

General Standards for the Protection of Minors from Abuse

at Nobu Hotel Warsaw dated 12.08.2024

Preamble

Bearing in mind the content of applicable laws and 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, Nobu Hotel Warsaw adopts this document as a model policy and procedures in the event of suspected harm to a child staying at the hotel and the prevention of such threats. We will implement the child protection policy at our hotel through this rules.

Chapter I

General Provisions

§1

1. Nobu Hotel Warsaw conducts its operational activities with the utmost respect for human rights, especially the rights of children as vulnerable persons.
2. Nobu Hotel Warsaw recognizes its role in conducting socially responsible business and promoting desirable social attitudes.
3. Nobu Hotel Warsaw, in particular, stresses the importance of the legal and social obligation to notify law enforcement authorities whenever a crime is suspected of having been committed against children, and is committed to training its staff in this regard.
4. Nobu Hotel Warsaw is committed to educating staff on circumstances indicating that a child staying at the facility may be abused and on 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 Nobu Hotel Warsaw and his/her relationship to the adult with whom he/she is staying at the facility. The staff shall take all possible steps to carry out the identification of the child and his/her relationship with the adult with whom he/she is in the facility.
6. In the implementation and application of these General Standards, Nobu Hotel Warsaw takes into account the situation of children with disabilities and children with special educational needs, taking into account the specifics of the facility and taking care of the personal dignity of such children, in particular, trains employees for contact with them.

§2

Whenever the General Standards for the Protection of Minors from Abuse refer to:

- a. **Hotel/facility** - shall mean Nobu Hotel Warsaw, located in Warsaw 00-670 at 73 Wilcza Street, operated by NBHW Sp. z o.o. (Jana III Sobieskiego 110/26 Street, 00-764 Warsaw);
- b. **General Standards** - shall mean these General Standards for the Protection of Minors from Abuse at Nobu Hotel Warsaw;
- c. **Child/minor** - means any person under 18 years of age;

- d. **Foreign adult** - it should be understood as any person over the age of 18 who is not a parent or legal guardian of the child;
- e. **Parents** - it should be understood as parents, as well as legal guardians and persons and entities exercising foster care over the child;
- f. **Adult** - it should be understood as any person over the age of 18 - both a foreign adult and a parent;
- g. **Abuse** - this should be understood as any intentional or unintentional act or failure to act to the detriment of a child by any person, in particular, the commission of a crime to the detriment of a child;
- h. **Inappropriate content** - it should be understood as any content, recorded in any form, which may negatively affect the mental development of a minor, in particular, pornographic content, as well as containing vulgar language or violence;
- i. **Crime to the detriment of a child** - shall be understood as any crime defined in the Act of June 6, 1997, the Penal Code (Journal of Laws of 2024, item 17), hereinafter referred to as the "**Penal Code**", by which a child is victimized; in particular, it shall be understood as crimes against sexual freedom and morality as defined in Chapter XXV of the Penal Code, committed to the detriment of a child;
- j. **Employees/Employee** - any person employed at the Hotel regardless of the legal relationship that is the basis of employment, in particular, being employed under a contract of employment or civil law contract, as well as under a relationship of appointment;
- k. **Employee hired to work with children** - it should be understood as any person hired at the Hotel to perform such duties, including a person hired under a civil contract, apprentice, trainee and volunteer, regardless of the nationality and age of the person;
- l. **Act** - it should be understood as the Law of May 13, 2016 on Counteracting the Threat of Sexual Crime and the Protection of Minors (Journal of Laws of 2024, item 560).
- m. **Instruction for Personnel** - it shall be understood as a document separate from the General Standards that provides practical guidance to personnel in the application of the General Standards.

Chapter II

Rules to ensure safe relations between minors and Employees

§3

1. Employees, in the course of their duties, shall pay attention to risk factors and circumstances indicating child abuse. Employees are required to comply with the Instruction for Personnel and these General Standards.
2. If an Employee or any other person suspects that a child is at risk of being abused or abused by a parent or a strange adult, respond in accordance with the procedures set forth in the General Standards.
3. The rules for a safe relationship with a child are adapted to the realities of the facility and address the areas described in the following paragraphs.

§4

Verbal communication with the child

1. Employees adjust the content and method of communication with the child according to his age and level of intellectual development.
2. Employees address minors with respect. In particular, Employees shall avoid in relation to children expressions that may:
 - a. Incite a sense of danger or anxiety in the child;
 - b. Humiliate or ridicule;
 - c. Violate the boundaries of the child's autonomy, especially wording of a vulgar or sexual nature.
3. Employees undertake communication with the child only under reasonable circumstances, in particular in carrying out the duties set forth in the General Standards, and furthermore to ensure an appropriate level of service related to the child's stay at the facility.

§5

Physical contact with the child

1. Employees do not engage in physical contact with minors except in cases strictly defined in the General Standards.
2. Physical contact between an Employee and a child bearing the hallmarks of abuse, in particular physical or sexual violence, is absolutely unacceptable.
3. Physical contact between an Employee and a minor is permissible in situations:
 - a. The need for pre-medical assistance (rescue activities related to related to the provision of first aid);
 - b. Responding to danger caused by external factors (ensuring the child's safety in case of fire, intense weather, danger from third parties);
 - c. When a minor threatens his/her own life or health or the life or health of third parties, there is no parent nearby to respond, and the nature of the threat indicates the need for immediate intervention without waiting for the appropriate services (police, emergency medical services);
 - d. Other justified cases, with the consent of the parent and in his presence.

Chapter III Procedures

§6

Procedure for identifying child-adult relationships

1. Employees are required to verify the identity of the child and the connection between the child and the adult with whom he or she is staying at the facility. The facility will place posters in areas

visible to guests stating that the Hotel cares about the safety of children and has appropriate child protection procedures in place.

2. Mandatory verification is made by the receptionist at the time of checking in an adult with a child for a stay at the facility.
3. After conducting a verification interview, in unusual or suspicious situations indicating a possible risk of child abuse, the Employee who became suspicious of the possibility of child abuse shall notify the supervisor (manager/manager/supervisor - depending on who is in charge at the time). The notified supervisor shall conduct an identification interview with the adult as specified in paragraph 5.
4. In the case specified in paragraph 3, if the supervisor's verification interview with the adult does not dispel doubts or provide further suspicions, the supervisor shall decide to apply the procedure specified in § 8.
5. In order to identify the child and his/her relationship to the person with whom he/she is staying in the facility (which is done in particular by the receptionist referred to in paragraph 2 above, and in justified cases also by the supervisor), it is necessary to:
 - a. Ask the adult about the child's identity and the relationship between the child and the person with whom the child has arrived at or is staying at the facility. For this purpose, the Employee may ask to see the child's identity document or other document confirming that the adult has the right to take care of the child in the facility. In the absence of an identity document, the Employee may ask for the child's data (name, surname, address, PESEL number);
 - 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 a parent as defined in these General Standards, ask if he or she has a document showing parental consent for the adult to travel together with the child (e.g., a written statement);
 - d. If the adult does not have a parental consent document, ask for the phone number of the above-mentioned, and then contact the parents and confirm the child's stay in the facility with the foreign adult with the knowledge and consent of the parents.
6. In the event of resistance from an adult to show the child's document or to indicate the relationship, the employee explains that the procedure is based on current Polish law, serves to ensure the safety of children using the facility and was developed in consultation with non-governmental organizations working in this field.

§7

Procedure in case of suspected child abuse

1. In the event that the conversation specified in §6.2 does not dispel doubts or provides further suspicion of the adult and his intention to harm the child, the Employee shall notify the supervisor and security personnel (if they are on the premises at the time).
2. From the moment of the first doubts, both the child and the adult should be under constant observation by staff and not be left alone.

3. The supervisor, who has been notified of the situation, enters into conversation with the suspected adult for further clarification.
4. If the conversation provides indications of intent to harm a child or the fact of child abuse, the Reception Manager/Manager on Duty shall notify the Police. Further, the procedure in case of circumstances indicating child abuse specified in §8 shall be applied.
5. If unusual or suspicious situations are witnessed by Employees of other departments of the facility, in particular cleaning service, room service, bar and restaurant, the relaxation area or security employees, they should immediately notify their supervisor, who will decide on appropriate action to be taken.
6. Depending on the situation and location, the supervisor verifies 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.

§8

Procedure in case of circumstances indicating child abuse

1. Having a reasonable suspicion that a child in the facility is being abused, 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 is a direct witness to the incident. If the notifier is an Employee, he or she shall simultaneously inform his supervisor about the incident.
2. A reasonable suspicion of child abuse occurs when:
 - a. child disclosed the fact of abuse to the Employee;
 - b. Employee personally observed the abuse;
 - c. child has traces of abuse on him or her (e.g. scratches, bruises), and when asked answers incoherently or chaotically, 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 the event of the above-mentioned circumstances, the child and the person suspected of child abuse should be prevented from leaving the facility.
4. In justified cases, a civil detention of a suspected person may be made, in accordance with Article 243 of the Code of Criminal Procedure. In such a situation, until the arrival of the Police, the detained person should be kept under the constant supervision of two Employees, in a separate room invisible to other guests.
5. In any case, the child's safety should be ensured. The child should remain in the care of the Employee until the Police arrive. If possible, an attempt should be made to support the child.
6. If there is a reasonable suspicion that a crime has been committed that is related to involves the child's contact with the perpetrator's biological material (sperm, saliva, epidermis), you should if possible, do not allow the child to wash and eat/drink until the Police arrive.
7. After the police pick up the child, the surveillance footage and other relevant evidence (e.g., documents) regarding the incident should be secured and, if requested, a copy should be forwarded by registered mail or in person to the prosecutor or the Police.

8. After the intervention, the event should be described in a logbook or other document intended for this purpose. A copy of such document shall be given to the Coordinator for documentation and safekeeping.

Chapter IV Treatment of trainees

§9

1. These General Standards shall apply mutatis mutandis to underage trainees serving at the Hotel. In particular, the provisions of Chapter II regarding safe relations between minors and Hotel employees shall apply.
2. To the extent that the Hotel assumes in relation to minor trainees the role of organizer of educational, care, upbringing, or activity related to the development of interests by minors (or any other activity specified in the Law), the provisions of this Chapter IV, in particular, shall apply.
3. The General Standards are a publicly available document. Prior to admission of a minor to an internship, the minor shall be informed of the possibility of reading the contents of these General Standards directly at the facility or on the facility's website.

§10

Safe relations between minors

1. Any manifestation of violence, verbal or physical aggression, to the detriment of a minor by another minor, should be stopped immediately by the Employee or other persons witnessing the aggression.
2. The representative of the school/institution for the minor apprentice's apprenticeship shall be notified immediately of the incident, as well as the head of the department in which the minor apprentice is practicing and the human resources department. The supervisor shall decide to apply appropriate disciplinary measures to the apprentice who uses violence or physical or verbal aggression, including early termination of the apprenticeship period.
3. In the case of suspicion that a minor trainee is engaging in abusive behavior towards another minor, in particular compromising the health or sexual autonomy of another minor, the procedures of § 7 and § 8 shall be applied, subject to the points below:
 - a. in case of reasonable suspicion of abuse, immediately separate the minor at risk of abuse and the minor suspected of abuse;
 - b. A minor trainee suspected of abuse should immediately be placed at the disposal of a supervisor, who will interview him to determine the circumstances of the incident;
 - c. A minor suspected of abuse who is not a trainee should remain under the supervision of the Employee until his parent is contacted or, if the parent cannot be identified, until the arrival of the appropriate services;
 - d. with a minor at risk of abuse or a minor who has been abused, a conversation is immediately conducted to determine the circumstances and course of the incident. If the minor is a trainee, the interview is conducted by the trainee's supervisor or other person in

charge of the trainee, after which further action steps are determined. If the minor is a visitor, the interview is conducted in the presence of a parent.

§11

Protection of underage trainees from harmful content and rules of network use

1. The facility takes measures to ensure the safe use of the Internet by minor trainees, in particular, it conducts mandatory training before the start of the traineeship.
2. The use by a minor trainees of devices having access to the Internet is permitted on the premises only upon the instruction and approval of the immediate supervisor/apprenticeship supervisor designated at the Hotel. Trainees may use such devices for private purposes only during breaks from work or with the approval of the apprenticeship supervisor designated at the Hotel.
3. The minor trainee shall be acquainted with the detailed rules for the use of Internet-enabled devices during the mandatory training in the course of the apprenticeship. Relevant provisions shall also be included in the apprenticeship regulations or in the agreement/contract under which the minor is apprenticed.
4. Internet-enabled devices provided to a minor trainee by the Hotel for the purpose of performing official duties with them have adequate antivirus protection.
5. If an Employee becomes aware that a minor apprentice is in possession of or has been in contact with inappropriate content, he or she shall inform his or her supervisor, who shall, if necessary, interview the minor apprentice to determine the origin of the content, and shall take appropriate measures to protect the minor trainee.

§12

Support of a minor in case of disclosure of abuse

1. In case of disclosure of abuse, the parents of the minor trainee or a representative of the school/institution for the minor's apprenticeship shall be immediately notified of the fact. The person responsible for contacting the relevant persons is, in particular, the Coordinator.
2. The Coordinator (depending on the circumstances - together with a representative of the school/institution or the parents of the minor trainee), provide the minor trainee with the necessary support in the situation of disclosure of abuse, in particular:
 - a. preliminarily assess the condition of the minor trainee, with the proviso that a professional assessment should be made at a later stage by a certified person;
 - b. provide all pre-medical assistance, if necessary;
 - c. provide the minor trainee with a sense of security by isolating him from persons or other factors responsible for harm;
 - d. develop a plan to support the minor trainee in consultation with his or her parents and, if the minor trainee is apprenticed under an agreement/contract with a school, also with a psychologist or educator from the minor apprentice's school or institution;

- e. if necessary, support the minor trainee in contact with external institutions, in particular foundations whose statutory purpose is to help children and adolescents, as well as specialized psychological and pedagogical counseling centers.

Chapter V
Requirements for employment of Employees

§13

1. All persons working with children must not pose a threat to them, in particular, their employment history should indicate that they have not harmed any child in the past.
2. The Hotel shall exercise all due diligence to ensure appropriate security standards with respect to Employees, in particular by implementing appropriate procedures.
3. To the extent prescribed by the Act and special regulations, the Hotel shall apply procedures to verify the criminal record in advance (before employing the Employee or before allowing the Employee to engage in activities related to the upbringing, education, recreation, treatment, provision of psychological counseling, spiritual development, sports or the pursuit of other interests by minors, or the care of minors), and in particular shall verify the person in question in the Register and collect the relevant criminal record certificates from the Employee.

Chapter VI
Coordinator for the Protection of Minors

§14

1. The Director of the Hotel shall appoint from among the Employees a coordinator for the protection of minors, referred to in this document as **the Coordinator**.
2. The Coordinator is selected by drawing up a written statement of selection by the Hotel Director, which includes the name of the Coordinator, his contact information and the period for which the Coordinator is appointed. The statement of selection of the Coordinator is forwarded to the Human Resources Department.
3. Information about the person performing the duties of the Coordinator and his/her contact information is publicly announced so that Employees, guests and all interested persons, including minors using the Hotel's services, can become aware of them. In particular, the information is posted on the Hotel's website and in the form of an information card displayed in a prominent place in the Hotel.
4. In order to ensure more complete performance of duties, the Coordinator may request the Hotel Director to appoint a deputy. The Deputy Coordinator shall perform duties in the absence of the Coordinator.
5. Without affecting other provisions contained in these General Standards, the Coordinator is responsible in particular for:
 - a. Implementing General Standards at the facility;
 - b. Conducting training for Employees on the application of the General Standards;

- c. Receiving from Employees any statements required by the General Standards;
- d. Periodic evaluation of the General Standards in accordance with the procedure set forth in §17 of the General Standards;
- e. Development of Instruction for Personnel;
- f. Development of model statements and other documents that may be necessary in the implementation of the General Standards;
- g. Filing notices of suspected crimes against a minor and notifying the guardianship court;
- h. Receiving and keeping documents containing descriptions of the interventions carried out;
- i. Cooperation with the internship supervisor and the minor's parents in the event that support is needed for the minor after the disclosure of abuse.

§15

1. The Coordinator conducts mandatory training for facility Employees on the application of the General Standards.
2. The scope of the training depends on the expected level of contact of the Employee in question with minors. Training to the fullest extent must be given, in particular, to Employees operating the reception desk.
3. Training shall be conducted after the promulgation of the General Standards and whenever the General Standards or the Instruction for Personnel are amended. In addition, individual training shall be provided to each new Employee, prior to the commencement of his/her duties.
4. After the training, the Coordinator collects a written statement from each participating Employee. In the statement, the Employee confirms the fact of participation in the training, in particular, familiarization with the General Standards. The statements are kept in the Employee's personnel file.

§16

1. The Coordinator develops the Instruction for Personnel and is responsible for updating it on an ongoing basis in accordance with the realities of the facility and applicable regulations.
2. The Instruction for Personnel shall be presented to the Hotel Director for approval.
3. The Instruction for Personnel shall not be subject to public notice and is intended solely for the internal use of facility personnel.
4. The Instruction for Personnel includes, in particular, examples of situations that may indicate child abuse, sample scenarios for conversations with guests, and details the procedures outlined in the General Standards.

Chapter VII
Periodic evaluation of the General Standards

§17

1. The General Standards are subject to periodic evaluation for their adaptation to the conditions of the facility, existing needs and their compliance with applicable regulations.
2. The person responsible for evaluating the General Standards is the Coordinator.
3. Periodic evaluation of the General Standards is carried out once every 2 years and every time when new legislation regulating the issues regulated by these General Standards enters into force.
4. The Coordinator shall draw up written conclusions (hereinafter referred to as "**Written Conclusions**") from the evaluation of the General Standards, including, in particular, proposals for changes and improvements to the procedures contained therein.
5. Written Conclusions shall be submitted to the Facility Director, who shall make the necessary changes to the General Standards and announces these changes in an appropriate manner.
6. After reviewing the Written Conclusions and making any necessary changes to the General Standards, the Facility Director shall archive the Written Conclusions and shall be responsible for submitting them to the appropriate authorities in the event they make a request.

Chapter VIII
Enforcement of the General Standards

§18

1. Any violation of the procedures or duties set forth in the General Standards by a Facility Employee shall be reported to his/her supervisor, who shall forward the information to the Coordinator and the Facility Director.
2. The Facility Director shall decide on the possible disciplinary responsibility of the offending Employee.
3. The Facility Director may, in consultation with the Coordinator, determine in a separate document the disciplinary sanctions threatening Employees for specific violations.
4. When enforcing the provisions of the General Standards, the welfare and safety of children should be considered first and foremost.
5. An Employee who committed a violation unintentionally, as well as one whose act or omission did not significantly increase the risk of harm, shall not be liable for disciplinary action.

Chapter IX
Final Provisions

§19

1. These General Standards enter into force on the date of their promulgation.
2. The General Standards shall be announced by posting them in the facility so that guests can with them freely.

3. Along with the General Standards, Simplified General Standards shall be placed in the facility for children to read, adapted to their cognitive and intellectual abilities. The Simplified General Standards are an Appendix to the General Standards.
4. In addition, the General Standards and Simplified General Standards shall be posted on the facility's website.

Appendix: Simplified General Standards.