

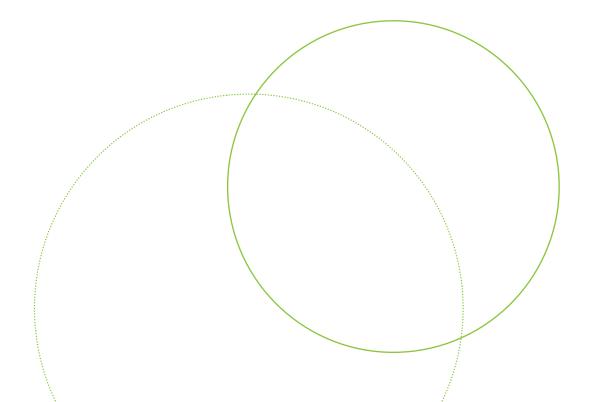
Equity Policy

Żabka Polska sp. z o.o. ul. Stanisława Matyi 8, 61-586 Poznań

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DOCUMENT SPECIFICATION

AUTHOR	Manager for Equity and Inclusive Organizational Culture
APPROVING ENTITY	Management Board of Żabka Polska Sp. z o.o.
STATUS	Applicable
VERSION	1.0
DATE	17.09.2021
NUMBER OF PAGES	7
SUBJECT MATTER	A document setting forth the basic principles of an equal oppor- tunity culture at Żabka Polska and its capital group.



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Section 1. Purpose

- 1.1. Given our values: Ambition, Openness, Responsibility and Credibility, Żabka Polska adopts this Equity Policy as its commitment to implement an equal opportunity culture. We recognize diversity and an inclusive organizational culture to be one of the strategic areas present in the Responsibility Strategy of Żabka Polska and its Responsible Organization pillar.
- 1.2. One of our ambitions is to build a culture of mutual respect and to treat people as individuals. Żabka Polska adopts this Equity Policy as a guideline for daily conduct and decision-making in support of diversity and inclusiveness. We believe this will enable us to turn the individuality of each and every one of us into the strength of Żabka Polska and its capital group.
- **1.3.** Żabka Polska is open to people with diverse identities, experiences, competencies and perspectives, and we want to build our team and business in that spirit.
- **1.4.** We believe that our efforts will translate into the growing involvement and effectiveness of our teams, which will be able to better understand the needs of our customers, franchisees and business partners by unlocking and using the potential of their diversity.

Section 2. Definition of diversity and inclusiveness

- **2.1. Equity** Equity is a key value for us, so we make our decisions fairly and without prejudice, based on competence, experience and performance.
- 2.3. Inclusive → For us, an inclusive organizational culture, also referred to as inclusiveness, organizational culture
 building a sense of belonging. We wish to ensure that all groups of employees and partners feel that our organization is the right place for each and every one of them, and that their individuality is valued.
- **2.4.** Our business is based on the belief that all people should be treated equally, and we strive towards an equitable approach, regardless of the variety of identity types:
 - **primary identity,** i.e., innate or inalienable qualities such as age, gender, nationality, ethnicity, physical ability, race, and sexual orientation;
 - **secondary identity,** i.e., characteristics acquired or attributed due to membership in particular groups, i.e., religion/non-religion, worldview, parental status, marital status, profession, level of education, place of residence, financial situation;
 - **organizational identity,** characteristics related to one's place and role in the organization, such as seniority, position, scope of responsibilities, remuneration, type of contract.



Section 3. Scope of application of the Equity Policy

- **3.1.** All groups of employees and partners are required to comply with the Equity Policy. Together, we want to care for each other and create an organization that is aware of how our actions affect other people.
- **3.2.** The Equity Policy is also applicable outside the organization i.e., with respect to customers, franchisees, suppliers and business partners.
- **3.3.** It is also our intention to encourage franchisees and business partners to read and apply the Equity Policy.

Section 4. Principles of the Equity Policy

4.1. Application of the Equity Policy is based on the following principles:

- **Creating an environment based on standards of equal treatment** we promote attitudes of openness and equal opportunities by creating an Equity Policy that includes all groups of employees and partners as well as by promoting its use outside the organization.
- Non-discrimination and respect we treat all groups of employees, customers, franchisees and business partners fairly, honestly, respectfully and equally. Discriminatory behavior, whether intentional or unintentional, goes against our values and harms all of us.
- Creating an organizational framework that encourages diversity within the organization we believe that diversity issues impact our business. People who feel respected and valued develop stronger relations and are more engaged in their work. Among other things, our activities aim to better identify the needs of different stakeholders, avoid the errors of groupthink, eliminate biases, and better identify business risks.
- Establishing appropriate policies, practices and tools we seek to ensure non-discriminatory treatment and promote diversity. Our assessments are always based on objectively measurable work results and skills and we do not tolerate any form of discrimination, workplace bullying or harassment.
- **Implementing educational and communication activities to create an open organizational culture** - we find a friendly working atmosphere very important. This is why we want to shape and promote attitudes of appreciation for diversity and acceptance of individual preferences, both among the groups of employees and partners as well as outside the organization.

Section 5. Equity Policy Actions

- **5.1.** Every person on our team is required to ensure that we build a culture of equal opportunity by creating a diverse and inclusive environment.
- **5.2.** We aim to address all discriminatory behavior. We provide everyone who experiences it with appropriate procedures and tools for anonymous reporting. Anyone who observes this type of behavior is encouraged to report it.
- **5.3.** In line with best practices, we will seek to ensure diversity in governing bodies, guaranteeing that we are represented by individuals with the right set of competencies, experience and perspectives.
- **5.4.** We find gender to be an important factor in diversity, and we will strive to have both male and female members sitting on the supervisory and management boards, with female members comprising at least 30% of the body.
- **5.5.** At Żabka Polska, we will create the position of Manager for Equity and Inclusive Organizational Culture. They will be responsible for overseeing the application of this Policy and coordinating activities designed to achieve its objectives, including:
 - promoting a culture of equal opportunity by creating a diverse and inclusive work environment as an important factor in achieving business goals;
 - identifying ways to foster a culture that supports diversity, which include developing and promoting relevant policies, programs and guidelines;
 - proposing measurable diversity objectives and activities;
 - ensuring that recruitment and selection processes at all levels of Żabka Polska are organized with the purpose of avoiding bias, both intentional and unintentional;
 - submitting reports on diversity in Żabka Polska to the management board and recommending appropriate actions.
- **5.6.** We want others to see Żabka Polska as an open workplace that responds to the different needs of each person, so that they can realize their full potential. We are committed to eliminating barriers to employment, fostering stable, long-term cooperation with Żabka Polska and creating conditions that are friendly to people with disabilities.
- **5.7.** We will ensure that there is no gender pay gap for work of the same value and we will prevent any discrimination in this regard. We wish to make this goal a reality by obtaining an equal pay certificate.
- **5.8.** Żabka Polska will define key indicators for monitoring diversity and inclusive organizational culture, to the extent permitted by applicable regulations. We will constantly monitor the implementation of diversity-promoting initiatives at Żabka Polska and the effect they have on said indicators.

- **5.9.** We operate with full transparency, so we will publish information on key diversity and antidiscrimination measures as well as indicators on diversity in the workforce.
- **5.10.** We pay special attention to personal development and provide everyone with an opportunity to receive specialist knowledge. We ensure that our training contributes to the equal development of everyone in the workplace. Training designed to promote a culture of equal opportunity and diversity within the organization will also be an important part of our educational offer.
- **5.11.** We continually review the satisfaction levels of our employee and partner groups. We want to know how to respond to their needs and build a workplace that provides positive work experiences, also in terms of equality and diversity.
- **5.12.** We promote open internal communication and encourage others to take their own initiatives to improve existing solutions and build an inclusive organizational culture.

Section 6. Other internal regulations

- **6.1.** The Equity Policy is a part of the wider scope of measures taken by Żabka Polska, also in its capital group, to create an open and ethical workplace. We encourage you to also read the following documents:
 - Work regulations,
 - Code of conduct,
 - Anonymous whistleblowing policy.

Section 7. Final provisions

- **7.1.** The Procedure, as hereby amended, was adopted by the Company's Management Board on 17 th September 2021
- 7.2. The Procedure, as hereby amended becomes effective on 17 th September 2021
- **7.3.** This Procedure will be applied by entities forming the capital group of Żabka Polska (Żabka Group).

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