



STANDARDS FOR THE PROTECTION OF MINORS IN THE B&B HOTELS CHAIN

I. PREAMBLE

Considering the obligations arising from the provisions of the Act of 13 May 2016 on Counteracting threats of sexual crimes and ensuring the protection of minors, and the guidelines of the United Nations on business and human rights, and recognizing the important role of businesses in ensuring respect for children's rights, B&B HOTELS Polska sp. z o.o. with its registered office in Warsaw (hereinafter also referred to as "**B&B HOTELS**"), as the operator of hotels belonging to the B&B HOTELS chain operating in Poland (hereinafter also referred to as "**Hotels**"), hereby adopts these Standards for the Protection of Minors (hereinafter also referred to as the "**Standards**").

This document outlines the rules and procedures applied in cases where a minor staying at the Hotel is suspected of being harmed and are aimed at preventing such risks, taking into account the needs of children with disabilities and children with special educational needs.

The Standards for the Protection of Minors in the B&B HOTELS chain are implemented based on the following principles:

1. B&B HOTELS operates with respect for the rights of minors as persons who are particularly vulnerable to harm;
2. B&B HOTELS acknowledges its role in conducting a socially responsible business and promoting desirable social attitudes;
3. B&B HOTELS emphasizes the importance of the legal and social obligation to notify law enforcement authorities of any suspected crimes against minors and is committed to training its employees in this regard, particularly regarding circumstances suggest that a minor staying in the Hotel may be harmed and how to properly react in such a situation;
4. To effectively prevent harm to minors, B&B HOTELS focuses on identifying minors staying at the Hotel and their relationship to the accompanying adult, and undertakes necessary actions to this end.

These Standards are effective from 15 August 2024 in all hotels operated by B&B HOTELS.

II. DEFINITIONS

The following terms have the following meanings:

1. **Minor or child** – any person under the age of 18;
2. **Tourist facilities** – hotel facilities and other establishments providing hotel services as defined in the Act of 29 August 1997 on Hotel services and the services of tour managers and guides;
3. **Child's guardian** – the child's legal representative: parent or guardian; foster parent; temporary guardian;
4. **Unfamiliar adult** – any person over 18 years of age who is not the child's parent or legal guardian;
5. **Child abuse** – any behavior that may constitute a prohibited act against a child committed 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 omission that violates the rights, freedoms, and personal rights of children and/or prevents their optimal development;

6. **Forms of violence against a child:**

- **physical violence against a child** – harm or potential harm resulting from an action or inaction by a parent or other person responsible for the child, or someone the child trusts, or who has authority over the child. This can be a single or repeated act;
- **psychological violence against a child** – a chronic, non-physical, harmful interaction between a child and a guardian, encompassing both actions and omissions. This includes such behaviors as emotional unavailability, emotional neglect, a relationship with the child based on hostility, blaming, disparaging, rejection, developmentally inappropriate or inconsistent interactions with the child, and failure to notice or recognize the child's individuality and the psychological boundaries between the parent and the child;
- **sexual abuse of a child** – the involvement of a child in sexual activity that the child is not capable of fully understanding and giving informed consent to, and/or that the child is not developmentally mature enough to consent to in a lawful manner, and/or that is inconsistent with the legal or moral norms of a given society. Sexual abuse occurs when such activity takes place between a child and an adult, or a child and another child, if these individuals, due to their age or developmental stage, are in a relationship of care, dependency, or authority. Sexual abuse may also take the form of **sexual exploitation**, which is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, deriving financial, social, or political gain from the sexual abuse of another person. There is a particular risk of sexual exploitation during humanitarian crises. Risks of exploitation exist for both children and their caregivers (definition according to UN Bulletin ST/SGB/2003/13);

7. **Child neglect** – the chronic or incidental failure to meet the child's basic physical and emotional needs and/or failure to respect their fundamental rights, resulting in health disorders and/or developmental difficulties. Neglect occurs in the context of a child's relationship with the person responsible for their care, upbringing, and protection;

8. **Crimes against children** – all crimes that can be committed against adults and in addition crimes that can be committed only against children (e.g. sexual abuse pursuant to Article 200 of the Penal Code¹). Due to the nature of accommodation facilities where isolation can be easily achieved, the crimes most likely to occur include crimes against sexual freedom and decency, particularly rape (Article 197 Penal Code), sexual exploitation of mental incapacity and helplessness (Article 198 Penal Code), sexual exploitation of dependence or critical situations (Article 199 Penal Code), sexual exploitation of a person under 15 years old (Article 200 of the Penal Code), grooming (seduction of a minor through remote communication means – Article 200a of the Penal Code);

9. **Other forms of child abuse beyond criminal acts** – all forms of violence against a child that do not meet the criteria of a publicly prosecuted crime (e.g., shouting, humiliation, pulling, insulting, neglecting needs, etc.);

10. An **Employee** is an individual employed under an employment contract or performing work under a similar contract (e.g. contract of mandate, B2B, contract for specific work), including interns, trainees, volunteers, etc.

III.

RULES ENSURING SAFE RELATIONS BETWEEN HOTEL EMPLOYEES AND MINORS, IN PARTICULAR, PROHIBITED BEHAVIOR TOWARDS MINORS

1. All Hotel employees, as well as other adults who interact with minors on the Hotel premises, are required to adhere to the following rules, if this interaction occurs with the consent of the Hotel;
2. The fundamental rule of all actions taken by employees who interacting with minors in the Hotel is to treat minors with respect and take into account their dignity and needs;
3. It is unacceptable for employees and other adults to use any form of violence against minors;
4. Hotel employees are obliged in particular to:
 - a) exercise patience and respect in their interactions with minors;

¹Act of 6 June 1997, Penal Code (consolidated text: Journal of Laws of 2024, item 17, as amended).

- b) listen carefully to minors and provide them with answers appropriate to their age and the situation, also considering any disabilities the minor may have;
 - c) inform minors where they can find a version of the Standards that they can understand, and provide answers to any questions minors may have about the Standards;
 - d) treat minors equally regardless of their gender, sexual orientation, ability/disability, social status, ethnic background, cultural background, religion, and worldview;
 - e) take actions to find the minor's parent/caregiver when the minor is left unattended and the situation may pose a risk to their safety;
 - f) avoid behaving towards a minor in an inappropriate, intimate, ambiguous, provocative or erotic/sexual manner;
 - g) if it is necessary to temporarily leave a minor under the care of the Hotel employees, ensure that the minor will stay under such care in a public place, e.g. the reception, hall, restaurant;
 - h) communicate with children only during working hours, in public areas, and only for purposes falling within the scope of the Hotel employees' duties.
5. In particular, hotel employees are prohibited from:
- a) shouting at, embarrassing, humiliating, ignoring, or insulting a minor;
 - b) hitting, jostling, pushing or in any way violating the child's physical integrity, unless there is a threat to the child's health or life;
 - c) engaging in romantic or sexual relationships with minors or making inappropriate proposals. This includes sexually suggestive comments, jokes, gestures, or sharing erotic or pornographic content with minors in any form;
 - d) recording or enabling third parties to record the image of a minor for private or professional purposes (e.g., video recording, photographing) without the consent of the child's parents or guardians and the child's own consent. This does not apply to recording the child's image in connection with the monitoring system used in the Hotel or in a situation when the minor's image is only a detail of a larger scene, such as a gathering, landscape, or public event, in which case parental or guardian consent is not required;
 - e) establishing contact with the minor through private communication channels (personal phone, email, messaging apps, social media profiles) or meeting the child outside of the workplace,
 - f) offering the minor alcohol, tobacco products or illegal substances;
 - g) touching the child if they do not want it or in a way that could be considered inappropriate or improper;
 - h) being alone with minors in hotel rooms or bathrooms without the presence of a parent, legal guardian or other person authorized to provide care, except in special and justified circumstances, such as the need to provide first aid or during an emergency.

IV.

RULES AND PROCEDURES FOR IDENTIFYING A MINOR STAYING AT THE HOTEL AND THEIR RELATIONSHIP TO THE ACCOMPANYING ADULT

1. A key measure in the prevention of harm to minors is to establish the identity of the child staying at the Hotel and their relationship to the accompanying adult.
2. Reception staff are required to take all possible steps to verify the identity of the minor and their relationship to the accompanying adult during check-in .
3. To identify the child and their relationship to the adult accompanying them:
 - a) request identification from the child or another document confirming that the adult has the right to care for the child. Examples include an ID card, a school ID, the MObywatel app, an Internet Patient Account, or a court ruling. If no identity document is available or if the adult refuses to present it, the child's personal details (name, surname, address, PESEL number) should be requested;
 - b) if there are no documents indicating the relationship between the child and the adult or if the adult refuses to present them, ask both the adult and the child about their relationship;
 - c) If the adult is not the child's parent or legal guardian, they should be asked to present a document such as a notarized parental consent for the adult to travel with the child or a consent signed by the child's parent, including the child's personal details, address, the parent's phone number, and the identity document number/PESEL number of the person entrusted by the parent with the child's

care. If the adult does not have any of the aforementioned documents, they should be asked to complete a relevant statement according to the model prepared by the Hotel. The statement should include the child's and the accompanying adult's details, as well as the relationship between the child and the adult. If the adult is not the minor's parent or legal guardian, they should declare that the parents/legal guardians have consented to their care of the child.

4. If the adult refuses to present the child's document and/or specify their relationship with the minor, explain that the procedure is intended to ensure the safety of children at the Hotel and that pursuant to the provisions of the Act of 13 May 2016 on Counteracting threats of sexual crime and ensuring the protection of minors, Hotel employees must adhere to these laws. If the matter is resolved positively, thank the person for taking the time to ensure that the child is in good care.
5. If the conversation does not resolve doubts about the adult's intentions towards the child, especially if the adult refuses to show identification or if the child does not have such a document and also refuses to provide a written statement, the supervisor or the Hotel manager and security staff (if they are on the premises of the Hotel at that time) should be discreetly informed (you can, for example, mention the need to use equipment in the back office and ask the adult to wait with the minor in the lobby, restaurant, or another location).
6. As soon as any initial concerns arise, both the child and the adult should, if possible, remain within the sight of a Hotel employee and should not be left alone.
7. The superior or Hotel manager, once informed of the situation, will take over the conversation with the adult to obtain further explanations.
8. If the conversation confirms the suspicion of an attempt to commit or a committed crime against the child, the superior or Hotel manager will notify the police of this fact. In such a situation, the rules provided for in section V of the Standards will apply.
9. If any unusual and/or suspicious situations are witnessed by employees of other departments, such as cleaning staff, room service, bar and restaurant staff, relaxation area staff, security, etc., they should immediately inform the supervisor or the Hotel manager, or in their absence, the decision-maker who will take appropriate action.
10. Depending on the situation and location, the supervisor or the Hotel manager verifies the validity of the suspicion of child abuse. For this purpose, they select appropriate measures to clarify the situation or decide to intervene and notify the police.

V

RULES AND PROCEDURES FOR RESPONDING TO REASONABLE SUSPICION THAT A MINOR'S WELL-BEING IS AT RISK ON HOTEL PROPERTY

1. The rules and procedures for responding should be applied taking into account the applicable laws and the principle of proportionality. Hotel employees should, in interactions with minors, pay special attention to the justified needs of individuals with disabilities or individuals with special educational needs.
2. A reasonable suspicion of harm to a minor arises particularly when:
 - b. the child discloses to a Hotel employee that they are being abused,
 - c. a Hotel employee is a witness to child abuse,
 - d. the child has visible signs of abuse (e.g., scratches, bruises), and responds inconsistently and/or chaotically or shows signs of embarrassment, or there are other circumstances that might indicate abuse, such as finding child pornography in the adult's room.
3. A Hotel employee who has a reasonable suspicion that a child staying at the Hotel has been or is being abused should immediately notify the supervisor or the Hotel manager, who will inform the police. If there is an immediate threat to the child's safety, the Hotel employee who has a reasonable suspicion of child abuse should promptly contact the police by calling the emergency number and describe the circumstances of the incident.
4. In this situation, the Hotel employee should make efforts to hinder or even prevent the minor and the person suspected of abusing the minor from leaving the Hotel.
5. In all cases, the child's safety must be ensured. The child should remain under the care of a Hotel employee until the police arrive.
6. If there is a justified suspicion that a crime involving contact between the child and the perpetrator's biological material (e.g., sperm, saliva, skin) has occurred, efforts should be made to prevent the child from washing or eating/drinking until the police arrive. The child should be informed why these restrictions are being applied.
7. Once the minor has been taken into police custody, the monitoring footage and other relevant evidence (e.g., documents) related to the incident should be secured and handed over to the Hotel manager,

who, upon request by the authorities, will send a copy by registered mail or deliver it personally to the prosecutor or police.

8. After the intervention, a detailed report describing the event in detail should be prepared and submitted to the Hotel manager, unless it is prepared by the Hotel manager.

VI.

APPLICABLE PROCEDURES AND PERSONS RESPONSIBLE FOR REPORTING SUSPECTED CRIMES AGAINST MINORS AND NOTIFYING THE GUARDIANSHIP COURT

1. In emergency cases, when there is reasonable suspicion that the life of a minor is in danger or their health may be at risk, the first Hotel staff member who becomes aware of such risk should immediately inform the relevant services (police, emergency medical services) by calling the emergency number and then prepare a short note to document it and inform the Hotel manager about the situation.
2. In cases of reasonable suspicion that a minor is staying at the Hotel without the consent of parents or guardians and may be subject to any harm, the Hotel manager will decide whether to call the police or, if in doubt, to engage further with the suspected adult to obtain additional explanations. If the conversation confirms the conviction of an attempted or actual crime against the minor, the Hotel manager will notify the police about this fact.
3. Subject to the principle of proportionality, Hotel employees will verify to what extent the suspicion of child abuse is justified. For this purpose, they select relevant measures to clarify the situation or decide to intervene, and then determine which entities and institutions should be informed about the suspicion of child abuse (e.g. police, prosecutor's office, family court).
4. If child abuse has been reported, in order to determine the course of events, the Hotel manager or the manager's deputy will hold a conversation with the child and other persons who have or may have knowledge about the incident and the personal (family, health) situation of the child, in particular their parents or guardians, and then prepare a short note to document it.
5. If a criminal offence has been committed or attempted against a child, the Hotel manager will prepare a report of the suspected crime and hand it over to the local police or prosecutor's office.

VII.

SCOPE OF RESPONSIBILITIES OF THE PERSON IN CHARGE OF PREPARING THE HOTEL STAFF TO IMPLEMENT THE STANDARDS, GUIDELINES FOR PREPARING STAFF FOR IMPLEMENTATION, AND THE METHOD OF DOCUMENTING THIS PROCESS

1. Oversight of the application of Standards in the Hotel is managed by B&B HOTELS through the Hotel manager.
2. The Hotel manager instructs employees about the content of the Standards and communicates the rules of applying them; this applies to all employees within 14 days of the introduction of the Standards and each time when a new employee is employed.
3. The Hotel staff confirms in writing that they have read the Standards and the rules specified herein concerning measures for protecting against sexual crimes and safeguarding minors by signing a relevant written statement.
4. The Hotel manager is responsible for ensuring the Standards are available to employees, guests and other entities cooperating with the Hotel.
5. The Hotel manager's contact details are available to all Hotel employees and guests, including minors. The details must include information on how to contact the Hotel manager (e-mail address, telephone number, availability: working days and hours).
6. At least once every two years, the Hotel manager will conduct training for the Hotel staff on the application of the Standards. The training may be conducted in any form, including external training, internal training, e-learning, or distribution of educational materials developed by B&B HOTELS and available to employees. The Hotel staff confirms participation in the training in writing by making a written statement or signing an attendance list.
7. At least once every two years, B&B HOTELS will evaluate the Standards to ensure they meet current needs and comply with applicable regulations. Findings from the evaluation will be documented in writing.
8. At least once every two years, a survey will be conducted among the Hotel staff to monitor the implementation of the Standards. In the survey, the employees can suggest changes to the Standards

and report violations of the rules and procedures of the Standards in the Hotel. The Hotel manager forwards the conclusions from this survey to B&B HOTELS to analyze whether the rules or procedures specified in the Standards do not require changes and if they are being properly applied.

VIII. FINAL PROVISIONS

1. The Standards take effect on 15 August 2024.
2. The Standards will be made available by posting them on the B&B HOTELS website and displaying them in a paper version at the Hotel Reception or another visible and generally accessible place on the Hotel premises, also in a shortened version intended for minors, by 15 August 2024.
3. The Standards will be updated as needed to reflect changes in applicable legal regulations.
4. The term "Hotel" used in the Standards means any hotel belonging to the B&B HOTELS chain operating in Poland.

The Management Board of B&B HOTELS Polska sp. z o.o.