

## Child protection procedure at Hotele Diament S.A.

### Preamble

In connection with the entry into force as of February 15, 2024, of the provisions of Article 22c(3) of the Law of May 13, 2016 on Preventing the Risk of Sexual Crime and Protecting Minors (i.e., Journal of Laws of 2024, item. 560), acting in accordance with 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, Hotele Diament S.A. adopts this document as a model of policies and procedures in the event of suspicion of harm to a child staying in a hotel and prevention of such threats.

We will implement the child protection policy at our hotels through this policy.

1. *Hotele Diament S.A.* conducts its operational activities with the utmost respect for human rights, in particular the rights of children as persons particularly vulnerable to abuse.
2. *Hotele Diament S.A.* recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
3. *Hotele Diament S.A.* in particular stresses the importance of the legal and social obligation to notify law enforcement authorities of any suspected crime committed against children and undertakes to train its staff in this regard.
4. *Hotele Diament S.A.* undertakes to educate the staff on circumstances indicating that a child staying at the facility may be abused and on 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 in the facility and his/her relationship to the adult with whom he/she is in the facility. Staff shall take all possible steps to carry out the identification of the child and his/her relationship to the adult with whom he/she is in the facility.

### Procedure for suspected child abuse

1. Whenever possible, identify the child and his/her relationship with the adult with whom he/she is in the facility
2. In unusual and/or suspicious situations indicating a possible risk of child abuse, identification is compulsorily carried out by the Reception Clerk. Examples of situations that may raise suspicion are included in Appendix 1.
3. In order to identify the child and his/her relationship to the person with whom he/she is in the facility, it is necessary to:
  - a. Inquire about the child's identity and the child's relationship to the person with whom the child has arrived at or is staying at the facility. For this purpose, you may ask for the child's identification document or other document confirming that an adult has the right to take care of the child in the facility. A list of sample documents is indicated in the footnote below. In the absence

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of an identity document, you can ask for the child's data (name, address, PESEL number)<sup>1</sup>.

- b. In the absence of documents indicating the relationship between the child and the adult, the adult and the child should be asked 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, ask if he or she has a document showing parental consent for the adult to travel together with the child (e.g., a written statement)<sup>2</sup>.
- d. If the adult does not have a parental consent document, ask for the phone number of the above-mentioned to call and confirm the child's stay in the facility with the stranger adult with the knowledge and consent of the parents/legal guardians.

4. In the event of resistance from an adult to show the child's document and/or indicate the relationship, it should be explained that the procedure serves to ensure the safety of children using the hotel and was developed in consultation with non-governmental organizations working on the subject.

**Note: if a certain situation arouses suspicion then it is expedient, advisable and legally justified (indicating the basis, i.e., Article 22c(3) of the above-mentioned law) to demand documentation of the child's identity. This will depend on the specific facts of the situation.**

- 5. Once the matter has been cleared up in a positive way, thank them for their time in making sure the child is well taken care of and once again emphasize that the procedure is designed to keep children safe.
- 6. If the conversation does not dispel doubts about suspicion toward the adult and his intention to harm the child, discreetly notify the supervisor and security personnel (if they are on the premises at the time). In order not to arouse suspicion, you can, for example, invoke the need to use the equipment at the back of the reception area, asking the adult to wait with the child in the lobby, restaurant or other place.

<sup>1</sup> In case of refusal to provide the child's data, you can additionally indicate the circumstance that the child / his parents are jointly responsible for any damage to the facility, in addition to the person ordering the accommodation..

<sup>2</sup> In various places, parents are required to prepare a document that certifies that they are giving permission for their child to travel with someone who is not their legal guardian. Asking for such a document is intended to make the guest of the facility aware that the absence of any data on his or her connection to the child with whom he or she is checking in at the facility is not correct/obvious. It also provides an argument for the employee to ask further questions to determine whether child abuse is occurring in this situation.

7. From the moment the first doubts arise, both the child and the adult should be under constant observation by staff and not be left alone.
8. The supervisor who has been notified of the situation or the Hotel Director who is approached by the supervisor in case of doubt shall take over the conversation with the suspected adult for further clarification.
9. If the conversation confirms the belief that a crime has been attempted or committed against the child, the Hotel Director shall notify the police. Further follow the procedure in case of circumstances indicating harm to the child.
10. If unusual and/or suspicious situations are witnessed by employees of other departments of the hotel, e.g. Employees of individual Hotel Departments (Reception, Floor Service, Restaurant, Technical) they should immediately notify their supervisor, who will provide full information about the incident to the Hotel Director.
11. Depending on the situation and location, the supervisor or the Hotel Director verifies the extent to which the suspicion of child abuse is justified. For this purpose, appropriate measures leading to clarification of the situation are selected or a decision is made to intervene and notify the police.

**Procedure in case of circumstances indicating child abuse**

12. Having a reasonable suspicion that a child staying in the facility is being harmed (or that the welfare of a child on the hotel premises is at risk), the Hotel Director shall notify the police by calling 112 and describing the circumstances of the incident. Depending on the dynamics of the situation and the circumstances, in particularly justified cases, if taking action by the Hotel Director will cause a delay that may adversely affect the situation of the child, the call is made by a person who is a direct witness to the incident. If the notifier is an employee, at the same time he or she informs his or her supervisor about the incident.
13. Reasonable suspicion of child abuse occurs when:
  - a. the child disclosed the fact of abuse to a hotel employee,
  - b. the employee has observed harm,
  - c. the child has signs of abuse (e.g., scratches, bruises) on him or her, and when asked, 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.
14. In this situation, prevent the child and the person suspected of harming the child from leaving the facility.
15. In any case, the safety of the child should be ensured. The child should remain in the care of a staff member until the arrival of the police.
16. If there is a reasonable suspicion that a crime has been committed associated with contact of the child with the biological material of the perpetrator (sperm, saliva, epidermis), if possible, do not allow the child to wash and eat/drink until the arrival of the police.

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17. After the child is picked up by the police, the surveillance footage and other relevant evidence (e.g., documents) regarding the incident should be secured and, upon request, a copy provided to the relevant authorities.
18. After the intervention, describe the event in the event log or other document intended for this purpose.

**Hiring people to work with children.**

1. All persons working with children must be safe for them, which means, among other things, that their employment history should indicate that they have not harmed any child in the past.
2. It is mandatory to check each person employed by Hotele Diament S.A. for work related to education, leisure or childcare in the Register of Sexual Offenders (and in the case of persons without Polish citizenship, to request information from the relevant criminal record of the country of citizenship, in the manner and for the periods provided for in the Law of May 13, 2016) . Checking a person in the Registry is carried out by printing out the results of a search for a person in the Registry with restricted access, which is then inserted into the personal file of the person checked. The check should be repeated every year. The scope of personal data necessary for checking a person in the Registry is provided in Appendix 3.
3. The person referred to in paragraph (2) shall submit to the employer information from the National Criminal Register with respect to the offenses specified in Chapters XIX and XXV of the Penal Code, in Articles 189a and 207 of the Penal Code, and in the Act of July 29, 2005 on Counteracting Drug Addiction (Journal of Laws of 2023, item 1939), or for the corresponding criminal offenses specified in the provisions of foreign law.
4. All employees who may have potential contact with children should submit a statement of no criminal record and no proceedings for acts against children - Appendix No. 4.

**Rules to ensure safe relationships between children and staff.**

1. The principles of safe relations of hotel staff with children apply to all employees, persons employed under a civil contract, interns, temporary workers.
2. The Hotel staff treats the child with respect and takes into account the child's dignity and needs, acts for the child's welfare and best interests.
3. Each employee of the Hotel is obliged to maintain a professional relationship with children and each time consider whether his/her reaction, message or action towards a child is appropriate to the situation, safe, justified.
4. It shall be impermissible to engage in any of the unauthorized activities specified herein in any form whatsoever:
  - **It is forbidden to embarrass, humiliate, disrespect and insult a minor,**
  - respect the child's right to privacy. The exception to this rule is when there is a threat to the life or health of a minor, but you should explain this to him as soon as possible,

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- in the case of inappropriate behavior of the child - such as disturbing other guests at leisure, playing games that threaten the safety of the child - attention should be paid in a form that does not violate the dignity of the child.
- 5. Violation of the rules listed in this document by hotel staff shall be grounds for disciplinary or criminal liability.

**Glossary:**

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

1. A child is any person under 18 years of age.
2. A foreign adult is any person over the age of 18 who is not the child's parent or legal guardian.
3. Harming a child means committing a crime against the child or endangering the child's welfare.
4. Crime against a child - all crimes that can be committed against adults can be committed against children, in addition to crimes that can only be committed against children (e.g., Sexual Exploitation from Article 200 of the Criminal Code). Due to the nature of tourist facilities, where seclusion can easily be obtained, the crimes most likely to occur on their premises will be crimes against sexual freedom and morality, in particular rape (Art. 197 of the Penal Code), sexual exploitation of insanity and helplessness (Article 198 of the Penal Code), sexual exploitation of dependence or critical position (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 remote communication - Article 200a of the Penal Code).
5. Personnel/employee - any person employed in Hotele Diament S.A. on the basis of an employment contract, civil law contract, as well as an apprentice, trainee and temporary employee.

**The procedure is subject to publication on the website of Hotels Diament S.A. in full and abbreviated versions, and is also available for review in printed form at all hotels.**

**The Hotel Director, insofar as it pertains to the area of the Hotel in which I hold this position, shall supervise the implementation of this Child Protection Procedure and its application. The Director of the Hotel is also the person responsible for filing notifications to the competent authorities regarding abuse or suspected abuse of minors, for preparing the staff to apply this Procedure (to the extent that applies to the area of the Hotel in which I hold this function). In the absence of the Hotel Director, his duties shall be assumed by another staff person designated by the Hotel Director.**

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