

Procedure on the protection of minors in DOZ Group companies

List of contents

1. Purpose of the Procedure	2
2. Scope	2
3. Glossary of terms used.....	3
4. General Provisions.....	4
5. Duties and responsibilities	5
6. Description of the procedure.....	6
1) Principles ensuring safe relations between Minors and DOZ Companies' Staff, in particular prohibited behaviour towards Minors.....	6
2) Principles and procedure for intervention in cases of suspected harm or possession of information about harm to a minor.....	7
3) Procedure and persons responsible for reporting suspected crimes against minors or reporting to the guardianship court.	8
4) Rules for reviewing and updating the Standards.....	9
5) Preparation of DOZ Companies' Personnel for the application of the Standards and how to document this activity.....	10
6) The rules and manner in which the Standards are made available to parents or legal or actual guardians and Minors for their familiarisation with and application.	11
7) Persons responsible for receiving reports of incidents threatening the Minor and providing support to the Minor.....	11
8) Method of documenting and retention policy for disclosed or reported incidents or events threatening the welfare of the Minor.....	12
9) Rules for the use of electronic devices with Internet access. Procedures for protecting children from harmful content and threats on the Internet and recorded in other forms. 13	
10) Principles for safe recruitment in DOZ Companies.....	13
7. Final Provisions	15
8. Related information.....	15
9. List of the attachments:	15

1. Purpose of the Procedure

This Procedure sets out the standards for the protection of minors in DOZ Group Companies, hereinafter referred to as "**Standards**" and "**Standards for the Protection of Minors**", which constitute standards for the protection of minors within the meaning of Article 22b of the Act of 13 May 2016 on Counteracting the Threat of Sexual Crime and the Protection of Minors (i.e. Journal of Laws 2024, item 560, as amended).

The purpose of the Standards and this Procedure is to:

- a. protect the Minor from abuse and to provide an immediate and effective response in the event of suspicion or knowledge of abuse of the Minor;
- b. ensure a prompt and effective response to situations where there is a suspicion that a crime has been committed to the detriment of the Minor and ensuring that appropriate action is taken to protect the Minor, including notification of relevant institutions such as the guardianship court and law enforcement authorities.

The standards specify in particular:

- a. Principles to ensure a safe relationship between Minors and DOZ Companies' Personnel, and in particular prohibited behaviour towards Minors;
- b. Principles and procedure for intervening in situations of suspected abuse or having information about abuse of a Minor;
- c. Procedures and persons responsible for filing notices of suspected offences against the Minor, notifying the guardianship court;
- d. Rules for reviewing and updating the Standards;
- e. The terms of reference of the person responsible for preparing the Personnel of the DOZ Companies for the application of the Standards, the principles for preparing such Personnel for their application and the way in which this activity is documented;
- f. The rules and manner in which the Standards are made available to parents or legal or actual guardians and Minors for their familiarisation with and application;
- g. Persons responsible for receiving reports of incidents threatening the Minor and providing support to the Minor;
- h. Method of documenting and retention policy for disclosed or reported incidents or events threatening the welfare of the Minor;
- i. Requirements for safe relationships between Minors, and in particular prohibited behaviour;
- j. Rules for the use of electronic devices with Internet access;
- k. Procedures for the protection of Minors from harmful content and threats on the Internet and recorded in other forms;
- l. Principles for establishing a support plan for the Minor following a disclosure of abuse.

2. Scope

This Procedure applies to entities operated by companies with capital or personal links to DOZ S.A., as indicated in **Annex No. 1**. The procedure covers, inter alia, General Pharmacies and Points of Pharmacy ("DOZ Pharmacies") and Pharmacy Museums ("DOZ Museums"). In particular, the provisions of these Standards apply to persons who, in the course of their official duties or in the scope of their activities, exercise or may exercise supervision or care over Minors. These persons are shown in **Annex No. 7**.

3. Glossary of terms used

- a. **Minor** - a person under the age of 18.
- b. **Harm to a Minor** – committing a prohibited or punishable act, as well as any other actions or omissions that are contrary to applicable law and the principles of social coexistence to the detriment of a Minor, including neglect by any person, including DOZ Company Personnel. Harm in particular is:
 - ✓ **Physical violence** – any direct action involving the use of force that results in unintentional injury, e.g. pushing, restraining, slapping, pinching, kicking, choking, hitting with an open hand, fist or objects, pouring boiling water or corrosive substances on someone, or using weapons.
 - ✓ **Psychological abuse** - all kinds of actions leading to the destruction of a positive self-image, using psychological mechanisms, e.g. ridicule, humiliation, humiliation, embarrassment, imposition of one's own views, constant criticism, control, restriction of contacts with other people, use of threats, blackmail.
 - ✓ **Sexual violence** – any type of behaviour resulting in unwanted contact in the sexual sphere. The person using this type of violence aims to humiliate the other person and deprive them of their dignity. Sexual violence can take many forms: physical, verbal, non-verbal. Sexual abuse is also sexual exploitation of the Minor, understood as involving the Minor in a sphere of sexual activity that is inappropriate to his or her stage of development, in a sphere of activities that the Minor does not understand and is unable to accept, and which at the same time violate legal and social norms. Crimes against sexual freedom listed in Chapter XXV of the Act of 6 June 1997 also constitute harm to the Minor. - Penal Code (Journal Of Laws of 2024, item 17), hereinafter referred to as the 'Penal Code', excluding the offences set out in:
 - Article 201 of the Penal Code, unless committed to the detriment of the Minor;
 - Article 202 § 1 of the Penal Code;
 - Article 202 § 3 of the Penal Code consisting of pornographic content involving the presentation of violence or the use of an animal;
 - Article 202 § 4a of the Penal Code
 - Article 202 § 4b of the Penal Code involving the storage or possession of pornographic content depicting a manufactured or processed image of a Minor engaged in sexual activity;
 - Article 202 § 4c of the Penal Code
 - Article 204 § 1 and 2 of the Criminal Code, unless committed to the detriment of a minor
 - ✓ **Neglecting** – continuous failure to meet basic physical and emotional needs, e.g. lack of care and prevention of meeting basic physiological needs (related to sleep, food, hygiene).
- c. **DOZ companies** - entities identified in **Annex No. 1**.
- d. **DOZ Company** -any of the entities identified in **Annex No. 1**.
- e. **Personnel** - persons employed by or working with the DOZ Company, regardless of the type of legal relationship with the Company. In particular, but not exclusively, these are persons employed under an employment contract, civil law contract, works contract, voluntary agreement, internship/apprenticeship contract.
- f. **Manager** - a person employed by or working with the DOZ Company and designated to direct or manage a facility (DOZ Pharmacy, DOZ Museum) belonging to the DOZ Company or to manage or coordinate activities within a subordinate organisational unit (e.g. director/head of department, coordinator of department(s)).

- g. **Collaborating Entities** - external entities that collaborate with the DOZ Companies, e.g. contractors, subcontractors, performing benefits or services for or in the presence of Minors.

4. General Provisions

- 1) The Standards described in the Procedure relate to:
 - a. Relationships between DOZ Companies' Personnel and Minors;
 - b. relationships observed between Minors and third parties (including those related to Minors) in DOZ Pharmacies, DOZ Museums and during other activities undertaken by DOZ Companies' Personnel in the course of their official duties or in the scope of their activities under their contracts with the DOZ Companies;
- 2) Any member of Staff who has credible knowledge of the commission of behaviour to the detriment of a Minor, in particular the commission of a criminal act, including the use of violence or threats, is required to inform the Manager immediately under the terms set out below. Failure to comply with this obligation may result in criminal liability in accordance with generally applicable laws.
- 3) In the absence of the Manager, the Manager's duties and responsibilities under these Standards shall be assumed by a nominated deputy for the duration of the absence.
- 4) Only persons with an Authorisation granted by the Administrator shall have access to personal data resulting from this Procedure, to the extent necessary to perform any tasks related to the implementation of the Standards for the Protection of Minors.
- 5) If criminal acts to the detriment of a Minor are committed by the Supervisor (identified in the Procedure as the person responsible for coordinating activities related to notifying the relevant authorities and institutions of the harm done to the Minor or the suspicion that a criminal offence has been committed to the detriment of the Minor), then it is the responsibility of any person who has obtained information or has a suspicion of the incident to notify law enforcement authorities and relevant institutions.
- 6) Entities working with DOZ Companies whose employees or collaborators perform work or provide services for DOZ Companies in the presence of Minors are obliged to familiarise themselves with the DOZ Companies' Standards for the Protection of Minors and to adoption. It is the responsibility of the co-ordinator of the co-operating entity to inform the co-operating entity of this obligation. The rules and responsibilities of DOZ Companies' Personnel apply equally to employees and collaborators of collaborating entities. Employees and collaborators of collaborating entities are obliged to inform the Manager of the DOZ Company's facility where the incident or event took place about any observed or reported incident or occurrence (and their suspicion). If the incident or occurrence took place outside of the DOZ Company's permanent premises, an employee or collaborator of the collaborating entity shall inform the Manager designated to manage or coordinate the activities of the organisational unit where the incident took place and to which the report relates of the incident or occurrence.
- 7) Personnel and persons using the services of the DOZ Companies or participating in events organised by the DOZ Companies or entities cooperating with the DOZ Companies may provide comments and suggestions on the DOZ Companies' Standards for the Protection of Minors to the dedicated email address: ochronamaloletnich@doz.pl.

5. Duties and responsibilities

Manager - responsible for:

- compiling and securing documentation of any observed or reported incident or occurrence (and suspicion thereof) that threatens the welfare of the Minor and forwarding it through the dedicated reporting channel in Pharmacy365;
- making reports and submitting notifications to law enforcement agencies, social welfare centres, guardianship courts;
- making the Standards for the Protection of Minors document available in writing upon request to the person concerned;
- receiving reports of incidents threatening the safety of Minors and coordinating the reception of such reports and further actions taken;
- conducting internal training on the Standards for the Protection of Minors;
- informing Personnel who do not have access to the IT means of communication used in the DOZ Companies of any change in the Standards for the Protection of Minors;
- documenting the in-house training carried out and forwarding the documentation to the Human Resources Department.

Personnel - responsible for:

- informing the Manager about any incident or event (or suspicion thereof) that threatens the welfare of the Minor;
- participation in training on the applicable Standards for the Protection of Minors;
- cooperation with external institutions and law enforcement agencies;
- reporting any problems, difficulties or suggestions regarding the Standards;
- providing emotional support to the Minor who directly reports the incident;
- ensuring the protection of the Minor until the arrival of the relevant services when temporary care is needed.

HR Department - responsible for:

- reviewing and updating the Standards in accordance with the Procedure.

The DOZ Ethics Committee - responsible for:

- handling of the Register;
- email box maintenance ochronamaloletnich@doz.pl..
- Keeping and archiving records of reports of suspected abuse of a Minor.

Recruiter- responsible for:

- collecting from Candidates the documents set out in section 10) "DOZ Companies' Safe Recruitment Policy" in section 6. Description of the procedure
- forwarding the retrieved documents to the Human Resources Department.

Human Resources Officer - responsible for:

- keeping in the Employees' personnel files or other persons' files the documents set out in section 10) "DOZ Companies' Safe Recruitment Policy" in section 6. Description of the procedure
- carrying out a cyclical verification of the Personnel documents indicated in point 10) "Principles for secure recruitment in DOZ Companies".

6. Description of the procedure

1) Principles ensuring safe relations between Minors and DOZ Companies' Staff, in particular prohibited behaviour towards Minors.

1. The relationship between Minors and DOZ Companies' Staff must be professional. Messages or actions taken towards them must be appropriate to the situation, safe, justified and understandable to everyone (adapted to the individual needs and capabilities of Minors, especially those with special educational needs and disabilities).
2. Contact with Minors should be characterised by respect, patience, kindness, care for the physical and psychological safety of each Minor. In the presence of Minors, Staff are not allowed to make inappropriate jokes, use vulgarities, make offensive gestures, utter sexually explicit and violent content.
3. Any form of physical, psychological, sexual or verbal violence against Minors is unacceptable and prohibited, in particular violation of a Minor's physical integrity (unless it is due to the need for his/her safety or that of other Minors - difficult/aggressive behaviour of a Minor), shaming, humiliating, disrespecting and insulting a Minor, shouting at a Minor in a situation other than due to his/her safety or that of other Minors.
4. In addition, additional rules are established for the Staff of DOZ Pharmacies, establishments providing pharmaceutical services and other health care services when dealing with Minors:
 - **principle of transparency** - all interactions with Minor Patients must take place in the presence of a parent, other legal guardian or other authorised adult, unless the medical situation requires otherwise, which should be clearly justified and documented;
 - **principle of respect for privacy** - The staff of DOZ Pharmacy must respect the privacy of the Minor using the services or benefits of DOZ Pharmacy, ensuring that all medical activities, such as vaccinations, examinations or interviews, take place under conditions that guarantee discretion;
 - **principle of using language understandable to Minors** - when communicating with a Minor, use language appropriate to their age and level of understanding, avoiding medical terminology that may be incomprehensible or cause concern;
 - **safe touch principle** - any form of physical contact with a Minor, such as vaccinations or examinations, should be carried out with the utmost care, in a professional manner and only to the extent necessary;
 - **prohibition of inappropriate physical contact** - any inappropriate physical contact with a Minor is prohibited; any physical interaction should be limited to medically necessary activities;
 - **prohibition on isolating Minors** - it is prohibited to isolate a Minor from his/her caregivers; all actions should be carried out in the presence of an adult whom the Minor trusts (unless isolating the Minor is due to a necessary, legitimate need to ensure his/her safety in case of perceived harm to the Minor);
 - **prohibition on imposing opinions and decisions** - it is forbidden to impose medical decisions on the Minor and his/her guardians; all decisions should be made jointly, fully respecting the wishes of the Patient and his/her guardians.

2) Principles and procedure for intervention in cases of suspected harm or possession of information about harm to a minor.

1. The procedure covers all cases where the Staff of the DOZ Companies:
 - suspects that the Minor is being abused (physically, mentally, emotionally or sexually);
 - obtains direct or indirect information about the abuse of the Minor.
2. When intervening in a situation where there is suspicion of harm or information about harm to a minor, the following general principles apply:
 - **principle of prioritising the Minor's safety** - any action taken under the procedure must be aimed at protecting the Minor from further harm;
 - **principle of confidentiality** - all information concerning the abuse of a Minor must be treated as confidential; only those responsible for the intervention should have access to this information;
 - **principle of immediacy** - intervention in the event of suspected abuse of a Minor must be carried out without delay, in accordance with established procedures.
3. The procedure for making interventions includes:
 - **Identification of situations of abuse** - Staff must be adequately trained to recognise signs and symptoms that may indicate abuse of a Minor. It is necessary to pay particular attention to: physical signs of violence (bruises, wounds, burns), changes in the Minor's behaviour (anxiety, withdrawal, sudden mood changes) or inappropriate behaviour of adults towards the Minor;
 - **responding to suspected abuse** - In the event of suspected abuse of a Minor, Staff should immediately inform the Manager. If the situation requires immediate intervention (e.g. an immediate threat to the Minor's life or health), Staff should immediately notify the police or relevant emergency services;
 - **reporting suspected abuse** - The manager must immediately report suspected abuse of the Minor to the relevant institution such as:
 - a) police/prosecutor's office (**Annex No. 4**),
 - b) social assistance centre (**Annex No. 5**),
 - c) guardianship court (**Annex No. 6**).The choice of the appropriate institution to report suspected abuse is left to the discretion of the Manager. In this respect, the assessment shall be made taking into account all the circumstances of the specific case known to the Manager.
4. Reporting suspected abuse should include a detailed description of the situation, while keeping data to a minimum, including:
 - data of the Minor and his/her guardians;
 - a description of the symptoms or behaviours giving rise to suspicion;
 - circumstances of the incident that aroused suspicion.
5. Every case of suspected abuse must be thoroughly documented. The documentation should include:
 - date and time of collection;
 - data of persons involved in the situation;
 - a detailed description of the symptoms or behaviour that gave rise to the suspicion;
 - a description of the intervention measures taken.
6. The information referred to above should be included in the Intervention Sheet constituting **Annex No. 3** to this Procedure. The Manager is responsible for drawing up the Intervention Charter. In order to ensure that every case of suspected abuse of a Minor

is documented as well as possible, Staff may also take case notes, interview notes and other forms of documentation.

7. The records referred to in the previous point must be kept in such a way as to ensure that they are kept confidential and accessible only to authorised persons. Once this has been completed, the Manager should provide documentation as soon as possible, but no later than 7 days from the date of the incident, by creating a report in the Pharmacy365 system under Communications and Reports/Safeguarding Minors and attaching a scan of the completed and signed Intervention Sheet (**Annex No. 3**) and copies of any documents relating to the intervention (e.g. case notes, call notes, etc.). Once the documents have been uploaded, it is imperative that all copies are deleted from the computer memory (if, for example, they have been saved on the desktop) and that the originals are sent by correspondence to: DOZ S.A. office - Ethics Committee al. Jerozolimskie 134, 02-305 Warsaw, with the obligatory annotation "by hand". The Ethics Committee shall keep and archive the documentation for a period of 5 years, unless a longer retention period is required by separate regulations, e.g. due to ongoing proceedings, with special care for unauthorised access to the aforementioned documentation.
8. Staff should work closely with the institutions responsible for the protection of Minors, providing all necessary information and supporting intervention.
9. Staff shall be subject to regular training in recognising the signs of abuse of Minors and knowing the intervention procedures.

3) Procedure and persons responsible for reporting suspected crimes against minors or reporting to the guardianship court.

1. The procedure covers all cases where the Staff of the DOZ Companies:
 - suspects that a crime has been committed against the Minor (e.g. physical violence, psychological violence, sexual abuse);
 - has information that such a crime has been committed.
2. The manager is responsible for coordinating the notification of the relevant authorities and institutions.
3. The manager shall monitor the procedure referred to in point 1 above and ensure that all actions are taken in accordance with the law and applicable regulations.
4. Staff are required to inform the Manager immediately of any suspected offence against a Minor. The Manager is responsible for reporting suspected offences against the Minor to the relevant law enforcement authorities. Staff liaise with the Manager and other authorities to secure evidence and documentation of the incident.
5. The procedure for reporting suspected offences includes:
 - **report of suspicion** - in the event of a suspected offence to the detriment of a Minor, Staff immediately informs the Manager;
 - **assessment of the situation** - the manager assesses the situation, collects the necessary information and decides on the way forward;
 - **notification of law enforcement authorities** - in the event of a suspected crime, the Manager is obliged to immediately notify the nearest police station or public prosecutor's office. The report must include a detailed description of the situation, including details of the Minor, the circumstances of the incident and any evidence or information that may be relevant to law enforcement (**Annex No. 4**);

- **notification of the guardianship court** – if the situation concerns issues related to the care of a minor, the manager shall also notify the competent guardianship court; the notification of the guardianship court should include a description of the situation, the minor's details and an indication of the need to take care or protective measures (**Annex 6**).

4) Rules for reviewing and updating the Standards.

1. The purpose of reviewing and updating the Standards, hereafter referred to as the "Review", is to ensure that the Standards comply with applicable laws, current guidelines and best practice in the protection of Minors. Regular reviews and updates are carried out to maintain a high level of safety for Minors and to adapt procedures to changing conditions and needs.
2. Frequency of Review:
 - a. periodic inspection: Standards are reviewed at least once every 2 years;
 - b. extraordinary review - conducted at any time in the event of:
 - changes in legislation affecting the standards of protection of Minors,
 - reporting of an incident or situation that indicates a need to modify the Standards,
 - the introduction of new programmes or services in the DOZ Companies that may affect the safety of Minors.
3. The person responsible for the Review is the designated HR Officer who initiates the periodic review and oversees the entire process of reviewing and updating the Standards.
4. The Review procedure includes:
 - a. Initiating the Review - The HR Officer initiates the Review process;
 - b. Assessment of current Standards - The HR Officer carries out a detailed analysis of the current Standards, taking into account:
 - compliance with applicable law,
 - compliance with the Standards by the Staff of the DOZ Companies,
 - The effectiveness of the Standards in ensuring the protection of Minors,
 - comments and suggestions made by the Staff of the DOZ Companies and the people who use their services.
 - c. Collection of data and information - The Ethics Committee collects data on incidents, complaints, reports and other situations related to the protection of Minors that have occurred since the last review and provides anonymised data to the HR Officer;
 - d. analysis by the Legal Officer of the latest guidelines, recommendations and legal developments affecting the Standards;
 - e. proposals for amendments and updates - on the basis of the analysis carried out, proposals for amendments and updates to the Standards are developed, if necessary;
 - f. approval by the Board of DOZ S.A. and implementation of the revised Standards (once the changes have been approved, the HR Officer is responsible for implementing the revised Standards);
 - g. documenting the Review (the HR Officer prepares a protocol for each review, detailing the analyses carried out, incidents reported, change proposals and approved updates);
 - h. Monitoring the effectiveness of the revised Standards - Staff are required to report any problems, difficulties or suggestions regarding the new Standards so that they can be adjusted if necessary.

5) Preparation of DOZ Companies' Personnel for the application of the Standards and how to document this activity.

1. To ensure that Staff are knowledgeable in recognizing the signs of abuse of Minors, intervention procedures, and are aware of and well prepared to apply the Standards, Staff members who, as part of their job duties or scope of practice, have or may have supervision or care of Minors are required to:
 - a. familiarise themselves with these Standards for the Protection of Minors and to strictly adhere to the guidelines and procedures contained therein;
 - b. complete training on the protection of minors. Completion of training by Personnel will be documented.The list of units/cells subject to training is indicated in **Annex No. 7..**
2. The staff referred to above who:
 - a. has access to the DOZ Academy training platform - is obliged to complete the dedicated training within 7 days of it being made available to Personnel on the DOZ Academy training platform and, in the event of absence of a Personnel member during this period, within 7 days of the end of their absence. Completion of the training within the stated timeframe will also be required whenever a new version of the training becomes available, which will be communicated to Personnel in the usual manner in the DOZ Companies.
 - b. does not have access to the DOZ Academy training platform - is required to attend an in-house training session, organised by the Manager, at which the Manager will inform Personnel of the Minor Protection Standards applicable to DOZ Companies and present the policies, procedures and responsibilities arising therefrom. Attendance at the training will also be required whenever the content of the Standards for the Protection of Minors is updated, of which Staff will be informed by the Manager.
3. The Manager shall provide the training referred to in paragraph 2(b) above on the date a member of the Personnel is employed or commences working with him or her, and if the current Associate is admitted to any other activity relating to the Minor's upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests, or to the care of the Minor.
4. The Manager must inform Personnel who do not have access to the IT means of communication used by the DOZ Companies of any change to the Standards for the Protection of Minors that has been implemented and of the training referred to in paragraph 3 above as soon as possible, but no later than 7 days after they have been updated, or, if a member of the Personnel is absent during this period, within 7 days of the end of their absence.
5. A Staff Member who does not have access to the DOZ Academy IT platform shall confirm the fact that he/she has completed the internal training on the Standards for the Protection of Minors in DOZ Companies by signing a document confirming the training (**Annex No. No. 8**). The document shall be attached to the civil law contract signed by the Staff Member and kept with that contract.
6. In the absence of the Manager, the training shall be carried out by the deputy in charge, in accordance with Part 4. General provisions of paragraph 3) of this Procedure.
7. For training delivered on the DOZ Academy training platform, it does not use Annex No. 7. A record of Staff completion of training will be recorded in the system.

6) The rules and manner in which the Standards are made available to parents or legal or actual guardians and Minors for their familiarisation with and application.

1. The purpose of making the Standards available is to ensure that parents, legal guardians and Minors are fully informed of the policies and procedures in place at DOZ Companies to protect children and young people. Transparent and easily accessible, the Standards aim to increase trust in the DOZ Companies and enable parents and legal guardians to take an active role in protecting their children.
2. Principles for sharing Standards:
 - **principle of transparency** - The Standards shall be made available in an open and transparent manner so that every parent, legal or actual guardian and Minor has the opportunity to review them;
 - **principle of accessibility** - The standards are available in written, electronic and, on request, oral form so that they can be understood by all audiences, regardless of their preferences or technical capabilities;
 - **principle of comprehensibility** - The standards are presented in a way that is understandable, adapted to the age and perception level of Minors and in a form that is accessible to those without specialised knowledge.
3. Ways of sharing the Standards:
 - **in writing** - in DOZ Pharmacies and DOZ Museums, an extract from the Standards is displayed in a prominent place, covering the most important information relevant to Minors. The procedure in full is available for inspection from the Manager. It is the responsibility of the Manager to make the procedure available in this form to the person concerned;
 - **in electronic form** – the full Child Protection Standards are available on the DOZ S.A. website. www.dozsa.pl.

7) Persons responsible for receiving reports of incidents threatening the Minor and providing support to the Minor.

1. The purpose of the procedure is to ensure that there are clear and effective rules for receiving reports of incidents that threaten the safety of Minors. The procedure aims to respond quickly to reports and to ensure that Minors receive the necessary assistance.
2. The main person responsible for receiving calls and coordinating activities is the Manager or, in his/her absence, his/her deputy.
3. Staff are required to report any incidents or suspected incidents endangering a Minor to the Manager immediately. Staff are also responsible for providing initial emotional support to the Minor.
4. The admissions procedure includes:
 - a. **direct application:**
 - **reporting person** - a report can be made by any member of Staff, parent, legal guardian or Minor directly to the Manager. The notifier shall provide the notifier with the information clause constituting **Annex 2** to the Procedure,
 - **form of application** - application may be made in person, by e-mail or in writing,
 - **reporting** - The manager documents the receipt of the report on an Intervention Sheet (**Annex No. 3**), containing a detailed description of the incident, the date and time of the report, the details of the reporter (if possible) and the planned action. If necessary, the Manager may draw up additional documents, such as staff notes, interview notes, etc., to be annexed to the intervention sheet.

- b. **submitting a report** – After receiving the report, the manager analyses the situation and decides on further steps. Depending on the circumstances, the report may be forwarded to the relevant services, such as the police, the guardianship court or other institutions for the protection of Minors.
 - c. **documentation** - all actions taken in response to a report are carefully documented, including decisions taken, discussions with the parties involved and information provided. These documents are kept secure in accordance with data protection legislation.
 - d. **archiving** - documentation for each application must be kept confidential and accessible only to authorised persons. Once this has been completed, the Manager should provide documentation as soon as possible, but no later than 7 days from the date of receipt of the request, by creating the request in the Pharmacy365 system under Communications and Requests/Safeguarding Minors and attaching a scan of the completed and signed Intervention Sheet (**Annex No. 3**) and copies of any documents relating to the intervention (e.g. case notes, call notes, etc.). Once the documents have been uploaded, it is imperative that all copies are deleted from the computer memory (if, for example, they have been saved on the desktop) and that the originals are sent by correspondence to: DOZ S.A. office - Ethics Committee al. Jerozolimskie 134, 02-305 Warsaw, with the obligatory annotation "by hand". The Ethics Committee shall keep and archive the documentation for a period of 5 years, unless a longer retention period is required by separate regulations, e.g. due to ongoing proceedings, with special care for unauthorised access to the aforementioned documentation.
5. The purpose of the procedure is to ensure that appropriate support is provided to Minors in the event of a report of an incident threatening their safety.
6. The procedure for providing support to the Minor includes:
- a. **first response**, including:
 - Emotional support - when dealing directly with a Minor who reports an incident, Staff provide emotional support and ensure that the Minor feels safe. If necessary, the Minor may be isolated from potential perpetrators in a secure room,
 - informing carers - The manager informs the parents or legal guardians of the situation unless there is suspicion that they are the perpetrators of the incident. In such a case, the information is only passed on to the relevant services;
 - b. **intervention actions** - notification of services - depending on the situation, the Manager contacts the police, the guardianship court or other relevant institutions to report the incident and take appropriate action;
 - c. **provide protection to the Minor** - in the event of the need for temporary care, the Personnel are required to take steps to secure the Minor until the arrival of the relevant services.

8) Method of documenting and retention policy for disclosed or reported incidents or events threatening the welfare of the Minor.

- 1. Any incident or occurrence that threatens the welfare of a Minor is recorded electronically in the Pharmacy365 system (hereinafter: "Register") by the Managers, who obligatorily provide full documentation of each violation against Minors in accordance with the procedures described above. The DOZ Ethics Committee is responsible for the operation of the Register.
- 2. The Register shall contain the following information:
 - a) application number;
 - b) date and time of the report;

- c) data of the notifying person (if available);
 - d) a description of the incident, including all relevant details;
 - e) the name of the Minor concerned;
 - f) details of the person responsible for accepting the application;
 - g) action taken (including reports to relevant services, information provided to legal guardians);
 - h) the outcome of the intervention and further steps, if any are planned.
3. The original documentation relating to reported incidents or events threatening the welfare of the Minor, due to its special nature, shall be strictly protected and kept in a secure place, in a lockable cabinet, accessible only to the Manager who compiled the documentation.
 4. All personal data contained in the records is protected in accordance with applicable data protection legislation, including the GDPR.
 5. Access to the data is only available to persons directly involved in the application process (Registry staff) and to persons authorised in accordance with the law, with the exception described in point 3.
 6. Incident records shall be retained for a minimum period of 5 years from the date of reporting or until any related investigations are completed, whichever is longer. Information that is no longer necessary for the purpose shall be deleted immediately.
 7. At the end of the retention period, the records shall be destroyed in such a way that the data they contain cannot be recovered, in accordance with the procedures for the destruction of records.
 8. Incident records that are no longer in active use are archived. In the case of electronic records, files are stored in encrypted form on dedicated archive media.

9) Rules for the use of electronic devices with Internet access. Procedures for protecting children from harmful content and threats on the Internet and recorded in other forms.

1. Access to the Internet at DOZ Group Companies is password-protected. The infrastructure at the DOZ Group Companies' facilities allows Staff to access the Internet.
2. Staff are required to use the Internet in a manner that does not violate the Standards.

10) Principles for safe recruitment in DOZ Companies.

1. Before entering into an employment relationship with a person or before allowing a person to engage in any other activity related to the upbringing, education, recreation, treatment, psychological counselling, spiritual development, sports or the pursuit of other interests of minors, or the care of minors (hereinafter: Candidate) who, in the course of his/her official duties or activities, will exercise supervision or care of the Minor (supervisor, coordinator, guardian or other person designated to have direct contact with the Minor), on the DOZ Company (hereinafter: Employer) and the person with whom the employment relationship is to be established or who is to be admitted to such activity, as shown in **Annex No. 7**, shall have the obligations set out in paragraphs 2 to 7 below.
2. The employer (recruiter) shall obtain information on whether the data of the person referred to in point 1 are included in the Register with restricted access or in the Register of persons in respect of whom the State Commission for the Prevention of Sexual Exploitation of Minors under 15 years of age has issued a decision on entry in the Register on the website:

rps.ms.gov.pl. Before hiring a Candidate or allowing a Candidate to engage in other activities specified in point 1, the Recruiter shall send the information obtained in a PDF file to the Human Resources Department. The HR Department employee records the information in print and attaches it to the Employee's personal file or to the documentation concerning the person authorised to perform such activities.

3. The candidate shall submit to the Employer (recruiter) information from the National Criminal Register with respect to the offences specified in Chapters XIX and XXV of the Penal Code, in Articles 189a and 207 of the Penal Code and in the Act of 29 July 2005 on Counteracting Drug Addiction (Journal of Laws of 2023, item 1939), or for the corresponding offences defined by foreign law.
4. If the Candidate has citizenship of a country other than the Republic of Poland, he/she shall, in addition, submit to the Employer (Recruiter) information from the criminal record of the country of citizenship obtained for the purposes of professional or voluntary activities related to contacts with children, or information from the criminal record of that country if the law of that country does not provide for the issuance of information for the aforementioned purposes.
5. The candidate submits to the Employer (recruiter), under pain of criminal liability, a declaration about the country or countries in which he/she has resided in the last 20 years, other than the Republic of Poland and the country of citizenship (**Annex No. 9**), and, at the same time, submits to the Employer (Recruiter) the criminal record information of those countries obtained for the purposes of professional or voluntary activities related to contacts with children, or the criminal record information of that country, if the law of that country does not provide for the issuance of information for the aforementioned purposes.
6. If the law of the country from which the information referred to in points 4-5 is to be submitted does not provide for its preparation or there is no criminal record in the country concerned, the Candidate shall submit a declaration to that effect together with a declaration that he/she has not been validly convicted in that country of offences corresponding to the offences defined in Chapters XIX and XXV of the Penal Code, in Articles 189a and 207 of the Penal Code and in the Act of 29 July 2005. on Counteracting Drug Addiction, and no other judgment has been issued against him or her stating that he or she has committed such prohibited acts, and that he or she is not obliged, by virtue of a decision of a court, other authorized body or the law, to comply with the prohibition to hold any or specific positions, to engage in any or certain professions or activities related to the upbringing, education, leisure, medical treatment, provision of psychological counselling, spiritual development, sports or the pursuit of other interests by Minors, or to the care of Minors (**Annex No. 10**).
7. The declarations referred to in points 5 to 6 shall be made under pain of criminal liability for making a false declaration. The applicant is required to include the following clause: 'I am aware of the criminal liability for making a false statement.' This clause replaces the authority's instruction on the criminal liability for making a false declaration.
8. The information and statements referred to in points 3-6 shall be attached to the personal file of the employee or to the documentation concerning a person authorised to engage in activities related to the upbringing, education, recreation, treatment, provision of psychological counselling, spiritual development, sports or other interests of minors, or with caring for them, and shall be stored in accordance with the retention period for such documentation. To this end, the recruiter shall send the aforementioned documents to the

Human Resources Department no later than 7 days from the date the employee is hired or the person is admitted to the activity referred to above.

9. On the Standards Review date set out in paragraph 4) "Rules for reviewing and updating the Standards" above, Human Resources shall simultaneously review the Personnel documents indicated in paragraphs 2 to 6 above and repeat the steps described in this section of the Procedure to obtain up-to-date certificates and statements.

7. Final Provisions

1. Updating Annex No. 1 and Annex No. 7 does not require an amendment to this Procedure.

8. Related information

- 1) Information on whether the process indicated in the Procedure or part of it is also described in other related Internal Regulations: NO
- 2) Does the Procedure Apply to DOZ Pharmacies: YES
- 3) Whether the Procedure is communicated to DOZ Pharmacies: YES

9. List of the attachments:

No.	Name
Annex 1	List of DOZ Group Companies covered by the Procedure
Annex 2	Information clause for persons whose data have been obtained in the course of an application
Annex 3	Intervention sheet - form for reporting an incident or event threatening the welfare of a minor
Annex 4	Notice to law enforcement authorities
Annex 5	Application to the social welfare centre
Annex 6	Application to the guardianship court
Annex 7	List of persons covered by mandatory training on the Standards for the Protection of Minors; list of persons covered by the safe recruitment procedure in DOZ Companies
Annex 8	Internal training card
Annex 9	Statement of country(ies) of residence during the last 20 years
Annex 10	Declaration of no criminal record made where the third country does not have a criminal record or does not issue information from it for professional or voluntary activities involving contact with children

Annex 1 to the Procedure for the protection of minors in DOZ companies

Name of unit	NIP
PZF Cefarm - Łódź Sp. z o.o. in Łódź	7272619792

Annex 2 to the Procedure for the protection of minors in DOZ companies

INFORMATION CLAUSE FOR PERSONS WHOSE DATA WAS OBTAINED DURING THE REGISTRATION PROCESS

Due to the processing of personal data related to the introduction of standards for the protection of minors in DOZ Group companies (hereinafter referred to as the 'Procedure') within the meaning of Article 22b of the Act of 13 May 2016 on counteracting threats of sexual offences and protecting minors (i.e. Journal of Laws of 2024, item 560, as amended), each Party undertakes to act in accordance with the applicable provisions on personal data protection, in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

The processing of the other Party's personal data as well as that of the persons whose data it has obtained in the course of and follow-up activities will be carried out solely for the purpose of carrying out activities in accordance with the Act on Counteracting the Risk of Sexual Offences and Protecting Minors. All information about the principles of personal data processing by the Data Controller is described in the following information clause.

Information clause on the processing of personal data by :

This clause exhausts the information obligation arising from Article 13(1) and (2) 2 and Article 14(1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (Journal Of Laws of the EU). L. 2016. 119. 1) hereinafter referred to as 'GDPR'.

We would like to assure you that we take great care to process the personal data we obtain in accordance with the applicable legislation and to ensure its security throughout the processing period. In order to effectively implement the data protection principles, we implement appropriate technical and organisational measures, taking into account the state of the art, the nature, scope, context, purposes of the processing and the risk of infringement of the rights or freedoms of natural persons, and we give the processing the necessary safeguards.

Who is the Controller of your data and how can you contact the Controller?

The data will be used by DOZ Group companies within the framework of a data co-management agreement

DOZ Group companies are joint controllers (hereinafter referred to as Controller(s)) of your personal data, the list of which is attached to this procedure.

Each Controller processes personal data for its own purposes.

Who can you contact regarding your personal data?

In order to ensure adequate protection of personal data, the Controllers have appointed a Data Protection Officer who can be contacted at the following email address: iod@doz.pl. In all matters relating to the processing of personal data and the exercise of your rights in relation to the processing of personal data, you may contact the Data Protection Officer.

Is providing data mandatory and where did the Controller obtain your personal data?

In the case of the processing of your data on the basis of:

- Article 6(1)(c) of the GDPR and Article 9(2)(c) and (g), the obligation to process the data obtained arises from legal provisions. Failure to provide them will prevent the Controller from performing the activities imposed on it by law.
- Article 6(1)(f) of the GDPR, processing in the legitimate interests of the Controller

If the Controller has not obtained the data directly from you, your personal data in the scope of, among others: identification data (name and surname), contact details, other data (e.g. place of employment):

- may have been obtained by the Controller in the course of carrying out the Procedure in connection with which they were disclosed
- may have been made available to the Controller by other means, i.e. an entity, to make your data available to the Controller.

What are the purposes and legal basis for processing your personal data?

The personal data you provide may be processed for various purposes and on various legal bases described below:

Purposes of processing:	Legal basis for processing	Period of data processing
Fulfilment of legal obligations imposed on the Controller, in particular those arising by law in connection with the implementation of the Procedure.	Article 6(1)(c) Article 9(2)(c) and (g)	Personal data will be processed for 5 years from the date of submission or until the completion of all related proceedings, whichever is longer. Information that is no longer necessary for the purpose shall be deleted immediately.
Determining, investigating or defending against potential claims arising from the implementation of the Act and maintaining a record of events. to demonstrate the Controller's accountability	Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Controller, which is to secure claims and ensure accountability.	Personal data will be processed until the statute of limitations for claims under generally applicable law. Where data are processed for the purpose of establishing, asserting or defending claims, there is no right to object (Art. 21(1), 2nd sentence). 2 GDPR).

Who may be the recipient of your personal data, i.e. to whom may the Controllers transfer the personal data obtained?

The recipients of your personal data may be:

1. entities processing personal data on behalf of the Controller, with whom the Controller has concluded legally required personal data processing agreements, i.e.:
 - 1.1. external entities providing and supporting the Controller's IT systems
 - 1.2. entities providing services related to the Controller's day-to-day operations.
 - 1.3. DOZ Group Entities under a binding separate Co-Management Agreement.The above entities have been obliged by the Controller to provide adequate technical and organisational measures to ensure the security and protection of the personal data provided to them.
2. Entities authorised under applicable legislation, in connection with the so-called sharing of personal data. In such a case, before transferring the personal data obtained by the relevant Controller, it shall verify the existence of the legal basis for disclosure each time.

As a rule, personal data obtained by the Controller will not be transferred to a third country or international organisation outside the European Economic Area. However, in certain situations, due to the Controller's cooperation with service providers in the pursuit of personal data processing objectives, personal data may be transferred to countries outside the European Economic Area. In such a situation, the Controller shall take care of all formalities related to the proper protection of personal data, including, among others, the use of standard contractual clauses adopted by the Commission (EU) and shall provide the data subjects whose data it has obtained with the relevant information.

What rights do you have in relation to the processing of your data by Controller?

In connection with the processing of personal data obtained by the Controller, you have the following rights:

- access to your personal data and receive a copy thereof (Article 15 of the GDPR) – if the legal basis for the processing of your data is Article 6(1)(b) or (c) or (f) of the GDPR
- rectify inaccurate personal data and completion of incomplete data (Article 16 of the GDPR) – if the legal basis for the processing of your data is Article 6(1)(b) or (c) or (f) of the GDPR
- request the deletion of your personal data, the so-called right to be forgotten (Article 17 of the GDPR) – if the legal basis for the processing of your data is Article 6(1)(b) or (f) of the GDPR
- request restriction of processing (Article 18 of the GDPR) – if the legal basis for the processing of your data is Article 6(1)(b) or (c) or (f) of the GDPR
- **transfer** of personal data (Article 20 GDPR) - if the legal basis for processing your data is Article 6(1b) GDPR.

- object to the processing of personal data (Article 21 of the GDPR) – if the legal basis for the processing of your data is Article 6(1)(f) of the GDPR.
- lodged with the President of the Personal Data Protection Office. Detailed information on the right to complain to PUODO, is available at: <https://uodo.gov.pl/pl/83/155>.

Each time you wish to exercise the above rights, the Controller will assess and verify your requests and comply with them in accordance with applicable law.

Is the personal data obtained subject to automated processing or profiling?

No, your personal data collected and processed by the Controller is not subject to automated processing, including profiling.

Intervention card**Form for reporting an incident or event threatening the welfare of a minor**

1. First name and surname of the minor:		
2. Date and time of the incident:		
3. Place of incident (address):		
4. Reason for intervention (form of harm) - a description of the symptoms or behaviours that aroused suspicion. The description must contain only the necessary information in accordance with the principle of minimisation. If the intervention is undertaken as a result of a report of an incident or event threatening the welfare of a minor, the details of the reporter (if available) should be indicated:		
5. Details of persons involved in the situation:		
6. Person reporting suspected abuse:	Name and surname:	
	official position:	
7. Description of actions taken at the scene:	date:	action:
8. Form of intervention undertaken (tick as appropriate):	<input type="checkbox"/> notice of suspected offence. <input type="checkbox"/> application for insight into the situation of the Minor/family. <input type="checkbox"/> other type of intervention:.	
9. Intervention data (name of the authority to which the intervention was reported) and date of intervention:		
10. Outcomes of interventions: actions of judicial authorities if information on outcomes/actions of another actor/actions of legal guardians:		

Signature of the person making the notification:

.....

....., dated.....

[Notifier's data]

[Data of the unit - police or prosecutor's office].

NOTICE

of a suspected offence against a minor

I hereby give notice of the possible commission of an offence to the detriment of a minor*
..... by

JUSTIFICATION

In the course of carrying out his duties, the employee noticed the above mentioned minor*

Bearing in mind the above information, as well as the welfare and safety of the minor/young person*, I request that the case be initiated.

At the same time, I point out that all correspondence in this case should be addressed to the address indicated in the heading.

....., dated.....

.....

.....

Applicant:

Address for correspondence:

REQUEST FOR AN OVERVIEW OF THE CHILD'S SITUATION

I hereby request an insight into the situation of the child /family by conducting an environmental interview as far as the above-mentioned minor is concerned and to provide assistance to the child in the event that the child's welfare is found to be at risk.

JUSTIFICATION

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

Thank you in advance for taking the above action.

.....
(legible signature)

....., *dated*.....

The District Court in.....

Family and Minors Division

Applicant:

Address for correspondence:

Participants in the proceedings:

ul

the minor's parents:

REQUEST FOR AN OVERVIEW OF THE CHILD'S SITUATION

I hereby request an insight into the situation of the minor*..... and issue appropriate care orders.

JUSTIFICATION

[Description of situation where child welfare is at risk]
.....

With these facts in mind, it can be presumed that the welfare of the minor/young child*..... is at risk and that the parents are not exercising parental authority properly. Therefore, the request for insight into the minor's family situation and possible parental support is justified.

Please send all correspondence in the case to the correspondence address indicated in the header.

List of persons subject to mandatory training on Standards for the Protection of Minors

Unit/organisational unit	Obligation to train
DOZ Pharmacies	All persons, regardless of their form of employment or cooperation
DOZ Museums	All persons, regardless of their form of employment or cooperation
DOZ Herbarium	All persons, regardless of their form of employment or cooperation
Inventory and Asset Protection Department	All employees - persons employed under a contract of employment
HR Department - Head Office	All employees - persons employed under a contract of employment
Regional Marketing Department - Masovia Region Regional marketing department - Eastern region Regional marketing department - West region Regional marketing department - Central region Regional marketing department - North region	All employees - persons employed under a contract of employment

List of persons subject to secure recruitment in DOZ Companies

Organisational unit	Obligation to train
DOZ Museums	All persons, regardless of their form of employment or cooperation
Inventory and Asset Protection Department	All employees - persons employed under a contract of employment
Regional Marketing Department - Masovia Region Regional marketing department - Eastern region Regional marketing department - West region Regional marketing department - Central region Regional marketing department - North region	All employees - persons employed under a contract of employment

Internal training card in the field of Standards for the Protection of Minors in DOZ Companies

.....
Place and date

.....
Name and surname of the training participant

.....
The Company

I hereby confirm that on an internal training course was conducted on the Standards for the Protection of Minors in DOZ Group Companies. The purpose of the training was to familiarise the Participant with the current Procedure for the Protection of Minors in DOZ Group Companies and to discuss the procedures, duties and guidelines arising from it, in particular the standards of conduct in dealing with minors and the procedures for responding to and reporting incidents where the welfare and safety of a minor may be at risk.

Trainer:

Participant:

.....
Trainer's signature Participant's signature

The Participant confirms that he/she has read the above information and undertakes to observe and apply it.

.....
Signature of Participant

....., dated.....
(city)

STATEMENT

Full name.....

PESEL/passport number

Citizenship

Pursuant to Article 21(5) of the Act of 21 March 2024 on the prevention of the risk of sexual offences and the protection of minors:

- ☐ I declare that during the last 20 years I have resided in the following countries other than the Republic of Poland and the country of my citizenship²:

.....

.....

- ☐ I declare that I have not resided in countries other than the Republic of Poland and the country of my nationality during the last 20 years.

I am aware of the criminal liability for making a false statement.

.....

(date and legible signature)

Instruction:

Place an X in the box next to the answer chosen. If you choose 1 option, list these countries.

Applies to foreigners without a PESEL number.

² The term "State of my nationality" refers to persons who are not citizens of the Republic of Poland.

Declaration of no criminal record submitted in cases where a third country does not keep a criminal record or does not issue information from it for the purposes of professional or voluntary activities involving contact with children

....., dated.....
(city)

Full name.....

PESEL/passport no.¹

Pursuant to Article 21(7) of the Act of 21 March 2024 on the prevention of the risk of sexual offences and the protection of minors:

I declare that no criminal record information is issued for professional or voluntary activities involving contact with children/no criminal record².in the State(s)

I certify that I have not been validly convicted in the State(s) of [specify] for prohibited acts corresponding to offences specified in Chapters XIX and XXV of the Criminal Code, in Articles 189a and 207 of the Criminal Code and in the Act of 29 July 2005 on counteracting drug addiction, and no other ruling has been issued against me stating that I have committed such prohibited acts, and that I have not been imposed an obligation resulting from a court ruling, another authorised body or a statute to comply with a prohibition on holding any or specific positions, performing any or specific professions or activities related to the upbringing, education, leisure, treatment, provision of psychological counselling, spiritual development, practice of sports or other interests of minors, or to the care of minors.

'I am aware of the criminal liability for making a false statement.'

.....
(date and legible signature)

¹ Applies to foreign nationals without a PESEL number..

² Delete as appropriate.