

**CHILD SAFEGUARDING STANDARDS
FOR IMPACT CLEAN POWER TECHNOLOGY S.A.
- FULL VERSION -**

I. General Provisions

1. The child safeguarding standards (hereinafter also referred to as the “Standards”) apply to all activities carried out by **Impact Clean Power Technology S.A.**, aimed at minors, including as an employer employing young workers, an organiser of vocational placements, practical vocational training for pupils, or educational activities.
2. These Standards constitute fulfilment of a legal obligation concerning the introduction of child safeguarding standards arising from the Act of 13 May 2016 on Counteracting Threats of Sexual Offending and Protecting Minors.
3. The purpose of introducing the Standards is the safeguarding of minors – participants in initiatives organised by **Impact Clean Power Technology S.A.**, including educational activities, by defining proper conduct towards participants in activities for all persons involved in those activities and providing guidance, examples of good practice, procedures and information on the legal consequences of negligence or breaches of legal provisions concerning the protection of minors from all forms of violence.
4. The guiding principle of all activities undertaken at **Impact Clean Power Technology S.A.** in relation to minors is acting in the best interests of the child and for the welfare of the child. Each Staff Member treats minors with respect and takes their needs into account. It is unacceptable to use violence against minors in any form. Staff Members and **Impact Clean Power Technology S.A.**, in pursuing these objectives, act within the framework of applicable law and in accordance with internal regulations and their competencies.

II. Definitions used in these Standards

Company/Employer - Impact Clean Power Technology S.A., with its registered office in Pruszków, ul. Przejazdowa 22, 05-800 Pruszków

Staff Member – any person employed on the basis of an employment relationship or a paid or unpaid civil-law contract, as well as any person performing activities for **Impact Clean Power Technology S.A.**

Minor (Child) – any person under 18 years of age, including young workers at the Company, in particular pupils undertaking vocational placements or practical vocational training, or participating in another form of educational activities at **Impact Clean Power Technology S.A.**

Guardian of a child – hereinafter also guardians of a child, means the statutory representative of a child: a parent¹ or guardian²; a foster parent³; a temporary guardian (i.e. a person authorised to represent a minor citizen of Ukraine who is staying in the territory of the Republic of Poland without the care of adults)⁴.

Guardian’s consent – consent means, as a rule, the consent of one of the parents in the case of ordinary, day-to-day matters concerning a child and the consent of both parents in matters exceeding ordinary management. In matters concerning day-to-day matters concerning a child, if one of the parents objects, they must be informed of the need for the matter to be resolved by the family court (in such a case, a ruling of the guardianship court replaces the consent of both parents). In these cases, the consent of a guardian, foster parent or temporary guardian applies accordingly.

Child abuse or neglect means any conduct towards a child that constitutes a prohibited act against them. In addition, abuse or neglect includes neglect (intentional or unintentional), an act or omission, as well as any result thereof, causing a violation of the rights, freedom or personal interests of a child and disrupting their development.

The following basic forms of abuse or neglect are distinguished:

- **Physical abuse of a child.** This is an act or omission as a result of which a child suffers actual physical harm or is potentially at risk of such harm. The harm is the result of an act or omission by a parent, guardian, person responsible for the child, a person who has authority over them or a person whom they trust. Physical abuse may be a one-off occurrence or repeated conduct.

¹ Within the meaning of Article 98 of the Act of 25 February 1964 – Family and Guardianship Code (consolidated text: Dz. U. of 2023, item 2809, as amended), hereinafter referred to as the “Family and Guardianship Code”.

² Within the meaning of Article 155 of the Family and Guardianship Code.

³ Within the meaning of Article 112¹ of the Family and Guardianship Code.

⁴ Within the meaning of Article 25 of the Act of 12 March 2022 on Assistance to Citizens of Ukraine in Connection with the Armed Conflict in the Territory of That State (consolidated text: Dz. U. of 2024, item 167, as amended).

- **Emotional abuse of a child.** This is a chronic, non-physical, harmful interaction between a child and a person responsible for them or a person whom the child trusts. As with physical abuse, it includes both acts and omissions. Manifestations of emotional abuse include, among others:
 - emotional unavailability,
 - emotional neglect,
 - a relationship with a child based on hostility, blame, disparagement and rejection,
 - developmentally inappropriate or inconsistent interactions with a child,
 - failure to perceive or recognise a child's individuality,
 - failure to perceive or recognise psychological boundaries between a child and the responsible person,
 - inappropriate socialisation, moral corruption,
 - situations in which a child witnesses violence.
- **Sexual abuse of a child (child sexual abuse).** This is the involvement of a child by an adult or another child in sexual activity. It concerns situations where no physical contact occurs (e.g. exhibitionism, verbal harassment - e.g. conducting conversations of a sexual nature that are inappropriate to the child's age, commenting in a sexual manner on the child's appearance and behaviour, encouraging contact with pornographic content, *grooming* - non-sexual seduction strategies aimed at establishing sexual contact in the future) and where such contact does occur (situations such as: touching a child, forcing a child to touch the perpetrator's body, sexual intercourse). Any sexual act undertaken with a child before reaching 15 years of age is a criminal offence. In the case of children, we speak of sexual abuse when, between the abusing person (an adult, another child) and the abused person (a child), there is a relationship of power, care or dependence due to age or level of development. Another form of child sexual abuse is sexual exploitation. This is any actual or attempted abuse of a child's vulnerability, power imbalance or trust - for sexual purposes. Sexual exploitation includes (although this is not necessary) deriving financial, social or political gains from sexual abuse.
- **Child neglect.** This is the chronic or incidental failure to meet a child's physical and psychological needs. It may take the form of failing to respect the rights of a child, which as a result leads to disorders in their health and/or development. Child neglect occurs in the child's relationships with a person required to provide care, upbringing, concern and protection.
- **Peer-on-peer abuse (peer bullying, *bullying*).** Peer-on-peer abuse occurs when a child experiences various forms of harassment by peers. It concerns direct actions or actions using communication technologies (e.g. via the internet and mobile phones). Peer-on-peer abuse is observed where the harmful action is intended to cause distress or harm to someone (intentionality), is systematic in nature (repetition), and the victim is weaker than the perpetrator or group of perpetrators. It includes:
 - verbal abuse (e.g. name-calling, making snide remarks, ridicule),
 - relational aggression (e.g. exclusion from a group, ignoring, turning others against a person, blackmail),
 - physical abuse (e.g. beating, kicking, pushing, pulling),
 - property-related abuse (e.g. theft, destruction of items)
 - cyberbullying/electronic abuse (e.g. malicious messages in messaging apps, a post on a social networking service, posting photographs or videos on the internet that ridicule the victim),
 - sexual abuse - touching intimate parts of the body or being forced by a peer to engage in sexual intercourse or other sexual activities,
 - abuse based on gender-related norms and stereotypes (e.g. abuse in romantic relationships between peers), as well as on origin, nationality, sexual orientation, religion or other characteristics.
- **Person responsible for child safeguarding standards** – a staff member designated by the Employer, supervising the proper application of the Standards and ensuring that they are up to date. In the event of absence, another person designated to provide cover in this position.
- **Person responsible for receiving reports** – a staff member or several staff members designated by the Employer and responsible for receiving reports concerning incidents threatening a child. In the event of absence, another person designated to provide cover in this position.
- **Intervention register** – records containing a register of disclosed or reported incidents or events threatening the welfare of a child, including:
 - A report specifying the reporting person,
 - The person/persons suspected of abuse (guardian of a child, staff member, another child, another person),
 - The type of intervention undertaken (notification of a possible criminal offence, application for review of the family situation, initiation of the Blue Cards procedure),

- The date of the intervention,
- Documents produced during the intervention (including official notes, intervention records, copies of notifications/applications sent to the competent services).
- **Personal data of a child** – any information enabling a child to be identified, including their first name, surname and image.

II. Responsibility for the safeguarding of minors

1. Impact Clean Power Technology S.A. recognises that the care of minors is understood as concern for their dignity and physical and mental welfare, respects the rights of minors and does not tolerate any abuse against them.
2. Impact Clean Power Technology S.A., in the course of its activities aimed at minors, including educational activities, guarantees their safety and protection. Staff Members have appropriate knowledge of risk factors and signs of child abuse, and, in performing their duties, pay attention to their occurrence. Staff Members are attentive to the situation and wellbeing of a child.
3. If risk factors are identified, the designated Staff Member, as appropriate to the situation, holds a discussion with the guardians of a child, providing information on the available support offering and encouraging them to seek assistance from other institutions working for children. The steps taken must be documented in accordance with the method adopted at Impact Clean Power Technology S.A.
4. The Employer, on the basis of Article 21 paragraph 1 of the Act of 13 May 2016 on Counteracting Threats of Sexual Offending and Protecting Minors, requires that persons conducting activities and staff members assigned to work with minors (e.g. as placement supervisors or instructors of practical vocational training) submit, before commencing the performance of activities (other undertakings) with minors, the following (in a form suitable for inclusion in the employee personnel file or other records relating to the person permitted):
 - information evidencing verification in the Sex Offenders Register,
 - a certificate from the National Criminal Register in respect of criminal offences specified in Chapters XIX and XXV of the Criminal Code, in Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction (Dz.U. of 2023, item 172 and of 2022, item 2600), or in respect of prohibited acts specified in the provisions of foreign law corresponding to those criminal offences.
5. Persons referred to in paragraph 4 who hold citizenship of a country other than the Republic of Poland must additionally submit information from the criminal register of the country of citizenship obtained for the purposes of professional or voluntary activity involving contact with children.
6. Persons referred to in paragraph 4 submit a statement on the country or countries in which they have resided during the last 20 years, other than the Republic of Poland and the country of citizenship, and at the same time submit information from the criminal registers of those countries obtained for the purposes of professional or voluntary activity involving contact with children.
7. If the law of the country referred to in paragraph 5 or 6 does not provide for the issuing of information for the purposes of professional or voluntary activity involving contact with children, information from the criminal register of that country must be submitted.
8. Where the law of the country from which the information referred to above is to be submitted does not provide for its preparation or no criminal register is maintained in that country, that person submits a statement to that effect together with a statement that they have not been convicted by a final judgment in that country of prohibited acts corresponding to the criminal offences specified in Chapters XIX and XXV of the Criminal Code, in Article 189a and Article 207 of the Criminal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction, and that no other ruling has been issued against them stating that they committed such prohibited acts, and that they are not subject to any obligation arising from a court ruling, a ruling of another authorised body or a statute to comply with a prohibition on holding any or specified positions, practising any or specified professions or carrying out activities related to the upbringing, education, leisure, treatment, provision of psychological counselling, spiritual development, practising sport or pursuit of other interests by minors, or to caring for them.
9. The statements referred to in paragraphs 6 and 8 are made under penalty of criminal liability for making a false statement. The person making the statement is required to include in it a clause with the following

wording: “I am aware of criminal liability for making a false statement”. This clause replaces the authority’s instruction on criminal liability for making a false statement.

10. A person appointed to a position involving work with children must also submit a statement confirming familiarisation with the child safeguarding standards and an undertaking to comply with them – according to the template constituting Appendix no. 1a and 1 b to the Standards.
11. All statements submitted by a person with whom an employment relationship is to be established or who is to act within the entity are included in the employee personnel file, and, if there is none, attached to the civil-law contract.
12. Refusal to sign the required statements precludes the possibility of establishing an employment relationship or any other form of cooperation. Persons who have not submitted the above information, certificates and statements to Impact Clean Power Technology S.A. will not be permitted to work with minors.
13. In the event of illness or other absence of staff designated to conduct activities with minors, including educational activities, and cover by another person, the above provisions apply to that person.
14. The information and statements referred to above are attached to the employee personnel file or to the records relating to a person permitted to engage in such activity.

III. Rules:

- **ensuring safe relationships between minors and staff permitted to carry out activities aimed at minors;**
- **for taking intervention measures where abuse of a minor is suspected or information about abuse of a minor is held,**
- **for using electronic devices with internet access and the procedure for protecting minors from harmful content and threats on the internet and those recorded in another form,**
- **for establishing a support plan for a minor after disclosure of harm,**
- **for protection of the image of a minor.**

The following rules are introduced in order to eliminate the risk of abuse being committed against minors, and compliance with them enables the risk of abuse occurring in relations with minors to be minimised.

§ 1

Rules on safe relationships between staff members and minors

1. The Staff Member knows and applies the established rules on safe relationships between staff members and minors.
2. The guiding principle of all actions undertaken by each Staff Member is acting in the best interests of the child and for the welfare of the child.
3. The Staff Member treats the child with respect and takes into account their dignity, needs and right to privacy.
4. It is unacceptable to use violence against a child in any form.
5. It is unacceptable to establish with a child any relationships of a sexual, romantic or partner nature.
6. It is unacceptable to record the image of a child (filming, recording their voice, photographing) for a Staff Member’s private purposes.
7. Each contact with a child is transparent (i.e. known to the superior) and arises from the performance of official tasks and activities.
8. It is unacceptable to maintain contacts based on providing financial or material rewards arising from the exploitation of physical advantage, a power relationship or the dependency of a child, where the intention is the Staff Member’s satisfaction or fulfilment of their needs.
9. Care must be taken to ensure that each message, action or activity undertaken towards a child is appropriate to the situation, to their stage of development and individual physical and mental capabilities, is safe and justified, and does not result in unequal treatment of the child in relation to other children, including favouritism.
10. A detailed description of the rules on safe relationships is set out in Appendix no. 3 to the Standards.

§ 2.

Taking into account the situation of children with special educational needs, including disabilities

1. Impact Clean Power Technology S.A. takes into account the situation of children with special educational needs, including disabilities, in a manner adapted to the needs of children present on the premises of Impact Clean Power Technology S.A., in particular by:
 - a. treating each child with due respect, without discriminating against them on the basis of any characteristics, including special needs, disability, race, sex, religion, skin colour, national or ethnic

origin, language, marital status, sexual orientation, health status, age, abilities, political beliefs or social status,

- b. showing all children concern for their welfare and development,
 - c. using universal design, reasonable adjustment and modifications in order to ensure equal access for persons with special educational needs, including disabilities,
 - d. eliminating barriers that hinder children's independent functioning, including information and communication barriers and architectural barriers,
2. The following behaviours by staff members are unacceptable:
- discussing a child's situation, including their family situation, health situation, etc., in the presence of unauthorised persons,
 - disparaging comparisons with other persons,
 - disregarding or superficial and inattentive treatment of a child's reported need for support and assistance,
 - a passive attitude of staff members in relation to concern for a child's development and ensuring the child's safety in a situation threatening their wellbeing.

§ 3.

Scope of responsibility

1. Each staff member may notice or be informed of the occurrence of the above-mentioned acts of violence;
2. Each staff member is required to respond in a situation of violence (as a witness to the incident or as a person informed of the incident), i.e. to attempt to interrupt the situation, ensure the safety of persons: witnesses, the person experiencing abuse, the person perpetrating abuse – by isolating them;
3. Care must be taken to ensure that children know that they have the right and the opportunity to speak with the person responsible for their protection or another trusted person among the Staff Members, who will take action to provide the child concerned with support while respecting their privacy, if:
 - they have any problem, are afraid or are experiencing violence, including if they have experienced behaviour breaching the rules on safe relationships by a Staff Member, another child, the guardian of a child, another close person or any person,
 - they have witnessed inappropriate, incomprehensible or unclear behaviour, including behaviour indicated in the rules on safe relationships towards another child by a Staff Member, another child, the guardian of a child, another close person or any person.

§ 4.

Types of threat to the safety of minors

1. A threat to children's safety may take various forms and involve various methods of contact and communication.
2. For the purposes of this document, the following classification of threats to children's safety has been adopted:
 - a criminal offence against a child has been committed (e.g. child sexual abuse, child maltreatment),
 - another form of abuse or neglect not constituting a criminal offence has occurred, such as, for example, domestic violence not meeting the elements of the criminal offence of maltreatment, shouting, humiliation, mocking, smacking, pressure and demands exceeding the child's capabilities,
 - neglect of the basic needs of a child has occurred (e.g. those relating to nutrition, hygiene or health).
3. Where a staff member suspects that a child is being abused or neglected, or where such a circumstance is reported by a child or the guardian of a child, the staff member is required to prepare an official note and forward it to the person responsible for receiving reports or directly to the person responsible for conducting interventions. The note may be prepared in writing or sent by e-mail.
4. If abuse or neglect by the person designated to conduct the intervention is reported, the intervention is conducted by another person indicated by the President of the Company.
5. The person responsible for conducting interventions informs the guardians of the child of the situation that has occurred and of the obligation to report suspected child abuse or neglect to the appropriate institution (public prosecutor's office/police or family court or guardianship court, social welfare centre).
6. If informing the guardian of a child is contrary to the welfare of the child or impossible, this requirement is waived.
7. After informing the guardian who is not the perpetrator of violence in accordance with the preceding item, the person responsible for conducting interventions submits a notification of a suspected criminal offence to the public prosecutor's office/police or an application for review of the family situation to the district

court, family and juvenile division, social welfare centre, or initiates the “Blue Cards” procedure in accordance with the Act of 29 July 2005 on Counteracting Domestic Violence (Dz. U. of 2024, item 424, as amended).

8. The further course of proceedings falls within the competence of the institutions indicated in the preceding item.
9. An intervention record is prepared for the course of each intervention, the template for which constitutes Appendix No. 2 to these Standards.
10. All persons who, in connection with the performance of official duties, have obtained information about child abuse or neglect or related information are required to maintain confidentiality, excluding information provided to authorised institutions as part of intervention measures.
11. Where a suspected threat to the safety of a child has been reported by the guardians of a child and that suspicion has not been confirmed, the guardians of the child must be informed of this fact in writing.
12. Where there is a suspicion that a child’s life is at risk or that they are at risk of serious bodily harm, the relevant services (police, ambulance service, social welfare centre) must be informed immediately by calling 112 or 999 (ambulance). The services are informed by the staff member who first obtained information about the threat and then prepares an official note and forwards it to the person responsible for conducting interventions, who is responsible for the further course of the intervention in accordance with the procedures described in the Standards.

§ 5.

Child abuse or neglect by an adult (Staff Member or third party)

1. Where child abuse or neglect by a third party has been reported, the person responsible for conducting interventions holds discussions with: the child, other persons who have or may have knowledge of the incident and of the child’s personal (family, health) situation, and in particular with their guardians. The person responsible for conducting interventions seeks to establish the course of the incident, as well as the impact of the incident on the child’s mental and physical health. The findings are recorded in the intervention record.
2. The person responsible for conducting interventions organises a meeting/meetings with the guardians of the child, to whom they provide information about the incident, any intervention and the need/possibility of obtaining specialist support, including from other organisations or services.
3. Where a criminal offence has been committed against a child, the person responsible for conducting interventions prepares a notification of a possible criminal offence and submits it to the police or public prosecutor’s office with territorial jurisdiction.
4. Where a discussion with the guardians indicates that they are not interested in helping the child, ignore the incident or otherwise fail to support the child who has experienced abuse or neglect, the person responsible for conducting interventions prepares an application for review of the family situation, which they submit to the competent family court.
5. Where child abuse or neglect by Staff Members has been reported, depending on the situation (legal classification), a report is made to the relevant services in accordance with applicable law. Until the matter is clarified, the staff member suspected of child abuse or neglect constituting a prohibited act within the meaning of Polish law is removed from all forms of contact not only with the victim, but also with the other children. In other situations, the Management Board takes disciplinary action in accordance with the law and the rules applicable in the Company.
6. Where a Staff Member has committed abuse or neglect against a child that is not a criminal offence (e.g. shouting, exclusion, humiliation), the person responsible for conducting interventions should examine all the circumstances of the case, in particular hear from the person suspected of abuse, the child and other witnesses to the incident. Where the harm to the child’s welfare is significant, in particular where discrimination or a violation of the dignity of a child has occurred, consideration should be given to implementing appropriate disciplinary procedures, including termination of a legal relationship (termination of an employment contract, civil-law contract, placement agreement or volunteering agreement) with the person who committed the abuse or neglect, or recommending such a solution to that person’s superiors.

§ 6.

Child abuse or neglect by a guardian of a child

1. Where child abuse or neglect by the child’s guardian has been reported, the person responsible for conducting interventions holds a discussion with the child. The person responsible for conducting interventions should also hold discussions with other persons who have or may have knowledge of the

incident and of the child's personal (family, health) situation. The person responsible for conducting interventions seeks to establish the course of the incident, as well as the impact of the incident on the child's mental and physical health. The findings are recorded in the intervention record.

2. Where a criminal offence has been committed against a child, the person responsible for conducting interventions prepares a notification of a possible criminal offence and submits it to the police or public prosecutor's office with territorial jurisdiction.
3. Where a child experiences a form of abuse or neglect other than the commission of a criminal offence against them by guardians or other household members:
 - where the behaviour towards the child meets the criteria for domestic violence, the Blue Cards procedure must be initiated by sending the "Blue Card – A" form to the chair of the interdisciplinary team competent for the place of residence of the person experiencing domestic violence within 5 days. Where a child experiences violence from a child – another family member (siblings, extended family), the "Blue Cards" procedure may be initiated in relation to the guardian who does not respond to the child abuse or neglect.
 - where the behaviour does not meet the criteria for domestic violence, and family relationships are otherwise dysfunctional (e.g. the parents are unable to fulfil their upbringing responsibilities) – or where the child experiences neglect, an application must be made to the family court competent for the place of residence of the child for a review of the family situation.
4. Where there is a threat to the life and health of a child, the police and the social welfare centre are notified, and then relatives who could temporarily take over care of the child are identified.

§ 7.

Peer-on-peer abuse

1. Where there is a suspicion of child abuse or neglect by another child present at Impact Clean Power Technology S.A., the person responsible for conducting interventions holds a discussion with the child suspected of perpetrating abuse and their guardians, and separately with the child experiencing abuse and their guardians. They also speak with other persons who have knowledge of the incident. During the discussions, efforts should be made to establish the course of the incident, as well as the impact of the incident on the mental and physical health of the child experiencing abuse. The findings are recorded in the intervention record. Separate intervention records are prepared for the child perpetrating abuse and the child experiencing abuse.
2. A remedial plan must be developed together with the guardians of the child perpetrating abuse, with the aim of changing undesirable behaviours.
3. During the discussions, it must be ascertained whether the child suspected of abusing or neglecting another child is themselves being abused or neglected by guardians, other adults or other children. If such a circumstance is confirmed, intervention must also be undertaken in relation to that child.
4. Where a discussion with the guardians indicates that they are not interested in helping the child, ignore the incident or otherwise fail to support the child who has experienced abuse or neglect, the person responsible for conducting interventions prepares an application for review of the family situation, which they submit to the competent family court.
5. If the person suspected of abuse is a child aged from 13 to 17 years and their behaviour constitutes a punishable act, the family court with territorial jurisdiction or the police must also be informed by means of an appropriate written notification.
6. If the person suspected of abuse is a child over 17 years of age and their behaviour constitutes a criminal offence, the police unit or public prosecutor's office with territorial jurisdiction must then be informed by means of a written notification.

§ 8

Rules for safe use of the internet

1. The following are considered threats associated with children's use of the internet and electronic media:
 - access to illegal content, including child sexual abuse material, material depicting pornography, content promoting racism and xenophobia, and other illegal content directed against children's safety,
 - access to harmful and inappropriate content, which includes, among others
 - content depicting violence, physical injuries,
 - content presenting graphic scenes, death, cruelty to animals,
 - content encouraging self-destructive behaviour (self-harm, starvation, suicide, taking harmful substances, including psychoactive substances not clearly identified as drugs, etc.),
 - content inciting violence, criminality, radicalisation (including sects) and extremism,
 - pathostreaming content,

- discriminatory content
 - pornographic content, etc.
 - access to harmful and inappropriate online contacts and online services, resulting, among other things, in peer pressure, cyberbullying, grooming, sextortion, sexual activity as a source of income for minors, online gambling, access to age-inappropriate advertising, access to age-inappropriate social media,
 - access to harmful and risky behaviours resulting, among other things, in taking up online challenges, sexting, exerting pressure, and engaging in abuse using information and communication technologies.
2. Recording educational activities or otherwise recording them in any way (audio, video) is not possible without the consent of the person conducting those activities. Safe use of electronic devices with internet access includes the following rules:
 - not disclosing personal data,
 - taking care not to disseminate one's own image or the image of others,
 - informing adults about inappropriate content and proposals to meet,
 - time-limited use of devices.
 3. The rules referred to above constitute a pillar of the procedure for protecting children from harmful content and online threats, as well as threats recorded in another form. In the event of a report by a minor or independent identification of the above-mentioned content or threats by staff, the following must be done:
 - talk to minors about the above-mentioned threats and their consequences;
 - contact parents in order to cooperate with them and make them aware of the identified problem;
 - monitor the situation as far as possible.
 4. Documentation must be prepared for the actions taken, at least in the form of a note describing the identified content/threats and the actions taken.
 5. In the event of disclosure of illegal content, harmful or age-inappropriate content, or in the event of incidents affecting children's safety related to the use of the internet, the following measures must be taken:
 - each report/case of disclosure of harmful or inappropriate content should be registered, analysed and appropriately documented. The analysis of the incident should include a detailed description of the incident, an indication of the persons involved and/or the actions taken to identify the perpetrator, and materials documenting the incident. Securing this evidence should take place with respect for the rights of the child, including their right to privacy. After the incident, regular post-intervention monitoring must be conducted, checking the situation and needs of the children involved in the incident and/or the persons harmed by it.

§ 9

Protection of the image of minors

1. Photographing and recording minors participating in educational activities and making these materials public may take place only with the written consent of parents or legal guardians.
2. Guardian's consent to the recording of a child's image is not required only where the image constitutes merely a detail of a larger whole, such as a gathering, a landscape or a public event.

§ 10

Prohibited work and restrictions on the employment of young workers

1. Young workers are prohibited, in particular, from performing the following work:
 - a) requiring excessive physical effort, including lifting loads exceeding permissible standards,
 - b) performed in conditions posing a risk to health or life, in particular where there is exposure to noise, vibrations, extreme temperatures, dust or chemical substances,
 - c) involving the operation of dangerous machinery, equipment or tools, as well as work at height, underground or in confined spaces,
 - d) in contact with biological agents and waste,
 - e) creating an increased risk of an accident at work or requiring special responsibility,
 - f) which may have an adverse effect on the physical, mental or moral development of a young worker.
2. The full list of work prohibited for young workers is set out in the Regulation of the Council of Ministers of 19 June 2023 (Dz.U. 2023 item 1240, as amended).
3. Young workers must not be employed:
 - a) at night-time,
 - b) during overtime hours.

IV. Indication of persons designated for particular activities provided for in the Standards

1. All violations of the rules specified in the Standards must be reported to the Company. A report may be sent to the persons referred to in paragraph 2 below.
2. The Company designates a person responsible for child safeguarding standards, i.e. Paulina Skalska, +48 880 622 377, e-mail: paulinaskalska@icpt.pl
4. The Company designates persons responsible for receiving reports of incidents threatening a minor and conducting interventions (including submitting notifications of a suspected criminal offence against a minor/notification to the guardianship court), i.e. Paulina Skalska, +48 880 622 377, e-mail: paulinaskalska@icpt.pl
5. The duties of the person **responsible for child safeguarding standards** include:
 - ensuring that the child safeguarding standards are made available on the Company's website and on its premises;
 - preparing staff members to apply the child safeguarding standards before commencing work or after changes have been made to these standards;
 - coordinating educational activities,
 - cooperating with other designated persons in the implementation of the child safeguarding standards;
 - maintaining records of staff members who have familiarised themselves with the child safeguarding standards before commencing work or after changes have been made to these Standards;
 - reviewing the child safeguarding standards in consultation and cooperation with the President of the Management Board
 - monitoring the implementation of the guidelines contained in the child safeguarding standards, planning the evaluation of the standards and updating them.
6. The duties of the person **responsible for receiving reports** include:
 - receipt of a report concerning the occurrence of a risk factor posing a threat to the welfare of the child;
 - receipt of a report concerning disclosed signs of child abuse or actual child abuse or neglect, or disclosed or reported incidents or events threatening the welfare of a child,
 - receipt of a report concerning suspected or improper disclosure, dissemination or use of the image of a child or problems disclosed in this regard;
 - where the health or life of a child is directly at risk - immediately informing the police;
7. The duties of the person **responsible for conducting interventions** include:
 - documenting reports, verifying them and providing information about the results of the findings made;
 - initiating an intervention;
 - initiating the "Blue Cards" procedure (NK) in the event of suspected domestic violence;
 - notifying the guardianship court;
 - submitting a notification of a suspected criminal offence against a minor;
 - maintaining the intervention register.

V. Final Provisions

1. The Standards enter into force on the date of their announcement.
2. The announcement is made by sending the text to staff electronically and publishing it on the website impactnewenergy.com. The text of the Standards will also be made available at the Company's registered office by posting it in a visible place.
3. The Standards are public and must be made permanently available in the manner referred to above in paragraph 2, in the full version and in the abridged version intended for minors. Any updates to the Standards must also be made available. The Standards are made available to parents or de facto/legal guardians before the commencement of activities (including by providing them to the school with which the Company cooperates in organising them), and before a minor participates in the activities, together with information on access to the content of the Standards at any time, in particular on the website. Minors are provided with the abridged version of the Standards at the time the activities commence by indicating the place where they are posted and by having them read out or, where appropriate, discussed with them by staff.
4. The Company is required, at least once every two years, to assess the Standards in order to ensure that they are adapted to current needs and comply with applicable provisions. In addition, the Standards are

subject to review each time child abuse or neglect of a minor or a criminal offence against a minor is disclosed. The conclusions from the assessment carried out must be documented in writing.

Appendix No. 1a

Statement confirming familiarisation with the child safeguarding standards and an undertaking to comply with them

....., on

Statement confirming familiarisation with the child safeguarding standards and an undertaking to comply with them

I, PESEL No. declare that I have familiarised myself with the child safeguarding standards, including the rules on safe staff–child relationships applicable at and undertake to comply with them.

.....
signature

INTERVENTION RECORD

1. Full name of the child		
2. Reason for the intervention (form of abuse or neglect)		
3. Person reporting suspected abuse or neglect		
4. Description of measures taken other than intervention	Date	Action
5. Meetings with the child's parents/legal guardians	Date	Description of the meeting
6. Form of intervention taken (circle as appropriate)	notification of a suspected criminal offence, application for review of the situation of a child/family, other type of intervention. What type?	

7. Data relating to the intervention (name of the authority to which the intervention was reported) and date of the intervention		
8. Results of the intervention: actions of judicial authorities, if the organisation has obtained information on the results of its own actions / actions taken by the parents/legal guardians	Date	Action

Prepared by:

RULES ON SAFE RELATIONSHIPS

The guiding principle of all actions taken by Staff Members is acting in the best interests of the child and for the welfare of the child. A Staff Member treats the child with respect and takes their dignity and needs into account. It is unacceptable to use violence against a child in any form. In pursuing these objectives, Staff Members act within the framework of applicable law, the Company's internal regulations and their own competencies. The rules on safe relationships between Staff Members and children apply to all Staff Members, co-workers, trainees and volunteers. Familiarity with and acceptance of the rules are confirmed by signing a statement.

Relationships between Staff Members and children

You are required to maintain a professional relationship with children and to consider each time whether your response, communication or action towards a child is appropriate to the situation, safe, justified and fair to other children. Act in a way that is open and transparent to others in order to minimise the risk of your behaviour being misinterpreted.

Communication with children

When communicating with children, show patience and respect.

Listen carefully to children and provide them with answers appropriate to their age and the situation.

You must not embarrass, humiliate, disregard or insult a child. You must not shout at a child except where this is necessary to ensure the safety of the child or other children.

You must not disclose sensitive information concerning a child to unauthorised persons, including other children. This includes the image of a child, and information about their family, economic, medical, care and legal situation.

When making decisions concerning a child, inform them of this and try to take their expectations into account.

Respect the child's right to privacy. If it is necessary to depart from the principle of confidentiality in order to protect the child, explain this to them as soon as possible.

Ensure that you are within sight or hearing of other Staff Members when conducting activities with children. In exceptional and justified situations where you must be alone with a child, always notify other Staff Members of this and state exactly where you will be with the child.

You must not behave inappropriately in the presence of children. This includes using vulgar words, gestures and jokes, making offensive remarks, referring in statements to sexual activity or attractiveness, and exploiting a power relationship or physical advantage over a child (intimidation, coercion, threats).

Assure children that if they feel uncomfortable in any situation, in relation to specific behaviour or words, they may tell you or a designated person (depending on the intervention procedures adopted by the Company) and may expect an appropriate response and/or assistance.

Address the child by the name in the form preferred by the child, and respect their identity and expression.

Activities with children

Appreciate and respect children's contribution to the activities undertaken, actively involve them and treat them equally regardless of their sex, sexual orientation, ability/disability, social, ethnic, cultural or religious status, or worldview.

Avoid favouritism towards children.

You must not establish any romantic or sexual relationship with a child or make inappropriate proposals to them. This also includes sexual comments, jokes and gestures, and making erotic and pornographic content available to children, regardless of its form.

You must not record the image of a child (filming, voice recording, photographing) for private purposes. This also applies to enabling third parties to record children's images if consent has not been obtained from the guardians of the children and from the children themselves.

You must not offer children alcohol, tobacco products or illegal substances, nor use them in the presence of children while performing official duties or while on the Company's premises.

You must not accept money or gifts from a child or the guardians of a child. You must not enter into any relationship of dependence with a child or the guardians of a child that could lead to accusations of unequal treatment or obtaining financial or other benefits.

Physical contact with children

Any violent act against a child is unacceptable. However, there are situations in which physical contact with a child may be appropriate and meet the rules of safe contact: it responds to the child's needs at that particular moment, and takes into account the child's age, developmental stage, sex, cultural context and circumstances. However, it is not possible to define universal appropriateness for every such physical contact, because behaviour that is appropriate towards one child may be inappropriate towards another. Always use your professional judgement, listening to, observing and noting the child's reaction, asking them for consent to physical contact (e.g. a hug) and remaining aware that, even with your good intentions, such contact may be misinterpreted by the child or third parties.

You must not hit, poke, push or in any way violate the physical integrity of a child.

Never touch a child in a way that may be considered indecent or inappropriate.

Always be prepared to explain your actions.

Do not engage in activities such as tickling, pretend fights with children or rough physical play.

Take particular care with children who have experienced violence and child abuse or neglect, including sexual abuse, physical abuse or neglect. Such experiences may sometimes cause a child to seek inappropriate or inadequate physical contact with adults. In such situations, you should respond sensitively but firmly, and help the child understand the meaning of personal boundaries.

Physical contact with a child must never be covert or concealed, involve any reward, or arise from a power relationship. If you witness any of the above-described behaviours and/or situations by other adults or children, always inform the person responsible and/or proceed in accordance with the applicable intervention procedure.

Physical contact with a child may take place only with the child's consent and in accordance with their need. Before hugging or stroking them, for example to comfort or calm them, you must ask whether they need it.

Contact outside working hours

As a rule, contact with children should take place only during working hours and relate to purposes falling within the scope of your duties.

You must not invite children to your place of residence or meet them outside working hours without the knowledge and consent of the children's guardians. This also includes contact with children through private communication channels (private telephone, e-mail, messaging apps, social media profiles).

If there is such a need, the appropriate form of communication with children and their guardians outside working hours is through official channels (e-mail, work telephone). Communication with a child via online channels (e.g. social media groups, private e-mail accounts) is possible only if another adult is also in the group or among the recipients. In every case, such contact must be transparent.

Maintaining social or family relationships (where children and children's guardians are persons close to the staff member) requires maintaining confidentiality of all information concerning other children and their guardians.

Online contact

Be aware of digital threats and risks arising from the recording of your private online activity by applications and algorithms, as well as from your own actions on the internet. This applies to liking particular pages, using dating applications on which you may encounter children with whom you carry

out professional activities, following particular people/pages on social media, and the privacy settings of the accounts you use. If your profile is publicly accessible, children and their guardians will have insight into your digital activity.

You must not establish contact with children by accepting or sending invitations on social media.

If, for the purpose of educational or upbringing-related objectives, you communicate with children through online channels (e.g. social media groups), ensure that another staff member also has access to them in order to maintain transparency of activities. In every case, such contact must be transparent and conducted with the knowledge and consent of the children's guardians.

Protection of the child

When working with a child who has experienced child abuse or neglect, including sexual abuse, physical abuse or neglect, exercise caution and maintain distance in order to protect the child. Always explain the boundaries of the relationship to the child.

In the event of suspected abuse or disclosure of harm, always give the child the opportunity to speak and present their view/opinion, remembering that this may be the child's first and only conversation (the child may not make any further attempts to seek support). It is particularly important to:

- express your concern by stating that you believe the child;
- reassure the child that they did the right thing by starting a conversation about the harm they experienced;
- explain to the child that they are not to blame for the situation;
- unequivocally condemn every form of violence, giving a clear signal that it is unacceptable and must be prevented/stopped;
- appropriately inform the child that other appropriate persons will deal with this matter, including providing them with information that measures will be taken to ensure their safety and that they are not to blame for what happened.

Appendix No. 4
Template for notification of a suspected criminal offence

....., on

District Public Prosecutor's Office in.....¹

Notifying party:
correspondence address:

Notification of a suspected criminal offence

I hereby submit a notification of a suspected criminal offence
..... against the minor
(full name, date of birth) by (full name of the alleged
perpetrator).

Justification

While (full name of the staff member) was performing official
duties, (full name of the child) disclosed
.....

Further description of the suspected criminal offence

.....
.....
.....
.....

Having regard to the above information, as well as the welfare and safety of the minor, I request that
proceedings be initiated in this matter.

Please send all correspondence in the matter to the correspondence address, quoting the reference
number and journal number of the letter.

.....
signature of staff member

.....
signature of the person responsible
for taking intervention measures

Appendices:

1. Document confirming authorisation to act on behalf of the reporting party.
2. Any other documents

¹The notification must be submitted to the district public prosecutor's office with jurisdiction over the
place where the criminal offence was committed.

²Description of the situation that occurred. It must be completed in accordance with what happened (it
is important to indicate, for example: when and where the incident took place, who may have seen
it/known about it, who may have committed the criminal offence).

Appendix No. 5

Template for an application for review of the situation of a child/family

.....on

District Court in
Family and Juvenile Division
Ref. No.

Applicant:
Full name or name of institution
represented by:
correspondence address:

Participants in the proceedings:
(full names of the minor's parents/guardians)
Street
(residential address)
minor's details:
(child's full name, date of birth)

APPLICATION FOR REVIEW OF THE SITUATION OF A CHILD

I hereby apply for a review of the situation of the minor
..... (child's full name, date of birth) and
for the issue of appropriate guardianship orders.

Justification

Description of the situation posing a threat to the welfare of the child
.....
.....

Having regard to the above facts, it may be presumed that the welfare of the minor
..... is at risk and that the parents are not properly exercising parental
responsibility. Therefore, the application for review of the family situation of the minor and possible
support for the parents is justified.

Please send all correspondence in the matter to the correspondence address, quoting the reference
number and journal number of the letter.

.....
signature of staff member

.....
signature of the person responsible
for taking intervention measures

Appendices:

1. Document confirming the authority to represent the reporting party.
2. Any other documents
3. Copy of the letter

Note:

The application must be filed with the court competent for the child's place of residence, not the registered address.

The child's full name and the address of their place of stay must always be provided. Only in such a case can the court provide effective assistance, including by sending a court probation officer to the family to conduct an interview.