
receptionist



konserwator
maintenance worker



kelner
waiter



kucharz
cook



MINORS' PROTECTION STANDARDS

at Royal Hotel & SPA

Preamble

Having regard to the legal obligation arising from the Act of May 13th, 2016, on counteracting the threat of sexual crime and the protection of minors, and the content of the United Nations guidelines on business and human rights, recognizing the important role of business in ensuring respect for children's rights, Royal Hotel & SPA adopts the Minors' Protection Standards (also, "SOM (from polish: Standard Ochrony Małoletnich)", "Standards"). This document is a set of principles and procedures to be used in the event of a suspicion that a child staying at Royal Hotel & SPA is being harmed and to prevent such threats, and taking into account the situation of disabled children and children with special educational needs.

Minors' Protection Standards at Royal Hotel & SPA are implemented based on the following principles:

1. Royal Hotel & SPA conducts its operational activities with respect for the rights of children as people who are particularly sensitive to harm.
2. Royal Hotel & SPA recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
3. Royal Hotel & SPA in particular emphasizes the importance of the legal and social obligation to notify law enforcement agencies of any suspected crime against children and undertakes to train its employees in this area.

Glossary:

For the purposes of this document, the meaning of the following terms has been clarified as:

1. **Tourist Facilities** – hospitality facilities and other facilities providing hotel services as defined in the Act of August 29th, 1997, on hotel services and the services of tour and tourist guides.
2. **Child/Minor** – in accordance with the Civil Code, this should be understood as a person from birth to 18 years of age;
3. **Child's Guardian** - this should be understood as a parent or legal guardian having full parental or legal authority (a person representing the child, appointed by the court, i.e., a person authorized to represent a minor Ukrainian citizen staying in the Republic of Poland without adult supervision)
4. **Foreign Adult** – any person over the age of 18 who is neither the child's parent nor legal guardian.
5. **Harming a Child** - it should be understood as committing a prohibited or punishable act to the detriment of a minor by any person, including a hotel employee, or a threat to the minor's well-being, including neglect; any intentional or unintentional action/inaction by an individual,

institution, or society as a whole and any result of such actions or inactions that violate the rights, liberty, and personal goods of children and/or disrupt their optimal development.

6. Forms of child abuse:

- **Physical abuse of a child** is violence in which a child suffers actual physical harm or is potentially threatened with it. This harm occurs as a result of an action or failure to act on the part of a parent or other person responsible for the child, or whom the child trusts, or who has authority over the child. Physical abuse can be repeated or a one-time act.
- **Psychological abuse of a child** is a chronic, non-physical, harmful interaction between a child and a caregiver, including both actions and negligence. It includes, among others: emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, denigration, rejection; developmentally inappropriate or inconsistent interactions with the child, failure to recognize or acknowledge the child's individuality and the psychological boundaries between the parent and the child.
- **Sexual abuse of a child** is involving a child in sexual activity that the child is not able to fully understand and give informed consent to and/or to which they are not developmentally mature and cannot consent in a legally valid manner and/or which is inconsistent with the legal or social norms of a given society. It is sexual abuse when such activity occurs between a child and an adult or a child and another child, if these persons, due to their age or level of development, are in a relationship of care, dependency, or power. Sexual abuse can also take the form of sexual exploitation, i.e. any actual or attempted abuse of a position of vulnerability, superior power, or trust, for sexual purposes, including, but not limited to, deriving financial, social or political benefits from the sexual exploitation of another person. A particular risk of sexual exploitation occurs during humanitarian crises. The risk of exploitation exists both for children and their caregivers (definition according to UN Bulletin ST/SGB/2003/13).
- **Neglect of a child** is chronic or incidental failure to meet the child's basic physical and mental needs and/or failure to respect their basic rights, causing health disorders and/or developmental difficulties. Neglect occurs in the relationship between the child and the person who is obliged to care for, raise and protect the child.

7. Crime Against a Child – all crimes that can be committed against adults and additional crimes that can be committed only against children (e.g., sexual exploitation as per Article 200 of the Penal Code). Due to the nature of accommodation facilities where isolation is easily obtainable, the crimes most likely to occur include crimes against sexual freedom and decency, particularly rape (Article 197 of the Penal Code), sexual exploitation of insanity and helplessness (Article 198 of the Penal Code), sexual exploitation of dependence or critical situation (Article 199 of the Penal Code), sexual exploitation of a person under 15 years old (Article 200 of the Penal Code), grooming (seduction of a minor through remote communication means - Article 200a of the Penal Code).

8. Other Forms of Child Abuse Beyond Criminal Acts – all forms of violence against a child that do not meet the criteria of a public prosecution offense (e.g., shouting, vilipending, pulling, insulting, neglecting needs, etc.).

9. Employee – an individual employed under a labor contract or providing work under a similar agreement (e.g., order contract, B2B, contract for specific work), as well as an intern, trainee, volunteer, etc.

10. Employee Working with Children – any person performing tasks or delegated to perform tasks related to upbringing, education, recreation, treatment, psychological counseling, spiritual development, sports, or other interests of minors, or with taking care of minors.

11. Entrepreneur – the organ/entity/person managing a given facility or a network of facilities, responsible for the proper functioning of the facility in formal terms.

CHAPTER I. FACILITY EMPLOYEES

General principles

1. Royal Hotel & SPA undertakes to educate its employees on the circumstances indicating that a child staying in the facility may be harmed and on how to respond quickly and appropriately to such situations. The facility may implement the above education through various forms of training, e.g.: external and internal training, e-learning, educational materials developed by the hotel and available to employees, educational materials available free of charge, developed by other organizations.
2. Each employee, before being allowed to work, is familiarized with the SOM, which is confirmed by them by submitting a declaration and agreeing to comply with the rules and procedures contained in this document.
3. Employees employed to work with children are subject to recurrent training, which is documented by the employer.
4. Royal Hotel & SPA undertakes to consult the situation of children with disabilities and children with special educational needs, adapting the guidelines to the scope of the facility's operations.

Hiring people to work with children

1. People working with children must demonstrate in their employment history that they have not harmed any child in the past.
2. Every person employed/delegated by Royal Hotel & SPA to work with children must be checked in the Register of Sexual Offenders. This also applies to underage employees, i.e. under 18 years of age. Checking a person in the Register is done by printing the results of searching for a person in the Register, which is then entered into the personal files of the person being checked.
3. Every person employed/delegated to work with minors must provide information from the National Criminal Register regarding crimes specified in Chapters XIX and XXV of the Penal Code, in Article 189a and Article 207 of the Penal Code and the Act of July 29th, 2005, on Counteracting Drug Addiction (Journal of Laws of 2023, item 172 and of 2022, item 2600), or for prohibited acts corresponding to these crimes specified in the provisions of foreign law.

4. If the employed/delegated person has a citizenship other than Polish, then they should also submit information from the Criminal Record of the country of their citizenship, obtained for the purposes of professional or volunteer activity related to contact with children, or standard information from the Criminal Record, if the law of that country does not provide for the issuance of information for the above purposes.
5. The employed/delegated person should also be asked to provide a declaration of the country/countries of residence in the last 20 years, other than the Republic of Poland and the country of citizenship, submitted under penalty of criminal liability.
6. If the law of the country from which the information on no criminal record is to be submitted does not provide for the issuance of such information or does not maintain a criminal record, then the employed/delegated person shall submit a declaration of this fact under penalty of criminal liability.
7. Under declarations submitted under penalty of criminal liability, a declaration of the following content shall be submitted: "I am aware of criminal liability for submitting a false declaration." This declaration replaces the authority's warning regarding criminal liability for submitting a false declaration.
8. In the event of using the services of external entities, the facility should include an appropriate provision in the agreement with this entity, which will enable enforcement of an appropriate standard of checking by this entity of its employees, in terms of their safety in relation to children. The provision will enable the facility to control the fulfilment of the obligation under penalty of immediate termination of the agreement and contractual penalty or other sanctions related to failure to fulfil the terms of the agreement in this scope.

Scope of competences and responsibilities of people designated to implement the Minors' Protection Standards (SOM)

1. Supervision over the application of the SOM is carried out by the Entrepreneur.
2. The Entrepreneur appoints a coordinator for SOM (hereinafter referred to as the "**Coordinator**").
3. The Coordinator is responsible for familiarizing employees with the content of the SOM and monitoring its application at the Royal Hotel & SPA.
4. The Coordinator organizes and documents the process of educating employees on recognizing symptoms that a child staying at the facility may be being harmed and on how to respond quickly and appropriately to such situations, in accordance with the procedures adopted by the facility.
5. The Coordinator delineates each intervention or reported incident at the facility related to child abuse in a document created for this purpose (e.g. an event log or intervention register).
6. In the event of a justified suspicion that a crime has been committed, the Coordinator is responsible for securing evidence, including monitoring recordings, and forwarding them at the request of the services in the form of a copy by registered mail or in person to the prosecutor or police.

7. The Coordinator is responsible for conducting the procedure in a situation where a child has been harmed by an employee of the facility or another adult who is not directly employed by Royal Hotel & SPA, but by a third party.

8. The Coordinator is responsible for monitoring and updating the SOM and its availability to employees, guests and other entities cooperating with the facility.

9. The Coordinator's contact information is available to all employees and guests of the facility, including children. It has to contain: e-mail address, telephone number, availability: days and office hours.

Principles of safe employee-child relationships

1. All employees of the Royal Hotel & SPA are required to apply the following principles, including other adults who have contact with children on the premises, if such contact is with the consent of the facility.

2. The guiding principle of all actions taken by employees who have contact with children on the premises of the Royal Hotel & SPA is to treat the child with respect and to take into account their dignity and needs.

3. It is unacceptable for employees and other adults to use violence against children in any form.

A. Behaviors and practices expected from employees:

- Be patient and respectful when communicating with the child.
- Listen carefully to the child and provide answers that are appropriate to their age and the situation. When communicating with the child, try to keep your face level with the child's face.
- Assure the child that if they feel uncomfortable with a situation, they can tell you or another designated person and get help.
- Inform the child where the version of the SOM for the minors is located in the facility. Assure them that if they have questions, they can come to you or another designated person.
- Respect and treat equally the minors regardless of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion and worldview.
- Ensure a safe space. If there are children in the area where you work, make sure that equipment and supplies are used in a manner consistent with their intended use and that the surroundings are safe (pay attention to window and stair protection, access to busy roads, open water, etc.)
- If you see a child left unattended and the situation may indicate a threat to the child's safety, take action to find the parent/guardian.

B. Unacceptable behaviors and practices by employees towards children in the facility

- You must not shout, embarrass, humiliate, disrespect or insult a child.
- You must not hit, poke, push or in any way violate the physical integrity of a child, unless there is a threat to the child's health or life.
- You must not engage in any romantic or sexual relationship with a child or make inappropriate propositions to a child. This also includes sexual comments, jokes,

gestures and sharing erotic and pornographic content with children, regardless of its form.

- You are not allowed to save the image of a child for private or professional purposes (recording, photographing) without the consent of the child's parents/guardians and the consent of the child themselves. This also applies to allowing third parties to record images of children. An exception is a situation where the child's image is only a detail of a whole picture, such as a gathering, landscape, public event, then the consent of the parent/guardian is not required.
- You are not allowed to contact the child through private communication channels (private phone, e-mail, instant messaging, social media profiles) or meet the child outside the workplace.
- You are not allowed to offer the child alcohol, tobacco products or illegal substances.
- Never touch the child if they do not want to be touched or in a way that may be considered indecent or inappropriate.

If you witness any of the above-described behaviors and/or situations from other adults or children, always inform the person responsible for implementing and monitoring the SOM at the facility or your immediate supervisor:

General Manager Magdalena Pańkowska, phone number: +48 570 181 303, e-mail address: m.pankowska@royal-hotel.pl . Working hours: Monday-Friday, 8:00-16:00.

SECTION II. CHILD IDENTIFICATION PROCEDURE DURING CHECK-IN AT THE RECEPTION

1. One of the forms of effective prevention of child abuse is to establish the identity of the child staying in the facility and their relationship with the adult with whom they are staying in the facility.
2. The receptionist takes all possible steps to identify the child and their relationship with the adult accompanying the child.
3. To identify the child and their relationship with the person with whom they are staying in the facility, you should:
 - a. Ask for an identity document or other document confirming that the adult has the right to take care of the child. Examples of documents that can be used for identification include: ID card, school ID, MObywatel application, Patient's Internet Account, court order. In the absence of an identity document or refusal to present it, ask for the child's data (name, surname, address, PESEL/Personal ID number).
 - b. In the absence of documents indicating the relationship between the child and the adult or refusal to present them, the adult and the child should be asked about this relationship. An example of a conversation with an adult and a child can be found in Annex no. 2.
 - c. If the adult is not the parent or legal guardian of the child, they should be asked to present a document, e.g. notarized consent from the parent for the person to travel with the child or consent signed by the child's parent, along with the child's data, address, telephone contact for

the parent and the PESEL/Personal ID number of the person to whom the parent has entrusted the care of the child.

If the adult does not have any of the above documents, they should be asked to fill in an appropriate declaration, in accordance with the template prepared by the facility. The declaration should include the child's data and the data of the adult with whom the child is staying, along with an indication of the relationship between the child and the adult. If the adult is not the child's parent or legal guardian, they should declare that the parents/legal guardians have consented to the care of the child.

4. In the event of an adult refusing to show the child's ID and/or indicating the relationship, it should be explained that the procedure is intended to ensure the safety of children using the Royal Hotel & SPA and that, in accordance with the provisions of the Act of May 13th, 2016, facility employees must comply with the provisions on children's rights. After explaining the matter in a positive manner, thank them for the time spent making sure that the child is well looked after.

5. If the conversation does not dispel doubts regarding the suspicion against the adult and their intention to harm the child, and especially if they refuse to show an identity document or the child does not have such a document, and also refuses to submit a written statement, this should be discreetly notified to the supervisor and security staff (if they are on the premises at the time) in such a way as not to arouse suspicion (for example, you can refer to the need to use the equipment in the back of the reception, asking the adult to wait with the child in the lobby, restaurant or another place.)

6. From the moment the first doubts arise, both the child and the adult should be within the sight of the facility employee, if possible, and should not be left alone.

7. The supervisor who has been notified of the situation takes over the conversation with the adult in order to obtain further explanations.

8. If the conversation confirms the attempt or commission of a crime to the detriment of the child, the supervisor notifies the police. The procedure for circumstances indicating child harm is then applied (see Chapter III).

9. If employees of other departments, e.g. cleaning service, room service, bar and restaurant staff, security, etc., witness unusual and/or suspicious situations, they should immediately notify the supervisor, and in the event of his absence - the decision-maker who will take appropriate action (see points 7 and 8 above).

10. Depending on the situation and place, the supervisor verifies to what extent the suspicion of child abuse is justified. For this purpose, the supervisor selects appropriate measures to clarify the situation or decides to intervene and notifies the police.

CHAPTER III. PROCEDURE IN THE CASE OF CIRCUMSTANCES INDICATING A CHILD ABUSE BY AN ADULT

1. A reasonable suspicion of child abuse occurs when:

- a. The child has disclosed the abuse to a facility employee,

- b. The employee has observed the abuse,
- c. The child has signs of abuse (e.g. scratches, bruises), and when asked, the child responds incoherently and/or chaotically and/or becomes embarrassed, or there are other circumstances that may indicate abuse, e.g. finding pornographic materials involving children in an adult's room.

2. An employee who has a reasonable suspicion that a child staying in the facility is or has been harmed should immediately notify their supervisor/decision-maker, who will notify the police. In the event of a threat to the safety of a child, an employee who has a reasonable suspicion that a child has been harmed, shall immediately notify the police by calling 112 and describing the circumstances of the incident. Regardless of the above, the employee shall notify the Royal Hotel & SPA Coordinator about the incident.

3. Efforts should be made to make it difficult or even impossible for the child and the person suspected of harming the child to leave the facility.

4. According to the Code of Criminal Procedure, a citizen's arrest of the suspect may be made. In such a situation, until the police arrive, the detained person remains under the supervision of security staff or other employees of the Royal Hotel & SPA, who can perform such activities without endangering their health or life.

5. In each case, the child's safety should be ensured. If possible, the child should be under the care of the employee until the police arrive. If possible, an attempt should be made to show support to the child.

6. In the event of a justified suspicion that a crime has been committed related to the child's contact with the perpetrator's biological material (sperm, saliva, epidermis), the child should be prevented from washing and eating/drinking until the police arrive. The child should receive the explanation why such restrictions were imposed on them.

7. After the child is taken over by the police, the monitoring material and other important evidence (e.g. documents) regarding the incident should be secured and forwarded to the Coordinator, who, at the request of the services, will forward a copy of them by registered mail or in person to the prosecutor or the police.

8. After the intervention, the incident should be reported to the Coordinator, who will delineate it in an event log or other document intended for this purpose.

CHAPTER IV. PROCEDURE IN THE CASE OF SUSPICION OR ACKNOWLEDGMENT OF CHILD ABUSE BY AN EMPLOYEE OR OTHER ADULT

1. In the event of suspicion of child abuse by an employee or another adult who is not directly employed by Royal Hotel & SPA but by a third party, the person who has received this information should immediately inform the Coordinator of this fact, and in his absence, another person designated for this purpose.

2. If the life or health of a child is at risk, the person who has received information on this subject should immediately notify the police by calling the emergency number 112, providing their own data, the child's data (if possible), the child's location and a description of the circumstances of the case, and notify the supervisor/decision-maker, who will notify the child's

guardians/parents. The person who has received information about the incident also informs the Coordinator, at least by e-mail/in writing.

3. In the event that an employee has committed a form of harm to a child other than committing a crime to their detriment, the Coordinator, after receiving information, should investigate all the circumstances of the case, in particular by listening to the employee suspected of harm and other witnesses to the event. In a situation where the violation of the child's well-being is significant, in particular when discrimination or violation of the child's dignity has occurred, the Coordinator should recommend to the Entrepreneur appropriate personal actions towards this employee.

4. If the person who committed the harm is not directly employed by Royal Hotel & SPA, but by a third party (e.g. outsourcing), then it is recommended to ban them from entering the premises of Royal Hotel & SPA, and if necessary, terminate the contract with the third party.

CHAPTER V. PROCEDURE IN THE EVENT OF OTHER FORMS OF VIOLENCE TO A CHILD BY A PARENT/LEGAL GUARDIAN OR ANOTHER ADULT

1. In the event of a child being harmed by a parent/legal guardian or another adult with whom the child is staying in the facility, any employee witnessing such harm should react to it strongly.

2. If the child's life or health is at risk, the person who has received information on this subject should immediately notify the police by calling the emergency number 112, providing their own data, the child's data (if possible), the child's location and a description of the circumstances of the case, and notify the supervisor/decision-maker. The person who has received information on the incident also informs the Coordinator, at least by e-mail/in writing.

3. If a facility employee witnesses physical violence against a child (slapping, pulling, shouting, other items listed in the definition of physical violence), they should try to stop the shouting and react.

4. In the event of leaving a child under 7 years of age unattended, the employee who has received information about such an event should notify their supervisor. The supervisor who has been notified of the situation makes a decision on further action, taking into account the circumstances and the context of the provisions of the Penal Code and the Petty Offences' Code. Depending on this, the supervisor will attempt to find the parent/legal guardian or other adult with whom the child is staying on the premises and explain that they cannot leave the child unattended. In a situation where it is not possible to find the parent/legal guardian or other adult with whom the child is staying in the facility, or this person is unable to take care of the child, the supervisor notifies the police. In each case, the child's safety must be ensured.

CHAPTER VI: MONITORING AND EVALUATION OF MINORS' PROTECTION STANDARDS

1. The Entrepreneur appoints a coordinator responsible for the Minors' Protection Standards used at the Royal Hotel & SPA and places their contact details in a place easily accessible to employees and hotel guests, including children.

2. The Entrepreneur determines the scope of the Coordinator's tasks and competences in the topic of preparing employees to apply the provisions of the SOM, the principles of preparing employees to apply them and the method of documenting these activities.
3. The Coordinator, referred to in the preceding subpoint, monitors and evaluates the SOM once every two years.
4. Monitoring and evaluation include verification of the implementation of the Standards, responding to signals of violation of the rules and procedures and proposing changes to the document, especially in terms of adapting them to current needs and compliance with legislation in force.
5. The Coordinator conducts a survey among Royal Hotel & SPA employees every 2 years to monitor the level of implementation of the SOM.
6. In the survey, employees may propose changes and may point out violations of the SOM rules and procedures in the facility.
7. The Coordinator processes the surveys completed by employees, prepares a monitoring report on this basis, which is then forwarded to the Entrepreneur. The Entrepreneur introduces the necessary changes to the document and announces the new wording of the Minors' Protection Standards to employees.

Final provisions

1. The Minors' Protection Standards enter into force on 15th of August, 2024.
2. The Minors' Protection Standards are made available to all employees by placing them on the Royal Hotel & SPA website and in the General Director's Office.
3. The Minors' Protection Standards are made available to guests by placing them on the Royal Hotel & SPA website and in paper form at the Hotel Reception.
4. The Minors' Protection Standards are made available in an understandable and abbreviated version for children staying at the Royal Hotel & SPA, in a place accessible to them.