

STANDARDS FOR THE PROTECTION OF MINORS

Legal basis: art. 22c Ustawy z dnia 13 maja 2016 r. o przeciwdziałaniu zagrożeniom przestępczością na tle seksualnym (Dz.U. 2023 poz. 1304 z późn. zm.) – hereinafter referred to as the “Act.”

All persons employed by the Company—regardless of the basis of their employment (employment contract, civil law contract, cooperation agreement, internship agreement, etc.)—are required to comply with the provisions of this document. The Company has the right to require the aforementioned persons to confirm in writing their commitment to comply with the rules set forth in this document.

FABRYKA MEBLI SPIN ROMAN ŁĄŻNY I JERZY ŁĄŻNY, with its registered office at 31 Mnichowo Street, 62-200 Gniezno. – owner of the Feniks Hotel in Gniezno at 18 Wrzesińska Street (hereinafter referred to as the “Company” or “Hotel”) conducts its business guided by respect for human rights, with particular emphasis on the rights of children, who are especially vulnerable to all forms of harm. With their well-being in mind, these guidelines, titled “Standards for the Protection of Minors,” have been developed, and their content is as follows:

I. DEFINITIONS

1. Standards – this document titled “Child Protection Standards”
2. Child – any person under the age of 18
3. Staff or Staff Member – a person employed at Hotel Feniks regardless of the basis of employment (employment contract, civil law contract, cooperation agreement, internship agreement, etc.)
4. Company Management – the person(s) who are currently members of the Company’s Management Board
5. Facility – Hotel Feniks in Gniezno at 18 Wrzesińska Street
6. Child Abuse – the commission of a crime to the detriment of a child
7. Penal Code – ustawa z dnia 06 czerwca 1997 r. Kodeks karny (tj. Dz.U. 2022 poz. 1138 z późn. zm.)
8. Crimes against a child – in the case of children, any crimes that are also committed against adults may occur, as well as crimes directed exclusively against children (e.g., sexual abuse pursuant to art. 200 Kodeksu Karnego). Due to the nature of tourist facilities, where it is easy to find seclusion, the most common crimes occurring on their premises are those related to violations of sexual freedom and public decency, especially rape (pursuant to art. 197 Kodeksu Karnego), sexual abuse of a mentally incompetent or helpless person (pursuant to art. 198 Kodeksu Karnego), sexual abuse of a relationship of dependence or a

critical situation (pursuant to art. 199 Kodeksu Karnego), sexual abuse of a person under 15 years of age (pursuant to art. 200 Kodeksu Karnego), and grooming (solicitation of a minor using means of remote communication—pursuant to art. 200a Kodeksu Karnego).

9. Legal Guardian – a parent or a non-parent legal representative of the Child, appointed in accordance with applicable law
10. Adult Stranger – a person over 18 years of age who is not the Child's Legal Guardian
11. Intervention Report – a document based on a template established by the Company's Management Board, prepared whenever Child Abuse is identified
12. Intervention Register—a register maintained by the Company's Management Board or by a person designated by the Company's Management Board in accordance with a template established by the Company's Management Board, in which cases of intervention in connection with the identification of Child Abuse are documented.

II. GENERAL PRINCIPLES

1. Every Hotel Guest, including a Child, shall be treated with due respect and with regard for their dignity. Any behavior that may violate the above principle is prohibited.
2. Staff are required to respond in situations of Child Abuse or where there is reasonable suspicion that Child Abuse is occurring.
3. One effective way to prevent child abuse is to identify any child staying at the Facility and determine their relationship to the adult with whom they are staying at the Facility.
4. Every person, including a child, has the right to report a suspicion or confirmed instance of child abuse to the Facility's staff and has the right to expect an appropriate response from the staff.

III. PROCEDURE IN CASES OF SUSPECTED CHILD ABUSE

1. Whenever possible, the Child's identity and their relationship to the adult with whom they are staying at the Facility must be verified. If necessary, reference should be made to the requirements set forth in this Standard.
2. In unusual or suspicious situations indicating a possible risk of child abuse, identification must be conducted by a reception desk employee.
3. To verify the Child's identity and their relationship to the person with whom they are staying at the Facility, the following steps must be taken:
 1. Ask about the Child's identity and their relationship to the person with whom they arrived at the Facility or are staying there—for this purpose, you may request the Child's or another document confirming that the adult has the right to care for the Child at the Facility. A list of examples of such documents is provided in the footnote below. If no identification document is available, you may ask for the Child's personal information (first name, last name, address, PESEL number)
 2. If there are no documents indicating a family relationship between the child and the adult, ask both the adult and the child about this relationship.
 3. If the adult is not the Child's parent or legal guardian, you should ask whether they have a document confirming the parents' consent for the adult to travel with the Child (e.g., a written statement)

4. If an adult does not have a parental consent form, ask for the parents' phone number so you can call and confirm that the child is at the Facility with an unrelated adult with the knowledge and consent of the parents or legal guardians.
4. If the adult refuses to present the child's identification or to clarify their relationship to the child, explain that the procedure is designed to ensure the safety of children using the Facility and was developed in consultation with non-governmental organizations active in this field.
5. After resolving the matter in a positive manner, thank the adult for the time they took to ensure that the child is in good care and reiterate that the procedure is intended to ensure the safety of children.
6. If the conversation does not dispel doubts regarding suspicions about the adult and their intent to harm the child, you should discreetly notify your supervisor and security personnel (if they are on the premises at that time).
7. From the moment the first concerns arise, both the child and the adult should be under constant supervision by staff and should not be left alone.
8. The supervisor, having been notified of the situation, decides whether to notify the police or, in case of doubt, takes over the conversation with the suspected adult in order to obtain further clarification.
9. If the conversation confirms the suspicion of an attempted or committed crime against a child, the supervisor shall report this to the police. Thereafter, the procedure for circumstances indicating harm to a child shall apply.
10. If employees from other Hotel departments—such as housekeeping, room service, bar and restaurant staff, the lounge area, security, and others—witness unusual or suspicious situations, they should immediately notify their supervisor, who will decide on the appropriate course of action.
11. Depending on the situation and location, the supervisor shall assess the validity of the suspicion of child abuse. To this end, the supervisor shall select appropriate measures to clarify the situation or decide to intervene and notify the police.

IV. PROCEDURE IN CASES WHERE CIRCUMSTANCES INDICATE CHILD ABUSE

1. If there is reasonable suspicion that a child present on the premises is being abused, the police must be notified immediately by calling 112 and describing the circumstances of the incident. Depending on the situation and circumstances, the call should be made by the person who is a direct witness to the incident (employee/supervisor). If the person making the report is an employee, they must also inform their supervisor of the incident.
2. A reasonable suspicion of child abuse exists when:
 1. A child has disclosed the abuse to a staff member,
 2. A staff member has observed child abuse,
 3. The child shows signs of abuse (e.g., scratches, bruises), and when asked, responds inconsistently or incoherently, becomes flustered, or there are other circumstances that may indicate abuse, such as finding child pornography in an adult's room.
3. In this situation, the child and the person suspected of child abuse must be prevented from leaving the premises.
4. In justified cases, a citizen may detain a suspect. In such a situation, until the police arrive, the person must be kept under the supervision of two employees in a separate room out of sight of other guests.

5. In all cases, the Child's safety must be ensured. The Child should remain under the care of a staff member until the police arrive.
6. In the event of a reasonable suspicion that a crime has been committed involving the Child's contact with the perpetrator's biological material (semen, saliva, skin cells), the Child should, as far as possible, be prevented from washing or eating/drinking until the police arrive.
7. After the police have taken the Child into custody, secure the surveillance footage and other relevant evidence (e.g., documents) pertaining to the incident and, at the request of the authorities, provide a copy via certified mail or in person to the prosecutor or the police.
8. Each staff member involved in the intervention shall prepare an official report describing the circumstances of the incident.

V. DOCUMENTATION AND CONFIDENTIALITY

1. Following an intervention conducted in accordance with Section IV above, the incident must be documented in the Intervention Record. Intervention Records are compiled in the Intervention Register maintained by the Company.
2. Documentation regarding interventions shall be stored in a manner that ensures confidentiality, for a period no longer than is required or consistent with applicable laws.
3. All persons who, in the course of their official duties, have obtained information regarding child abuse or related matters are required to keep such information confidential, except for information disclosed to authorized Company employees and authorized institutions as part of intervention activities.

VI. STAFF

1. These Standards shall be implemented by ensuring that all currently employed Staff Members are familiar with the content of these Standards. The Company's Management Board, or a person designated by the Management Board, is responsible for fulfilling the aforementioned obligation.
2. Every newly hired Staff Member, prior to commencing official duties, shall be informed of these Standards and is required to familiarize themselves with them.
3. The Management Board may also undertake other types of training, instructional, and informational activities directed at Staff Members.
4. If a Hotel Staff Member is hired for work related to education, recreation, or childcare, it is mandatory to check such a person against the Sex Offender Registry. This check must be repeated annually. Such Staff Members must also be required to provide an appropriate certificate of no criminal record from the National Criminal Registry, in accordance with the requirements of the Act.
5. All staff members who may come into contact with children must submit a declaration stating that they have no criminal record and are not currently under investigation for acts committed against children.

VII. RULES FOR REVIEWING AND UPDATING THE STANDARDS

1. These Standards are subject to periodic review, evaluation, and updating conducted by the Company's Management Board with the participation of competent individuals at least once every two years.
2. The aforementioned activities are intended to adapt the Standards to current needs and ensure compliance with applicable regulations.

VIII. PRINCIPLES AND METHOD OF MAKING THE STANDARDS AVAILABLE

1. The Company publishes the text of the Standards on its website, www.hotelfeniks.pl, as well as in a conspicuous location on the premises of the Facility.