

**STANDARDS FOR THE PROTECTION OF MINORS  
MERCEDES-BENZ MANUFACTURING POLAND SP. Z O.O**

**Preamble**

Mercedes-Benz Manufacturing Poland sp. z o.o. (hereinafter: „**MBMPL**”) as a responsible employer, is committed not only to the development of the automotive industry but also to the education and development of young talents. MBMPL offers an opportunity for adolescent workers to work and for juveniles to undertake internships, contributing both to their education and preparation for a future career in a modern and safe work environment.

Based on Article 22b of the Act of 13 May 2016, on Counteracting Threats Related to Sexual Offenses and the Protection of Minors, the Management Board of Mercedes-Benz Manufacturing Poland sp. z o.o. adopts the „**Standards for the Protection of Minors**” (hereinafter: „**Standards**”), which aims to ensure the protection, dignity, and rights of every minor. MBMPL employees are required to follow the guidelines contained in this document, ensuring that young people experience comfort, safety, and an opportunity to freely express their needs and concerns during cooperation.

MBMPL is committed to follow applicable laws and ethical standards, creating a supportive environment for learning and development that is free from any form of violence or mistreatment.

**§1.**

**General Provisions**

1. A minor is any person who has not reached the age of 18.
2. Violence against minors may be expressed as:
  - a) **Physical violence** – inflicting pain on another person through actions such as beating, jerking or pushing;
  - b) **Psychological violence** – causing distress to someone through actions such as ridiculing, insulting, calling names, or backbiting;
  - c) **Sexual abuse** – any type of sexual abuse by engaging a minor in sexual activity that he or she is unable to fully understand and give informed consent to (this violence may take the form of forcing a minor to participate in sexual activities, using a minor for prostitution, using a minor to produce pornographic materials). This type of violence may also be the so-called sexting, which involves sending other people your intimate photos or videos via the Internet and forcing a minor to send his or her intimate photos;

- d) **Cyberbullying** – it is violence that occurs on the Internet. It may manifest itself as name-calling in online chat rooms, posting offensive comments, sharing content on the Internet that is harmful and offensive to minors and adults, publishing photoshopped and humiliating photos, hacking accounts and impersonating other people on the Internet;
  - e) **Harm to a minor** – the committed of a criminal or delinquent act to the detriment of a minor by any person, including MBMPL employees, or a threat to the welfare of a minor, including neglect of a minor;
  - f) **Neglect** – includes, among others: leaving a minor unattended, ignoring a minor, not speaking to a minor, refusing medical care to a minor.
3. Minors may experience violence from other minors, parents, legal guardians, or other adults.
  4. It is the responsibility of all adults working at MBMPL to pay attention to situations where a minor is or may be at risk of harm.
  5. Adults working at MBMPL are responsible for ensuring the well-being of all minors present in MBMPL.
  6. In the event of experiencing any violence, any minor may and has the right to report it to any MBMPL employee.

## **§2.**

### **Rules to ensure safe relationships between minors and MBMPL personnel**

1. The rules ensuring safe interactions between MBMPL employees and minors apply to all MBMPL employees.
2. The primary principle guiding actions taken by MBMPL employees in their interactions with minors is to act in the best interest of the minor.
3. MBMPL employees are required to maintain a professional relationship with minors and to carefully assess whether their response, communication, or actions toward a minor are appropriate, safe, and justified given the situation.
4. MBMPL employees monitor the situation and well-being of minors and pay attention to the appropriateness and correctness of relationships between MBMPL employees and minors, as well as among minors themselves.
5. It is the responsibility of MBMPL employees to ensure the safety of minors staying in MBMPL.
6. MBMPL employees, in particular:
  - a) respect children's rights;
  - b) care of the emotional and mental well-being of minors;
  - c) maintain the confidentiality of personal information provided to them by a minor, except when the disclosure of such information is required by law or is necessary to protect the life, health or safety of the minor or other persons;

- d) do not use physical or emotional coercion;
  - e) do not embarrass, disrespect or insult minors;
  - f) do not record the image of a minor for private purposes;
  - g) do not appropriate the property of a minor, except when it is necessary for legal reasons or to ensure the safety of the minor or other persons;
  - h) do not use any forms of harm/violence against minors;
  - i) do not violate the minor's bodily integrity - each physical contact must be necessary and justified for reasons of safety of the minor or other persons;
  - j) respect the dignity of the minor;
  - k) do not remain indifferent when witnessing harm to a minor;
  - l) do not behave inappropriately towards a minor (e.g., do not use vulgar language, do not suggest meetings outside MBMPL, do not offer alcohol, drugs, or other illegal substances).
7. It is prohibited to touch minors in a manner that could be misinterpreted or that they do not consent to.
  8. Physical contact with a minor may never be secret or hidden, involve any gratification or result from professional subordination.
  9. MBMPL employees do not contact minors via private communication channels without the knowledge of their guardians.
  10. In communication with minors, MBMPL employees:
    - a) show empathy and willingness to help;
    - b) build relationships with minors based on trust, emotional support, and mutual respect;
    - c) support minors with disabilities;
    - d) adapt messages and requirements to the minor's level of development;
    - e) do not use sarcasm or comments that may negatively affect the minor's well-being and self-esteem (in particular, do not use sarcastic comments about the minor's appearance);
    - f) do not raise their voices;
    - g) are neither vulgar nor ambiguous (e.g., they do not respond to inappropriate/offensive jokes made by the minor).

### **§3.**

#### **Relationship rules between minors**

1. MBMPL employees ensure that minors respect each other and accept cultural differences, promoting an atmosphere of openness and tolerance.
2. MBMPL employees make minors aware of the rules of personal boundaries of other minors.

3. MBMPL employees encourage minors to develop empathy, understand the feelings of others and provide support, which contributes to the creation of positive relationships between minors.
4. MBMPL employees encourage minors to use new technologies responsibly and to avoid disseminating content that is inappropriate or offensive to others.
5. MBMPL employees ensure that minors avoid vulgarity, mockery and insults in their contacts.
6. Minors take responsibility for their words and actions and ensure that their behavior contributes to the creation of a safe and positive environment.
7. Ridicule and humiliation in relationships between minors is unacceptable.
8. All forms of aggression in relationships between minors are prohibited.
9. MBMPL employees regularly monitor the behavior of minors to ensure safe and positive relationships.

#### **§4.**

##### **Rules and procedure for taking action in cases of suspected harm to a minor**

1. If a minor does not feel safe / is harmed or another minor is harmed, the minor should report it to any Foreman, Production Supervisor, Internship Supervisor, Manager.
2. Each employee is obliged to intervene in a situation when he or she receives a report from a minor or when he or she witnesses violence against a minor.
3. Any employee who suspects child abuse is obliged to immediately notify his or her superior or the person responsible for the protection of minors at MBMPL.
4. The person designated by MBMPL conducts a conversation with the minor and other individuals who have or may have knowledge of the incident and the minor's personal situation, particularly their guardian.
5. The designated person organizes a meeting with the minor's legal guardians, during which he or she provides information about the incident and the need/possibility of using specialist support, including other organizations or services. An exception is a situation when the minor's family/legal guardian is the source of harm.
6. If abuse by an MBMPL employee is reported, such a person is completely excluded from the intervention procedure.
7. If possible, specialists, in particular psychologists and pedagogues, can be involved in the intervention in order to use their help in talking to the minor about difficult experiences.
8. If MBMPL is unable to offer the necessary assistance, it will inform the relevant institutions (family court, police, social welfare center).
9. A report is prepared for each intervention.
10. Employees who have information about the abuse of a minor or information related to this are obliged to keep this information confidential, with the exception of information provided to authorised institutions as part of intervention activities.

11. If a suspicion of a threat to the safety of a minor was reported by the minor's legal guardians and the suspicion was not confirmed, the minor's legal guardians should be informed of this fact in writing.
12. If harm to a minor is reported involving an MBMPL employee, that employee is immediately suspended from all forms of contact with minors until the matter is resolved.
13. If an MBMPL employee commits a form of harm against a minor other than a criminal offense, particularly if it involves discrimination or a violation of dignity, appropriate disciplinary measures should be considered.
14. Every minor should remember that they are not to blame for the violence directed at them, and no one has the right to harm another person.
15. MBMPL employees are committed to providing special care to minors who are subjected to violence.
16. A minor can also get help by calling the following numbers:
  - a) **Helpline for Children and Youth: 116 111**
  - b) **24-hour hotline for Children, Youth, Parents and Teachers: 800 080 222**
  - c) **Antidepressant Hotline Forum Against Depression: 22 594 91 00**
  - d) **Telephonic Psychological First Aid: 22 425 98**

#### **§5.**

##### **Rules for establishing a support plan for a minor after disclosing harm**

1. Regardless of whether the intervention procedure is used, MBMPL employees should support the minor after disclosing the harm and pay attention to any disturbing signals.
2. After disclosing harm, designated persons may create a support group for the minor.

#### **§6.**

##### **Rules for using electronic devices with Internet access**

1. Minors may use their own electronic devices in MBMPL, taking into account the rules set out in the work regulations.
2. Minors can not use the publicly available WI-FI network in MBMPL.
3. If possible, MBMPL employees should inform minors about the principles of safe use of the Internet.
4. Minors are prohibited from filming, taking photos or recording sound on any electronic devices on the premises of MBMPL.
5. The rules for using electronic devices with access to the Internet should be subject to the following rules:
  - a) minors should not trust people they meet via the Internet;

- b) minors should not meet people they met online; However, if they really want to meet such a person, remember that such a meeting should take place:
  - only with the parent's consent!
  - preferably for the first time under the supervision of a parent, possibly in the company of a friend and necessarily in a public place.
- 6. Minors should inform their parents about any proposal to meet made by people they have met on the Internet and not meet such people without their consent and supervision.
- 7. Minors should not provide their personal data to people they meet on the Internet.
- 8. Minors should use instant messengers only for contacts with friends and family.
- 9. Minors should remember that online hate is a crime and that the family court may impose a penalty on them for doing so.

#### **§7.**

##### **The guidelines for access to Standards**

1. Standards are a publicly available document.
2. Standards are available on the MBMPL website.
3. Paper copies of Standards are available to MBMPL employees, minors and their guardians upon request at any time. Interested parties may request additional copies of documents or detailed explanations regarding specific principles.
4. The short version of Standards will be posted in the corridors of MBMPL, so that every minor and MBMPL employees can read them.

#### **§8.**

##### **Protection of a minor's image**

1. MBMPL ensures protection of the image of minors.
2. In the case of processing data of minors regarding the image, the consent of parents or legal guardians is required.
3. The consent of minors' parents is not required to disseminate the image of a person constituting only a detail of a whole, such as a gathering, landscape, or public event.

#### **§9.**

##### **Responsible Persons**

1. The Management Board of MBMPL appoints persons responsible for preparing employees to apply Standards and for supervising the implementation of these Standards (hereinafter referred to as: „Responsible Person“).
2. Responsible Persons receive calls about incidents threatening a minor, initiate appropriate interventions and provide support to an abused minor, review and update

the Standards, maintain a register of calls, prepare MBMPL staff to apply the Standards.

3. MBMPL employees may submit their comments, proposals for changes to the regulations contained in the Standards to the Responsible Persons and report incidents of violation of the Standards.
4. Responsible Persons are also obliged to submit notifications on suspicion of committing a crime to the detriment of a minor, notify the guardianship court and take other appropriate actions.

#### **§10.**

##### **Rules for updating Standards and competences of Responsible Persons**

Responsible Persons are required to review the Standards at least once every two years to ensure that they are adapted to current needs and comply with current legislation. The results of the assessment shall be documented in writing.

#### **§11.**

##### **Final provisions**

1. Every minor on the premises of the MBMPL is required to read and follow the rules of this document.
2. Standards enter into force on the day of their announcement.
3. The document is published on the MBMPL website and posted in a publicly accessible location within MBMPL.