

## **Child Protection Standards at Nickel Resort & Wellnest**

### **Preamble**

Bearing in mind the guidelines of the United Nations on Business and Human Rights, recognizing the significant role of business in ensuring respect for children's rights, in particular the right to the protection of their dignity and freedom from all forms of harm, "Nickel Hospitality sp. z o.o." (hereinafter "the Company") adopts this document as a model of rules and procedures applicable in the event of suspicion that a child staying at Nickel Resort & Wellnest (hereinafter "the Resort") is being harmed, and to prevent such threats. We will implement the child protection policy in our Resort through these principles:

1. The Hotel conducts its operational activities with the utmost respect for human rights, in particular the rights of children as individuals particularly vulnerable to harm.
2. The Hotel recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
3. The Hotel specifically emphasizes the importance of the legal and social obligation to notify law enforcement authorities of any suspected commission of a crime against children and undertakes to train its staff in this regard.
4. The Hotel undertakes to educate Staff on the circumstances indicating that a Child staying at the facility may be harmed and on how to react quickly and appropriately to such situations.
5. One form of effectively preventing harm to children is the identification of a child staying at the facility and his/her relationship to the adult person with whom he/she is staying at the facility. The Facility Staff shall take all possible steps to identify the child and his/her relationship with the adult person with whom he/she is staying at the facility.
6. Definition of terms: a) Child/Minor – any person under the age of 18; b) Resort Employee/Staff - A person engaged by "Nickel Hospitality Sp. z o.o." to perform duties at the Resort, regardless of the manner of entrusting these duties, including a person employed under a civil law contract, an apprentice, a trainee, and a volunteer, regardless of the nationality and age of that person.

### **I. PRINCIPLES ENSURING SAFE RELATIONS BETWEEN MINORS AND RESORT STAFF, AND IN PARTICULAR PROHIBITED BEHAVIORS TOWARDS MINORS:**

1. Staff contact with Children should occur only during working hours and relate to purposes within the scope of the Staff's duties. Staff are obliged to act in an open and transparent manner for others to minimize the risk of misinterpreting their behavior, and furthermore, to ensure that they remain within sight or hearing of other Staff members when conducting activities with Children.
2. Resort Employees who have direct contact with minors should perform their tasks in a manner that ensures respect for the rights of third parties, in particular the rights of Children, with respect, and in a polite and cultured manner, refraining from any behavior that could violate the Minor's personal space, cause them to feel threatened, uncomfortable, or fearful.
3. Staff are obliged to consider each time whether the reaction, communication, or action towards a Child is adequate to the situation, safe, justified, and fair to other Children, and in communication with Children, they are obliged to be patient, listen carefully to

Children, and provide them with answers appropriate to their age and the given situation, taking into account any disability of the Child.

4. When making decisions concerning a Child, Staff are obliged to inform the Child about it and try to take their expectations into account. Respecting the Child's right to privacy, if it is necessary to deviate from the principle of confidentiality to protect the Child, Staff are obliged to explain this to them as soon as possible.
5. In particular, the following are unacceptable:
  - using any form of violence against minors, both verbal and, even more so, physical, including shaming, humiliating, disregarding, and insulting the Child, yelling at the Child in a situation other than one resulting from the safety of the Child or other Children; hitting, shoving, pushing, any violation of the Child's physical integrity, touching the Child in a way that could be considered indecent or inappropriate;
  - disclosing sensitive information concerning the Child to unauthorized persons, including other Children, whereby the prohibition covers both the Child's image and information about their family, economic, medical, care, and legal situation;
  - recording the Child's image (filming, voice recording, photographing) for private purposes, as well as enabling third parties to record Children's images without the prior consent of the Child's Guardians and the Child themselves;
  - establishing any relationships with the Child, and in particular romantic or ones through private communication channels (private telephone, e-mail, instant messengers, social media profiles), making inappropriate proposals, including comments, jokes, gestures, and providing Children with erotic and pornographic content regardless of its form; inviting Children to one's place of residence, meeting with them outside of working hours;
  - offering Children alcohol, tobacco products, or illegal substances, as well as using them in the presence of Children.
6. Hotel Employees should pay attention to disturbing behaviors of minors that may indicate they are being harmed and should attempt to contact the minor if they suspect such harm. If a minor tries to contact an employee, the employee should listen to them and, if possible, obtain the fullest possible information about the minor's situation. Staff are obliged to assure Children that if they feel uncomfortable in any situation, regarding specific behavior or words, they can tell the Staff or the Hotel Director about it and can expect an appropriate reaction and/or their help.
7. Care for minors with special educational needs or disabilities: a. Minors with special needs and with disabilities usually require greater care. In such cases, detailed sensitivity combined with the issuance of clear and unambiguous messages is expected from staff. Carefully listening to minors is of great importance. What they say should not be disregarded.

b. If a minor with disabilities needs assistance with personal activities, staff should provide it with full understanding of the problem and with the documented consent of the parent (guardian).

c. Minors with disabilities or specific difficulties may be excluded from the group more quickly than others. For this reason, the staff's ability to listen to such children is particularly important, especially since they may have difficulty expressing their feelings.

## **II. PRINCIPLES AND PROCEDURES FOR IDENTIFYING A MINOR STAYING AT THE HOTEL AND THEIR RELATIONSHIP TO THE ADULT PERSON WITH WHOM THEY ARE STAYING:**

1. Whenever possible, the identification of the child and their relationship with the adult person they are staying with at the Resort should be carried out. Identification is mandatory by the reception staff upon check-in at the Hotel and by other employees in unusual and/or suspicious situations indicating a possible risk of harm to the child.
2. To identify a child and his/her relationship to the person they are staying with at the facility, the Staff shall:
  - a. ask about the child's identity and the child's relationship to the person with whom they arrived at or are staying at the facility. For this purpose, a child's identity document or other document confirming that the adult person has the right to care for the child at the facility may be requested (e.g., a child's identity document indicating kinship, a civil status certificate, a court order). In the absence of an identity document, the child's details (first name, last name, address, PESEL number) should be requested;
  - b. in the absence of documents indicating the kinship between the child and the adult person, the adult person and the Child should be asked about this relationship;
  - c. if the adult person is not the parent or legal guardian of the Child, they should be asked whether they have a court order for the care of the Child or a notarized consent from the parent for that person to travel with the child or a document proving the parents' consent for the adult person's joint trip with the child (e.g., a written statement).
  - d. If the adult person does not have a document of parental consent, the telephone number of the aforementioned should be requested in order to call and confirm the child's stay at the facility with an unrelated adult person with the knowledge and consent of the parents/legal guardians.
3. In the event of resistance from the adult person to show the child's document and/or indicate the relationship, the Staff shall explain that the procedure serves to ensure the safety of children using the Hotel and has been developed in agreement with non-governmental organizations operating in this field. After a positive clarification of the matter, the Staff shall thank them for the time spent ensuring that the Child is well cared for and reiterate that the procedure is intended to ensure the safety of children.
4. In the event of difficulties in identifying the Child and obtaining confirmation that the Child is at the Resort with the consent of the legal guardians, the Staff shall inform their supervisor or the Hotel Director. From the moment the first doubts arise, both the child, especially if they have a disability, and the adult person should be under constant observation by the staff and should not be left alone. In such a situation, the Staff shall apply the principles and procedures for responding in the event of a reasonable suspicion that the welfare of a minor staying at the Resort is at risk.

## **III. RULES AND PROCEDURES FOR RESPONDING IN CASE OF A REASONABLE SUSPICION THAT THE WELL-BEING OF A MINOR STAYING AT THE HOTEL FACILITY OR USING TOURIST SERVICES IS THREATENED:**

1. All employees are responsible for receiving reports of incidents endangering a minor and providing them with support. Regarding any situation of harm or possession of information about harm to a minor, the Personnel is obliged to immediately inform their direct supervisor or the Facility Director verbally, and also in writing, by submitting an appropriate official note describing the course of the event. The note can be in written or email form.

2. If Personnel, including employees of hotel departments other than the reception, e.g., housekeeping, bar and restaurant staff, SPA area staff, security, and others, witness unusual and/or suspicious situations involving Children, they should immediately notify their supervisor or the Facility Director, who will decide on the intervention. The information should be provided on the same day the employee became aware of the suspicion or information. If the employee is no longer present at the Facility on that day, they are obliged to provide the information by phone.
3. A reasonable suspicion of child abuse occurs when: a. the child disclosed the fact of being harmed to a Facility employee, b. an employee observed the abuse, c. the Child has traces of harm on their body (e.g., scratches, bruises), and when asked, answers inconsistently and/or chaotically, and/or becomes embarrassed, or other circumstances may indicate harm, e.g., finding child pornography in an adult's room.
4. Forms of Harm to a Child: a. a crime has been committed against the child (e.g., sexual abuse, child maltreatment), b. another form of harm has occurred that is not a crime, such as shouting, physical punishment, humiliation, c. the child's basic needs have been neglected (e.g., related to nutrition, hygiene, or health).
5. In a situation of reasonable suspicion of a crime committed against a Child, the Child and the person suspected of harming the Child should be prevented from leaving the Facility. In justified cases, a citizen's arrest of the suspected person can be made. 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 sight of other guests. In this case, the child's safety should be ensured. The child should remain under the care of an employee until the police arrive.
6. In the case of a reasonable suspicion that a crime related to the child's contact with the perpetrator's biological material (sperm, saliva, epidermis) has been committed, if possible, the child should not be allowed to wash or eat/drink until the police arrive.
7. After the child is taken by the police, the monitoring footage and other relevant evidence (e.g., documents) related to the incident should be secured, and upon the request of the authorities, a copy should be sent by registered mail or delivered personally to the prosecutor or the police.
8. If child abuse is reported against a member of the Personnel, that person will be immediately removed from all forms of contact with children (not only the harmed child) pending the investigation of the matter.
9. If a member of the Facility Personnel has committed a form of harm to a child other than a crime, the Facility Director should investigate all the circumstances of the case, in particular, hear the person suspected of the harm, the child, and other witnesses to the event. If the violation of the child's well-being is significant, especially if discrimination or violation of the child's dignity has occurred, consideration should be given to terminating the legal relationship with the person who committed the harm, or recommending such a solution to that person's superiors. If the person who committed the harm is not directly employed by the Company but by a third party, then a ban on that person's entry to the institution's premises should be recommended, and if necessary, the agreement with the cooperating institution should be terminated.
10. In the case of suspected harm to a child by another child staying at the Facility, a conversation should be held with the child suspected of the harm and their guardians, as well as separately with the child subjected to the harm and their guardians. In addition, other individuals with knowledge of the event should be interviewed. Together with the guardians of the child causing harm, a remedial plan should be developed to change the undesirable behaviors. With the guardians of the child subjected to harm, a plan to ensure their safety should be developed, including ways to

isolate them from the sources of danger. During the conversations, it should be ensured that the child suspected of harming another child is not themselves being harmed by their guardians, other adults, or other children. If such a circumstance is confirmed, intervention should also be taken in relation to that child.

11. All individuals who, in connection with the performance of their professional duties, have obtained information about harm to a Child or related information are obliged to keep this information confidential, excluding information provided to authorized institutions as part of intervention activities. There is an absolute prohibition on informing the media about such events.

#### **IV. PROCEDURES AND PERSONS RESPONSIBLE FOR FILING NOTIFICATIONS OF SUSPECTED CRIMES AGAINST A MINOR AND NOTIFYING THE FAMILY COURT:**

1. In urgent situations where there is a suspicion that a child's life is in danger or faces serious harm to health, the appropriate services (police, ambulance) should be informed immediately by calling 112 or 998 (ambulance). The notification to the services is made by the member of staff who first becomes aware of the threat and then completes the Intervention Protocol.

2. In case of difficulty in identifying the Child and the lack of confirmation that the Child is at the Facility with the consent of the Child's legal guardians, the Supervisor who has been notified of the situation decides whether to notify the police or, in case of doubt, takes over the conversation with the suspicious adult to obtain further explanations. If the conversation confirms the belief of an attempted or committed crime against a child, the Supervisor notifies the police of this fact.

3. Depending on the situation and location, outside of the situations referred to in points 1 and 2, the Supervisor or the Facility Director, based on information from the Personnel, verifies the validity of the suspicion of child abuse. For this purpose, they select appropriate measures to clarify the situation or decide to conduct an intervention, and then determine which entities and institutions should be informed about the suspicion of harm to a minor.

4. Interventions in cases of child abuse are conducted by the Hotel Director, who may permanently designate another person for this task. If such a person is designated, their details (name, surname, email, phone) will be made known to the Personnel, children, and guardians. If another person is designated to conduct interventions, the term "Facility Director" should be understood as the person responsible for conducting the intervention.

5. If child abuse is reported, the Facility Director conducts a conversation with the child and other persons who have or may have knowledge of the event and the child's personal situation (family, health), in particular their guardians. The Director of the institution tries to establish the course of events.

6. The Facility Director informs the guardians of the obligation to report the suspicion of child abuse to the appropriate institution (prosecutor's office/police or family and guardianship court).

7. After informing the guardians in accordance with the preceding point, the Facility Director submits a notification of suspected crime to the prosecutor's office/police or a request for

insight into the family situation to the district court, family and juvenile division, social welfare center.

8.If a crime has been committed against the Child, the Facility Director prepares a notification of the possibility of a crime being committed and forwards it to the locally competent police or prosecutor's office.

9.If the person suspected of abuse is a child between the ages of 13 and 17, and their behavior constitutes a punishable act, the locally competent family court or police should also be informed by written notification.

10.If the person suspected of abuse is a child over 17 years of age, and their behavior constitutes a crime, then the locally competent police unit or prosecutor's office should be informed by written notification.

11.If, from the conversation with the guardians, it appears that they are not interested in helping the child, ignore the event, or otherwise do not support the child who has experienced harm, the Facility Director prepares a request for insight into the family situation, which is sent to the competent family court.

12.A protocol is drawn up for each intervention, which is attached to the register of interventions kept by the institution.

13.In the case of notification to the Police or other authorized services, the relevant provisions for the disclosure of personal data to state services apply to the transfer of personal data of adults and Minors to them.

**V. SCOPE OF COMPETENCE OF THE PERSON RESPONSIBLE FOR  
PREPARING THE ENTITY'S PERSONNEL FOR THE APPLICATION OF  
STANDARDS, THE RULES FOR PREPARING THIS PERSONNEL FOR THEIR  
APPLICATION, AND THE METHOD OF DOCUMENTING THIS ACTIVITY:**

1. The Standards come into force on July 23, 2024.
2. The announcement of the standards takes place by posting them on the Facility's website and displaying them at the Facility's Reception, also in a shortened version intended for children, by July 31st.
3. The Facility Director familiarizes employees with the content of the Standards and conveys the rules for their application, which is done by sending the text additionally by electronic means. This applies to all employees within 14 days of the introduction of the standards and each time a new employee is hired or new duties involving Children are assigned.
4. The Facility Personnel confirms in writing that they have read the Company's documentation and the rules for applying protective measures against the risks of sexual offenses and the protection of minors contained therein by submitting an appropriate statement.
5. The Facility Director is responsible for training Hotel employees in the application of the Child Protection Standards and the procedures in force in the Company, in particular regarding: a. the necessity to react and report without undue delay to the supervisor any unusual or suspicious situations where there is a suspicion of child abuse; b. the manner of communication with Minors and prohibited behaviors.

6. The training referred to in point 5 is conducted cyclically at least once a year. Attendance at the training is confirmed by a signed attendance list.
7. At least once every two years, the Company will assess the standards to ensure their adaptation to current needs and compliance with applicable regulations. The conclusions of the assessment will be documented in writing.
8. An internal register of disclosed or reported incidents or events endangering the well-being of a minor is created and kept at the Hotel, for the maintenance of which the Facility Director is responsible.

**Management Board of the Company**

**Nickel Hospitality Sp. z o. o.**