PROCEDURE FOR PROTECTING CHILDREN IN THE FACILITY

Preamble

Having regard to the content of the United Nations Guiding Principles on Business and Human Rights, recognizing the important role of business in ensuring respect for the rights of children, in particular the right to protection of their dignity and freedom from all forms of harm, **the Facility** hereby adopts this document as a model for rules and procedures in the event of a suspicion that a child staying in the Facility is being harmed and for preventing such threats.

§1.

Definitions

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

- 1. Child any person under 18 years of age.
- 2. Stranger Adult any person over the age of 18 who is not a parent or legal guardian of the Child.
- 3. Child Abuse means committing a crime to the detriment of a child.
- 4. Crimes against Children all crimes that can be committed against adults can be committed against children, as well as crimes that can only be committed against children (e.g., sexual abuse under Article 200 of the Penal Code¹). Due to the specific nature of facilities where it is easy to obtain the possibility of isolation, the crimes that may 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 a 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).
- 5. Facility understood as a place where Hossa.biz Sp. z o.o. conducts hotel, recreational, sports or interest-related activities and as the organization of recreational, sports or interest-related events by Hossa.biz Sp. z o.o.
- 6. Facility Director/Coordinator the person managing the Facility responsible for the implementation of this Procedure.
- 7. Facility Employee understood as a person who is part of the Facility's staff, regardless of the legal basis for performing work in the Facility.
- 8. Employee working with children An employee of the Facility who works with children, including a person working under a civil contract, an apprentice, an intern and a volunteer, irrespective of the person's nationality and age, who is subject to a check against the Sex Offender Register.

§ 2.

The Child Protection Procedure at our Facility will be implemented through the following principles:

- 1. The Facility conducts its operations with the utmost respect for human rights, in particular the rights of children as people who are particularly vulnerable to harm.
- 2. The facility recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
- 3. In particular, the Facility emphasises the importance of the legal and social obligation to notify law enforcement agencies of any suspected crime against children and undertakes to train its staff in this regard.

¹ Act of 6 June 1997, the Penal Code (consolidated text, Journal of Laws of 2022, item 1138, as amended).

- 4. The Facility is committed to educating staff on circumstances indicating that a child in the Facility may be abused and how to respond quickly and appropriately to such situations.
- 5. One of the forms of effective prevention of child abuse is the identification of the Child staying in the Facility and his/her relationship to the adult with whom he/she stays in the Facility. The Staff takes all possible steps to identify the Child and his/her relationship with the adult with whom he/she is present in the Facility.

§ 3.

Procedure in the event of suspected Child abuse

- 1. Whenever possible, the Child and his/her relationship with the adult with whom he/she stays in the Facility should be identified.
- 2. In unusual and/or suspicious situations indicating a possible risk of harm to the Child, identification is mandatory by a Facility Employee at the reception desk, if a reception desk is provided in a given Facility. Examples of situations that may raise suspicion can be found in **Appendix No. 1** to this procedure.
- 3. In order to identify the Child and his/her relationship to the person with whom he/she is staying in the Facility, it is necessary to undertake the following steps:
 - a. Ask about the Child's documents (ID card, passport, school ID) and record his/her data in the Facility's register if one is kept.
 - b. Ask about the Child's relationship with the person with whom he or she arrived or is staying at the Facility.
 - c. In the absence of documents indicating the relationship between the Child and the adult, you should ask about this relationship the adult and the Child. An example of a conversation with an adult and a child can be found in **Appendix No. 2** to this procedure.
 - d. If the adult is not the child's parent or legal guardian, you should ask if they have a document proving the parents' consent to the joint trip of the Adult Stranger and the Child (e.g., a statement from the parent). If the Adult Stranger does not have a parental consent document, you should ask for the telephone number listed above to call and confirm that the child is staying in the Facility with the Adult Stranger with the knowledge and consent of the parents/legal guardians.
- 4. In the event of resistance from the adult to presenting the Child's document and/or indicating 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 NGOs working on the subject.
- 5. Once the matter has been explained in a positive way, thank them for taking the time to ensure that the Child is well looked after and reiterate that the procedure is designed to keep Children safe.
- 6. If the conversation does not dispel any doubts regarding the suspicion against the adult and his/her intention to harm the Child, the Facility Director/Coordinator and security (if they are on the premises at the time) should be discreetly notified.
- 7. From the moment the first doubts arise, both the Child and the adult should be under constant supervision of the staff and not be left alone.
- 8. The Facility Director/Coordinator who has been notified of the situation will decide to notify the police or, in case of doubt, will take over the conversation with the suspicious adult for further clarification.
- 9. If the conversation confirms the belief that a crime has been attempted or committed against a child, the Facility Director/Coordinator notifies the police of this fact. The following procedure is followed in the event of circumstances indicating harm to a child.

- 10. All Facility Employees, including cleaning, room service, bar and restaurant staff, relaxation zone staff, and Facility security, in the event of witnessing unusual and/or suspicious situations, should immediately notify the Facility Director/Coordinator who will decide on appropriate actions.
- 11.Depending on the situation and location, the Facility Director/Coordinator verifies to what extent the suspicion of Child Abuse is justified. For this purpose, the officer selects appropriate measures to clarify the situation or decides to intervene and notifies the police.

§ 4.

Procedure in the event of circumstances indicating harm to a Child

- 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 circumstances, the call is made by the person who is a direct witness to the event (Facility Employee/Facility Director/Coordinator). If the notifier is a Facility Employee, he or she shall simultaneously inform the Facility Director/Coordinator about the incident.
- 2. Reasonable suspicion of Child Abuse occurs when:
 - a. The child disclosed to the Facility Employee the fact of being harmed,
 - b. A facility employee observed harm,
 - c. The child shows signs of abuse (e.g., scratches, bruises), and when asked, the child responds in an inconsistent and/or chaotic manner 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,
- 3. In this situation, the Child and the person suspected of Child Abuse should be prevented from leaving the facility.
- 4. In justified cases, a citizen's arrest² of a suspected person may be made. In such a situation, the person should be kept in a separate room, away from the view of other guests, under the supervision of two members of staff until the police arrive.
- 5. In every case, care must be taken to ensure the child's safety. The child should remain under the care of a Facility Employee until the police arrive.
- 6. In the event of a reasonable suspicion that a crime has been committed involving a child's contact with the perpetrator's biological material (sperm, saliva, epidermis), the child should, if possible, not be allowed to wash or eat/drink until the police arrive.
- 7. After the child is picked up by the police, it is necessary to secure the surveillance footage and other important evidence (e.g., documents) relating to the incident and, at the request of the services, forward a copy by registered mail or in person to the prosecutor or the police.
- 8. After the intervention, the incident should be described in an event log or other document intended for this purpose.

² Art. 243. Act of 6 June 1997, the Code of Criminal Procedure (consolidated text Journal of Laws of 2022, item 1375)

Employing People to Work with Children

- 1. All persons working with children must be safe for them, which means, that their employment history should indicate that they have not harmed any child in the past.
- 2. Every person employed by the Facility for work related to education, recreation and childcare must be checked against the Sex Offenders Register. A person is checked in the Register by printing out the results of the person's search in the Register with limited access, which is then entered into the personal file of the person being checked. The inspection should be repeated every year. The scope of personal data necessary to check a person in the Register can be found in **Appendix No. 3** to this Procedure.
- 3. Every Employee employed to work with children, including a person who may have potential contact with children, is obliged to familiarize themselves with the content of the Child Protection Procedure in the Facility and to comply with the rules and procedures contained in this document, which is confirmed by submitting a statement of no criminal record, that there are no proceedings pending against them for acts against Children and that they have familiarized themselves with the content of the Procedure. The model statement constitutes **Appendix No. 4** to this Procedure.
- 4. Every Employee employed to work with Children, including a person who may have potential contact with Children, should submit a statement regarding the country or countries of residence in the last 20 years, other than the Republic of Poland and the country of citizenship. The model statement constitutes **Appendix No. 5** to this Procedure.
- 5. An example list of positions/functions in the Facility subject to verification in the context of child protection can be found in **Appendix No. 6** to this Procedure.
- 6. In the event of concluding a civil law contract in B2B form, it is required to obtain the statement referred to in this section from the owner of the company. The model statement constitutes **Appendix No. 7** to this Procedure.

§ 6.

Final provisions

- 1. The procedure enters into force on August 15, 2024.
- 2. The Child Protection Procedure is available on the Facility's website, at the Facility's reception desk if there is any in a given Facility, or displayed on the notice board, if any.
- 3. This Procedure will be assessed at least once every two years to ensure it remains relevant to current needs and complies with applicable regulations, and the conclusions of the assessment will be documented in writing.

Appendices:

- 1) Appendix No. 1: Examples of situations that may raise suspicions or indicate child abuse.
- 2) Appendix No. 2: An example of a conversation with an adult and a child during identification
- 3) Appendix No. 3: The scope of employee/collaborator/intern/trainee/volunteer data necessary to check the Sex Offenders Register.
- 4) Appendix No. 4: A model statement of an Employee employed to work with Children stating that they have no criminal record, that there are no ongoing proceedings against them for acts against Children and that they have familiarized themselves with the content of the Procedure
- 5) Appendix No. 5: A model statement of an Employee hired to work with Children about the country or countries of residence in the last 20 years, other than the Republic of Poland and the country of citizenship
- 6) Appendix No. 6: A sample list of positions/functions in the Facility subject to verification in the context of child protection
- 7) Appendix No. 7: A model statement for outsourcing companies employed by the facility

Examples of situations that may raise suspicions or indicate child abuse

PLEASE NOTE! The presence of certain indicators does not automatically mean that a minor is being exploited. It is important to remain vigilant and pay attention to situations that may cause you concern. Another worrying situation is one in which the relationship between the adult and the child does not seem relaxed and caring.

RECEPTION (if available in a given Facility)

A Guest does not want to provide his or her personal data or the Child's data.	A Guest takes the Child directly to the room, giving the impression that s/he does not want the Child to make contact with the person working at the reception.
A Guest states that s/he does not have his and/or the Child's documents; s/he does not want to provide any explanation.	A Guest who checks in with a child invites other people who are not guests of the Property (such people may appear for a short time).
A Guest pays in cash or by prepaid card. S/he pays daily (s/he doesn't know how long s/he will stay) or asks someone else to pay for the accommodation.	A Guest rents a room by the hour, or not for the entire day; or s/he rents a room for a very long period.
A Guest brings with him/her gadgets or items that can be given to the Children as gifts.	A Guest who arrives with a child has no luggage or arrives with very little luggage (a handbag/briefcase).
A Guest arrives at the Facility with a child with whom he or she did not previously check in at the reception desk.	A Guest is behaving towards the child in a sexually charged manner, and the relationship between the adult and the child does not seem natural or caring.
A Guest with a child rents a room in which there are fewer beds than the number of people registered – e.g., a double bed for an adult.	A Child is dressed inappropriately for the weather or inappropriately for the adult with whom he or she came to the facility.
During registration, the child appears restless, stressed or forced to stay in the facility with an adult.	Children selling small items or begging in front of the Facility.
A Child arrives at the Facility late at night or at a time when he or she should be at school.	A Child does not know where he or she is, or when asked about the purpose of the trip, gives inconsistent answers.

RESTAURANT and BAR (if available in a given Facility)

A Guest comes to a bar or restaurant with a Child with whom he or she was not registered at the Facility.	People from outside, not registered at the Facility, seem to be looking for clients and offering them something (it is possible that they will want to act as intermediaries in passing on contact details to the Children).
A Guest enquiry about sexual services for adults, including with young people (e.g., overheard conversation in a bar or restaurant).	Children wait at a table or bar for an adult to pick them up who does not appear to be their parent or guardian (possibly a client or human trafficker).
Children who appear to be unattended ask for food, drinks, or money.	Exchange of cash between an adult and a Child (the exchange may raise suspicion of payment for services).
Children seem restless, nervous and avoid eye contact.	A Child has no identification document and appears to be under the supervision of an adult.
An Adult behaves in a sexual manner towards a Child – this is not a natural and caring relationship.	An Adult gives a Child alcohol.
During the stay, the adult and the Child do not come to the dining room for breakfast.	

FLOOR SERVICE (if provided in a given Facility)

"Do Not Disturb" sign still visible on the door to the room where the Children stay.	No consent to cleaning the room throughout the guest's stay.
Lots of banknotes/cash noticed in room (may indicate illegal payments).	Children left unattended in a room for a long time or not leaving the room at all (e.g., food is brought to them).
A large number of computers, cell phones, payment card readers and other items were noticed in the room.	The Adult and Children leave the room infrequently, almost never, or only at times when there are few guests moving around the facility.
There are children's clothes or toys in the room, even though the Child has not been registered with the Facility.	Adults who are not guests of the Facility are present in the lobby, appear to be observing the area, and interact with the guest who arrived with the Child.
A large amount of alcohol or drugs observed in the room where an adult is registered with a Child.	In a room where an adult has checked in with a Child/Children, there are condoms etc. left in the room or bathroom.

An example of a conversation with an adult and a child during identification

When talking to an adult, stay calm, polite, and patient.

At the beginning of the conversation, it is worth informing the adult that the Facility has child protection procedures in place and that the employee may ask additional questions to verify the child's data.

There may be situations in which an adult feels uncomfortable or expresses opposition or dissatisfaction. This does NOT necessarily mean that s/he is a potential criminal.

Example of a conversation with a client:

«Our Facility has child protection procedures in place, therefore, upon registration we ask you to present the identity documents of all persons who are guests of the facility. Does the child have an identity document with them?» (ID, passport, other).

If the Child does not have a document or after checking it, it is not certain that the adult is the Child's legal guardian, we can ask the following questions to help determine the situation:

- ➤ What is the Child's name and how old is he?
- Are you the Child's legal guardian? or Is the Child related to you?
- > Do you have a certificate from the Child's guardians that the Child is under your care?
- > Do you have the telephone number of the Child's guardians so that we can confirm this?
- For what purpose are you travelling with your Child?

Sample Conversation with a Child:

- What's your name, how old are you? Where do you live?
- ➤ Who is the person you came/are staying/travelling with?
- Do you know this Gentleman/Lady well?
- Where are your parents? We would like to contact them do you have their phone number?

If an adult is responsible for the Child, we inform them that we would like to speak with the Child. If an adult makes contact with the Child difficult, we can emphasize that in a situation where it is impossible to establish the Child's identity, we will have to notify the police.

Scope of employee/collaborator/intern/trainee/volunteer data required for checking in the Sex Offenders Register.

First name and surnam	e:
Date of birth:	
Pesel:	
Maiden name:	
Father's name:	
Mother's name:	

The register is available at: https://rps.ms.gov.pl/

To obtain information from the restricted access registry, you must create an organization profile.

A model statement of an Employee hired to work with Children stating that they have no criminal record, that there are no ongoing proceedings against them for acts against Children and that they have familiarized themselves with the content of the Procedure

Statement
place and date
I,holding identity card Nohereby state that I have not been convicted of a crime against sexual freedom and decency or a crime involving the use of violence to the detriment of a minor and that no criminal or disciplinary proceedings in this respect
are pending against me.
Furthermore, I state that I have become familiar with the Child Protection Procedure in force in and undertake to comply with it.
Signature

A model statement of an Employee hired to work with Children about the country or countries of residence in the last 20 years, other than the Republic of Poland and the country of citizenship

Statement

about the country or countries of residence in the last 20 years, other than the Republic of Poland and the country of citizenship

place and date
I,holder of identity card nohereby state that for the last 20 years prior to submitting this statement I have resided in:
1) in the period from to 2) in the period from to 3)
Furthermore, I state that I have become familiar with the Child Protection Procedure in force in
I am aware of criminal liability for submitting a false statement.
Signature

A sample list of positions/functions in the Facility subject to verification in the context of child protection

Job/Function Categories:

- Facility Employee DIRECTLY works with children, e.g., conducts classes and takes care of minors in the facility - the obligation to verify the employee in the Register of Sex Offenders and a certificate from the National Criminal Register in Poland and from other countries is required, if applicable.
- 2. Facility Employee who INDIRECTLY has contact with a minor in the facility has no obligation to verify. It is recommended that the employee voluntarily states that he or she has no criminal record for sexual offences listed in the National Criminal Code.

JOB DESCRIPTION	CATEGORY	SCOPE	COMMENT
A Easility Employee performing work	DIRECTLY	MINOR - GUEST	In the case of a B2B contract, it is
A Facility Employee performing work related to care and organization of			required to obtain a statement from the
free time for Children in the Facility			company owner (in accordance with
free time for children in the Facility			Appendix 7 to this procedure)
lifeguard	DIRECTLY	MINOR - GUEST	need for supervision at the pool
traineeship supervisor	DIRECTLY	MINORS - INTERNSHIP	takes responsibility for the trainee
	INDIRECTLY	MINOR -	only in the case of providing information
Facility Employee - Reception		GUEST/TRAINEE	to a minor, e.g., the child has left his/her
rasine, 2p.o, co mosephiem			parent/guardian (got lost)
	INDIRECTLY	MINOR -	in the case of service performed in the
		GUEST/TRAINEE	room during the stay of guests (a minor
Facility Employee - housekeeping			may be in the room, but a
			parent/guardian is always with him/her)
	INDIRECTLY	MINOR -	in the event of a fault in the room being
		GUEST/TRAINEE	repaired during the guests' stay (a minor
Facility Employee - housekeeping			may be in the room, but a
			parent/guardian is always with them)
	INDIRECTLY	MINOR -	while serving the takeaway dish
Facility Employee - Kitchen		GUEST/TRAINEE	restaurant hall (minors are under the
, ,			care of their parents/guardians)
Facility Employee – catering	INDIRECTLY	MINOR -	during the catering service (the minor is
(bar/café/restaurant/canteen)		GUEST/TRAINEE	under the care of a parent/guardian)
Facility Employee - administrative and	INDIRECTLY	MINOR -	employees with access to sensitive data
office (marketing, sales, accounting,		GUEST/TRAINEE	who do not have direct contact with a
secretarial)			minor
Managamanti Quin :	INDIRECTLY	MINOR -	in case of acting as host
Management; Owner		GUEST/TRAINEE	
	DIRECTLY /INDIRECTLY	MINOR -	In the event that the procedures are
Facility Employee – SPA		GUEST/TRAINEE	performed by an employee to a minor,
			the person working directly
Facility amplement and a second	INDIRECTLY	MINOR -	in urgent situations requiring security
Facility employee - security		GUEST/TRAINEE	intervention

A model statement for outsourcing companies the Facility cooperates with

place and date
Statement regarding the fulfilment of requirements specified by the provisions of the Act of May 13, 2016 on counteracting the threat of sexual crime and protecting minors - employees with Polish citizenship
On behalf of the company under the name of address, NIP (tax ID), National Court Register number (KRS) (hereinafter: "Company") I hereby state that the Company and the person employed by the Company, i.e., in the position of, who performs work in (hereinafter: "Employee") meet all the requirements specified in the provisions of the Act of 13 May 2016 on Counteracting the Threat of Sexual Crime and the Protection of Minors (hereinafter referred to as: "The Act"), in particular:
within 14 days prior to concluding an agreement with Hossa.biz Sp. z o.o. with its registered office in Gdańsk on or assigning an Employee to perform services for Hossa.biz Sp. z o.o. the Company obtained information included in the Register with limited access and/or the Register of persons in respect of whom the State Commission for Combating Sexual Exploitation of Minors Under the Age of 15, according to which the Employee's data are not included in the above-mentioned Registers,
the Employee submitted to the Company information from the National Criminal Register regarding the offences specified in Chapter XIX and XXV Penal Code, in Article 189a and Article 189a and Article 207 The Penal Code and the Act on Counteracting Drug Addiction of 29 July 2005 or for prohibited acts corresponding to these crimes specified in the provisions of foreign law, from which it results that the Employee has not been convicted and is not listed in the aforementioned Register, and the Company states that the information submitted by the Employee is dated no later than 14 days before the conclusion of the contract with Hossa.biz Sp. z o.o with its registered office in Gdańsk on Maintenant-IIII days before the conclusion of the Employee to perform services for Hossa.biz Sp. z o.o,
3) The Employee does not have any citizenship other than Polish.
also state that the Employee has become familiar with the Child Protection Procedure in force at Hossa.biz Sp. z o.o. and has undertaken to comply with it.
am aware of criminal liability for submitting a false statement.
Signature

Model statement for outsourcing companies employed by the facility

place and date	

Statement

regarding the fulfilment of requirements specified by the provisions of the Act of May 13, 2016

on counteracting the threat of sexual crime and protecting minors - employees <u>with citizenship</u> other than Polish

On behalf of the company under the name of address, Tax Identification Number, National Court Register number I hereby state that the Company and the person employed by the Company, i.e., in the position of, who performs work in (hereinafter: "Employee") meet all the requirements specified in the provisions of the Act of 13 May 2016 on Counteracting the Threat of Sexual Crime and the Protection of Minors (hereinafter referred to as: "The Act"), in particular:

- 1) within 14 days prior to concluding an agreement with Hossa.biz Sp. z o.o. with its registered office in Kołobrzeg on or assigning an Employee to perform services for Hossa.biz Sp. z o.o. the Company obtained information included in the Register with limited access and/or the Register of persons in respect of whom the State Commission for Combating Sexual Exploitation of Minors Under the Age of 15, according to which the Employee's data is not included in the aforementioned Registers,
- 3) The Employee has a citizenship other than Polish and therefore:
- b) the Employee has submitted to the Company a statement under penalty of criminal liability regarding the countries/countries in which he/she resided in accordance with art. 21 section 5 of the Act, and has submitted to the Company information from the criminal records of these countries obtained for the purposes of professional or volunteer activity related to contacts with children, and in the event that the law of the country/countries of the Employee's residence does

not provide for the issuance of information for the purposes of professional or volunteer activity related to contacts with children, has submitted information from the criminal register of such country/countries, and the Company declares that the submitted declaration and the information (information) submitted by the Employee is dated no later than 14 days before the conclusion of the agreement with Hossa.biz Sp. z o.o. with its registered office in Gdańsk on or the referral of the Employee to perform services for Hossa.biz Sp.

in the event that the law of the country from which the information referred to in point a) or b) above is to be submitted does not provide for its preparation or a given country does not keep a criminal record, the Company declares that the Employee - under penalty of criminal liability - has submitted to the Company a statement of this fact together with a statement that s/he has not been finally convicted in that country for prohibited acts corresponding to the crimes specified in Chapter XIX and XXV Penal Code, in Article 189a and Article 207 Penal Code and the Act of 29 July 2005 on Counteracting Drug Addiction and no other judgement has been issued against the Employee stating that s/he has committed such prohibited acts, and that there is no obligation resulting from a judgement of a court, other authorized body or act to comply with the ban on occupying any or specific positions, performing any or specific professions or activities related to the upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, practising sports or the pursuit of other interests by minors, or with caring for them, and the Company states that the statement (statements) submitted by the Employee is dated no later than 14 days before the conclusion of the agreement with Hossa.biz Sp. z o.o with its registered office in Gdańsk on or the assignment of the Employee to perform services for Hossa.biz Sp.

I also state that the Employee has become familiar with the Child Protection Procedure in force at Hossa.biz Sp. z o.o. and has undertaken to comply with it.

I am aware of criminal liability for	r submitting a false statement.
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Signature