

CHILD PROTECTION, HUMAN TRAFFICKING AND SEXUAL EXPLOITATION PREVENTION POLICY

Royal Cliff Hotels Group | Chonburi, Thailand

ZERO-TOLERANCE COMMITMENT: Royal Cliff Hotels Group does not tolerate human trafficking, the sexual exploitation or abuse of children, forced labour, or any other form of violence or exploitation on its premises, through its services, or in connection with its business activities.

I. PURPOSE AND COMMITMENT

Royal Cliff Hotels Group (RCHG) is committed to providing a safe and responsible environment for guests, employees and the wider community. We recognise that hotels and tourism businesses have an important role in preventing, identifying and responding to human trafficking, the sexual exploitation and abuse of children, and other forms of violence.

This policy establishes the standards and procedures RCHG follows to prevent exploitation, respond to suspicious situations promptly and responsibly, protect potential victims, preserve relevant information and cooperate with competent authorities. It is designed to support the principles of The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code).

II. SCOPE

This policy applies across all Royal Cliff Hotels Group properties, facilities and services, including the Pattaya Exhibition and Convention Hall (PEACH). It applies to all directors, employees, temporary staff, contractors, suppliers, business partners, guests, visitors and other persons using or providing services on RCHG premises.

III. DEFINITIONS

A. Child: Any person under 18 years of age, regardless of the age of majority or consent under local law.

B. Human Trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons through force, coercion, deception, abuse of vulnerability or other unlawful means for the purpose of exploitation, including sexual exploitation, forced labour or involuntary servitude.

C. Sexual Exploitation or Abuse of Children: Any actual or attempted abuse of a child for sexual purposes, including commercial sexual exploitation, grooming, trafficking for sexual purposes, production or sharing of child sexual abuse material, or arranging or facilitating sexual activity involving a child.

D. Violence Against Children: Physical, sexual or emotional violence, neglect, coercion, intimidation, exploitation or other conduct that may cause harm to a child.

E. Suspicious Situation: Any behaviour, circumstance or information that gives a reasonable concern that a person, particularly a child or vulnerable person, may be at risk of exploitation, trafficking, abuse or violence. Employees are not expected to prove that an offence has occurred before reporting a concern.

IV. PREVENTION AND HOTEL COMMITMENTS

- **Zero tolerance.** RCHG will not knowingly allow its rooms, facilities, digital channels, transport arrangements, events or other services to be used for human trafficking, child sexual exploitation or abuse, or other unlawful exploitation.
- **Staff training.** Employees receive awareness training during onboarding and refresher training thereafter. Relevant guest-facing and operational teams, including Front Office, Security, Housekeeping, Food & Beverage and Recreation, receive guidance on warning signs and escalation procedures.
- **Security and monitoring.** RCHG uses 24-hour security operations, CCTV and other lawful security measures to help identify and respond to potential risks. Guest-registration and access information may be reviewed when there is a legitimate safety or security concern.

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- **Guest information and awareness.** RCHG may communicate its zero-tolerance position and appropriate child-protection information through guest-facing channels, staff communication, event procedures and other relevant touchpoints.
- **Suppliers and business partners.** RCHG expects relevant contractors, suppliers and partners to comply with applicable laws and to support RCHG's zero-tolerance approach. Child-protection and anti-trafficking expectations may be incorporated into contracts, procurement standards and partner communications where appropriate.
- **Responsible recruitment and conduct.** Employees are required to comply with RCHG standards of conduct. Any employee who participates in, facilitates, conceals or knowingly fails to report serious exploitation or abuse may be subject to disciplinary action, up to and including termination, in accordance with applicable law and company procedures.

V. PROCEDURE FOR RESPONDING TO SUSPICIOUS SITUATIONS

When an employee observes, receives information about, or reasonably suspects human trafficking, sexual exploitation of a child, abuse or other violence, the following procedure applies:

1. **Report immediately.** Notify the Manager on Duty and/or Security without delay. Serious concerns must be escalated to senior management. A concern should be reported even when the employee is uncertain; proof is not required before reporting.
2. **Prioritise immediate safety.** If a child or other person appears to be in immediate danger, Security and management must take reasonable steps to prevent further harm and contact the appropriate emergency or law-enforcement authorities as required.
3. **Do not confront or investigate.** Employees should not confront a suspected offender, conduct an independent investigation, promise secrecy, or repeatedly question a child. The objective is to report, protect and preserve information, not to determine guilt.
4. **Preserve relevant information.** Security and management should preserve available and lawfully accessible information that may assist competent authorities, such as CCTV footage, registration records, access records, incident logs and relevant communications. Evidence must not be altered, deleted or unnecessarily circulated.
5. **Handle the situation confidentially.** Information should be shared only on a need-to-know basis with authorised RCHG personnel and competent authorities. The dignity, privacy and safety of the potential victim must be respected at all times.
6. **Refer to competent authorities.** Where there is a reasonable suspicion of trafficking, child sexual exploitation, abuse or other serious violence, RCHG will cooperate with and, where appropriate, report the matter to police, child-protection authorities or other competent agencies.
7. **Support the potential victim.** Where practicable, RCHG will provide a safe environment while awaiting assistance and cooperate with appropriate child-protection, medical or social-service professionals. Employees must avoid actions that could increase risk to the child or interfere with an official investigation.
8. **Document and follow up.** Management should ensure that the concern, actions taken, referrals and relevant follow-up are documented through the appropriate internal incident-reporting process, with records handled securely and in accordance with applicable privacy requirements.

VI. GUEST AND VISITOR RESPONSIBILITIES

- **Accurate registration.** Guests are required to provide accurate registration information and declare room occupants in accordance with hotel procedures and applicable law.
- **Age and identity verification.** RCHG may request valid identification where reasonably necessary to verify age or identity, particularly where circumstances raise a safeguarding or security concern.
- **Protection of minors.** Where circumstances reasonably warrant, an adult accompanying a minor may be asked to clarify the relationship with the child and provide supporting information or documentation. Any concern will be handled sensitively and without discrimination.

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- **Room and premises access.** Where there is a legitimate safety, security or suspected-illegal-activity concern, RCHG may take reasonable action, including lawful access to a guest room or restricted area, in accordance with hotel procedures and applicable law.
- **Enforcement.** RCHG may refuse service, remove persons from its premises, restrict future access and/or report conduct to competent authorities where permitted by law and justified by safety, security or suspected criminal activity.

VII. EMPLOYEE REPORTING AND NON-RETALIATION

Employees are required to raise safeguarding concerns promptly through the designated internal reporting channels. Reports made in good faith will be treated seriously and confidentially to the extent reasonably possible. RCHG does not tolerate retaliation against an employee who raises a genuine concern or assists with an authorised investigation.

VIII. COLLABORATION AND COMMUNITY ENGAGEMENT

RCHG supports cooperation with law-enforcement agencies, government authorities, child-protection organisations and other recognised stakeholders working to prevent human trafficking and the sexual exploitation of children. Where appropriate, RCHG may participate in awareness, education and community initiatives and share relevant information in accordance with law and privacy obligations.

IX. TRAINING, REVIEW AND CONTINUOUS IMPROVEMENT

- **Training and awareness** will be reviewed periodically and updated to reflect emerging risks, operational experience and recognised good practices.
- **Relevant incidents and near-misses** may be reviewed by management to identify opportunities to strengthen controls and staff awareness.
- **This policy** will be reviewed at least annually, or earlier if there is a significant legal, operational or safeguarding development.
- **RCHG may maintain records** of training, implementation activities and child-protection initiatives to support internal governance and reporting under relevant responsible-tourism commitments.

X. POLICY ENFORCEMENT

Breaches of this policy by employees may result in disciplinary action in accordance with company procedures and applicable law. Guests, visitors, contractors, suppliers or other third parties who engage in prohibited conduct may be removed from RCHG premises, denied future access, have business relationships terminated and/or be referred to competent authorities, as appropriate.

Nothing in this policy requires an employee to place themselves or another person in danger. Where there is uncertainty, employees should promptly escalate the matter to management and Security for assessment and action.

XI. DOCUMENT CONTROL

Policy Owner	Royal Cliff Hotels Group
Original Issue Date	31 October 2023
Revision Date	1 September 2026
Review Cycle	At least annually and as required

Note: This policy is an operational safeguarding framework and should be implemented in conjunction with applicable Thai law, RCHG security procedures and any specific reporting protocols adopted by management.

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