STANDARDS FOR THE PROTECTION OF MINORS

at the Montownia Lofts & Experience

Preamble

Bearing in mind the legal obligation arising from the provisions of the Act of 13 May 2016 on the prevention of the threat of sexual offences and the protection of minors and the content of the United Nations Guiding Principles on Business and Human Rights, recognising the important role of business in ensuring respect for the rights of children, the Montownia Lofts & Experience facility (hereinafter "Montownia") adopts for application the Standards for the Protection of Minors (also "SOM", "Standards"). This document is a set of policies and procedures to be used, in the event of suspected and prevented harm to a child who is in the Assembly Plant, taking into account the situation of children with disabilities and children with special educational needs.

The Montownia's Standards for the Protection of Minors are implemented on the basis of the following principles:

1. the Assembly House shall conduct its operational activities with respect for the rights of children as vulnerable persons to harm.

2. the Montownia recognises its role in conducting a socially responsible business and promoting desirable social attitudes.

3. Montownia in particular stresses the importance of the legal and social obligation to notify law enforcement authorities whenever a crime is suspected to have been committed against children and undertakes to train its employees in this regard.

Glossary:

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

1. tourist facilities - hotel facilities and other facilities where hotel services as defined in the Act of 29 August 1997 on hotel services and services of tour guides and tour operators are provided.

2. Child/minor - for the purposes of these standards, a child is understood to be any person under 18 years of age.

3. guardian of the child - a statutory representative of the child: parent or guardian; foster parent; temporary guardian (i.e. a person authorised to represent a minor citizen of Ukraine who resides in the territory of the Republic of Poland unaccompanied by an adult).

4. alien adult - any person over 18 years of age who is not the child's parent or legal guardian.

5. child abuse - shall be understood as behaviour that may constitute the commission of a criminal act to the detriment of a child by any person, including an employee of an entity, or a threat to the welfare of a child, including neglect of a child; any intentional or unintentional action/inaction of an individual, institution or society as a whole and any result of such action or inaction that violates the rights, freedoms and personal rights of children and/or interferes with their optimal development.

6 Forms of violence against the child:

• Physical violence against a child is violence whereby a child suffers actual physical harm or is potentially at risk of physical harm. This harm occurs as a result of an action or inaction on the part of a parent or other person responsible for the child, or whom the child trusts or has authority over. Physical violence against a child can be a repeated or one-off act.

• Psychological violence against a child is a chronic, non-physical, harmful interaction between a child and a carer, involving both actions and inactions. It includes, but is not limited to: 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 recognise or acknowledge the child's individuality and psychological boundaries between parent and child.

• Sexual exploitation of a child is the involvement of a child in sexual activity that the child is not able to fully understand and give informed consent to and/or to which the child is not developmentally mature and cannot consent in a legally valid manner and/or which is incompatible with the legal or moral norms of a given society. Sexual exploitation occurs when such activity occurs between a child and an adult or a child and another child, if these persons, because of their age or stage of development, are in a relationship of care, dependence, power. Sexual exploitation can also take the form of sexual exploitation, i.e. any actual or attempted abuse of a position of vulnerability, power advantage, or trust, for sexual purposes, including, but not limited to, profiting financially, socially or politically from the sexual exploitation of another person. A particular threat of sexual exploitation occurs during humanitarian crises. The threat of exploitation exists against both children and their caregivers (definition after UN Bulletin ST/SGB/2003/13).

• Child neglect is the chronic or incidental failure to meet a child's basic physical and psychological needs and/or to respect his or her basic rights, resulting in disruption to his or her health and/or developmental difficulties. Neglect occurs in a child's relationship with a person who has a duty of care, nurture, concern and protection to the child.

(7) Offence against a child - all offences that can be committed against adults and, in addition, offences that can only be committed against children (e.g. Sexual Exploitation under Article 200 of the Criminal Code). Due to the nature of accommodation facilities, where seclusion can easily be obtained, the offences most likely to occur on their premises will be offences against sexual freedom and morality, in particular rape (Article 197 CC), sexual exploitation of insanity and helplessness (Article 198 CC), sexual exploitation of dependence or critical position (Article 199 CC), sexual exploitation of a person under 15 years of age (Article 200 CC), grooming (seduction of a minor by means of distance communication - Article 200a CC).

(8) Other forms of child abuse than the commission of a criminal offence to the detriment of a child - all forms of violence used against a child that do not meet the characteristics of a criminal offence prosecuted by public prosecution (e.g. shouting, humiliation, tugging, name-calling, neglect of needs, etc.).

(9) A worker is a person employed under a contract of employment or performing work under a similar contract (e.g. commission, B2B, contract for work), as well as an intern, trainee, volunteer, etc.

(10) Child labourer - any person who performs tasks or is delegated to perform tasks related to the upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by or for minors.

(11) Operator - the body/entity/person managing a facility or network of facilities, responsible for the proper formal operation of the facility.

CHAPTER I. STAFF OF THE FACILITY

General principles

(1) The facility undertakes to educate its employees on circumstances indicating that a child in the facility may be abused and on how to respond promptly and appropriately to such situations. The facility may deliver the above education through various forms of training e.g.: external training, internal training, e-learning, educational materials developed by the facility and available to staff, educational materials available free of charge, developed by other organisations.

(2) Each employee, before being allowed to work, shall be familiarised with the SOM, which shall be confirmed by his/her declaration and commitment to comply with the rules and procedures contained in this document. Annex 1.

(3) Employees hired to work with children are subject to periodic training, which is documented by the employer.

(4) The Assembly House undertakes to take into account the situation of children with disabilities and children with special educational needs, adapting the guidelines in Appendix 12 to the specific nature and scope of the facility.

Employing people to work with children

(1) Persons working with children must demonstrate in their employment history that they have not harmed any child in the past.

(2) It is compulsory for every person employed/delegated by the Assembly to work with children to be checked against the Sexual Offender Register. This also applies to employees who are minors, i.e. under 18 years of age. Checking a person in the Register is done by printing out the results of a search of the person in the Register with restricted access, which is then inserted into the personal file of the person being checked. The range of personal data necessary to check a person in the Register is set out in Appendix 3.

(3) In addition, each person employed/delegated to work with children must provide information from the National Criminal Register in respect of offences specified in Chapters XIX and XXV of the Criminal Code, in Articles 189a and 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction (Journal of Laws of 2023, item 1939, as amended), or for corresponding offences specified in foreign law.

(4) If the person employed/delegated has a citizenship other than Polish, he/she should also submit information from the criminal record of the country of which he/she is a citizen, obtained for the purposes of professional or voluntary activities related to contacts with children, or information from the criminal record if the law of that country does not provide for the issuance of information for the aforementioned purposes.

(5) A declaration of the country(ies) of residence in the last 20 years, other than the Republic of Poland and the country of citizenship, should also be taken from the person recruited/delegated under pain of criminal liability. Attachment No. 4.

(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 recruited/delegated person shall submit a statement to that effect under pain of criminal liability. Annex 5.

(7) A declaration under penalty of criminal liability shall be made under the following: "I am aware of the criminal liability for making a false statement". This statement replaces the authority's instruction on criminal liability for making a false declaration.

(8) Where external bodies are used, the facility should include a provision in its contract with the body to enable it to enforce an appropriate standard of vetting of staff by the body to ensure their safety towards children. The provision will enable the facility to monitor compliance with the obligation on pain of immediate termination of the contract and a contractual penalty or other sanction related to non-compliance with the contract in this regard.

Terms of reference for persons designated to implement the Standards for the Protection of Minors:

(1) The Entrepreneur shall supervise the application of the SOM.

(2) The Entrepreneur shall appoint a coordinator for SOM (hereinafter referred to as "Coordinator").

(3) The Coordinator is the person responsible for familiarising the employees with the contents of the SOM and monitoring their application at the Assembly Plant.

(4) The Coordinator shall organise and document the process of educating staff on how to recognise the signs that a child in the facility may be abused and how to respond promptly and appropriately to such situations, in accordance with the procedures adopted by the facility.

(5) The coordinator shall describe each intervention or reported incident of child abuse on the premises in a document that is set up for this purpose (e.g. an incident log or intervention register).

(6) in the event of a reasonable suspicion that a crime has been committed, the Coordinator is responsible for securing evidence, including CCTV footage, and forwarding it to the prosecutor or police if requested by the service in the form of a copy by registered mail or in person.

(7) The Coordinator is responsible for carrying out the procedure when there has been harm to a child by a member of staff of the facility or another adult who is not directly employed by the Assembly House but by a third party.

(8) The coordinator is responsible for monitoring and updating the SOMs and their availability to both staff, visitors and others working with the facility.

(9) The Coordinator's data shall be available to all staff and guests of the facility, including children. The data must include information on how to contact the Coordinator (e-mail address, telephone, availability: days and hours of operation).

Principles for a safe staff-child relationship

(1) All employees of the Assembly Centre, including other adults who come into contact with children on the premises, are obliged to apply the following rules if the contact is with the permission of the facility.

(2) The guiding principle of all actions taken by staff who come into contact with children on the premises of the Assembly Rooms is to treat the child with respect and to have regard to their dignity and needs.

(3) It is unacceptable for staff and other adults to use violence in any form towards a child.

A. Behaviours and practices expected of staff

• Be patient and respectful in your communication with the child.

• Listen carefully to the child and give answers appropriate to the child's age and the situation at hand. When communicating with the child, try to keep your face at the level of the child's face.

• Assure the child that if he/she feels uncomfortable with a situation, he/she can tell you or another designated person and get help.

• Inform the child where the SOMs are located in the facility in a version they can understand. Assure him/her that if he/she has questions, he/she can go to you or another designated person.

• Respect the equal treatment of children regardless of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion and belief.

• Ensure a safe space. If there are children in the area where you are working, make sure that equipment and supplies are used as intended and that the environment is safe (pay attention to window and stairway protection, limited access to busy roads, open water, etc.).

• If you see a child/children left unattended and the situation may indicate a risk to the child's safety, take action to find the parent/guardian.

B. Unacceptable behaviour and practices by staff towards children in the facility

• You must not shout, shame, 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 enter into any romantic or sexual relationship with your child or make inappropriate proposals to them. This includes sexually explicit comments, jokes, gestures and sharing erotic and pornographic content with your child in whatever form.

• You must not record your child's image for private or business purposes (recording, photographing) without the consent of the child's parents/guardians and the consent of the child himself. This also applies to allowing third parties to record images of children. The exception to this is if the child's image is only a detail of a whole, such as a gathering, landscape, public event, in which case the consent of the child's parent/guardian is not required.

• You must not make contact with the child through private communication channels (private phone, email, instant messaging, social media profiles) or meet with the child outside the workplace.

• You must not offer your child alcohol, tobacco products or illegal substances.

• Never touch your child if they do not want you to or in a way that could be considered indecent or inappropriate.

If you witness any of the above described behaviours and/or situations from other adults or children, always inform the person responsible at the facility for the implementation and monitoring of SOM (Renata Mojsa-Ossowska, e-mail: renata.mojsa@montowniagdansk.pl, tel: 784 587 957) or your immediate supervisor.

CHAPTER II. PROCEDURE FOR IDENTIFYING THE CHILD WHEN REGISTERING AT RECEPTION

(1) One of the forms of effective prevention of child abuse is the identification of the child present in the facility and his/her relationship to the adult with whom he/she is present in the facility.

(2) The reception worker shall take all possible steps to carry out the identification of the child and their relationship to the adult with whom the child is accompanied.

(3) In order to carry out the identification of the child and his/her relationship to the person with whom he/she is in the facility, you must:

a. ask for the child's identification document or other document confirming that the adult has custody of the child. Examples of documents that can be used for identification are: identity card, school ID, MO citizen application, Internet Patient Account, court decision. In the absence of an identity document or refusal to produce it, ask for the child's details (name, address, PESEL number).

b. In the absence of documents indicating the relationship between the child and the adult or refusal to produce them, ask the adult and the child about this relationship. See Appendix 2 for an example of an adult and child interview schedule.

c. If the adult is not the child's parent or legal guardian, the adult should be asked to produce a document, e.g. a notarised parental consent for the person to travel with the child or a consent signed by the child's parent, together with the child's details, address, telephone contact for the parent and the identity document/PESEL number of the person to whom the parent has entrusted custody of the child.

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

(4) If the adult refuses to show the child's document and/or indicate the relationship, it should be explained that the procedure is to ensure the safety of the children using the Assembly Room and that, in accordance with the provisions of the Act of 13 May 2016, staff at the facility must comply with child rights legislation. Once the matter has been clarified in a positive way, you should thank them for their time in making sure the child is well looked after.

(5) If the conversation does not dispel doubts about the adult's suspicions and intentions to harm the child, particularly if the adult refuses to show identification or the child does not have it, or refuses to make a written statement, this should be discreetly communicated to the supervisor and security staff (if they are on the premises at the time) in a way that does not arouse suspicion (for example, you could refer to the need to use the equipment

in the back of the reception area, asking the adult to wait with the child in the lobby, restaurant or elsewhere). (You may, for example, refer to the need to use the equipment at the back of reception, asking an adult to wait with your child in the lobby, restaurant or other area).

(6) From the point of initial concern, both the child and the adult should be within sight of a member of staff at the facility if possible and should not be left alone.

7. the supervisor who has been alerted to the situation will take over the conversation with the adult for further clarification.

(8) If the conversation confirms the belief that a child has been attempted or committed, the supervisor shall notify the police. The procedure as in the case of circumstances indicating harm to the child (see Chapter III) is further applied.

(9). if unusual and/or suspicious situations are witnessed by staff from other departments e.g. cleaning service, room service, security staff, etc., they should immediately notify the supervisor or, in his/her absence, the decision maker who will take appropriate action (see points 7 and 8 above).

(10) Depending on the situation and location, the supervisor verifies the extent to which the suspicion of child abuse is justified. To this end, he/she selects appropriate measures leading to clarification of the situation or decides to intervene and notifies the police.

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

(1) A reasonable suspicion of child abuse exists when:

a. the child has disclosed the abuse to a member of staff at the facility,

b. the staff member has observed the abuse,

c. the child has signs of abuse on them (e.g. scratches, bruising) and when asked responds incoherently and/or chaotically and/or becomes confused or there are other circumstances that may indicate abuse e.g. child pornography found in an adult's room.

(2) A member of staff who has a reasonable suspicion that a child on the premises is being or has been harmed shall immediately notify the supervisor/decision maker who shall notify the police. Where there is a risk to the safety of a child, the member of staff who has a reasonable suspicion that a child is being harmed shall immediately notify the police by calling 112 and describing the circumstances of the incident. Notwithstanding the above, the member of staff shall notify the Coordinator of the incident.

(3) Efforts shall be made to make it difficult or even impossible for the child and the person suspected of harming the child to move away from the facility.

(4) In the case set out in the Code of Criminal Procedure, a citizen's arrest of the suspected person may be made. In such a situation, until the arrival of the police, the detained person shall remain under the supervision of security personnel or other staff of the Assembly Plant, who may carry out such actions without endangering their health or life.

(5) In all cases, the safety of the child must be ensured. The child, if possible, should remain in the custody of a member of staff until the police arrive. Where possible, attempts should be made to support the child. Appendix 10.

If there is a reasonable suspicion that a crime has been committed involving the child's contact with the perpetrator's biological material (sperm, saliva, epidermis), the child should be prevented, if possible, from washing and eating/drinking until the police arrive. Explain to the child why such restrictions have been applied to him/her.

(7) Once the child has been intercepted by the police, the CCTV footage and other relevant evidence (e.g. documents) relating to the incident should be secured and forwarded to the Coordinator, who will forward a copy by registered post or in person to the prosecutor or police if requested by the service.

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

CHAPTER IV. PROCEDURE IN THE EVENT OF SUSPECTED OR CONFIRMED CHILD ABUSE BY A STAFF MEMBER OR OTHER ADULT

(1) In the event of suspected child abuse by a member of staff or other adult who is not directly employed by the Assembly House but by a third party, the person who becomes aware of this information should immediately inform the Coordinator or, in the Coordinator's absence, another person designated for this purpose.

(2) If a child's life or health is at risk, the person who becomes aware of this should immediately notify the police by calling the emergency number 112, giving their own details, the child's details (where possible), the child's whereabouts and a description of the circumstances of the case and inform the supervisor/decision maker, who notifies the child's carers/parents. The person who becomes aware of the incident shall also inform the Co-ordinator, at least in email/written form.

(3) Where a member of staff has committed a form of harm to a child other than committing a criminal offence against the child, the Co-ordinator, on becoming aware, should investigate all the circumstances of the case, in particular by listening to the member of staff suspected of harm and other witnesses to the incident. Where the violation of a child's welfare is significant, in particular where there has been discrimination or a violation of a child's dignity, the Coordinator should recommend to the person in charge of the facility appropriate personnel action in relation to that staff member.

(4) If the person who has committed the abuse is not directly employed by the Assembly Plant but by a third party (e.g. outsourcing) then it should be recommended that he/she be banned from the premises of the Assembly Plant and if necessary terminate the contract with the third party.

CHAPTER V. PROCEDURE IF OTHER FORMS OF VIOLENCE AGAINST A CHILD BY A PARENT/LEGAL GUARDIAN OR OTHER ADULT ARE OBSERVED

(1) If a child is found to be abused by a parent/legal guardian or other adult with whom the child is on the premises, any member of staff who witnesses such abuse shall respond strongly.

(2) If a child's life or health is at risk, the person who becomes aware of such abuse should immediately notify the police by calling the emergency number 112, giving their own details, the child's details (where possible), the child's whereabouts and a description of the circumstances of the case and inform the supervisor/decision maker. The person who becomes aware of the incident shall also inform the Co-ordinator, at least in email/written form.

(3) If a member of staff at a facility witnesses physical violence being used against a child (spanking, tugging, shouting, others listed in the definition of physical violence) they should try to stop the abuse and respond. See Appendix 11 for possible forms and ways to respond to abusive behaviour by a parent/carer/other adult towards a child.

(4) In the event of leaving a child under the age of 7 unattended, the employee who has become aware of such an incident should notify a superior. The supervisor who has been informed of the situation shall decide on the further course of action, taking into account the circumstances and having regard to the context of the provisions of the Criminal Code and the Code of Offences. Depending on this, the supervisor shall attempt to locate the parent/legal guardian or other adult with whom the child is on the premises and explain that he/she cannot leave the child unattended. In circumstances where it is not possible to locate the parent/legal guardian or other adult with whom the child guardian/other adult is unwilling and/or unable to take custody of the child, the supervisor shall notify the police. In all cases, the safety of the child must be ensured.

CHAPTER V: MONITORING AND EVALUATION OF STANDARDS FOR THE PROTECTION OF MINORS

(1) The Undertaker shall appoint a Coordinator responsible for the Standards for the Protection of Minors applied at the Assembly Plant and shall post his/her contact details in a place easily accessible to employees and visitors to the facility, including children.

(2) The Undertaker shall define the terms of reference and authority of the Coordinator with regard to the preparation of employees for the application of the provisions of the SOM, rules for the preparation of staff for their application and the way in which these activities are documented.

(3) The coordinator referred to in the preceding paragraph shall monitor and evaluate the SOM once every two years.

(4) Monitoring and evaluation shall include verifying the implementation of the Standards, responding to signals of violations of the rules and procedures and proposing changes to the document, in particular with a view to adapting them to current needs and complying with current legislation.

(5) The Coordinator shall conduct a survey among the employees of the Assembly Plant, once every 2 years, to monitor the level of implementation of the SOM. A model of the survey is attached as Appendix 6.

(6) In the survey, employees may propose changes and indicate violations of SOM rules and procedures at the facility.

(7) The coordinator processes the questionnaires completed by the employees, prepares a monitoring report on this basis, which is then submitted to the entrepreneur. The entrepreneur makes the necessary changes to the document and announces the new wording of the Standards for the Protection of Minors to the employees.

Final provisions

(1) The Standards for the Protection of Minors shall enter into force on 15 August 2024.

(2) The Standards for the Protection of Minors shall be made available to all employees by posting them on the Assembly Plant website and with the Coordinator.

(3) The Standards for the Protection of Minors shall be made available to visitors by posting on the Assembly House website and at the reception desk of the facility.

(4) The Standards for the Protection of Minors shall be made available in an intelligible and abridged version for children in the Assembly Centre, in a place accessible to them.

CHAPTER V. PROCEDURE IN THE CASE OF ASCERTAINING THE USE OF OTHER FORMS OF VIOLENCE AGAINST A CHILD BY A PARENT/LEGAL GUARDIAN OR OTHER ADULT

(1) If a child is found to be abused by a parent/legal guardian or other adult with whom the child is on the premises, any staff member who witnesses such abuse shall respond strongly.

(2) If a child's life or health is at risk, the person who becomes aware of such abuse should immediately notify the police by calling the emergency number 112, giving their own details, the child's details (where possible), the child's whereabouts and a description of the circumstances of the case and inform the supervisor/decision maker. The person who becomes aware of the incident shall also inform the Co-ordinator, at least in email/written form.

(3) If a member of staff at a facility witnesses physical violence being used against a child (spanking, tugging, shouting, others listed in the definition of physical violence) they should try to stop the abuse and respond. See Appendix 11 for possible forms and ways to respond to abusive behaviour by a parent/carer/other adult towards a child.

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(3) The Coordinator referred to in the preceding paragraph shall carry out monitoring and evaluation of the SOM once every two years.

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(4) The Standards for the Protection of Minors shall be made available in an understandable and abbreviated version for children staying in the Assembly Room, in a place accessible to them.