



Żabka Polska Code of Conduct and Ethics for Żabka Polska Employees

Extended version



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HOW TO USE THE CODE?

To help you use the Code, we prepared a few guidelines:

► What attitudes do we support?

✓ Here you will find examples of attitudes or behaviors that we expect or consider worth imitating.

► What kind of behavior do we find unacceptable?

✗ Here you will find examples of behaviors that are not acceptable in Żabka Polska.

Learn more

- If there are any additional policies or codes to deepen your knowledge of a particular area, here you will find a reference to the relevant document. We also provide contact details of persons who may assist you in a particular case.

► Definitions

At the end of each section, you will also find essential definitions to help you fully understand how to interpret specific guidelines.

► What is the Code of Conduct and Ethics?

See "What is the Code of Conduct and Ethics" section and the end of this document to learn how to report any violations of the Code or whom to contact about any ethical dilemma.



Foreword by the President

Żabka Polska, which we are building together, has founded its business on the highest ethical standards. It is a key obligation of all employees, partners and franchisees who fulfill the mission of creating value by making people's lives easier to follow the law and internal regulations, including anti-corruption laws.

Our everyday attitudes, behaviors and a manner of conducting a business are just as important as the outcome they produce. This is why Żabka Polska is guided by the principles of integrity and fairness and makes sure its business is conducted in a transparent way. Thanks to this, we can enjoy the trust of our customers, franchisees and business partners.

The complexity of the world we see today makes it more difficult than ever to distinguish the right attitudes from those unacceptable. In order to maintain the highest ethical standards, I present to you the Code of Conduct and Ethics for Żabka Polska Employees. This document is to support us all in making ethically just decisions and choices. Due to its general nature, the Code cannot anticipate every possible situation and that is not its purpose. The Code should be used as a valuable source of

information and a guide in our everyday work. At its basis lies a guiding principle: do the right thing, ask when in doubt, and report any unethical behavior immediately.

At Żabka Polska we make a continuous effort to reinforce positive relationships with our customers, franchisees and the communities we serve. Each decision made in line with the Code of Conduct and Ethics of Żabka Polska enhances those ties and lets us build a workplace that makes us proud. So please read the Code, follow its principles in making ethical decisions on a daily basis, and stay true to our values.

Thank you for your cooperation and compliance with the Code.

Tomasz Suchański,
President of the Management Board of Żabka Polska

Values of Żabka Polska

At Żabka Polska we believe in creating value by making people's lives easier. We follow a value-based convenience model.

We remain open to innovation and ready to leave the beaten track. We maintain our credibility by ensuring the transparency of our activities and the consistency of all we say and do. We are driven by ambition, we consistently achieve our goals, and boldly look to the future. We understand the complexity of our impact on the environment and take full responsibility for it.

This Code is one of the tools that facilitate the fulfillment of the assumed obligations, as well as a manifestation of the company's commitment to shaping everyday business practice in a responsible manner.

Guaranteed respect for human rights

At Żabka Polska we find the inalienable nature and the absolute necessity of respecting human rights indisputable. All provisions of the Code are based on this belief and guarantee compliance with the provisions of the Universal Declaration of Human Rights, as well as the 10 principles of the United Nations Global Compact.

When it joined the Global Compact, Żabka Polska has made a clear declaration that it does not agree to any violations of personal dignity, and it expects both its employees and business partners to respect this declaration and ensure it is respected throughout the value chain.



What is the Code of Conduct and Ethics?

The Code of Conduct and Ethics for Żabka Polska Employees is a tool that can support you when you are faced with a choice and want to make sure you are making the right one. The standards and guidelines set forth in the Code are to facilitate your everyday work and be a signpost for appropriate and ethical behavior, in line with Żabka's values. The Code merely supplements the legal regulations which, of course, apply to every employee.

Who is the Code for?

Each employee and partner of Żabka Polska must comply with the Code. Regardless of the position held or the type or location of the duties performed, you must be aware that by acting on behalf of Żabka Polska you play the role of its ambassador. Thus, all decisions and actions you take have a direct impact on your reputation, as well as the reputation of Żabka Polska. It is, therefore, fundamental that you know, understand and comply with the Code and the policies it refers to.

Non-compliance with the Code

Everything we do at Żabka Polska is based on partnership and cooperation. The policies and codes serve to support us in everyday decisions and choices. Violating the rules applicable at Żabka Polska or failing to report a violation poses a direct threat to credibility, which is one of our values. It could also bring legal or financial consequences and affect the safety of our partners or business partners. This is why Żabka Polska will not tolerate any form of violation or failure to comply with the Code.

As an employee of Żabka Polska you are obliged to report any violations or irregularities considered by the company as undesirable. When in doubt whether a given behavior



constitutes a violation of the Code consult the compliance team and do not leave the situation unresolved.

You can be sure that each report will be dealt with as quickly as possible with due care and objectivity. A person reporting a breach of the Code is guaranteed confidentiality, and in the case of anonymous reports - the anonymous nature of the report.

Reporting violations of the Code

Violations of the Code may be reported in the following ways:

1. For reports that are easily resolved, the recommended method of providing information is direct contact with a selected representative of management, who - if unable to provide an appropriate answer - may at any stage forward the report to a responsible person for further investigation.
2. In writing by sending a traditional letter to: "Żabka Polska Sp. z o.o., ulica Stanisława Matyi 8, 61-586 Poznań", with a note reading "Whistleblowing". If the report concerns the members of the Company's Management Board, members of the Ethics Committee or a responsible person, it should be addressed to the President of the Management Board. If, however, the report concerns the President of the Management Board it should be addressed to the Chairperson of the Supervisory Board.
3. Using the Whistle B Platform (<https://report.whistleb.com/pl/żabka>) by completing a form or calling a dedicated phone line available 24/7 from any device with Internet connection. The whistleblower will remain fully anonymous, unless they decide to reveal their data in the report. Messages are encrypted, and contact and further communication with the whistleblower will be possible thanks to the individual code generated by the Whistle B Platform at the time of submitting the report.

Żabka Polska does not take any steps to identify the person making the anonymous report.

I. Our place of work



We form an organization based on equality and inclusive culture.

Competence, experience and motivation for self-improvement are the qualities that are most valued at Żabka Polska. This is why we support and demonstrate openness to others, learn from their experience and respect their opinions and diversity. We provide the opportunity to develop and release the natural potential that contributes to the growth of the organization. Our wish is to create an inclusive organizational culture - a culture of equal opportunities in which each person has a sense of belonging.

► What attitudes do we support?

- ✓ Be an example, treat others the same way you would want to be treated yourself.
- ✓ Make sure work is evaluated objectively and relationships are based on partnership. We assess each employee based on the way they perform their duties, not based on who they are.
- ✓ Ensure that all employees are treated equally, regardless of their age, gender, health, sexual orientation, race, skin color, religion, ethnicity or political affiliations.
- ✓ If you take part in recruitment processes, make your decisions solely on the basis of the candidate's experience and the competences required for a given position.
- ✓ Show respect and acceptance for the cultural or religious customs that are practiced by those around you.
- ✓ If you suspect that an employee may be discriminated against or mistreated, do not ignore it. Report all such cases.



► What kind of behavior do we find unacceptable?

- ✗ We do not tolerate any signs of discrimination based on age, gender, health, sexual orientation, race, skin color, religion or other indicators of diversity.
- ✗ We do not accept any physical, psychological, sexual violence, abuse or harassment of employees or attempts to intimidate them as well as any inhuman treatment of employees.
- ✗ We do not accept a passive attitude in a situation of disrespect, discrimination or violation of dignity. If you witness such behavior, react.



► Definitions

For us, **diversity** means the uniqueness of each person, the right to be oneself and the acceptance of similarities and differences between people. We believe that people should be treated equally and we strive for equal treatment regardless of differences such as: age, gender, ethnicity, nationality, level of fitness, race, sexual orientation, religion/irreligion, world view, parenthood, marital status, profession, level of education, place of residence, material status, place and role of a person in the organization (seniority, position, scope of powers, remuneration, type of contract).

We maintain work relationships that are based on mutual respect, values and partnership.

Regardless of our workplace or the position held, we show respect to every employee and partner of Żabka Polska. This reflects a partnership approach to our colleagues and proves that our actions are in line with the company's values. We are open to cooperation and new ideas and we respect other people's opinions. We make sure that our workplace is free from discrimination and harassment, where there is respect, a sense of belonging, and where everyone is supported and given the opportunity to grow as an employee and a person.

► What attitudes do we support?

- ✓ If you notice or experience behavior that creates an unfriendly or intimidating work environment, please report it. Especially when such behavior is presented by team leaders or management.
- ✓ Defend those who are mistreated at work.
- ✓ Support new employees and promote behaviors that embody the values of Żabka Polska from the first day of their employment.

► What kind of behavior do we find unacceptable?

- ✗ Do not behave in a way that diminishes personal dignity or creates a hostile work environment.
- ✗ Any behavior that could be perceived as harassment or bullying is forbidden.
- ✗ Do not spread slanderous and defamatory rumors and gossip.



► Definitions

Discrimination - a situation in which a person is treated less favorably than others in a comparable situation due to such diversity factors as, e.g., gender, race, ethnic origin, nationality, religion, denomination, world view, disability, age or sexual orientation.

Harassment - actions or behavior relating to or targeted at an employee consisting of persistent and long-lasting harassment or intimidation of an employee, causing them to underestimate their suitability for the job, as well as resulting in or aimed at humiliating or ridiculing an employee, isolating them or eliminating them from a work team (Polish Labor Code Art. 943 (2)).

We protect the safety and health of our employees.

We act responsibly in the workplace, keeping in mind our collective health and safety. We understand the importance of safety in the workplace - accidents may adversely affect the lives of those injured and their families, disrupt the organization's business, and damage the company's reputation. All employees of Żabka Polska have a right to a healthy and safe workplace, which we also influence with our daily decisions. Each of us should exercise due care when performing our duties to ensure safe working conditions for all employees.

► What attitudes do we support?

- ✓ Follow the OHS rules applicable at individual work stations.
- ✓ Take all reasonable precautions to maintain a safe workplace.



- ✓ Make sure you do not endanger yourself and others with your actions.
- ✓ Stop a task immediately if you feel it is unsafe for you or others. Report your concerns to designated people.
- ✓ Read workplace safety procedures.
- ✓ Notify your supervisor of any behavior, event or object that may endanger safety in the workplace.
- ✓ Respond to abnormal and undesirable situations that may pose a threat to the health and safety of Żabka Polska employees, our business partners or customers.

► What kind of behavior do we find unacceptable?

- ✗ Do not undertake or agree to engage in any activity if you are not competent or trained to do it safely.
- ✗ Do not ignore behavior that may put us all at risk in the workplace.
- ✗ Do not leave others without help. If they have suffered an accident, react.

We promote professional and personal growth.

Willingness to grow at work is a sign of ambition and openness, which are the values followed by Żabka Polska. We promote professional and personal development. For this purpose, we use the opportunities offered by Żabka Polska, both inside and outside the organization, by taking part in training, workshops and various projects. We are eager to collaborate with members of other departments and project teams, to share knowledge, and to incorporate evaluations of our work into further actions and decisions. At Żabka Polska every person has a right to grow professionally and to receive honest and fair feedback about their work. We all try to raise our qualifications and skills. We are open to feedback because we treat it as a tool and motivation to grow.



► What attitudes do we support?

- ✓ Actively seek professional development opportunities within the organization.
- ✓ Get involved in new projects and initiatives, which will allow you to gain new experiences, expand your knowledge and build a network of contacts.
- ✓ Share the acquired knowledge with your colleagues.

► What kind of behavior do we find unacceptable?

- ✓ Take advantage of our training offer and other development opportunities, encourage others to do so.
- ✓ Treat feedback on your work as a tool for further professional development.
- ✗ Do not provide feedback in a degrading manner.
- ✗ Do not block the development opportunities of your colleagues.

We use the company resources in a responsible and conscious manner.

The company's resources are its capital; therefore, we use them consciously and responsibly. They support our work and the effective implementation of all business activities of the organization. We perform our daily duties with the aim of protecting those resources against loss, damage, theft, misuse, waste or unauthorized disclosure. Our intellectual, material and technological resources are the foundation of development and success of Żabka Polska. All of us must protect them. We must be aware that their misuse entails the risk of financial loss, reputational damage or limited possibility of further development.

► What attitudes do we support?



Use the company's resources as intended at your position.



Report cases of improper use or theft of the company's resources.



Learn and let others know how important it is to take care of the resources owned by Żabka Polska. Inform others about the risks for an employee and for the Company, resulting, for example, from theft of intellectual property or technology.

► What kind of behavior do we find unacceptable?



Do not take out tangible resources belonging to Żabka Polska without authorization (e.g., commercial gadgets or products), even if they are a part of damaged transport or are no longer used in current communication. Do not use them for personal purposes.



✗ Do not share intellectual resources of Żabka Polska with third parties.

✗ Do not dispose of the company's financial assets without the approval of an authorized officer.





► Definitions

Tangible and intangible (including technological and intellectual) resources - resources used by the company in achieving its goals and obligations; everything that is owned or controlled by the business, regardless of whether created within the organization or acquired.

II. We are Żabka Polska



We protect the brand and good name of Żabka Polska.

We are ambassadors of Żabka Polska and we protect its reputation. Credibility is the basis for building partnerships with employees and businesses. Maintaining credibility lets us protect the good name of Żabka Polska and its employees. Our brand is our value, which makes us recognizable on the market.

It is our capital of trust, thanks to which we can develop together. Protecting the brand and the company's reputation is the responsibility of all of us.



► What attitudes do we support?

✓ Always act in compliance with the law and in the best interest of Żabka Polska.

✓ Verify whether partnerships with other entities will not be detrimental to our reputation.

✓ Pay attention when someone says unfavorable or untrue things about Żabka Polska.

✓ Remember about our values and expected attitudes, demonstrate our values by behaving appropriately in a professional environment.

✓ If you notice any activities that are clearly in violation of our standards, or if you have received information that the diet and other services provided do not meet the guaranteed quality standards, or if any service provided by Żabka Polska is perceived as low quality, report it.

► **What kind of behavior do we find unacceptable?**

✗ Do not speak on behalf of Żabka Polska without authorization, especially in emergency situations (information on authorization is provided by the Press Office).

✗ Do not mix private beliefs with those represented by Żabka Polska.

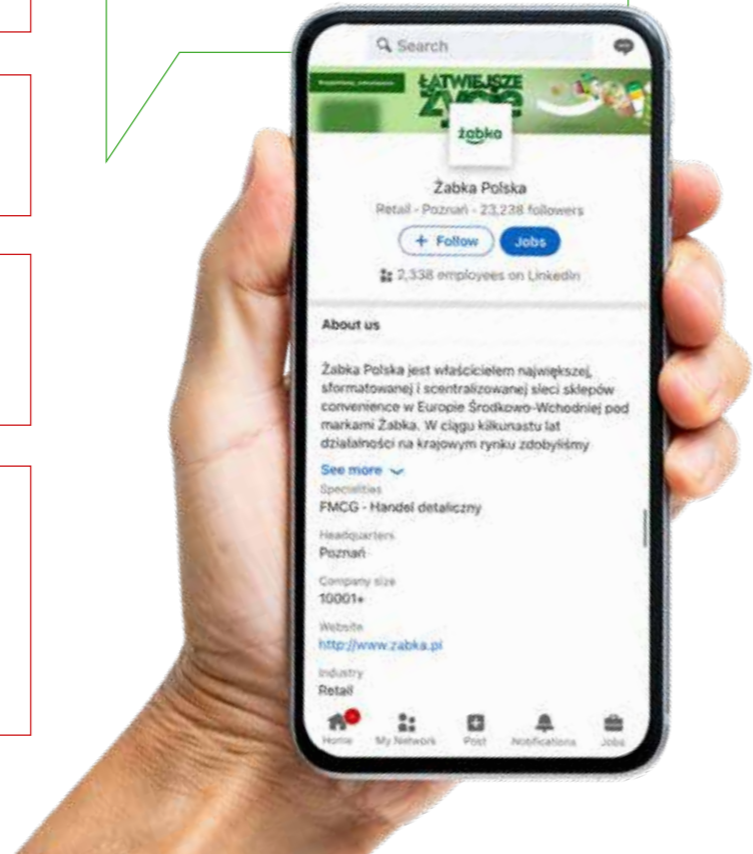
✗ Do not use the brand, your position or work equipment for private purposes.

✗ Do not say anything that could be detrimental to the reputation of Żabka Polska in private situations. You may not only damage our good name but also violate the personal data protection principles.

Learn more!

Any requests for comments to the media must be addressed to:

biuro.prasowe@zabka.pl



We foster a culture of trust among our customers.

We are obligated to provide our customers with safe and high-quality products and services. We treat our responsibility towards our customers seriously. To gain and maintain their trust, we make sure that the information and messages provided are verified and credible. We try to understand our customers' needs and take them into account in our decisions and business activities. Our high internal standards concerning our products and services, as well as setting ambitious expectations for our business partners translate into fostering a culture of trust among Żabka Polska customers.

► **What attitudes do we support?**

✓ If your work affects, directly or indirectly, the safety and quality of products or services, you should learn and follow relevant external and internal regulations.

✓ Make sure our business partners comply with procedures and policies governing ethics, safety and quality of products and services adopted by Żabka Polska. Work with your business partners and ensure they understand our expectations and their relevance, as well as their impact on customer trust.

✓ If you see that anyone, including a representative of a business partner, a team member or an officer, violates our standards, don't ignore it - react.

► **What kind of behavior do we find unacceptable?**

✗ Selection of suppliers without following the official procedures adopted by Żabka Polska.

✗ Compromise when it comes to safety and quality of products and services.

✗ Concealment of information that may adversely affect the product, service or health of our customers.

Learn more:

- **Business partners verification procedure**
- **Code of Conduct for Business Partners of Żabka Polska**



We protect personal data, confidential information and intellectual property we are entrusted with.

We understand the importance of ensuring safety of data, confidential information and intellectual property and we pay particular attention to it. We protect the intellectual property of Żabka Polska while respecting the intellectual property of others. We understand how important it is to ensure the security and ethical use of information and data shared with us by our customers and business partners. We are aware that our intellectual property constitutes our competitive advantage, therefore we expect everyone to pay special attention to its protection.



► What attitudes do we support?

✓ Maintain security of stored personal data and confidential information. Learn and follow procedures and policies governing storage, processing and disclosure of data applicable at Żabka Polska.

✓ If anyone asks you to provide them with data you have access to, make sure you may disclose such data. Answer the following questions: Are these data confidential? Does this person have the appropriate authorizations and do they understand how they can/cannot use such data?

✓ Report all data security related events, especially any breaches of GDPR regulations.

✓ If you suspect that another company violated the intellectual property of Żabka Polska, contact our legal team.

► **What kind of behavior do we find unacceptable?**

- ✘ Do not disclose data for processing to unauthorized persons.
- ✘ Do not ignore it when you witness any disclosure of personal data to unauthorized persons. Even if this was incidental - react.
- ✘ Do not share the intellectual property of Żabka Polska with others.
- ✘ When creating anything for Żabka Polska, do not copy other people's ideas. Comply with copyright and license conditions.
- ✘ Do not use professional information (in any form) for private purposes.

► **Definitions**

Confidential information - any information provided in the course of negotiations or performance of a contract that has not been publicly disclosed or is not generally available under applicable law, regardless of how it is provided (orally, in writing, via e-mail correspondence, electronic media or otherwise). In particular, it is information falling within the scope of the provisions of the Personal Data Protection Act, business information, including commercial, technical or organizational information about business owners or their affiliates.

Personal data - any information relating to an identified or identifiable living natural person. Individual information which, when combined, can lead to the identification of a person, also constitutes personal data.

Intellectual property - a set of rights relating to copyright and related rights, as well as industrial property rights and know how, including in particular musical, graphic or written works, trademarks, inventions, patents, industrial designs or computer software.

| We ensure fair competition.

We compete for customers and market position fairly and legally, based on the quality of our products and services. We understand that compliance with the principles of fair competition is inseparable from the values of Żabka Polska, which constitute the basis of everything we do. Respect for the principles of free and fair competition, including antitrust laws, builds trust among our customers and business partners, and is the basis for a thriving market.

► What attitudes do we support?

✓ If you gather information on our competition, do it fairly.

✓ Always reject information that you suspect has been obtained improperly.

► What kind of behavior do we find unacceptable?

✗ Do not use a competitor's trade secret material, regardless of how you came into possession of it.

✗ Never encourage anyone to give you information that they should keep confidential.

✗ When engaging in business activities, do not engage in practices that are unfair, manipulative or misleading.

✗ In discussions with competitors, avoid topics that might lead, even unintentionally, to a violation of competition laws, particularly illegal agreements on prices, margins, terms of sale, etc.



We are committed to transparent communication with the market and our stakeholders.

When promoting Żabka Polska we are guided by reliability and truthfulness of information. We understand the impact of information provided by Żabka Polska on our customers, business partners and other stakeholders. This is why we care about the credibility of our communication and, wherever possible, rely on dialog with partners. Based on our values of openness and credibility, we want to strengthen our relationships with business partners and customers. Their trust is the source of the strength of the Żabka Polska brand.



► What attitudes do we support?

- ✓ If you prepare information about the activities of Żabka Polska, do so with integrity, keeping in mind our values of openness and credibility. Check data sources, verify their validity.
- ✓ Ensure financial statements are accurate, complete, correct and consistent.

- ✓ Make every effort to ensure that marketing messages or external communications are clear, honest, fair and accurate.
- ✓ All statements made in relation to advertised products and services must be truthful.

- ✓ Read and follow the rules of the Code of Ethics in Advertising published by the Advertising Board.
- ✓ Images used in our advertisements must be compliant with the content and reflect the advertised product.
- ✓ Follow Żabka Polska's established path for accepting marketing materials.



► What kind of behavior do we find unacceptable?

- ✘ Do not use images that do not depict the advertised product or depict it in a way that may be misleading, e.g., using a 500 ml product image to advertise a 330 ml product.
- ✘ Do not include in advertisements any information that is untrue or that could lead to accusing Żabka Polska of violating advertising and marketing laws or acting in violation of competition and consumer protection principles.
- ✘ Do not publish any information about Żabka Polska without obtaining the relevant approvals.

Learn more:

► [Code of Ethics in Advertising](#)



III. Our business partners



We build our relations with franchisees based on the principles of ethics and good collaboration.

We are aware of the importance of our relations with franchisees. We care for transparency, respect and honesty in direct and indirect relations. We reflect this both at the level of prepared materials, contractual provisions, as well as during talks and negotiations. Cooperation with franchisees is one of the key areas of our organization. While making business decisions, we try to satisfy their needs. Relations with franchisees are the source of our success, so taking care of them is the responsibility of all of us.

► What attitudes do we support?

If you are responsible for cooperation with franchisees:

- ✓ Make sure the right candidates are recruited, liaise with the Franchisee Board and support franchisees in streamlining the processes related to running the store.

✓ In communication with franchisees show them that they are an equal partner for Żabka Polska and that we are working for common success.
- ✓ Always treat franchisees fairly and with due respect.

✓ If you notice or are made aware of unacceptable behavior of store employees, report it to the appropriate franchisee.
- ✓ Read the Code of Conduct for Franchisees and remind them of this document in your direct communication. Offer support if you learn that a franchisee is experiencing challenges that pose a risk of non-compliance with the Code.



► What kind of behavior do we find unacceptable?

- ✗ Do not use the position of Żabka Polska in your relations with franchisees.

✗ Do not speak about franchisees in a disrespectful manner.

Learn more!

Contact to a representative of the Franchisee Board:

poradzimy@zabka.pl



We take part in the creation of a responsible and safe value chain.

Our relationship with our business partners is guided by our values, the principles set out in this Code, the Code of Conduct for Business Partners and the priorities set forth in our Responsibility Strategy. We understand that the role of Żabka Polska is to promote responsibility in a supply chain and support our business partners in developing and understanding our priorities. The value chain built on high ethical standards and the idea of sustainable development is the basis for the continuous strengthening of Żabka Polska's market position. We are convinced that through dialog with business partners we can create new quality for our customers.



► What attitudes do we support?

If you are responsible for relations with business partners:

- ✓ Select business partners based on our standards, requirements for suppliers and internal procedures of Żabka Polska.
- ✓ Read the Code of Conduct for Business Partners of Żabka Polska.
- ✓ When talking to business partners, emphasize the importance of high ethical standards and quality of the products and services provided.
- ✓ Regularly monitor business partners with whom we already work. If you notice that a business partner no longer meets our requirements, talk to them about it before you decide to end the cooperation.

► What kind of behavior do we find unacceptable?

- ✗ Do not contract with entities that do not meet our standards within the scope described in the applicable procedures.
- ✗ Do not skip any procedures related to responsibility in the value chain. Doing so may create safety risks for our customers as well as reputational risks.

Learn more:

- [Business partners verification procedure](#)
- [Code of Conduct for Business Partners of Żabka Polska](#)
- [Requirements of Żabka Polska for own brand suppliers](#)
- [Requirements for branded manufacturers](#)





► Definitions

Supply chain - the process conducted from the moment an order is placed by Żabka Polska to the moment the product or service is delivered and the transaction is settled. Therefore, the supply chain includes the planning, execution and control of all activities related to the flow of materials and information: from the acquisition of raw materials, through a series of processing, to the final delivery of a product or service to the customer. The supply chain is also the cooperation and interaction of all entities involved in all stages of the process of delivering a product or service.

Business partner - a natural or legal person having a business relation with Żabka Polska, except for its Employees, Partners and Franchisees. Business partners are: (i) customers, (ii) suppliers of goods or services, (iii) other natural or legal persons or unincorporated entities, with whom Żabka Polska enters into business relations by concluding contracts or other agreements.

| We avoid conflicts of interest.

We are open to building and strengthening relationships with various business partners and stakeholders but we always act in the best interest of Żabka Polska and avoid situations that might give rise to the appearance of a conflict of interest. In business relations, we avoid situations where our personal interests might conflict with those of Żabka Polska. Full transparency of relations helps Żabka Polska avoid the risk of losing its credibility.

► What attitudes do we support?

✓ If you observe or suspect a potential conflict for yourself or your colleagues, regardless of the position held, inform your superior and the compliance team of the potential conflict of interest.

✓ When in doubt as to whether a particular relationship might lead to a conflict of interest, contact a representative of the compliance team.

✓ Follow the Conflict of Interest Management Policy.

✓ Be cautious about providing information to family members or friends who work for or do business with competitors.

✓ When making decisions, always act in the business interest of Żabka Polska.

► What kind of behavior do we find unacceptable?

✗ Do not take part in negotiations, contracting, selection of a business partner, etc. on behalf of Żabka Polska if the parties involved are family members, friends or other individuals with whom you have a relationship.



► Definitions

Conflict of interest - a situation in which an Employee's or a Partner's personal or financial interest directly or indirectly jeopardizes or may jeopardize his or her impartiality or independence in performing his or her official duties, making decisions or carrying out other tasks assigned by Żabka Polska.

Learn more:

- Compliance 2021 training
- Conflict of Interest Management Procedure

We counteract corruption and other irregularities in business relations.

We work with integrity and do not accept or give any benefits in exchange for support in the implementation of our own or a third party's business objective. There is only one way to win in business - by acting ethically. We put business goals of Żabka Polska ahead of our own benefits. We do not rely on or tolerate unethical or illegal business practices. Such actions harm our company and the communities in which we operate. They may lead to the lack of trust in Żabka Polska on the part of our customers, business partners or authorities controlling our work.

► What attitudes do we support?

- ✓ Verify our business partners. If you observe any activities that appear to be corruption or bribery, immediately report your suspicions to your superior or the compliance team.
- ✓ Always follow procedures and obtain appropriate approvals for payments to government officials, license issuers, etc.
- ✓ Comply with the Gifts and Samples Policy. Remember that a gift cannot be in the form of cash or cash equivalents (e.g., vouchers, loans, shares and other securities).



► What kind of behavior do we find unacceptable?

- ✗ Do not give or promise, and do not accept or solicit, any financial or personal benefits.

Learn more:



- ▶ Compliance 2021 training
- ▶ Gifts and Samples Policy.
- ▶ Procedure applying to the public sector

▶ Definitions

Corruption - giving, accepting, promising or soliciting financial or personal benefits in exchange for an abuse of power, a failure to perform a duty or any other use of one's position or function that is unlawful or contrary to the principles of community life - both in relations with Business Partners and representatives of the Public Sector.

Accepting bribes (in a public sector) - accepting by a person performing a public function financial or personal benefits or their promise in connection with the performance of such function, as well as soliciting such benefits or making the performance of official duties dependent on receiving such benefits.

Offering bribes (in a public sector) - giving or promising financial or personal benefits to a person performing a public function in connection with the performance of that function.

Accepting bribes in a private sector (accepting bribes by a manager) - soliciting or accepting financial or personal benefits or their promise by a person holding a managerial position in a company or a person related to the company based on the employment contract, contract of mandate, contract for specific work, in exchange for an abuse of power or a failure to perform a duty, which may cause a

financial loss to the company or constitute an act of unfair competition or which is an unacceptable act of favoritism shown to the purchaser or recipient of goods, services or performance.

Offering bribes in a private sector (offering bribes by a manager) - giving or promising financial or personal benefits to a person holding a managerial position in a company or a person related to the company based on the employment contract, contract of mandate, contract for specific work, in exchange for an abuse of power or a failure to perform a duty, which may cause a financial loss to the company or constitute an act of unfair competition or which is an unacceptable act of favoritism shown to the purchaser or recipient of goods, services or performance.

IV.

The environment we operate in



We care about the natural environment.

We are aware of the impact Żabka Polska has on the natural environment and we try to minimize it. We actively engage in pro-environmental initiatives and seek and find ways to reduce the impact of our business on the planet. The condition of the planet for future generations depends on us and, in the business context, on those market players who take responsibility for their negative environmental impact along the entire value chain. This is why Żabka Polska is conscious and ambitious in its pro-environmental actions, including climate protection, involving its employees, business partners, customers and franchisees.

► What attitudes do we support?

- ✓ Pay attention to how your daily behaviors and decisions can affect the environment and, if possible, minimize that impact (e.g., by saving water, electricity, sorting waste, etc.).

✓ In your business relationships, emphasize the importance of environmental issues (especially climate) to Żabka Polska and actively seek solutions supporting strategic objectives related to the pursuit of climate neutrality and fully circular economy.
- ✓ Point it out to others if you see that they act or encourage others to act in a way adversely affecting the environment.

► What kind of behavior do we find unacceptable?

- ✗ An attitude that demonstrates disregard for environmental issues, both in relations with employees as well as business partners and franchisees.

✗ We also avoid greenwashing, i.e., actions that create a false impression that our company and products are environmentally friendly.

Learn more:

► „Conveniently and responsibly” report





We support local communities and take part in social initiatives.

We understand that thanks to our employees, partners, business partners and franchisees Żabka Polska has strong ties with local communities and, therefore, knows and understands their challenges and needs. Together with our partners, we reach out to them and support them in their daily struggles by making prudent business decisions, engaging in social and volunteer activities, and other forms of support addressed to local communities. We want to inspire change and sustainable development.

Żabka Polska is a team with unique competence and experience. We want to use them not only to build our competitive advantage, but also to inspire business owners and local communities. We are open to the needs of our immediate environment and look at how we can positively influence it and contribute to its sustainable development.



► **What attitudes do we support?**

✓ Use your competence, knowledge and skills to contribute to social change at the local level.

✓ If you have an idea and a desire to support aid efforts or an organization, volunteer your initiative.

✓ Share the positive experience of volunteering and encourage others to do the same.

► **What kind of behavior do we find unacceptable?**

✗ Do not provide any kind of support to organizations or efforts that could harm Żabka Polska's reputation.

✗ Do not undertake activities for NGOs on behalf of Żabka Polska without appropriate approvals.

✗ Do not make any sponsorship commitments, follow the Donation and Sponsorship Procedure.

✗ Do not use your volunteering work for private purposes. This is a violation of our ethical principles. Such actions can have serious consequences for our reputation and infringe our policy on avoiding conflicts of interest.



Learn more:

► **Donation and Sponsorship Procedure.**

► **Definitions**

Sponsorship - a pecuniary gain, in the form of money or transferred goods, granted by Żabka Polska (a sponsoring entity) to a natural or legal person or another entity such as an unincorporated entity, a non-governmental organization, an institution, etc. (a sponsored entity) in order to encourage it to perform the activities specified in the sponsorship agreement.

Donation - a pecuniary or in-kind benefit granted and provided free of charge by Żabka Polska to legal persons, natural persons or other entities (e.g., unincorporated entities, a non-governmental organization, an institution, etc.), excluding Gifts within the meaning of the Gifts and Samples Procedure.



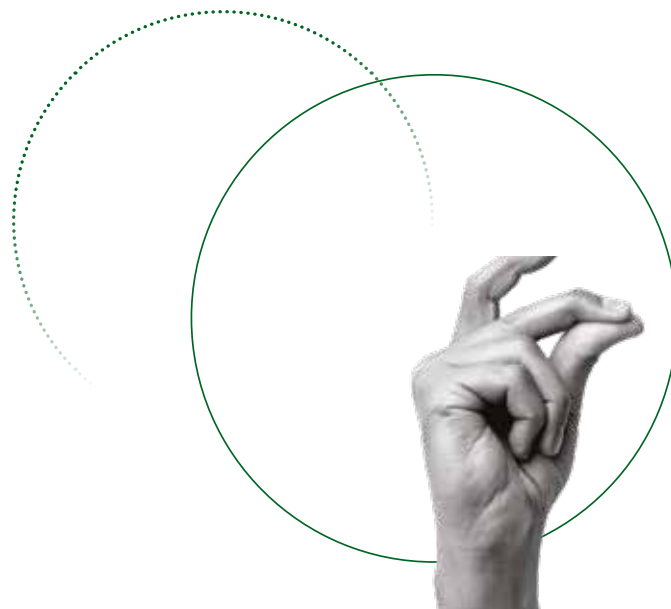
DO YOU HAVE ANY QUESTIONS OR DOUBTS CONCERNING THE CODE?

Contact us: **Compliance@zabka.pl**

WE REMIND YOU HOW TO REPORT A VIOLATION OF THE CODE:

1. By contacting a representative of management.
2. In writing by sending a traditional letter to:
"Żabka Polska Sp. z o.o. ul. Stanisława Matyi 8, 61-586 Poznań"
with a note reading "Whistleblowing".
3. By using the Whistle B Platform:
<https://report.whistleb.com/pl/zabka>
or calling a dedicated phone number: **00800-1124498**.

żabka



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