

MINORS' PROTECTION STANDARDS

HOTEL SWING****

[version effective from November 19, 2024]

By decision of the Management Board of the Company of February 13, 2024, a document entitled "Minors' Protection Standards" was introduced for use in the Company. This version of the document takes into account the changes introduced later.

Legal basis: art. art. 22c of the Act of May 13, 2016 on counteracting threats of sexual crime (Journal of Laws 2023 item 1304, as amended) - hereinafter referred to as the "Act".

All persons employed by the Company - regardless of the basis of employment (employment contract, civil law contract, cooperation agreement, internship agreement, etc.) - are obliged to apply the provisions of this document. The Company has the right to request from the above-mentioned persons confirmation in writing of their commitment to apply the principles provided for in this document.

Park Wodny w Krakowie S.A. with its registered office in Kraków, KRS: 0000299207 (legal successor of Hotel Swing Sp. z o.o.) - the owner and operator of Hotel Swing in Kraków at ul. Dobrego Pasterza 124 (hereinafter referred to as the "Company") conducts its business with respect for human rights, in particular the rights of children as people who are particularly sensitive to harm. With the well-being of children in mind, these principles have been prepared, entitled "Standards for the Protection of Minors", as follows:

I. EXPLANATION OF TERMS

1. **Standards** - this document entitled: "Standards for the Protection of Minors".
2. **Child** - any person up to the age of 18.
3. **Staff or Staff Member** - a person employed by the Company regardless of the basis of employment (employment contract, civil law contract, cooperation agreement, internship agreement, etc.).
4. **Management Board of the Company** - the person/persons who are currently Members of the Management Board of the Company.
5. **Facility or Hotel** - Hotel Swing in Krakow at ul. Dobrego Pasterza 124.
6. **Child Abuse** - committing a crime to the detriment of a Child.
7. **Penal Code** - Act of 6 June 1997, Penal Code (consolidated text: Journal of Laws 2022, item 1138, as amended).
8. **Crime to the Detriment of a Child** - all crimes that can be committed against adults can be committed to the detriment of children, and additionally crimes that can only be committed against children (e.g. sexual abuse under Article 200 of the Penal Code). Due to the specificity of tourist facilities, where it is easy to obtain the possibility of isolation, the crimes that can most often be committed on their premises will be crimes against sexual freedom and decency, in particular rape (Article 197 of the Penal Code), sexual exploitation of insanity and helplessness (Article 198 of the Penal Code), sexual exploitation of dependency or critical situation (Article 199 of the Penal Code), sexual exploitation of a person under 15 years of age (Article 200 of the Penal Code), grooming (seduction of a minor by means of distance communication - Article 200a of the Penal Code).
9. **Legal Guardian** - parent or legal representative of the Child who is not a parent, appointed in accordance with applicable law.
10. **Adult Stranger** - a person over 18 years of age who is not a Legal Guardian for the Child.
11. **Intervention Card** - a document in accordance with the template established by the Management Board of the Company, prepared in each case of a finding of Child Abuse.
12. **Intervention Register** - a register kept by the Management Board of the Company or by a person designated by the Management Board of the Company in accordance with the template established by the Management Board of the Company, in which cases of intervention in connection with a finding of Child Abuse are documented.

II. GENERAL RULES

1. Every Hotel Guest, including a Child, should be treated with due respect and dignity. Any behavior that may violate the above principle is prohibited.
2. The Staff should respond in the event of Child Abuse or a reasonable suspicion that Child Abuse is occurring.
3. **One of the forms of effective prevention of Child Abuse is the identification of the Child staying in the Facility and their relationship to the adult with whom they are staying in the Facility.**
4. Every person, including a Child, has the right to report a suspicion or fact of Child Abuse to the Facility Staff and has the right to expect an appropriate response from the Staff.

III. PROCEDURE IN THE CASE OF SUSPECTED CHILD ABUSE

1. Whenever possible, the Child and their relationship with the adult with whom they are staying in the Facility should be identified. If necessary, the requirements resulting from these Standards should be referred to.
2. In unusual or suspicious situations indicating a possible risk of Child Abuse, identification is mandatory by a receptionist.
3. In order to identify the Child and their relationship with the person with whom they are staying in the Facility, you should:
 - 1) Ask about the Child's identity and the Child's relationship with the person with whom they arrived at the Facility or are staying there. For this purpose, you can ask for the Child's identity document or another document confirming that the adult has the right to care for the Child in the Facility¹. A list of sample documents is provided in the footnote below. In the absence of an identity document, you can ask for the Child's data (name, surname, address, PESEL number)
 - 2) In the absence of documents indicating the relationship between the Child and the adult, you should ask the adult and the Child about this relationship.
 - 3) If the adult is not the parent or legal guardian of the Child, you should ask if they have a document confirming the parents' consent to the adult's joint trip with the Child (e.g. a written statement).
 - 4) If the adult does not have a parental consent document, you should ask for the telephone number of the above-mentioned ones to call and confirm that the Child is staying in the Facility with an adult unknown to them with the knowledge and consent of the parents/legal guardians.
4. In the event of resistance from the adult to present the Child's document or indicate the relationship, it should be explained that the procedure is intended to ensure the safety of Children using the Facility and has been developed in consultation with non-governmental organizations operating in this field.
5. After explaining the matter positively, thank them for the time they spent making sure that the Child is well looked after and emphasize once again that the procedure is aimed at ensuring the safety of the Children.
6. If the conversation does not dispel doubts regarding the suspicion against the adult and their intention to harm the Child, the superior should be discreetly notified, and in the absence of contact with the superior, a person from the Company's Management Board.
7. From the moment when the first doubts arose, both the Child and the adult should be under constant observation by the Staff and not be left alone.
8. The superior who has been notified of the situation decides to notify the police or, in the event of doubts, takes over the conversation with the suspicious adult in order to obtain further explanations.

¹ (e.g. the Child's identity document indicating relationship, civil status certificate, court decision, notarial consent of the parent for a given person to travel with the Child or consent signed by the Child's parent together with the indication of the Child's data, residential address, telephone contact details of the parent and the identity document number/PESEL number of the person to whom the parent has entrusted the care of the Child).

9. If the conversation confirms the belief in an attempt or commission of a crime to the detriment of the Child, the superior notifies the police. The procedure is then applied in the event of circumstances indicating harm to the Child.
10. If employees of other departments of the Hotel, e.g. cleaning service, room service, bar and restaurant staff, relaxation zone, security etc., witness unusual or suspicious situations, they should immediately notify their superior, who will decide on appropriate action.
11. Depending on the situation and place, the superior verifies to what extent the suspicion of harm to the Child is justified. For this purpose, they select appropriate measures leading to the clarification of the situation or decide to intervene and notify the police.

IV. PROCEDURE IN THE CASE OF CIRCUMSTANCES INDICATING CHILD HARM

1. If you have a reasonable suspicion that a Child staying in the facility is being harmed, you should immediately notify the police by calling 112 and describing the circumstances of the incident. Depending on the dynamics of the situation and the circumstances, the call is made by a person who is a direct witness to the event (employee/supervisor). If the notifier is an employee, they also inform their supervisor about the incident. 2. A reasonable suspicion of Child Abuse occurs when:
 - 1) The Child has disclosed the Abuse to a Staff Member,
 - 2) The Staff Member has observed the Abuse of the Child,
 - 3) The Child has signs of Abuse (e.g. scratches, bruises) and when asked, the Child responds incoherently or chaotically 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. In this situation, the Child and the person suspected of Child Abuse should be prevented from leaving the Facility.
3. In justified cases, the suspected person may be detained by a citizen. In such a situation, until the police arrive, this person should be kept under the supervision of two employees in a separate room away from the view of other guests.
4. In each case, the Child's safety should be ensured. The child should remain under the care of an employee until the police arrive.
5. In the event of a reasonable suspicion that a crime has been committed involving the Child's contact with the perpetrator's biological material (sperm, saliva, skin), the Child should be prevented from washing, eating or drinking until the police arrive, if possible.
6. After the Child is picked up by the police, the CCTV footage and other important evidence (e.g. documents) regarding the incident should be secured and, at the request of the services, a copy should be forwarded by registered mail or in person to the prosecutor or police.
7. Each Staff Member participating in the intervention prepares a memo describing the circumstances of the incident.

V. DOCUMENTATION AND CONFIDENTIALITY

1. After the intervention carried out in accordance with point IV above, the event should be described in the Intervention Card. Intervention Cards are collected in the Intervention Register maintained by the Company.
2. Documentation regarding the intervention is kept in a manner that ensures confidentiality, for a period not longer than required or in accordance with applicable legal regulations.
3. All persons who, in connection with the performance of their official duties, have obtained information about Child Abuse or information related thereto, are obliged to keep this information confidential, excluding information provided to authorized employees of the Company and authorized institutions as part of intervention activities.

VI. STAFF

1. The implementation of these Standards shall be effected by familiarising all currently employed Staff Members with the content of these Standards. The Management Board of the Company or a person designated by the Management Board of the Company shall be responsible for the performance of the above obligation.
2. Each newly employed Staff Member shall be informed of these Standards before starting their official duties and shall be obliged to familiarise themselves with them.
3. The Management Board may also undertake other types of training, instructional and informational activities addressed to Staff Members.
4. If a Hotel Staff Member is employed for work related to education, leisure or childcare, it is mandatory to check such person in the Register of Sexual Offenders. The check should be repeated every year. The above Staff Members shall also be required to have an appropriate certificate of no criminal record from the National Criminal Register, in accordance with the requirements of the Act.
5. All Staff Members employed to work with children, including those who may have potential contact with children, should submit a declaration of no criminal record and no pending proceedings for acts against children.

VII. RULES FOR REVIEWING AND UPDATING STANDARDS

1. These Standards are subject to cyclical control, assessment and updating by the Management Board of the Company with the participation of competent persons at least once every two years.
2. The above activities are aimed at adapting the Standards to current needs and compliance with applicable regulations.

IX. RULES AND METHODS OF PROVIDING STANDARDS

1. The Company publishes the full text of the Standards on its website www.hotelswing.pl as well as in a visible place on the premises of the Facility.
2. The Company publishes a shortened text of the Standards containing information relevant to Children on its website www.hotelswing.pl as well as in a visible place on the premises of the Facility.