

# STANDARDS FOR THE PROTECTION OF MINORS at Mystery Machinery Sp. z o.o.

#### **INTRODUCTION**

- 1. the Standards for the Protection of Minors apply to Mystery Machinery Sp. z o. o. (marketing name: "Mystery Machinery" Entertainment Centre Escape Room & Laser Tag, VR). The standards apply to every open and newly opened location of the Entertainment Centre.
- 2. The document contains the most important information for adults and minors residing in the Entertainment Centre, including parents, guardians, employees.
- 3. The purpose of creating the document is to ensure the safety of minors (hereafter also referred to as children) and to eliminate potential threats and any violence against minors.
- 4. In view of the implementation of the provisions of the law, as well as the creation of a safe and friendly environment in the Entertainment Centre, it is recommended to verify the identity of minors, for example, by showing a school student ID card, personal identity card or other document.

# **DEFINITIONS**

Minor - any person under the age of 18.

**Guardian of the Minor** - a person authorized to represent the minor, in particular their parent or legal guardian. According to this document, a foster parent is also a guardian.

**Consent of the Guardian** - means the consent of the person authorized to represent the minor, in particular, their legal representative (parent, legal guardian) or other person authorized to represent them under special regulations or court decision. In the case of parents, it means the consent of one of them. If there is no agreement between the parents of the minor, the case will be decided by the court.

Intervention - the participation of a police officer or police officers in the course of an event that may violate legal norms and take action to determine the nature, type and circumstances of the resulting event and undertakings aimed at restoring the violated legal order.

Intervention - for the purposes of this document, this is assumed to be a situation in which there is a threat to the safety of a Minor, resulting in a call to the police.

**Harm to a Minor** - the commission of an illegal act or a criminal act to the detriment of a Minor by any person or a threat to the welfare of a child, including neglect.

**Threat to the safety of a Minor** - for the purposes of this document, the following qualification of a threat to safety has been adopted:

- 1) a crime has been committed against a child,
- 2) there was another form of harm, which is not a crime,
- 3) there has been neglect of the child's vital needs (such as those related to nutrition, hygiene or health).

## I. DOCUMENT STORAGE LOCATION:

- 1. The original document is located in the office of the Entertainment Centre located in Katowice, Poland, ul. Bocheńskiego 16 (level "1").
- 2. A copy of the printed document is located at each location of the Entertainment Centre.



- 3. A .pdf version of the document is posted at www.mysterymachinery.pl in the "Regulations" tab at the bottom of the website.
- II. The developed Standards for the Protection of Minors have been adapted to the nature and type of activities of the "Mystery Machinery" Entertainment Centre Escape Room, Laser Tag, VR and specify in particular:
  - 1. Principles of safe interactions between staff and Minors,
  - 2. Procedure for action in situations of abuse of Minors,
  - 3. Persons responsible for filing notices of suspected crimes against a Minor,
  - 4. Persons responsible for the implementation of the Standards,
  - 5. Rules for the protection of personal data and the image of minors at the Entertainment Centre,
  - 6. Rules for safe use of the Internet and electronic media.

# III. Basic activities under the Policy for the Protection of Minors

- 1. The staff of the Mystery Machinery Entertainment Centre are knowledgeable and pay attention to the risk factors of abuse of minors as part of their duties.
- 2. If risk factors are identified, employees/co-workers, communicate this information to the Management of the "Mystery Machinery" Entertainment Centre.
- 3. Staff monitor the situation of Minors staying at the "Mystery Machinery" Entertainment Centre.
- 4. Whenever possible, identify the Minor and their relationship with the adult with whom they are visiting the Entertainment Centre.
- 5. In unusual and/or suspicious situations indicating a possible risk of harm to a Minor, identification is mandatory for staff.

#### AD. ITEM 1

# PRINCIPLES OF SAFE INTERACTIONS BETWEEN STAFF AND MINORS

- 1. The principles of safe relations of staff with children apply to all employees, interns, trainees, volunteers, as well as other persons employed at the Mystery Machinery Entertainment Centre on the basis of civil law contracts and constituting the staff of the respective entertainment centre (hereinafter collectively: "staff"). Familiarization with and acceptance of these Standards is accomplished by having each staff member sign a statement of familiarity with the Standards for the Protection of Minors (a sample of which is attached as Appendix 1 to the Standards for the Protection of Minors).
- 2. Each Entertainment Centre staff member is required to maintain a professional relationship with the children at the entertainment centre and consider each time whether their reaction, message or action toward a minor is appropriate to the situation, safe, reasonable and fair to other children. Each staff member of the Entertainment Centre is required to act openly and transparently to others to minimize the risk of misinterpretation of their behaviour.
- 3. The staff of the Entertainment Centre takes care, together with parents / legal guardians, of the safety of Minors while they are present on the premises, for example, during the organization of a Minor's birthday party or other special events.
- 4. Organization of a special event, e.g. birthday party for a Minor on the premises of the Entertainment Centre shall only be possible with the participation of 2 adults (guardians) of the group or 1 adult (guardian) and a staff member operating a given attraction, which is



- provided by the "Mystery Machinery" Entertainment Centre.
- 5. The staff supports Minors at every stage of the experience provided by the available attractions, mainly Escape Rooms, Virtual Reality Arena, Laser Tag Arena, Laser Maze Arena.
- 6. During the Minors' use of the puzzle rooms or laser and VR arenas, the staff shall observe the Minors' behaviour and reaction to the game, and if the situation requires it, offer the necessary assistance to complete it.
- 7. The staff takes into account the skills and abilities of minors based on their age, development, or disability.
- 8. The staff has the necessary experience and practice to be able to properly and appropriately select the degree of difficulty of the game as well as offer an appropriate attraction to play, for example, Minors having a fear of closed rooms will be offered to play in an open VR or laser arena.
- 9. The staff undertakes educational activities aimed at forming correct attitudes among Minors.
- 10. During the game or play, the staff observes the Minors and, if the situation requires it, corrects undesirable behaviour towards peers (other participants of the game) and towards adults (e.g., other personnel of the premises). Chastising the Minor aims at, among other things, eliminating: aggressive behaviour, explicit words, or raised voices (shouting) by paying attention and giving feedback that such behaviour during the game is undesirable and unacceptable.
- 11. In communication and in activities carried out with Minors on the premises of the Entertainment Centre, the staff is required to:
  - a) remain calm, patient, and respectful,
  - b) listen carefully to the Minor and give them answers appropriate to their age and the situation at hand,
  - c) inform the Minor about the decisions made concerning them, taking into account the expectations of the Minor,
  - d) respect the Minor's right to privacy,
  - e) value and respect the Minor's contribution to the activities undertaken, actively involve them and treat them equally regardless of their gender, sexual orientation, ability/disability, status, ethnic, cultural, religious, and worldview,
  - f) take special care with a Minor who has experienced abuse and harm, including sexual or physical, or neglect;
- 12. The staff of the "Mystery Machinery" Entertainment Centre is prohibited from:
  - a) shaming, humiliating, disrespecting, and insulting the Minor and raising their voice at the child in a situation other than for the safety of the Minor or other children,
  - b) disclosing sensitive information regarding the Minor to unauthorized persons, including other children; this includes the Minor's image, information about their family, economic, medical, custodial, and legal situation,
  - c) behaving inappropriately in the presence of a Minor; this includes using explicit words, gestures and jokes, making offensive remarks,
  - d) alluding to sexual activity or attraction in statements and using power dynamics or physical superiority (intimidation, coercion, threats) against the Minor,
  - e) the use of any form of violence against Minors, including, for example, hitting, poking, pushing, and violating physical integrity in any other way,
  - f) touching the Minor in a manner that may be considered indecent or inappropriate,



- g) engaging in activities such as tickling, hugging, pretend fights with Minors, or rough and tumble play,
- h) commenting on the appearance of the Minor's body or clothing.
- 13. The staff shall maintain a safe distance from Minors direct contact with a Minor shall occur prior to the start of the game, when the Game Master introduces the rules of the game, as well as when assisting in setting up the necessary props needed for the game, along with explaining the rules of their physical operation, refers primarily to: goggles for VR arena games, pads for VR games, laser equipment for laser arena games, car driving simulator). Physical contact with a Minor can only be overt, undisguised, and cannot involve any gratification or result from a power dynamic.
- 14. The staff shall treat all Minors fairly not discriminate against Minors on the basis of their faith, background, age, gender, physical appearance, abilities, material status.
- 15. When it is necessary to chastise a Minor due to their loud or inappropriate behaviour, or in cases of conflict between Minors during play/game, the staff shall use constructive criticism in the form of the following (sample) feedback messages, expressed in a subdued form:

"Please don't shout because it interferes with other children's play, thank you"

"Please do not pull your friend's clothes/hair/arm.... because it hurts her/him and interferes with the game, thank you"

"Please do not pull your friend by his/her clothes/hair/hand.... because you would not want to have that done to you during a game, thank you",

Always remembering to use polite language in the feedback: "please", "thank you".

- 16. At the same time, as soon as the information is given, the staff shall report the fact of inappropriate behaviour of the Minor to the parent/guardian who is with the Minor or children at the Entertainment Centre.
- 17. The general rule is that staff contact with Minors visiting the Entertainment Centre should only take place during business hours and relate to the performance of the tasks of the assigned position.
- 18. Staff are prohibited from inviting Minors to their place of residence, meeting with them outside of business hours; this includes contact with minors through private communication channels (private phone, email, instant messaging, social media profiles).

#### AD. ITEM 2

# PROCEDURES FOR ACTION IN CASES OF SUSPECTED ABUSE AND CIRCUMSTANCES INDICATING ABUSE OF MINORS

- If a staff member working with a Minor suspects that someone is harming the Minor or has
  credible information about a Minor being harmed, they should observe the Minor, their
  guardian and surroundings, as well as be required to take the actions indicated in this
  chapter, and then, report this circumstance to the person responsible for reporting
  notifications of suspected crimes against Minors.
- 2. Staff working with a Minor shall pay special attention to:
  - a) physical symptoms of harm to the Minor such as wounds, bruises, frostbite, burns, cuts and other marks on the Minor's body,
  - b) the appearance and condition of the minor, such as: unpleasant odour, inappropriate or dirty clothing, extreme emaciation,
  - c) non-standard behaviour of the Minor, including, for example, behaviour inappropriate to



age, fear of the guardian,

- d) the manner of behaviour of the person in charge of the Minor, including, for example: inconsistent or illogical explanations as to the formation of marks on the Minor's body, a negative approach to the Minor, the use of threats or physical punishment against the Minor, the guardian being under the influence of alcohol or other drugs.
- 3. If there is a reasonable suspicion of abuse of a minor, the staff member working with the child should try to obtain as much information as possible about the abuse of the minor. The findings shall be used to create an intervention card (a template of which is attached as Appendix 2 to the Standards for the Protection of Minors) which indicates the perceived irregularities and the acquired data on the circumstances of the incident.
- 4. If it is suspected that the perpetrator of abuse of a Minor may be their guardian or another staff member, the staff working with the child should not report these suspicions or consult with the guardian or potential abuser. In case of suspicion that the perpetrator of harm to a Minor may be a member of the staff of the Mystery Machinery Entertainment Centre, the suspicions should be immediately reported to the Company's Management Board.
- 5. A staff member must ensure the safety of both the Minor and themselves, acting with caution and appropriate to the situation. Staff members should avoid criticizing the caregiver and accusing them of harming the Minor.
- 6. In cases that are particularly dangerous to the life or health of a Minor, the staff working with the Minor should immediately call the appropriate services, such as the police, to the Amusement Centre. Such a situation would be, for example, aggressive behaviour of the Caregiver, the Caregiver under the influence of alcohol or other drugs, or a Minor under the age of 8 who came to the Facility alone.

## 7. Dealing with suspected abuse of a Minor

- 1) In case of suspected abuse of a Minor, discreetly notify the superior.
- 2) From the moment the first concerns arise, both the Minor and the adult should be under constant observation by staff and not left alone.
- 3) The management of the Mystery Machinery Entertainment Centre, which has been notified of the situation, decides to notify the police or, if in doubt, take over the conversation with an adult for further clarification.
- 4) If the conversation confirms the belief that a crime against a Minor was committed or attempted, the superior shall notify the police.
- 5) After each intervention, an intervention card must be completed, which is attached as Appendix 2 to the Standards for the Protection of Minors.

#### 8. Dealing with circumstances indicating abuse of a Minor

- 1) Having a reasonable suspicion that a Minor on the premises of the Entertainment Centre is being harmed, immediately notify the police by calling 112 and describing the circumstances of the incident. Depending on the dynamics of the situation and the circumstances, the phone call is made by a superior or a person who is a direct witness to the incident. If the notifier is a member of the staff, they shall at the same time inform the management of the Mystery Machinery Entertainment Centre.
- 2) In any case, the safety of the Minor must be ensured. The Minor should remain in the care of staff until the police arrive.
- 3) After the police pick up the Minor, surveillance footage and other relevant evidence (e.g., documents) regarding the incident must be secured.



- 4) After each intervention, an intervention card must be completed, which is attached as Appendix 2 to the Standards for the Protection of Minors.
- 5) Reasonable suspicion of abuse of a Minor occurs in particular when:
  - the Minor disclosed the fact of abuse to staff,
  - > staff observed abuse,
  - the Minor has traces of abuse on their person,
  - the Minor's guardian or a third party reports the abuse.

### AD. ITEM 3

#### PERSONS RESPONSIBLE FOR FILING NOTICES OF SUSPECTED CRIMES AGAINST A MINOR

1. Staff who suspect that the safety of a Minor is at risk shall report this fact to the Team Leader, or Shift Manager, who are selected to submit notifications to the Mystery Machinery Entertainment Centre Management and/or entities/units implementing anti-violence measures. Entities that can be contacted:

Police Helpline - number: 800 120 226

Helpline for children and adolescents - number: 116 111 Ombudsman for Children Helpline - number: 800 12 12 12

"BLUE LINE" - number: 800 12 00 02

National Help Line for Victims - +48 222 309 900

- 2. In the event that it is necessary to make a written report on the suspicion of a crime against a Minor, the Team Leader or Shift Manager shall immediately inform the Mystery Machinery Entertainment Centre Management, the Company's Management Board, providing the prepared notes and the intervention card and providing relevant information on the findings made on the issue of harming a Minor.
- 3. The staff is required to cooperate with law enforcement or other authorized entities to implement the plan for assisting the Minor.

#### AD. ITEM 4

#### PERSONS RESPONSIBLE FOR THE IMPLEMENTATION OF THE STANDARDS

The persons responsible for the implementation of the Standards are:

- 1. The Team Leader of each Entertainment Centre, and in their absence the Manager of the shift, during which staff worked with a Minor report that the Minor is being abused in terms of receiving reports of incidents that endanger the Minor, providing support and reporting these circumstances to law enforcement authorities.
- 2. Manager of the Mystery Machinery Entertainment Centre in terms of preparing staff to apply these Standards, reviewing and updating the Standards. A survey (the model of which is attached as Appendix 3 to the Standards for the Protection of Minors), which monitors the level of implementation of the Standards, is conducted once every 2 years. Based on it, a monitoring report is prepared and submitted to the Company's Management Board. Based on its results, the Standards are adjusted to meet current needs and compliance with applicable laws.
- 3. Personnel working with the Minor in the scope of their professional duties, as to the rules of conduct while working with a Minor, observing a Minor, and reporting abuse of the Minor.



#### AD. ITEM 5

# PRINCIPLES OF PROTECTION OF PERSONAL DATA AND IMAGE OF MINORS AT THE ENTERTAINMENT CENTRE

- 1. The protection of the image of Minors recorded by the surveillance cameras located on the premises of the Entertainment Centre is kept by the Personal Data Controller, which is Mystery Machinery Sp. z o. o., based in Krakow, and its legitimate interest is the safety of the people on the premises. Surveillance records are kept for a period from 3 to 14 days depending on the recorder. In the premises there are signs boards informing about 24-hour video surveillance.
- 2. Personal information that is collected when booking a game or party event is provided voluntarily directly by the adult (parent/guardian) who books the game for Minors. The data in question is mainly a contact phone number, e-mail address and the name of the person who books the game/attraction. The data is used for the correct booking of a specific game/attraction for a given day dedicated to a specific number of people, as well as for information purposes in case of postponement, cancellation of the game/attraction.
- 3. The staff points out to those on the premises of the Entertainment Centre that recording the image of a Minor requires the consent of their guardian.
- 4. If the image of a Minor is only a detail of a whole, such as a gathering, landscape, or event, the consent of a parent or legal guardian is not required to record the image of the Minor.

#### AD. ITEM 6

#### PRINCIPLES OF SAFE USE OF THE INTERNET AND ELECTRONIC MEDIA

- 1. On the premises of the "Entertainment Centre Escape Room, Laser Tag, VR, the only form of Internet and electronic media use is the generally available Internet network (WIFI) "Mystery Machinery GUEST", which each person on the premises of the Entertainment Centre can use only with private electronic devices, for example, cell phones, tablets, laptops.
- 2. The network infrastructure is based on current security standards.
- 3. The use of the provided Internet network (WIFI) for viewing content of an inappropriate or unsuitable nature for Minors is prohibited and the Entertainment Centre staff is authorized to disconnect the WIFI network if it is observed to be used for such purposes.