

**STANDARDS FOR THE PROTECTION OF MINORS
IN COTTONINA HOTEL & MINERAL SPA RESORT**

Preamble

Bearing in mind the legal obligation under the provisions of the Law of 13 May 2016. on Counteracting 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, Villa Cottonina Sp. z o.o., which operates the Hotel under the name Cottonina Hotel & Mineral SPA Resort, adopts the Standards for the Protection of Minors. This document constitutes a set of rules and procedures to be applied in the event of suspected harm to a child staying at Cottonina Hotel & Mineral SPA Resort and to prevent such harm, taking into account the situation of children with disabilities and children with special educational needs.

The Standards for the Protection of Minors at Cottonina Hotel & Mineral SPA Resort are implemented based on the following principles:

1. The Cottonina Hotel & Mineral SPA Resort conducts its operational activities with respect for the rights of children as vulnerable persons.
2. Cottonina Hotel & Mineral SPA Resort recognises its role in conducting a socially responsible business and promoting desirable social attitudes.
3. Cottonina Hotel & Mineral SPA Resort particularly emphasises the importance of the legal and social and social obligation to notify law enforcement authorities of any suspected offence against children and commits to train its Employees in this regard.

Definitions

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. **Hotel** - facility included in the tourist infrastructure, operated by Villa Cottonina Sp. z o.o. under the name Cottonina Hotel & Mineral SPA Resort.
3. **Employee** - a person employed under a contract of employment or performing work on the basis of a similar contract (e.g. contract of mandate, contract for specific work), as well as an intern and trainee.
4. **Child/Minor** - for the purposes of these standards, a child is defined as any person under the age of 18.

Villa Cottonina Sp. z o.o.

5. **Child Guardian** - the child's legal representative: parent or guardian; foster parent; temporary guardian (i.e. a person authorised to represent the minor).
6. **Alien Adult** - any person over the age of 18 who is not the child's parent or legal guardian.
7. **Harm to a child** - the commission of an illegal or criminal act to the detriment of a child by any person, including a member of staff, or a threat to the welfare of a child, including neglect. To the detriment of children, all offences that can be committed against adults can be committed, in addition to offences that can only be committed against children (e.g. sexual abuse under Article 200 of the Criminal Code). Due to the specific nature of Tourist 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 (Art. 197 of the Penal Code), sexual exploitation of insanity and helplessness (art. 198 of the Penal Code), sexual exploitation of dependence or critical position (art. 199 of the Penal Code), sexual exploitation of a person under 15 years of age (art. 200 of the Penal Code), grooming (seduction of a minor by means of remote communication - art. 200a of the Penal Code).

**Rules and procedures for identifying a minor staying at the Hotel
and his/her relationship to the adult with whom he/she is staying at the Hotel**

1. The identification of the minor and his/her relationship to the adult with whom he/she is staying at the Hotel is carried out by the hotel reception staff. The receptionist shall take all possible steps to carry out the identification of the child and his/her relationship with the adult who accompanies the child. In order to identify the child, it is necessary to:
Ask for the child's identity and the child's relationship to the person with whom the child has arrived at or is staying at the Hotel. For this purpose, you may ask for the child's identity card or other document that proves that the adult has the right of custody of the child.
2. 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.
3. If the adult is not the child's carer, ask if they have a document showing that the child's carers agree to the adult travelling with the child (e.g. a written statement giving consent from at least one of the child's parents/legal guardians).
4. If an adult does not have a document of consent from the child's carers, you can ask for the telephone number of the above to call and confirm the child's stay in the Hotel with a strange adult with the knowledge and consent of the child's guardians.

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5. If there is resistance from the adult to show the child's document or to indicate the relationship, it should be explained that the procedure serves to ensure that children staying at the Cottonina Hotel & Mineral SPA Resort and that such an obligation arises from generally applicable laws and ask for the completion of the Declaration of Consent of Parents/Legal Guardians for the child's custody.
6. If the employee's conversation with the child and the adult does not dispel doubts concerning the suspicion towards the adult and his/her intention to harm the child, and in particular if the adult refuses to show an identity document or the child does not have such a document, and refuses to give a written statement, this must be discreetly communicated to the supervisor and the Hotel Manager in such a way as not to arouse suspicion.
7. From the moment the first doubts arise, both the child and the adult should be under constant observation of the staff and should not be left alone if possible.
8. The supervisor who has been alerted to the situation will take over the conversation with the adult for further clarification.
9. Depending on the situation and the location, the supervisor verifies to what extent 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 Hotel Director and the police.
10. In the event that unusual or suspicious situations are witnessed by staff from other units, e.g. room service, restaurant, SPA, security, they shall immediately inform the Hotel Director or his/her designee who shall decide on the appropriate action to be taken.

**Policies and procedures for responding in the event of a reasonable suspicion,
that the welfare of a minor present on hotel premises is at risk**

1. Staff shall be knowledgeable and alert to risk factors and symptoms of child abuse as part of their duties.
2. If there is a reasonable suspicion that the welfare of a minor on Hotel premises is at risk, then each Hotel staff member is required, in response, to take appropriate action. A reasonable suspicion of child abuse occurs when:
 - a child has disclosed abuse to Staff
 - staff have observed the abuse

- a child shows signs of abuse (e.g. scratches, bruises) and when asked responds incoherently, chaotically or with embarrassment or there are other circumstances that may indicate abuse e.g. child pornography has been found in an adult's room
 - the child's Guardian or a third party will report child abuse.
3. The actions referred to in paragraph 1 should consist of immediately reporting the situation to the supervisor or the Hotel Director of the situation and, if this is not possible or would cause unnecessary delay, to notify the police.
 4. If an employee of the Hotel can be expected to do so in a given situation, he/she may also take direct action to stop the harm, taking into account, however, that such an attempt does not endanger the safety of himself/herself, the minor or members of the public. A bystander within the meaning of this provision is not the perpetrator or co-perpetrator of the abuse. The actions of the Hotel employee shall remain within the limits of the law, in particular comply with the rules governing necessary defence or so-called civil detention.
 5. The staff and the intervening person are obliged to make a note of the incident and the action taken. The note should be in writing.
 6. After the intervention, the incident should be described in the Child Welfare Incident Record. The record of incidents endangering the welfare of the child is kept by the person designated by the Director of the hotel.

Hiring people to work with children

1. The management of Cottonina Hotel & Mineral SPA Resort will make every effort to ensure that Hotel employees who may have contact with minors staying at the Hotel are aware of their responsibilities in this respect and that they are able to ensure safe relations between them and minors.
2. Hotel employees should not allow themselves to be left in the Hotel in the room alone with the minor, except when leaving the minor alone in the room could significantly endanger the minor's well-being, in particular health or life. Where possible, the presence of another adult should be ensured.
3. Any contact between a Hotel employee and a minor staying at the Hotel, should not go beyond interactions justified by the Hotel employee's official duties.

Principles to ensure a safe relationship between staff and child

1. The guiding principle of all actions taken by staff is to act for the welfare of the child and in their best interests.
2. Staff shall treat each child with respect and take into account their dignity and needs. It is unacceptable to use violence against a child in any form. In pursuing these aims, staff shall act within the framework of the applicable law, the organisation's internal regulations and their own competences.
3. Staff are required to maintain a professional relationship with children and to consider each time whether a response, message or action towards a child is appropriate to the situation, safe, reasonable and fair to other children.
4. A child must not be shamed, humiliated, disrespected or insulted. A child must not be shouted at in a situation other than for the safety of the child or other children.
5. You must not disclose sensitive information about the child to unauthorised persons, including to other children. This includes the child's image, information about the child's family, economic, medical, welfare and legal situation.
6. Staff are required to reassure children that if they feel uncomfortable about a situation, a particular behaviour or words, they can tell the hotel staff about it and can expect an appropriate response and assistance.
7. Children must not be offered alcohol, tobacco products or illegal substances.
8. Any violent action towards a child is not acceptable.
9. Contact with children should only take place during working hours and for purposes within the scope of staff duties. It is not permitted to invite children to one's place of residence or to meet them outside working hours. This includes contact with children through private communication channels (private phone, email, instant messaging, social media profiles).

Final provisions

1. The Policy shall enter into force on 15 February 2024.
2. The Standards will be reviewed and updated at least every two years to ensure that they are in line with current needs and comply with current legislation.
3. The Hotel shall make the Standards available on its website and at the reception desk.