



PROTECTION OF MINORS

In compliance with Law 679 of 2001, Law 1336 of 2009, Law 1098 of 2006, and other applicable regulations, Charleston Hotels and its establishments adopt a zero-tolerance policy toward any form of exploitation, abuse, violence, or violation of the rights of children and adolescents.

In addition to this policy, Charleston Hotels, its directors, employees, contractors, suppliers, and all other people associated with the organization in any capacity shall comply with the following provisions:

- Refrain from offering, promoting, facilitating, marketing, or permitting, whether expressly or covertly, programs, tourism packages, activities, or services that involve or may facilitate the commercial sexual exploitation of children and adolescents.
- Refrain from providing information to guests, tourists, or third parties, either directly or through intermediaries, regarding individuals, establishments, or locations where activities involving the commercial sexual exploitation of children and adolescents are carried out, promoted, or facilitated.
- Refrain from directing, transporting, or facilitating the access of tourists to establishments or locations where activities involving the commercial sexual exploitation of children and adolescents take place, as well as from facilitating the access of minors to locations where guests or visitors are accommodated for such purposes.
- Adopt the necessary measures to prevent any person associated with Charleston Hotels from offering or facilitating tourism services that promote, permit, or encourage sexual activities involving children and adolescents.
- Implement enhanced due diligence measures with respect to the accommodation of minors in order to verify their identity, the legitimacy of the accompanying person, and the existence of adequate authorizations where applicable.

- Any minor seeking accommodation at any Charleston Hotels property must be accompanied by his or her parents, legal representative, lawful custodian, or a duly authorized third party.
- Where a minor is accommodated with a person other than his or her parents or legal representative, Charleston Hotels may require the presentation of authorizations, identification documents, birth certificates, court orders, certifications, or any other supporting documentation reasonably necessary to verify the identity of the minor, the legitimacy of the accompanying person, and the existence of sufficient authorization from the person exercising parental authority, custody, or legal representation.
- Charleston Hotels reserves the right to deny registration, admission, or continued stay to any minor where:
 1. The identity of the minor or the accompanying person cannot be adequately verified;
 2. The documentation provided is insufficient, inconsistent, or gives rise to reasonable doubts regarding the legitimacy of the accompaniment;
 3. There are indications of risk to the minor's integrity, safety, or well-being; or
 4. Circumstances are identified that may be related to acts of exploitation, abuse, or violence against children and adolescents.
- The following, among others, shall constitute warning signs:
 1. Inconsistencies between the information provided by the minor and that provided by the accompanying person;
 2. An unjustified refusal to provide supporting documentation;
 3. Documentation that appears to be altered, incomplete, or contradictory;
 4. Evasive or suspicious behavior, or behavior inconsistent with the relationship represented to exist between the minor and the accompanying person; and
 5. Any circumstance that may reasonably suggest a potential risk to the minor.
- Upon identification of a warning sign, personnel shall suspend the registration or admission process, immediately notify the person designated by the establishment, and follow the applicable internal escalation and reporting procedures.
- Charleston Hotels shall report to the competent authorities any facts or reasonable suspicions of which it becomes aware relating to commercial sexual exploitation, abuse, or any violation of the rights of children and adolescents, including, as applicable, the National Police, the Childhood and Adolescence Police, the Colombian Family Welfare

Institute (ICBF), the Office of the Attorney General of the Nation, the Ministry of Commerce, Industry and Tourism, and any other competent authority.

- Charleston Hotels shall maintain internal mechanisms enabling its employees to immediately report any act, conduct, or situation that may constitute a threat to the integrity or rights of children and adolescents.
- Documentation collected for the purpose of verifying identity, family relationship, legal representation, or authorizations shall be retained in accordance with Charleston Hotels' personal data processing policies and applicable regulations, exclusively for purposes of security, regulatory compliance, and responding to requests from competent authorities.

Employees, officers, and representatives of Charleston Hotels shall have the authority to reject or cancel reservation requests, deny admission, or request the removal of guests, visitors, or third parties whenever there are reasonable grounds to believe that their conduct may violate this policy or the applicable regulations concerning the protection of children and adolescents.

WWW.HOTELCHARLESTONSANTATERESA.COM

Cartagena - Colombia

Cra 3ª N° 31 – 23 | Centro plaza de Santa Teresa

RNT 4244

T | +57(605) 664 9494 - 650 1000 E | **info@hotelescharleston.com**