Attachment No. 1
to the Order of the President of the Management Board No. 1/10/2024 dated October 7, 2024

STANDARDS FOR THE PROTECTION OF MINORS FOR EMPLOYERS WHO HIRE JUVENILE WORKERS AND ACCEPT TRAINEES

ETP ELEKTRO SP. Z O.O.

VALID FROM OCTOBER 7, 2024

PREAMBLE

This document fulfills the legal obligation to implement standards for the protection of minors and reflects the employer's commitment to creating a workplace where juvenile employees and trainees can safely realize their potential by developing professional and social skills. The employer, in the spirit of corporate social responsibility, acknowledges its responsibility to promote and respect children's rights.

§ 1
GENERAL PROVISIONS

1. For the purposes of this document, the following definitions apply:

   a) **Minor (child)** – refers to any person under the age of 18. In the context of this document, it means a juvenile employee or trainee under 18;
   b) **Juvenile (juvenile employee)** – an employee aged between 15 and 18, in accordance with Article 190 of the Labor Code, including a person under 15 employed for practical vocational training according to Article 191 § 21-23 of the Labor Code;
   c) **Trainee** – a person under 18 undergoing practical vocational training with the employer;
   d) **Employee assigned to work with children** – a person designated by the employer to serve as a supervisor of practical vocational training or a trainee instructor;
   e) **Personnel (employees)** – the entirety of the employer's employees, including those not assigned to work with children and those performing duties based on legal relationships other than an employment contract;
   f) **Employer** – ETP Elektro Sp. z o.o., with its registered office in Bierawa, Gliwicka 8, 47-240 Bierawa, registered in the National Court Register (KRS) under number: 0000216892, NIP: 7491961970, REGON: 532457288, with a share capital of PLN 15 470 000,00;
   g) **Workplace** – the place where the child works or undergoes training;
   h) **Management** – the person or function directing the employer's operations;
   i) **Child abuse** – any form of physical or psychological harm to a child, particularly the commission of a crime against them, domestic violence, neglect of the child's needs, or any other form of harm such as discrimination or mobbing;
   j) **Document** (standards for the protection of minors) – this document.

2. The employer adopts this document as a form of compliance with the obligation to provide children with care, assistance, and appropriate conditions necessary for their proper work performance as stipulated in Article 192 of the Labor Code.

§ 2
SAFE RECRUITMENT OF PERSONNEL FOR WORK WITH CHILDREN

1. An employee designated to work with children must always be present during the time and at the place where juveniles and trainees are working, ensuring direct supervision.
2. If the designated employee is absent, the employer will immediately transfer this responsibility to another employee meeting the legal requirements.
3. If necessary, the employer may assign an additional person to work with children.
4. When hiring or assigning an employee to work with children, the employer verifies the employee's criminal record in the following ways:

a) Verifies whether the employee's data is listed in the Register of Sexual Offenders with Restricted Access or in the Register maintained by the State Commission for Combating Sexual Abuse of Minors under 15;
b) Obtains a criminal record certificate from the National Criminal Register for offenses specified in chapters XIX and XXV of the Penal Code, in Article 189a and Article 207 of the Penal Code, and in the Act of July 29, 2005, on counteracting drug addiction (Journal of Laws of 2023, item 1939), or corresponding offenses under foreign law (applicable to foreigners, who must also provide appropriate criminal records from their country of citizenship);
c) Obtains a declaration from the employee about the countries where they have resided in the past 20 years, excluding Poland and their country of citizenship, under penalty of perjury. For this purpose, the country of residence is where the person stayed for more than three months;
d) Obtains a criminal record check from the registers of the countries listed in point c;
e) If the country in point c does not maintain a criminal register or does not issue such certificates, a declaration of no criminal record under penalty of perjury is required.

5. Verification of the criminal record of an employee assigned to work with children occurs once, before their assignment to work with children, and is not repeated unless required by law. Employees assigned to work with children for the first time after this document comes into force will also be checked, even if they have been employed for a long time.
6. Other employees of the employer are not subject to criminal record checks for offenses against children unless they are assigned to work with children for the first time.

§ 3
INTERVENTION PROCEDURES

A. General Provisions

1. Child abuse can take various forms, and perpetrators can include adults who are members of the employer's staff, family members of the child, or third parties.
2. Other children, either employed by the employer or participating in training programs, may also be perpetrators, as can children with whom the minor interacts outside the workplace.
3. Child abuse may take the form of:
   a) The commission of a crime against the child [1];
   b) Domestic violence – perpetrators may include adults living with the child. A child is considered a victim of domestic violence even if they only witness the violence, without directly experiencing it;
   c) Neglect of the child's needs – such as appropriate clothing, food, or medical care. The perpetrators may include the child's parents or guardians;
   d) Other forms of harm, such as discrimination or harassment.
4. The person responsible for managing interventions is the employer's management – Ms. Natalia Płazak - Chief Financial Officer. Management may designate another person for this task, whose details and function should be included in the minor protection standards.
5. If the person harming the child is part of the employer's management, the intervention will be handled by the employee assigned to work with children.
6. In cases where the child's life or health is at risk, the appropriate services should be notified immediately by calling 112.

[1] In the event of a crime or misdemeanor being committed by a person under 17 years of age, i.e. below the age of criminal responsibility, liability under the Act of 9.06.2022 applies to such a person. on the Support and Rehabilitation of Juveniles (Journal of Laws of 2024, item 978), and the act committed is referred to as a "punishable act".

7. All employees should respond immediately to any instance of child abuse, regardless of who the perpetrator is. This response should include at least informing the employee responsible for working with children or the employer's management of the observed issue or notifying the appropriate services if there is knowledge of a situation posing a threat to the child's life or health, or if there is a legal obligation to report suspected criminal activity. In cases where the event is subject to mandatory reporting, management should be notified simultaneously or after the authorities (police, prosecutor's office).

B. Abuse by an Adult

1. If there is suspicion of a crime against a child, a written report should be submitted to the relevant police unit or prosecutor's office. The report should briefly describe the incident, including the persons involved. If the location of the crime is known, the report should be sent to the unit with jurisdiction over that location; if not, the report should be sent to the unit with jurisdiction over the employer's headquarters.
2. If domestic violence or neglect of the child's basic needs is revealed, the child's school should be informed of the need to initiate the "Blue Card" procedure.
3. If non-criminal harm is inflicted on the child by an employee (e.g., minor violations of safe relationship principles), a disciplinary conversation should be held with the employee, and if there is no improvement, the employment contract should be terminated with notice. In severe cases, the contract should be terminated without notice. Where appropriate, procedures for resolving cases of discrimination and harassment should be followed.

C. Abuse by a Peer

1. If there is suspicion of a punishable act against a child or another form of harm (e.g., cyberbullying), the appropriate family court or police unit should be notified in writing to initiate proceedings in juvenile cases. The report should briefly describe the incident, including the persons involved. If the residence of the minor perpetrator is known, the report should be sent to the unit with jurisdiction over their residence; if not, it should be sent to the police unit or court with jurisdiction over the employer's headquarters.

D. Support after Revealing Abuse

1. After abuse is revealed, a meeting is organized with the child's non-abusive parents or guardians to provide information about the incident and the need for specialized support. The child and their non-abusive guardian are provided with a list of local organizations and institutions that offer help, along with contact information (e.g., local non-governmental organizations, local social welfare centers).

E. Intervention Register

1. The employer maintains an intervention register as an attachment to the juvenile employee register referred to in Article 193 of the Labor Code.
2. The intervention register is kept in written form, with an intervention card filled out for each case. One intervention card is completed for each child.

§ 4
PRINCIPLES OF SAFE RELATIONSHIPS

A. Rules for safe relationships between personnel and children

1. All actions taken by employees towards children should be directed by the best interest of the children.
2. Employees treat every minor with respect and patience, understanding that children need time and attention to acquire the necessary skills to perform work and the time required to master new skills may differ for each child.
3. Employees are not allowed to record the image of children without their knowledge and consent, as well as without the consent of the employer's management.
4. Employees must not use violence against minors in any form.
5. It is forbidden to use both physical and sexual violence (including violence involving touch or any form of physical contact, verbal violence, violence understood as jokes with a sexual connotation or comments about the appearance or clothing of children with sexual undertones, or violence involving the use of means of communication at a distance, understood as, for example, sending messages of a sexual nature) as well as psychological violence (particularly such actions as shouting, humiliation, insults, mocking, gossiping, or behaviors that indicate diminishing or exclusion).
6. The use of yelling towards a child is permitted when required by a situation related to warning the child about imminent danger.
7. Employees are not allowed to engage in bullying or discrimination against minors in any form.
8. The employee should listen to the opinions of minors on matters that concern them and take them into account to the extent possible by the employer's organizational capacities.
9. Employees are not allowed to offer children intoxicants (cigarettes, alcohol, drugs), even outside the workplace.
10. Employees must not engage in sexual or romantic relationships with minors, nor must they engage in such relationships where the age difference between the employee and the minor is negligible.
11. Employees should avoid favoring certain children.
12. Employees should avoid using vulgar language or language with sexual overtones in the presence of children.
13. Employees should avoid inappropriate physical contact with minors (e.g., indecent contact, violating physical integrity, including brutal physical games or jokes of this kind).
14. Each employee should pay attention to whether children work in accordance with safety and hygiene rules and immediately react in case of irregularities.

B. Safe Peer Relationships

1. Juveniles employed by the employer or undergoing training must treat their peers with kindness.
2. Juveniles have the right to express their opinions, even if they differ from those of their peers, and have the right to ask for help in performing their duties at any time.
3. Any form of peer harassment, including cyberbullying, is strictly prohibited.
4. It is also forbidden to record images of other minors without their knowledge and consent, especially in embarrassing or uncomfortable situations.

§ 5
STAFF TRAINING AND MONITORING OF STANDARD COMPLIANCE

1. All employees must be aware of and adhere to these standards.
2. If any irregularities in the application or knowledge of the standards are observed, the employee should address the issue and inform the person responsible for the protection of minors at the workplace.

3. The person responsible for overseeing the standards of protection of minors at the employer's premises is Ms. Katarzyna Maryniak - Production Manager.
4. The protection standards must be known and followed by all personnel.
5. The responsibilities of the person responsible for these standards include organizing initial and periodic meetings to familiarize personnel with the content and purpose of these standards. Periodic meetings are held at least before a new group of juvenile employees/trainees begins work.
6. Each new employee must familiarize themselves with the standards document and confirm this with a signed declaration.
7. The employee responsible for these standards conducts a review of the document's content at least once every two years, considering the relevance of legal regulations and the functionality of the standards in protecting children and meeting the organizational needs of the employer. This review may be preceded by discussions with employees or a survey regarding their knowledge of the standards and their effectiveness. This person will also consider any reports made by staff based on paragraph 2 of this section and the intervention register to date. The responsible employee will summarize the review in an official note to the management, suggesting any necessary changes to the content of the standards.

§ 6
FINAL PROVISIONS

1. In the workplace, minors have the option of connecting their devices to a wireless network and/or using provided electronic devices with internet access. These devices and the wireless network are secured with software blocking access to pornographic content. The IT department is responsible for the ongoing updates of this software.
2. This document and any updates will be published on the employer's website, available for review at the employer's headquarters, displayed in a notice board near the production hall, and included in a shortened version (regarding the safe relationship principles) in every contract with a juvenile employee or trainee.
3. This document comes into force on October 7, 2024.