

STANDARDS FOR THE PROTECTION OF MINORS

Cyrus Hotel in Wrocław

Preamble

Taking into account the legal obligation arising from the provisions of the Act of May 13, 2016 on counteracting the threats of sexual crime and the protection of minors and the content of the United Nations guidelines on business and human rights, recognizing the important role of business in ensuring respect for children's rights, Dreamriver Development sp. z o.o. based in Wrocław, operating Cyrus Hotel in Wrocław, hereinafter referred to as "Cyrus Hotel", adopts the Standards for the Protection of Minors (also "SOM", "Standards").

This document is a set of rules and procedures used in the event of suspicion that a child staying at the Cyrus Hotel is being harmed and to prevent such threats, taking into account the situation of disabled children and children with special educational needs. The Standards for the Protection of Minors at the Cyrus Hotel are implemented on the basis of the following rules:

1. Cyrus Hotel conducts its operational activities respecting the rights of children as persons who are particularly sensitive to harm.
2. Cyrus Hotel recognizes its role in running a socially responsible business and promoting desirable social attitudes.
3. Cyrus Hotel in particular emphasizes the importance of the legal and social obligation to notify law enforcement authorities of any suspected crime against children and undertakes to train its employees in this respect.

Glossary:

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 are provided, as defined in the Act of August 29, 1997 on hotel services and the services of tour guides and tourist guides.
2. **Child/minor** - for the purposes of these standards, a child is any person who is under 18 years of age.
3. **Guardian of the child** – the legal representative of the child: parent or guardian; foster parent; temporary guardian (i.e. a person authorized to represent a minor citizen of Ukraine who stays in the territory of the Republic of Poland without adult supervision).
4. **Strange adult** - any person over 18 years of age who is not the child's parent or legal guardian.
5. **Harming a child** - should be understood as behavior that may constitute a prohibited act to the detriment of the child by any person, including an employee of the entity, or a threat to the well-being of the child, including neglect; any intentional or unintentional action/omission of an individual, institution or society as a whole and any result of such action or inaction that violates the

rights, freedoms and personal rights of children and/or interferes with their optimal development.

6. Forms of violence against children:

- **Physical violence** against a child is violence as a result of which the child suffers actual or is potentially at risk of physical harm. This harm occurs as a result of an action or omission on the part of a parent or other person responsible for the child, or whom the child trusts, or who has authority over the child. Physical violence against a child may be a repeated or one-off activity.

- **Psychological violence** against a child is a chronic, non-physical, harmful interaction between a child and a caregiver, including both actions and omissions. This includes, among others: emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, denigration, rejection, developmentally inappropriate or inconsistent interactions with the child, failure to notice or recognize the child's individuality and mental boundaries between parent and child.

- **Child sexual abuse** is the involvement of a child in sexual activity to which he or she is unable to fully understand and give informed consent and/or to which he or she is not developmentally mature and cannot consent in a legally valid manner and/or which is incompatible with the legal or moral norms of a given society. Sexual abuse occurs when such activity occurs between a child and an adult or a child and another child, if these people, due to their age or level of development, remain in a relationship of care, dependence, and power. Sexual exploitation may also take the form of **sexual exploitation**, which is any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes, including, but not limited to, profiting financially, socially, or politically from the sexual exploitation of another person. There is a particular risk of sexual exploitation during humanitarian crises. The risk of exploitation exists both for children and their guardians (definition after UN Bulletin ST/SGB/2003/13).

- **Child neglect** is the chronic or incidental failure to meet his or her basic physical and mental needs and/or failure to respect his or her basic rights, resulting in health disorders and/or development difficulties. Neglect occurs in the child's relationship with the person who is obliged to care, raise, care and protect the child.

7. **Crime against a child** - all crimes that may be committed against adults, and additionally crimes that may only be committed against children (e.g. sexual abuse under Article 200 of the Penal Code). Due to the specificity of accommodation facilities in which isolation can be easily obtained, the crimes that may most often occur there will be crimes against sexual freedom and decency, in particular rape (Article 197 of the Penal Code), sexual abuse of insanity and helplessness (Article 197 of the Penal Code). 198 of the Penal Code), sexual exploitation of a dependent or 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).

8. **Other forms of harming a child** than committing a crime to its detriment - all forms of violence used against a child that do not meet the criteria of a crime

prosecuted by public prosecution (e.g. shouting, humiliation, pulling, name-calling, neglect of needs, etc.).

9. **An employee** is a person employed under an employment contract or performing work under a similar contract (e.g. commission, B2B, contract for specific work), as well as an intern, trainee, volunteer, etc.
10. **An employee employed to work with children** is any person who performs tasks or is delegated to perform tasks related to upbringing, education, recreation, treatment, providing psychological advice, spiritual development, practicing sports or pursuing other interests of minors, or caring for them.
11. **Entrepreneur** – a body/entity/person managing a given facility or network of facilities, responsible for the proper functioning of the facility in formal terms.

CHAPTER I. FACILITY EMPLOYEES

General rules

1. Cyrus Hotel undertakes to educate its employees about circumstances indicating that a child staying at the facility may be harmed and about ways to quickly and appropriately respond to such situations. The facility can implement the above-mentioned education through various forms of training, e.g.: external and internal training, e-learning, educational materials developed by the hotel and available to employees, educational materials available free of charge, developed by other organizations.
2. Before being allowed to work, each employee is familiarized with the SOM, which is confirmed by submitting a declaration and committing to comply with the principles and procedures contained in this document. Annex No. 1
3. Employees employed to work with children are subject to periodic training, which is documented by the employer.
4. Cyrus Hotel undertakes to take into account the situation of children with disabilities and children with special educational needs, adapting the guidelines from Annex 11 to the specificity and scope of operation of the facility.

Employing people to work with children

1. Persons working with children must demonstrate in their employment history that they have not harmed any child in the past.
2. Any person employed/delegated to work by Cyrus Hotel with children should be checked in the Register of Sexual Offenders. This also applies to minor employees, i.e. under 18 years of age. Checking a person in the Register is done by printing the results of searching for a person in the Register with limited access, which is then inserted into the personal file of the person being checked. The scope of personal data necessary to check a person in the Register is included in Annex 2.
3. In addition, each person employed/delegated to work with children must provide information from the National Criminal Register regarding crimes specified in Chapters XIX and XXV of the Penal Code, in Art. 189a and art. 207 of the Penal

Code and in the Act of 29 July 2005 on counteracting drug addiction (Journal of Laws of 2023, item 172 and of 2022, item 2600), or for prohibited acts corresponding to these crimes specified in the provisions of foreign law .

4. If the employed/delegated person has citizenship other than Polish, he or she should also submit information from the criminal register of the country of which he or she is a citizen, obtained for the purposes of professional or voluntary activity related to contacts with children, or information from the criminal register if the law of that country does not provide for the issuance of information for the above-mentioned purposes.
5. A statement should also be collected from the person employed/delegated on the country(ies) of residence during the last 20 years, other than the Republic of Poland and the country of citizenship, submitted under pain of criminal liability. Annex No. 3
6. If the law of the country from which information about a good criminal record is to be submitted does not provide for the issuance of such information or does not maintain a criminal record, the employing/delegated person shall submit a declaration of this fact under pain of criminal liability. Annex No. 4
7. Declarations submitted under pain of criminal liability include the following declaration: "I am aware of criminal liability for submitting a false statement." This declaration replaces the authority's instruction on criminal liability for submitting a false declaration.
8. If the facility uses the services of external entities, the facility should include an appropriate provision in the contract with this entity that will enable the entity to enforce an appropriate standard in checking employees for their safety towards children. The provision will enable the facility to control the fulfillment of the obligation under pain of immediate termination of the contract and contractual penalty or other sanctions related to failure to meet the terms of the contract in this respect.

Scope of competences and responsibilities of persons designated to implement the Standards for the Protection of Minors

1. Supervision over the use of SOM is carried out by the Entrepreneur.
2. The entrepreneur appoints a SOM coordinator (hereinafter referred to as the "Coordinator").
3. The coordinator is the person responsible for familiarizing employees with the content of the SOM and monitoring its application at the Cyrus Hotel.
4. The coordinator organizes and documents the employee education process in terms of recognizing symptoms that a child staying in the facility may be harmed and how to quickly and appropriately respond to such situations, in accordance with the procedures adopted by the facility.
5. The coordinator describes each intervention or related event reported with harm to a child on the premises in a document that is created for this purpose (e.g. an event log or intervention register).
6. In the event of a justified suspicion that a crime has been committed, the Coordinator is responsible for securing evidence, including surveillance recordings, and forwarding them, at the request of the services, in the form of a copy by registered mail or in person to the prosecutor or the police.

7. The coordinator is responsible for conducting the procedure in a situation where a child has been harmed by an employee of the facility or another adult who is not directly employed by Cyrus Hotel but by a third party.
8. The coordinator is responsible for monitoring and updating SOM and their availability for employees, guests and other entities cooperating with the facility.
9. The coordinator's details are available to all employees and guests of the facility, including children. The data must include information on how to contact the Coordinator (e-mail address, telephone number, availability: days and working hours).

Principles of safe employee-child relationships

1. All employees of the Cyrus Hotel are obliged to apply the following rules, including other adults who have contact with children on the premises, if this contact takes place with the consent of the facility.
2. The guiding principle of all activities undertaken by employees who have contact with children on the premises of the Cyrus Hotel is to treat the child with respect and take into account his or her dignity and needs.
3. It is unacceptable for employees and other adults to use any form of violence against a child.

A. Behaviors and practices expected of employees

- Be patient and respectful when communicating with your child.
- Listen carefully to the child and give him answers appropriate to his age and the situation. When communicating with your child, try to keep your face at the level of the child's face.
- Reassure your child that if they feel uncomfortable with a situation, they can tell you or someone else and get help.
- Inform the child where in the facility there are SOMs in a version he or she understands. Reassure them that if they have any questions, they can contact you or another designated person.
- Maintain equal treatment of children regardless of their gender, sexual orientation, ability/disability, social status, ethnicity, culture, religion and worldview.
- Maintain a safe space. If there are children in the area where you are working, make sure that equipment and supplies are used as intended and that the environment is safe (pay attention to window and staircase guards, limited access to busy roads, open water, etc.).
- If you see a child/children left unattended and the situation may indicate a threat to the child's safety, take action to locate the parent/guardian.

B. Unacceptable behavior and practices by employees towards children in the facility

- You must not shout, embarrass, humiliate, disrespect or insult the child.
- You must not hit, poke, push or in any way violate the child's physical integrity, unless there is a threat to the child's health or life.
- You must not have any romantic or sexual relationship with your child or make inappropriate propositions to your child. This also includes sexually explicit

comments, jokes, gestures and sharing erotic and pornographic content with children regardless of its form.

- You are not allowed to record the child's image for private or business purposes (recording, photographing) without the consent of the child's parents/guardians and the consent of the child himself. This also applies to allowing third parties to record images of children. The exception is when the child's image is only a detail of the whole, such as a gathering, landscape, public event, then the consent of the child's parent/guardian is not required.
- You must not contact the child through private communication channels (private telephone, e-mail, instant messaging, social media profiles) or meet the child outside the workplace.
- You must not offer your child alcohol, tobacco products or illegal substances.
- Never touch your child unless they want to or in a way that might be considered obscene or inappropriate.

If you witness any of the above-described behaviors and/or situations from other adults or children, always inform the person responsible for implementing and monitoring SOM at the facility or your immediate supervisor.

CHAPTER II. PROCEDURE FOR IDENTIFYING A CHILD WHEN REGISTERING AT THE RECEPTION

1. One of the forms of effective prevention of child abuse is to determine the identity of the child staying in the facility and his relationship with the adult with whom he stays in the facility.
2. The receptionist takes all possible steps to identify the child and his/her relationship with the adult who accompanies the child.
3. To identify the child and his relationship with the person with whom he is staying at the facility, you should:
 - a. ask for the child's identity document or other document confirming that an adult has the right to care for the child. Examples of documents that can be used for identification include: ID card, school ID, MObywatel application, Internet Patient Account, court decision. If you do not have an ID document or refuse to show it, please ask for the child's data (name, surname, address, PESEL number).
 - b. If there are no documents indicating the relationship between the child and the adult or the child refuses to produce them, the adult and the child should be asked about this relationship.
 - c. If an adult is not the child's parent or legal guardian, he or she should be asked to present a document, e.g. the parent's notarial consent to travel with the child or consent signed by the child's parent, along with the child's details, address, and telephone contact details of the parent. and the identity document number/PESEL number of the person to whom the parent entrusted the care of the child.

If an adult does not have any of the above. documents, please ask her to complete an appropriate declaration in accordance with the template prepared by the facility. The declaration should include the child's details and the details of the adult with whom the child is staying, along with an indication of the

relationship between the child and the adult. If an adult is not the child's parent or legal guardian, he or she should declare that the parents/legal guardians have consented to caring for the child.

4. In the event of an adult's refusal to present the child's document and/or indicate the relationship, it should be explained that the procedure is intended to ensure the safety of children using the Cyrus Hotel and that, in accordance with the provisions of the Act of May 13, 2016, the facility's employees must comply with the provisions of scope of children's rights. Once the matter has been resolved in a positive manner, thank them for taking the time to make sure the child is well cared for.
5. If the conversation does not dispel doubts regarding the suspicion of the adult and his or her intention to harm the child, especially when he or she refuses to show an identity document or the child does not have such a document, and also refuses to submit a written statement, the supervisor and security staff should be discreetly notified. (if they are on the premises at that time) in such a way as not to arouse suspicion (e.g. you can invoke the need to use the equipment at the reception desk by asking an adult to wait with the child in the hall, restaurant or other place .)
6. From the moment the first doubts appear, both the child and an adult should, if possible, be within sight of the facility employee and should not be left alone.
7. The superior who has been notified about the situation takes over the conversation with the adult to obtain further explanations.
8. If the conversation confirms the belief that there is an attempt or commission of a crime to the detriment of the child, the superior notifies the police of this fact. The procedure continues to apply as in the case of circumstances indicating harm to a child (see Chapter III).
9. If employees of other departments witness unusual and/or suspicious situations, e.g. cleaning service, room service, bar and restaurant employees, relaxation zone employees, security staff, etc., they should immediately notify their supervisor, and in the event of his/her absence - the person decision-making body that will take appropriate action (see points 7 and 8 above).
10. Depending on the situation and place, the superior verifies to what extent the suspicion of child abuse is justified. For this purpose, it selects appropriate measures to clarify the situation or decides to intervene and notifies the police.

CHAPTER III. PROCEDURE IN CASE OF CIRCUMSTANCES INDICATING ABUSE OF CHILD BY AN ADULT

1. There is reasonable suspicion of child abuse when:
 - a. the child disclosed the fact of abuse to an employee of the facility,
 - b. the employee observed abuse,
 - c. the child shows signs of abuse (e.g. scratches, bruises), and when asked, the child answers inconsistently 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 .
2. An employee who has reasonable suspicion that a child staying at the facility is or has been harmed should immediately notify the supervisor/decision-maker, who notifies the police. In the event of an existing threat to the child's safety, an

employee who has reasonable suspicion that the child has been harmed immediately notifies the police by calling 112 and describing the circumstances of the incident. Regardless of the above, the employee notifies the Cyrus Hotel Coordinator about the incident.

3. Efforts should be made to make it difficult or even impossible for the child and the person suspected of child abuse to leave the facility.
4. In the case specified in the Code of Criminal Procedure, a citizen may arrest a suspected person. In such a situation, until the police arrive, the detained person remains under the supervision of security guards or other hotel employees who can perform such activities without endangering their health or life.
5. In all cases, ensure the child's safety. If possible, the child should remain under the care of an employee until the police arrive. Where possible, you should try to support your child. Annex No. 9
6. In the event of a justified suspicion that a crime has been committed involving the child's contact with the perpetrator's biological material (sperm, saliva, epidermis), if possible, the child should not be allowed to wash or eat/drink until the police arrive. You should explain to your child why such restrictions are imposed on him or her.
7. After the police take over the child, the monitoring material and other relevant evidence (e.g. documents) regarding the event should be secured and handed over to the Coordinator, who, at the request of the services, will forward a copy of it by registered mail or in person to the prosecutor or the police.
8. After the intervention, the event should be reported to the Coordinator, who describes it in the event log or another document intended for this purpose.

CHAPTER IV. PROCEDURE IN THE EVENT OF SUSPECT OR FINDING ABUSE OF A CHILD BY AN EMPLOYEE OR OTHER ADULT

1. In the event of suspicion of child abuse by an employee or another adult who is not directly employed by Cyrus Hotel but by a third party, the person who received this information should immediately inform the Coordinator and, in his absence, another person designated for this purpose. purpose.
2. If the life or health of a child is at risk, the person who became aware of this should immediately notify the police by calling the emergency number 112, providing their own data, the child's data (if possible), the child's place of residence and a description of the circumstances of the case and notify the supervisor/decision maker who notifies the child's guardians/parents. The person who learned about the incident also informs the Coordinator, at least in e-mail/written form.
3. If an employee has committed a form of abuse against a child other than committing a crime to its detriment, the Coordinator, after receiving the information, should investigate all the circumstances of the case, in particular by listening to the employee suspected of abuse and other witnesses of the incident. In a situation where the violation of the child's best interests is significant, in particular when discrimination or violation of the child's dignity has occurred, the Coordinator should recommend to the person managing the facility appropriate personnel actions in relation to this employee.

4. If the person who committed the harm is not directly employed by Cyrus Hotel but by a third party (e.g. outsourcing), then it should be recommended that he or she be banned from entering the premises of Cyrus Hotel and, if necessary, terminate the contract with the third party.

CHAPTER V. PROCEDURE IN CASE OF FINDING OTHER FORM OF VIOLENCE AGAINST A CHILD BY A PARENT/LEGAL GUARDIAN OR OTHER ADULT

1. If it is discovered that a child is being harmed by a parent/legal guardian or another adult with whom the child is staying in the facility, any employee who witnesses such harm should react decisively.
2. If the life or health of a child is at risk, the person who became aware of this should immediately notify the police by calling the emergency number 112, providing their own data, the child's data (if possible), the child's place of residence and a description of the circumstances of the case and notify your supervisor/decision maker. The person who learned about the incident also informs the Coordinator, at least in e-mail/written form.
3. If an employee of the facility witnesses physical violence committed against a child (spanking, pulling, screaming, others listed in the definition of physical violence), he or she should try to stop the harm and react. Possible forms and ways of responding to harmful behavior of a parent/guardian/other adult towards a child are included in Appendix 10.
4. In the event of leaving a child under 7 years of age. unattended, an employee who becomes aware of such an event should notify his or her superior. The superior who has been notified about the situation decides on further action, taking into account the circumstances and the context of the provisions of the Penal Code and the Code of Petty Offenses. Depending on this, the supervisor attempts to find the parent/legal guardian or other adult with whom the child is staying on the premises and explains that he/she cannot leave the child unattended. In a situation where it is not possible to find the parent/legal guardian or other adult with whom the child is staying at the facility, or the parent/legal guardian/other adult is unwilling and/or unable to take care of the child, the supervisor notifies fact the police. In all cases, you must ensure your child's safety.

CHAPTER V: MONITORING AND EVALUATION OF STANDARDS FOR THE PROTECTION OF MINORS

1. The entrepreneur appoints a Coordinator responsible for the Minors Protection Standards applied at the Cyrus Hotel and places his contact details in a place easily accessible to hotel employees and guests, including children.
2. The entrepreneur determines the scope of tasks and competences of the Coordinator in terms of preparing employees to apply the provisions of the SOM, the rules for preparing employees to apply them and the method of documenting these activities.
3. The coordinator referred to in the preceding point monitors and evaluates the SOM once every two years.

4. Monitoring and evaluation include verifying the implementation of the Standards, responding to signals of violation of rules and procedures and proposing changes to the document, especially in terms of adapting them to current needs and compliance with applicable regulations.
5. The coordinator conducts a survey among Cyrus Hotel employees once every 2 years to monitor the level of SOM implementation. The survey template is attached as Appendix 5.
6. In the survey, employees can propose changes and indicate violations of SOM policies and procedures at the facility.
7. The coordinator prepares surveys completed by employees and prepares a monitoring report on this basis, which is then forwarded to the entrepreneur. The entrepreneur makes the necessary changes to the document and announces to employees the new wording of the Standards for the Protection of Minors.

Final provisions

1. The Standards for the Protection of Minors enter into force on August 15, 2024.
2. The Standards for the Protection of Minors are made available to all employees by posting them on the Cyrus Hotel website and in the Coordinator's office.
3. Standards for the Protection of Minors are made available to guests by being posted on the Cyrus Hotel website and at the reception.

List of attachments:

- ✓ **Appendix No. 1:** Declaration of familiarization with the Standards for the Protection of Minors.
- ✓ **Appendix No. 2:** Scope of data to be checked in the Register of Sexual Offenders.
- ✓ **Appendix No. 3:** Sample declaration on countries of residence.
- ✓ **Appendix No. 4:** Template of a clean criminal record declaration.
- ✓ **Appendix No. 5:** Survey monitoring the level of SOM implementation.
- ✓ **Appendix No. 6:** Examples of situations that may raise suspicions or indicate child abuse.
- ✓ **Appendix No. 7:** Sample list of employee positions in the facility subject to verification in the context of child protection.
- ✓ **Appendix No. 8:** Template of the declaration regarding the use of SOM for outsourcing companies employed by the facility.
- ✓ **Appendix No. 9:** How to talk to a child victim of a crime - tips for facility employees.
- ✓ **Appendix No. 10:** Ways to respond to harmful behavior of a parent/guardian/other adult towards a child.
- ✓ **Appendix No. 11:** Guidelines for standards for the protection of minors, taking into account the situation of minors with special educational needs, including disabilities.