

STANDARDS FOR THE PROTECTION OF UNDERAGE PERSONS
APPLICABLE
IN SUN & SNOW SP. Z O.O.

Legal basis of Standards for the Protection of Underage Persons. This document has been drawn up on the basis of:

- Act of 13 May 2016 on counteracting the threats of sexual offences and the protection of underage persons (consolidated text: Journal of Laws of 2024, item 560);
- Act of 28 July 2023 on amendments to the Act – Family and Guardianship Code and certain other acts (Journal of Laws, item 1606).

Standards for the protection of underage persons are a document describing, in a structured way, procedures for the protection of children, and presenting the manner of their implementation, application, monitoring and evaluation by the organisation.

Preamble

Taking into consideration the content of the United Nations Guiding Principles on Business and Human Rights, recognising the leading role of business in ensuring respect for children's rights, in particular the right to respect for their human dignity and their right to freedom from all forms of abuse, *Sun & Snow spółka z ograniczoną odpowiedzialnością* adopts this document as a model set of rules and procedures to be followed in the event of suspected harm to a child staying at the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* and the prevention of such threats.

We will implement the policy for the protection of underage persons at our facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* through these rules.

1. *Sun & Snow spółka z ograniczoną odpowiedzialnością* conducts its operational activities with the utmost respect for human rights, especially the rights of children as vulnerable persons.
2. *Sun & Snow spółka z ograniczoną odpowiedzialnością* recognises its role in conducting socially responsible business and promoting desirable social attitudes.
3. *Sun & Snow spółka z ograniczoną odpowiedzialnością*, in particular, puts an emphasis on the importance of the legal and social obligation to notify law enforcement authorities whenever a criminal offence is suspected of having been committed to the detriment of children, and undertakes to train its staff in this regard.
4. *Sun & Snow spółka z ograniczoną odpowiedzialnością* undertakes to educate the 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 the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* and the child's relationship to the adult with whom the child is staying at the facility. The staff shall take all possible steps to carry out the identification of the child and the child's relationship with the adult with whom the child is staying at the facility.

Chapter I

Glossary

For the purposes of this document, terms listed below shall have the following meaning:

1. **Tourist facilities** – hotel facilities and other facilities where hotel services are provided defined in the Act of 29 August 1997 on hotel services, as well as on services of tour leaders and tourist guides.¹
2. **Child/underage person** – for the purposes of these standards, it is assumed that any person under the age of 18 years shall be considered a child.
3. **Guardian of a child** – a statutory representative of the child: a parent or a legal guardian; foster parent, temporary guardian (i.e. a person authorised to represent an underage citizen of Ukraine staying in the territory of the Republic of Poland without adult care).
4. **Adult stranger** – any person over the age of 18 who is not a guardian of the child within the meaning of section 3.
5. **Child abuse** – child abuse means any behaviour towards a child that constitutes a prohibited act against the child. Moreover, abuse shall include neglect (intentional or unintentional), action or omission and any effect thereof resulting in a violation of the child's rights, freedom, personal welfare and the disruption of the child's development.

The following basic forms of abuse can be distinguished:

Physical violence against a child. It is a one-off or repeated act or omission as a result of which a child suffers or is potentially at risk of actual physical harm. Harm is the result of an act or omission on the part of a parent, guardian, person responsible for the child, having power over the child or one whom the child trusts.

Psychological violence against a child. It is a long-term, non-physical, harmful interaction between a child and a person responsible for the child or someone the child trusts. As in the case of physical violence, it includes both actions and omissions. Indications of psychological violence include, inter alia:

- emotional unavailability;
- emotional neglect;
- a relationship with a child based on hostility, incrimination, defamation, rejection;
- developmentally inappropriate or inconsistent interactions with the child;
- failure to notice or acknowledge the personality of the child;
- failure to recognise or acknowledge psychological boundaries between the child and the person responsible;
- inadequate socialisation, demoralisation;
- situations when a child witnesses violence.

¹ Journal of Laws of 2023, item 1944.

Sexual violence against a child (sexual abuse of a child). It is a child being involved in sexual activity by an adult or another child. It applies to situations where there is no physical contact (e.g. exhibitionism, verbal harassment, e.g. having conversations about sexual topics inappropriate to the child's age, making sexual comments on the child's appearance and behaviour, exposing the child to pornography, grooming – strategies for non-sexual seduction of the child with the intention of establishing sexual contact in the future) and when such contact occurs (situations such as: touching the child, sexual intercourse, forcing the child to touch the offender's body). Any sexual activity undertaken with a child up to the age of 15 is a criminal offence. In the case of children, sexual abuse occurs when there is an authority, care or dependency relationship between the abuser (adult, another child) and the abused (child) due to age or developmental stage.

Sexual exploitation is another form of sexual abuse of children. Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes. This includes (but is not limited to) profiting monetarily, socially or politically from the sexual exploitation. The risk of sexual exploitation is especially high during humanitarian crises. Both children and their guardians are at risk of sexual exploitation.

Child neglect. It is a continuing or incidental failure to meet the physical and mental needs of the child. It may take the form of disregarding the rights of the child, causing health disturbances and/or development difficulties. Neglect occurs in the relationship between the child and the person obligated to care, raise, nurture and protect the child.

Peer violence (peer harassment, bullying). Peer violence occurs when a child experiences various forms of harassment from peers. It involves direct actions or actions with the use of communication technologies (e.g. via the Internet and mobile phones). Peer violence is observed when the harmful action is intended to cause someone distress or harm (intentionality), is systematic (repetitive), and the victim is weaker than the perpetrator or a group of perpetrators. It includes:

- verbal violence (e.g. name-calling, mocking, ridicule);
- social violence (e.g. exclusion from the group, ignoring, turning others against the person, blackmail);
- physical violence (e.g. beating, kicking, pushing, grabbing);
- material violence (e.g. stealing, destroying objects);
- cyberbullying/electronic violence (e.g. malicious instant messaging, posting on a social networking site, posting photos or videos ridiculing the victim);
- sexual abuse – touching intimate parts of the body or being forced to have sexual intercourse or other sexual activities by a peer;
- violence driven by gender norms and stereotypes (e.g. violence in romantic relationships between peers).

6. **Criminal offence to the detriment of a child** – the Penal Code, in principle, contains a catalogue of prohibited acts that can be committed to the detriment of adults and children. In addition, it lists prohibited acts that are recognised in the case of committing them to the detriment of an underage person, including an underage person up to 15 years of age²).

² Act of 6 June 1997 – Penal Code (Journal of Laws of 2024, item 17).

Given the specific nature of accommodation facilities, where is it easy for any person to find isolation from other people, the criminal offences against sexual freedom and decency may be committed at the facilities. They include, for instance:

- a) rape (Article 197 of the Penal Code);*
 - b) committing a prohibited act involving subjecting another person to sexual intercourse or another sexual act, or making this person to perform such an act, while taking advantage of insanity and vulnerability of this person (Article 198 of the Penal Code);*
 - c) committing a prohibited act involving subjecting another person to sexual intercourse or another sexual act, or making this person to perform such an act, while taking advantage of dependence or critical situation of this person (Article 199 of the Penal Code);*
 - d) sexual intercourse or another sexual act with an underage person up to 15 years of age, subjecting such a person to such acts or making such a person to perform such acts (Article 200 of the Penal Code);*
 - e) grooming (seduction of an underage person by means of distance communication – Article 200a of the Penal Code);*
 - f) dissemination, production, recording or importing, storing or possessing, or disseminating or presenting pornographic content with the participation of an underage person, as well as possessing a processed image of a child, participation in presentation of pornographic content with the participation of an underage person (Article 202 of the Penal Code).*
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7. **Employee** is a person employed under a contract of employment or performing work under a similar contract (e.g. personal service contract, B2B, specific task contract), as well as an intern, trainee, volunteer, etc.
 8. **Employee working with children** is any person whose actual duties are related to the upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by underage persons, or the care of underage persons.
 9. **Entrepreneur or farmer** – the body/entity/person managing a given tourist facility or network of facilities, responsible for the proper operation of the facility in formal terms.

Chapter II

Rules for safe relationships between underage persons and the facility or the organiser staff, in particular behaviours prohibited towards underage persons.

Setting the rules for safe relationships between underage persons and the staff of facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* is of key importance in the context of the protection of the good and safety of children. Employees of facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* are obliged to follow the rules presented below:

a) Respect for dignity of underage persons:

- The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* undertakes to respect dignity as well as physical and psychological integrity of an underage person.
- Humiliation, intimidation or discrimination in any form will not be tolerated.

b) Physical safety:

- The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall be obliged to ensure physical safety of underage persons, avoiding any activities that may result in injuries.
- Physical violence against underage persons in any form shall be unacceptable.
- Touching a child in a way that may be considered indecent or improper shall be prohibited.
- Secret or hidden physical contact with a child shall be prohibited,
- Maintaining any physical contact with a child involving the use of an unequal relationship between the employee and the child shall be prohibited.

c) Psychological safety:

- The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall avoid any activities that may adversely affect the psychological state of underage persons, such as intimidation, ridicule or humiliation.
- Any form of psychological violence shall be strictly prohibited.

d) Prohibition to abuse power:

- The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* may not abuse their position or power against underage persons for personal benefits or to inflict harm.
- Using the dependency situation for sexual purposes shall be unacceptable.
- Offering alcohol, tobacco products, illegal substances to children shall be prohibited.
- Establishing any dependency relationship with the child or parents or guardians of the child, as well as behaving in a way potentially suggesting the existence of such a dependency relationship to others shall be prohibited.

e) Protection of the privacy:

- The staff undertakes to maintain the privacy of underage persons, not to disclose personal data without proper justification and not to allow unauthorised access to information about underage persons.
- It shall be prohibited to disclose any information relating to the child to unauthorised persons, including other children; this prohibition shall also include making available the child image without

the relevant consent, disclosing information about the family, economic or health situation and other information, the disclosure of which may adversely affect the underage person.

f) Safe communication:

- Communication in any form, including electronic communication, shall comply with the principles of ethics and safety.
- It shall be prohibited to establish private relationships, especially sexual ones, with underage persons.

g) Education and awareness:

- The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall be committed to regular education in the area of safety of underage persons and identification of signs of potential abuse.
- All employees of *Sun & Snow spółka z ograniczoną odpowiedzialnością* should know the procedures for reporting potential abuse of underage persons.

h) Incident reporting:

- The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall be obliged to immediately report any identified or suspected abuse of underage persons to responsible services or authorities.

Observing the aforementioned rules shall be of key importance in the context of creating a secure environment for underage persons, where their good and safety have top priority. Facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* should also implement relevant procedures, trainings and monitoring in order to effectively apply these rules.

Chapter III

Rules and procedure for the identification of the child staying at the hotel facility and the child's relationship to the adult with whom the child is staying at the facility

1. Upon check-in at the facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*, when possible, it is always necessary to carry out the identification of the child and the child's relationship to the adult with whom the child is staying at the facility.
2. Carrying out the identification of the child by the reception desk staff shall be obligatory in unusual and suspicious situations implying a risk of harming the child.
3. In order to identify the child and the child's relationship with the adult with whom the child is staying at the facility, it is necessary to:
 - a) ask about the child's identity and the child's relationship with the adult with whom the child has arrived or is staying at the facility. To this end, it is possible to ask for the child's identity document or other document confirming that the adult has the right to take care of the child (e.g. civil status certificate, court judgment). In the absence of an identity document, it is possible to ask for the child's data (first name, surname, address, Personal Identification Number (PESEL)). Additionally, both the adult and the child should be asked about their relationship. A sample conversation script with the adult and a child is attached as Appendix no. 1;
 - b) if there are no 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 guardian of the child, he or she should be asked if he or she has a document confirming consent granted by guardians of the child to the adult to travel together with the child (e.g. a written statement of consent of at least one of the parents/legal guardians of the child);
 - d) if the adult does not have a documented consent of guardians of the child, the adult should be asked for the phone number of the aforementioned person, to call and confirm the child's stay at the facility with the adult stranger with the knowledge and consent of the guardians of the child.
4. Upon online check-in at the facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*, if an underage person is going to be checked in for recreational or tourist stay, the person checking in the underage person shall be obliged to fill in the form including information referred to in section 3.
5. If the adult is unwilling to present the child's document or confirm the relationship, it is necessary to explain that the procedure is aimed at ensuring safety of children using the facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* and that such the obligation is imposed by universally binding legal regulations. The aforementioned information shall also be available upon online check-in.
5. If, after the conversation, doubts still persist as to the concerns regarding the adult and his or her intention to abuse the child, the reception desk manager or a person authorised by him or her shall be notified discreetly. In order not to arouse suspicion, it is possible, for example, to refer to 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 another place.

6. From the moment of the first doubts, both the child and the adult should be under constant observation by the staff and should not be left alone.
7. The reception desk manager or a person appointed by them shall take a decision on notifying the Police or in the case of doubts, enter into conversation with the suspected adult for further clarification.
8. If the conversation shows that there is an indication of an attempt of or committing a criminal offence to the detriment of the child, the superior shall notify the Police thereof. Further, the rules applying in case of circumstances indicating child abuse shall be followed.
9. If unusual or suspicious situations are witnessed by the staff of other organisational units, e.g. cleaning service, room service, bar and restaurant, they should immediately notify the director/manager/owner of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* or a person appointed by them, who will decide on appropriate actions to be taken.

Chapter IV

Rules and procedure for responding in case of a justified suspicion that the good of a child staying at or using services of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* is at risk.

1. In case of a justified suspicion that a child staying at the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* is being abused, the Police should be notified immediately by calling 112 and describing the circumstances of the incident. Depending on the dynamics and circumstances of the situation, the call shall be made by the person who directly witnessed the incident (employee/superior). If the report is made by an employee, he or she shall simultaneously inform his or her superior about the incident.
2. It may be reasonably believed that a child is abused if:
 - a. the child has told an employee of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* that the child has been abused;
 - b. an employee of *Sun & Snow spółka z ograniczoną odpowiedzialnością* has seen the child being abused;
 - c. the child's body shows signs of abuse (e.g. scratches, bruises) and when asked, the child answers are inconsistent and/or chaotic or the child looks embarrassed, or there are other circumstances indicating abuse, e.g. child pornography materials are found in the adult's room.
3. In such the case, the child and the person suspected of child abuse should be prevented from leaving the facility.
4. In justified instances, a citizen's arrest of the suspect can be made.³ In this case, until the Police arrive, the detained person should remain under the supervision of two employees in a separate room, out of view of other guests.
5. The safety of the child must be protected regardless of the circumstances. The child must remain under the care of an employee of *Sun & Snow spółka z ograniczoną odpowiedzialnością* until the Police arrive.

³ Article 243 of the Act of 6 June 1997 – Code of Penal Procedure (consolidated text: Journal of Laws of 2024, item 37, as amended).

§ 1. Anyone has the right to apprehend a person caught in the act of committing an offence, or seized in a pursuit undertaken directly following the commission of an offence, if it is feared that such person may go into hiding or if his identity cannot be established.

The notion “in the act” used in § 1 means apprehending the offender in the course of carrying out any of the stages of a criminal offence (but not a petty offence), i.e. at the stage of punishable preparation, attempt or performance. In practice, usually, it will be an attempt, as apprehension in general prevents the performance of a prohibited act. Identifying just an object of the criminal offence is sufficient to apprehend [an offender]. K. Dudka [in:] M. Janicz, C. Kulesza, J. Matras, H. Paluszkiewicz, B. Skowron, K. Dudka, *Kodeks postępowania karnego. Komentarz* (Code of Penal Procedure, Commentary), 2nd edition, Warsaw 2020, Article 243.

§ 2. The apprehended person should be surrendered to the Police without delay.

Explanation: It is impossible to verify suspicion based on facts or evidence; that is the task of the body conducting the proceedings. Section 2 describes situations involving a justified suspicion. Citizen's arrest does not require the occurrence of a prohibited act (i.e. catching an adult having sexual intercourse with a child); the stages of the act are sufficient for arrest, i.e. preparation, attempt or performance. Arrest at the stage of attempt (i.e. direct intent to commit an act) means its prevention. Renting a room with a child would be an attempt.

6. In case of a justified suspicion of committing a criminal offence involving a child's exposure to the perpetrator's biological material (semen, saliva, epidermis (skin)), the child should, as far as possible, be prevented from washing themselves, eating and/or drinking until the arrival of the Police.
7. When the child is collected by the Police, the surveillance footage and other relevant evidence (e.g. documents) relating to the incident should be secured, and their copies shall be sent by registered post or delivered personally to the public prosecutor or the Police upon request.
8. After the intervention, the incident should be recorded in the incident log or another document designated for this purpose. The template of the intervention card is attached as Appendix no. 2.
9. Examples of situations raising suspicions or indicating child abuse are described in Appendix no. 3.

Chapter V

Procedures and persons responsible for reporting suspicion of committing a criminal offence to the detriment of an underage person, and for notifying a guardianship court.

The procedure relating to suspicion of committing a criminal offence to the detriment of an underage person at the facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* requires close cooperation between various persons and authorities. The following steps represent a general procedure and persons responsible in the facility for reporting suspicion of committing a criminal offence to the detriment of an underage person.

1. Reporting suspicion:

- An employee of *Sun & Snow spółka z ograniczoną odpowiedzialnością* or another person, who has noticed or suspected a criminal offence committed to the detriment of an underage person, should immediately report this fact to competent authorities.

2. Incident documentation:

- The reporting person should draw up a detailed intervention card with the date, hour, place, participants, witnesses, as well as description of the incident.

3. Making the report:

- The notification of suspicion of committing a criminal offence to the detriment of an underage person should be submitted to competent authorities, such as the Police.

4. Notification to a guardianship court:

- When the suspected criminal offence relates to a child, a guardianship court responsible for cases of the protection of children's rights should be notified.

5. Cooperation with law enforcement agencies:

- Facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* should cooperate with law enforcement agencies, by making available necessary information and supporting the proceedings.

6. The implementation of this document shall be overseen by the Management Board of *Sun & Snow spółka z ograniczoną odpowiedzialnością*.

7. The director/manager/owner of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall be responsible for making reports in the case of suspicion of committing a criminal offence to the detriment of an underage person and for notifying a guardianship court after receiving information from the Coordinator.

8. The Management Board of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall appoint Coordinators for Standards for the Protection of Underage Persons (hereinafter: "Coordinator").

9. The Coordinator shall be a person responsible for presenting the content of this document to employees of the facility/facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* and for monitoring the application of this document.

10. The Coordinator shall describe every intervention or a reported incident involving child abuse at the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* in a document drawn up for this purpose (hereinafter: "Register of Interventions") and shall notify the director/manager/owner of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* of the incident.

11. In case of a justified suspicion of committing a criminal offence, the Coordinator shall be responsible for securing evidence, including the surveillance footage, and sending them by registered post or delivering personally to the public prosecutor or the Police upon request.

12. The Coordinator shall be responsible for applying the procedure when a child is harmed by an employee of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością* or by another adult.
13. The Coordinator shall be responsible, together with the Management Board of *Sun & Snow spółka z ograniczoną odpowiedzialnością*, for monitoring and updating this document and for its availability both to employees and guests, as well as other entities cooperating with the facility.
14. Details of the Coordinator shall be available to all employees and guests of the facility of *Sun & Snow spółka z ograniczoną odpowiedzialnością*, including children. The details must include information on how to contact the Coordinator (email address, telephone number, availability: working days and hours).

Chapter VI

Rules for underage persons' Internet access and for the protection against harmful content

1. Facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*, offering their guests Internet access, are obliged to take measures protecting children from accessing content that may pose a threat to their proper development, in particular security software should be installed and updated.
2. At facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*, an underage person may access Internet under the supervision of a parent, legal guardian or an authorised employee.
3. The network infrastructure at facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* provides access to the Internet to all facility staff and guests after entering a password.

Chapter VII

Rules for the protection of the underage person's image

The protection of the underage person's image is an important aspect of the law aimed at protecting privacy. Recognising the underage person's right to privacy and protection of personal rights, *Sun & Snow spółka z ograniczoną odpowiedzialnością* ensures the protection of the underage person's image.

General rules for the protection of a child's image are presented below:

1. Consent of parents or guardians:

- Before publishing or using the child's image, the written consent of parents or legal guardians authorised to represent the child shall be required. This consent is especially important in case of commercial or public activities.
- The aforementioned written consent shall contain information where the recorded image would be placed and in what context it would be used (e.g. publishing the image on www.youtube.pl/ website of *Sun & Snow spółka z ograniczoną odpowiedzialnością* for promotional/ information purposes, etc.), unless the parent has signed the general consent to the processing of the image.

2. Restriction of access to the image:

- Facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* apply security measures to restrict unauthorised access to children's images, such as group photographs without names and identification details.
- Facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* take care of safety of images of underage persons by avoiding unnecessary signing of photographs/recordings with information identifying the child by first name and surname.

3. Prohibited use of the image:

- It shall be prohibited to use the child's image in a humiliating or insulting way or in a way harmful to the child's psychological or physical well-being. Children have the right to respect and dignity, and their images should not be used in a harmful way.

4. Protection against commercial use:

- Using the child's image for commercial, marketing or promotional purposes shall require the consent of parents or guardians. A child shall not be the subject to advertising campaigns without an appropriate protection of rights.

5. Right to privacy:

- Children have the right to privacy, which also includes against unauthorised disclosure of their image.
- *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall process the image in compliance with regulations on the protection of personal data.

6. Regulations pertaining to social media:

- Special rules apply to the publication of children's images in the context of social media. *Sun & Snow spółka z ograniczoną odpowiedzialnością* and parents should understand consequences of sharing images of their children online and should protect their privacy.

Chapter VIII

Recruiting people to work with children

1. All persons working with children must be safe persons to work with children, which means that their employment history must show that they never harmed a child in the past.
2. The staff employed by facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* to perform work relating to education, recreation and the care of children must be checked in the Register of Sexual Offenders. Checking a person in the Register of Sexual Offenders shall involve printing out the results of the person search in the restricted-access Register of Sexual Offenders; then, the printout shall be attached to the personal file of the person checked. The check must be repeated every year. The scope of data for the purposes of checking a person in the Register of Sexual Offenders is attached as Appendix no. 4.
3. All employees employed to work with children, including those who may have potential contact with children, should make a declaration of no criminal record and no proceedings pending for acts against children. The template of the declaration of no criminal record is attached as Appendix no. 5.
4. - Information on no criminal record shall be obtained from the National Criminal Register for a candidate to work for facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*.
5. Guidelines for verification of information on criminal record are presented in Appendix no. 6.
5. A candidate with a citizenship other than Polish must also present an information from the national criminal register of his or her country of citizenship obtained for the purposes of professional or voluntary activities involving contacts with underage persons or an information from the criminal register if the law of the country does not provide for issuing the information for the aforementioned purposes.
6. Moreover, the candidate is also required to make a declaration on the country/countries (other than the Republic of Poland) of their residence during the past 20 years, under pain of criminal liability. The declaration template is attached as Appendix no. 7.
7. If the law of the country from which information about no criminal record is to be submitted does not provide for the issuance of such information or no criminal register is kept, then the candidate shall make, under pain of criminal liability, a relevant declaration together with a declaration that he or she has not been validly convicted and no other judgment/decision has been issued against him or her indicating that he or she committed such prohibited acts, and that he or she is not obliged, based on the judgment of the court, decision of another authorised body or an act, to comply with the prohibition to hold any or specified positions, to practice any or specified professions or activities relating to upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by underage persons, or regarding caring for them.
8. Under the declaration made under pain of criminal liability the following note must be included: I am aware of criminal liability for making a false declaration. This note shall replace the authority's notice of criminal liability for making false declarations.

9. Before being admitted to work, every employee shall sign the declaration on familiarising himself or herself with the Standards for the Protection of Underage Persons and undertaking to comply with the Standards. The declaration template is attached as Appendix no. 8.

Chapter IX

Rules to be followed to ensure safe interactions between employees of facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością* and underage persons

1. The fundamental rules applying with respect to all activities taken by the staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* is to act for the good and in the best interest of the child.
2. The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall show respect to the child and take into account the child's dignity and needs. Violence against the child in any form shall be unacceptable. When pursuing these objectives, the staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall act in compliance with the applicable law, internal regulations of the organisation and their competence.
3. The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall be obliged to maintain professional relationship with children and to consider in each case whether their response, message or actions towards the child are adequate for the situation, safe, justified and fair to other children.
4. It is prohibited to embarrass, humiliate, disrespect or insult the child. Shouting at the child is prohibited unless it is required for safety of the child or other children.
5. No sensitive information relating to the child shall be disclosed to unauthorised persons, including other children. This shall include the child's image, information on his/her family, economic, medical, guardianship and legal status.
6. The staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall be obliged to reassure the children that if they ever feel uncomfortable in any situation due to a particular behaviour or words, they may notify the staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością* thereof and expect an appropriate response and/or assistance.
7. Alcohol, tobacco products or illegal substances must not be offered to children or used in their presence.
8. Any violence against the child is unacceptable.
9. Contact with children should only take place during working hours and should relate to purposes remaining within the scope of duties of the staff of *Sun & Snow spółka z ograniczoną odpowiedzialnością*. Inviting children to an employee's place of residence or meeting with children outside working hours shall be prohibited. This also includes communicating with children via private communication channels (private telephone, email, messengers, social media profiles).

Chapter X

Monitoring and evaluation of the application of Standards for the Protection of Underage Persons

1. *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall appoint a Coordinator responsible for Standards for the Protection of Underage Persons applicable in *Sun & Snow spółka z ograniczoną odpowiedzialnością* and shall disclose his or her contact details in a place easily accessible to staff and guests of the facility, including children.
2. *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall determine the scope of tasks and competencies of the Coordinator with respect to training of employees in the application of provisions of Standards for the Protection of Underage Persons, principles for preparing employees to apply them and the way of documenting these activities.
3. The Coordinator shall monitor and evaluate Standards for the Protection of Underage Persons at least every two years.
4. Monitoring and evaluation shall include verification of the implementation of Standards for the Protection of Underage Persons, responses to signals of violations of rules and procedures, and proposition of amendments to the document, especially in terms of adjusting it to current needs and compliance with applicable regulations.
5. At least every two years, the Coordinator shall conduct a survey among employees of *Sun & Snow spółka z ograniczoną odpowiedzialnością* for the purposes of monitoring the degree of implementation of Standards for the Protection of Underage Persons. The survey form is attached as Appendix no. 9.
6. In the survey form, employees may propose amendments to and disclose violations of rules and procedures set in Standards for the Protection of Underage Persons at facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*.
7. The Coordinator shall verify survey forms completed by employees and based thereon, shall draw up a monitoring report to be submitted to the Management Board of *Sun & Snow spółka z ograniczoną odpowiedzialnością*. *Sun & Snow spółka z ograniczoną odpowiedzialnością* shall make necessary amendments to the document and notify employees of the new version of Standards for the Protection of Underage Persons.

Chapter XI
Final provisions

1. This document shall come into force on the date of its announcement, i.e. 15 October 2024 and shall be effective as of 15 August 2024.

2. Standards for the Protection of Underage Persons shall be published on the website at www.sundandsnow.pl, in the Rules tab, Policy for the protection of underage persons, and shall be available at receptions desks of facilities of *Sun & Snow spółka z ograniczoną odpowiedzialnością*.