

This document is an illustrative model of child protection procedures that can be applied by various tourist accommodation facilities. This document requires analysis and adaptation of its individual provisions to the individual needs and capabilities of the facility/hotel/network and is not a closed catalog.

SUNTAGO VILLAGE CHILD PROTECTION PROCEDURES

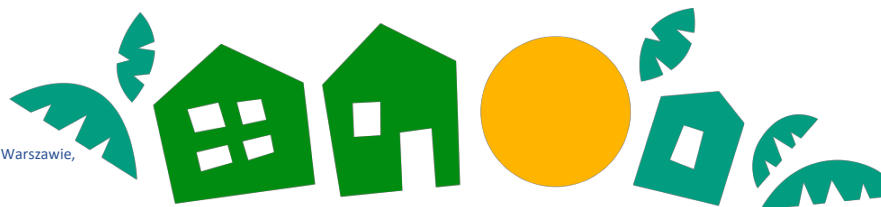


Preamble

Bearing in mind the contents of 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, **SUNTAGO VILLAGE** managed by Moyome Sp. z o.o. with its registered office in Warsaw (02 - 768) at 41 Fosa St., premises 11, registered in the Register of Entrepreneurs kept by the District Court for the City of Warsaw. st. of Warsaw, XIII Economic Department of the National Court Register under the KRS number: 0000745104, using the NIP number: 5272861463, REGON number: 381018973 with the share capital of 505 000 PLN, adopts this document as a model of rules and procedures in case of suspicion of harm to a child staying at **SUNTAGO VILLAGE** and prevention of such threats.

We will implement SUNTAGO VILLAGE's child protection policy through these rules.

1. **SUNTAGO VILLAGE** shall conduct its operational activities with the utmost respect for human rights, in particular the rights of children as vulnerable persons to harm.
2. **SUNTAGO VILLAGE** recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
3. in particular, **SUNTAGO VILLAGE** emphasizes the importance of the legal and social obligation to notify law enforcement authorities whenever a crime is suspected to have been committed against children and is committed to training its staff in this regard.



(4) SUNTAGO VILLAGE is committed to educating its staff about circumstances indicating that a child in the facility may be harmed and how to respond quickly and appropriately to such situations.

(5) One of the forms of effective child abuse prevention is the identification of the child staying at the facility and his/her relationship to the adult with whom he/she is staying at 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 in case of suspected child abuse

(1) Whenever possible, identify the child and his/her relationship with the adult with whom he/she is in the facility¹

2) In unusual and/or suspicious situations, indicating a possible risk of child abuse, identification is mandatory to be carried out by the front desk employee.

(3) In order to identify the child and his/her relationship to the person with whom he/she is staying at the facility, it is necessary to:

a. Ask for the child's identity and the child's relationship to the person with whom he/she has arrived at or is staying at the facility². For this purpose, you can ask for the child's identity card or other document that proves that the 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 of an identity document, you can ask for the child's data (name, address, PESEL number)³.

¹ As part of known good practice, some venues place placards in prominent places for visitors to see, stating that the venue cares about the safety of children and has appropriate child protection procedures in place. Such practices make it easier for the facility's staff to refer to these records and thus verify the details of the guest and the child/children when the situation appears suspicious.

² The establishment could develop a template message to publish on its website and/or send to guests with their booking confirmation that, in relation to having Child Protection Procedures in place, requires the guest staying at the establishment with a child to have a document that demonstrates that the guest is an adult with custody rights (e.g. child identification document indicating the child's relationship, civil status certificate, court decision, notarised consent of the parent to travel with the child or consent signed by the child's parent with the child's details, address, telephone contact to the parent and ID/PESEL number of the person to whom the parent has entrusted custody of the child).

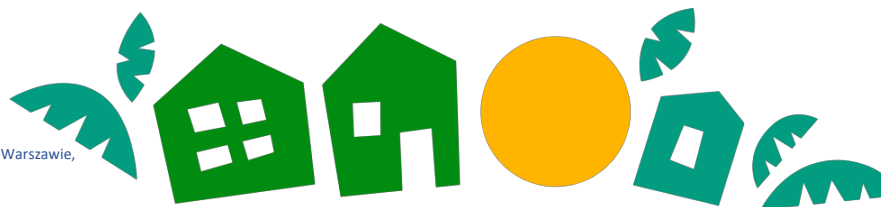
³ If the child's details are refused, it may be indicated additionally that the child/their parents are jointly responsible for any damage to the facility, in addition to the person ordering the accommodation.

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.

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 with the child (e.g., a written statement)⁴.

d. If the adult does not have a document of parental consent, ask for the phone number of the above to call

and confirm the child's stay at the facility with a foreign adult with the knowledge and consent of the parents/legal guardians.



(4) If there is resistance on the part of the adult to show the child's document and/or indicate the relationship, explain that the procedure serves to ensure the safety of children using SUNTAGO VILLAGE, and was developed

in consultation with NGOs working on the subject.

(5) after explaining the matter in a positive manner, thank the person for taking the time to make sure the child is well taken care of and once again emphasize that the procedure is designed to ensure the safety of children.

(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 elsewhere.

(7) From the moment the first concerns arise, both the child and the and the adult should be under constant observation of the staff and not be left alone.

(8) the supervisor who has been notified of the situation shall decide to notify the police or, if in doubt, take over the conversation with the suspected adult for further clarification.

4 In various venues, parents are required to prepare a document that certifies that they are giving their permission for their child to travel with someone who is not their legal guardian. Asking for such a document is intended to make the visitor to the venue aware that it is not correct/obvious that he/she is not connected to the child with whom he/she is checking in at the venue. It also provides an argument for the staff members to ask further questions to determine whether child abuse is taking place in this situation. It is also possible for the facility to create a model statement for its own use and inform clients that such a document is required when guests are checking in with children of whom they are not the parents/legal guardians. Such documents should be consulted in terms of RODO and other regulations applicable to the site.

(9) In the event that the conversation confirms the belief that an attempted or committed crime against the child, the supervisor shall notify the police. Further the procedure is followed in case of circumstances indicating harm to the child.

(10) If unusual and/or suspicious situations are witnessed by employees of other departments, e.g. cleaning service (outside company), technical employees, food service employees, security employees (outside company), etc., they should immediately notify the supervisor, who will decide on taking appropriate action.

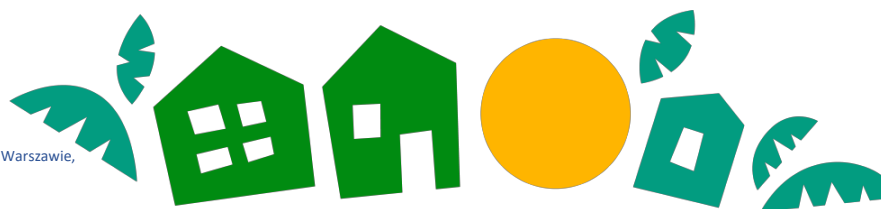
(11) Depending on the situation and location, the supervisor shall verify the extent to which the suspicion of child abuse is justified. To this end, he selects appropriate measures leading to clarification of the situation or decides to intervene and notifies the police.

Procedure in case of circumstances indicating child abuse

(1) Having a reasonable suspicion that a child in the facility is being harmed, immediately notify the police **by calling 112** and describing the circumstances of the incident. Depending on the dynamics of the situation and circumstances, the call is made by the person who directly witnesses the incident (employee/supervisor). If the notifier is an employee, at the same time he informs his supervisor about the incident.

(2) A reasonable suspicion of child abuse occurs when:

- a. the child disclosed the fact of abuse to the employee of the facility,
- b. the employee observed the abuse,



c. the child has signs of abuse (e.g., scratches, bruises) on him/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.

(3) In this situation, prevent the child and the person suspected of child abuse to move away from the facility.

(4) In justified cases, a civil detention⁵ of the suspected person may be made. In such a situation, until the arrival of the police, the person should be kept under the supervision of two employees in a separate room away from the view of other visitors.

⁵ Article 243. of the Act of 6 June 1997 - the Code of Criminal Procedure (Journal of Laws of 2022, item 1375).

§ 1. Any person shall have the right to apprehend a person in the act of committing a crime or in a pursuit undertaken immediately after committing a crime, if there is a fear of such person hiding or his identity cannot be established. The term 'in the act of committing a crime', as used in § 1, means apprehending the perpetrator in the course of realizing any of the stage forms of the crime (but not of the offence), i.e. in the stage of criminal preparation, attempt or execution. In practice, it will most often be an attempt, as apprehension generally thwarts the commission of a criminal act. It is sufficient to perceive the mere factual aspect of the offence in order to undertake the act of detention. K. Dudka [in:] M. Janicz, C. Kulesza, J. Matras, H. Paluszkiwicz, B. Skowron, K. Dudka, Kodeks postępowania karnego. Komentarz, wyd. II, Warsaw 2020, art. 243.

§ 2. A person apprehended shall be immediately handed over to the police.

Explanation: The subject is not in a position to verify his suspicion on the basis of facts or evidence, that is what the trial authority is for. In paragraph 2 we have described situations where there is reasonable suspicion. For a citizen's detention it is not necessary that the criminal act has been committed (thus the 'invasion' of an adult in the course of intercourse with a child), the stage forms of the act are sufficient for detention, thus preparation, attempt or execution. Detention at the time of the attempt (i.e. with the direct aim of committing the act) is its prevention. Renting a room with a child would already be an attempt.

(5) In all cases, the safety of the child should be ensured. The child should be kept under the supervision of a staff member until the arrival of the police.

(6) In the case of a reasonable suspicion that a crime has been committed related to the child's contact with the perpetrator's biological material (sperm, saliva, epidermis), the child should be prevented, if possible, from washing and eating/drinking until the arrival of the police.

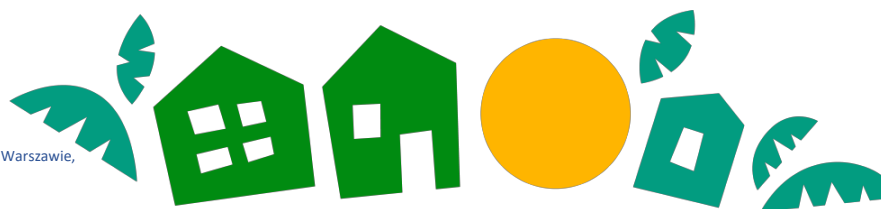
(7) After the police pick up the child, secure the surveillance footage and other relevant evidence (e.g., documents) of the incident and, if requested by the service, provide a copy by registered mail or in person to the prosecutor or the police.

(8) After the intervention, describe the incident in a logbook or other document intended for this purpose

Employment of people to work with children

(1) All people 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) Any person employed⁶ by Moyome Ltd. for work related to related to education, leisure and childcare should be compulsorily checked against the Sex Offender Registry⁷. 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.



(3) All employees hired to work with children, including those who may have potential contact with children, should submit a statement that they have no criminal record and no proceedings for acts against children.

7 Act of 13 May 2016 on counteracting the threat of sexual offences (i.e. Dz. U. of 2020, item 152, as amended).

8 Act of 6 June 1997 Criminal Code (i.e. Journal of Laws of 2022, item 1138, as amended).

Glossary:

For 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 to the child's detriment.
4. Crime to the detriment of a child - to the detriment of children can be committed all crimes that can be committed against adults, in addition to crimes that can only be committed against children (e.g. Sexual abuse from Article 200 of the Criminal Code⁸). 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 morals, in particular rape (Article 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. An employee hired to work with children, who should be checked in the Sexual Offender Registry, is any person hired to perform such duties, including a person hired under a civil contract, an apprentice, an intern and a volunteer, regardless of the person's nationality and age.

