



Code of Conduct for Business Partners of Żabka Polska



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Foreword

The mission of Żabka Polska is to create value by making people's lives easier. It is inseparably linked with sustainable development, achieved through ethical cooperation with our partners with whom we share common values and beliefs. We believe that our success lies not only in the things we do together but also in the way we do them.

In 2021 we adopted the Żabka Polska Responsibility Strategy for 2021-2025, which we then fully integrated with our business strategy. This means that all our initiatives, investments and partnerships must be assessed in terms of their impact on the environment, and our stakeholders, and each of our decisions must be coherent not only with the law, but also with our ethical principles and sustainability goals.

Because our partners are key actors in the implementation of our mission it is imperative that they are fully committed to building a responsible

and ethical supply chain based on the same values, principles and attitudes.

When we created the Code of Conduct for Business Partners of Żabka Polska we set ambitious goals for ourselves and our partners, and we are aware that the only way to achieve them is through close cooperation. We expect our partners to make sure that our principles and standards are observed in their and their subcontractors' businesses.

We believe this to be the only way our business can become more than just providing products and services to our customers, and can make a real difference and contribute to building responsible business and creating value.

Values of Żabka Polska

We understand the complexity of our impact on the environment and take full **responsibility** for it.

We remain **open** to dialogue and joint search for innovativeness, and we are ready to leave the beaten track. We maintain our **credibility** by creating transparency in the workplace. While being driven by **ambition**, we consistently achieve our goals and boldly look to the future. This is why the Responsibility Strategy of Żabka Polska is fully integrated with the company's business strategy. It not only defines the directions of our development, but also sets the goals and commitments for the entire value chain of the company and its business partners.

This Code constitutes a reflection of Żabka Polska's philosophy and its approach to building business relations based on responsibility and partnership.



RESPONSIBILITY



OPENNESS



CREDIBILITY



AMBITION



What is the Code?

The Code of Conduct for Business Partners of Żabka Polska is a set of rules that shape the company's relationships with its surrounding community. In addition to laying grounds for our cooperation and setting standards, it defines ambitions and directions of development that Żabka Polska intends to follow together with its business partners. The purpose of the Code is to build a sustainable value chain based on partnership and mutual responsibility.

► Who is this Code for?

The Code must be observed by all Żabka Polska business partners. We believe that they will follow the norms and standards outlined in the Code also in relations with their business partners.

Please note that some of the provisions of the Code apply to selected sectors or partners and only those sectors and partners should find them mandatory. This issue is regulated by the relevant provisions of bilateral agreements.

► Is the Code mandatory?

Each area of cooperation with business partners regulated by this Code has been divided into two sections differentiated by the level of advancement of the standards concerned.

The "our standards" section sets forth fundamental norms, to which a business partner agrees upon signing of the Code or on the date specified by mutual agreement of the parties (in specific cases). In case a business partner fails to observe said norms upon establishing cooperation or to adapt to them within the specified period cooperation will not be established.

The "our ambitions" section sets forth the company's aspirations and the standards that will take effect from 2025, to which both Żabka Polska and its business partners must adhere. These goals are ambitious, yet we believe that by challenging ourselves, we can grow together. Starting from 2025 the norms listed in this section will become "our standards", and thus, mandatory.



The "good practice" section constitutes a set of inspirations that will help us set the directions of change. Their implementation, however, will not be mandatory.

We reserve the right to revise the provisions of the Code and change the effective dates of particular norms.

► Verification of compliance with the Code

Because the credibility of our business partners affects the credibility of Żabka Polska we reserve the right to verify whether our business partners comply with the norms. Said verification may be carried out by Żabka Polska directly or by entities acting on its behalf in line with BSCI, SAI SA8000 and SMETA standards.

► Non-compliance with the Code

Any breach of the Code's provisions constitutes an immediate threat to the company's credibility. It can also have legal or financial consequences and affect safety. This is why we do not tolerate violations or non-compliance with the Code at Żabka Polska.

Every agreement with a business partner will set forth the norms and standards that Żabka Polska expects to be complied with. Żabka's business partner is required to report any breaches or irregularities arising from the agreements concluded with Żabka Polska.

Each report will be dealt with as quickly as possible with due care and objectivity. A person reporting a breach of the Code will be guaranteed full anonymity.

► Designation of standards and the beginning of their validity:

OUR STANDARDS

Basic - to be met as of the date of the Code's acceptance or on a mutually agreed compliance date, but no later than 12 months from the start of the affiliation.

OUR AMBITIONS

Advanced - to be implemented by 2025.

GOOD PRACTICE

Examples of inspirations and solutions that are worth considering but not mandatory.



► How to report violations of the Code?

Any violations of the Code may be reported in writing by traditional mail addressed to: "Żabka Polska Sp. z o.o., 8 Stanisława Matyi Street, 61-586 Poznań", with a note reading "Whistleblowing". If the report concerns 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.

The Business Partner may also report violations using the Whistle B Platform by [completing a form](#), which is accessible 24/7 from any device with an Internet connection. The whistleblower will remain fully anonymous, unless it is their decision to disclose 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.

The Company does not perform any activities aimed at establishing the identity of the person making an anonymous report.



Legal grounds, guaranteed respect for human rights and international declarations on sustainable development

Żabka Polska will establish cooperation with a business partner who guarantees that their business complies with all applicable international and national laws, as well as any guidelines and rules of sustainability set by the international community. They include, among others:

- **Universal Declaration of Human Rights,**
- **Fundamental Convention of the International Labour Organization,**
- **Paris agreement,**
- **Trade rules,**
- **Anti-trust laws,**
- **Boycott regulations,**
- **Anti-corruption laws,**
- **UN Global Compact,**
- **Sustainable Development Goals (SDG) under the 2030 UN Agenda.**

At Żabka Polska we find the inalienable nature and the absolute necessity of respecting human rights indisputable. The provisions of this Code are based on this belief and guarantee compliance with 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 made a clear declaration that it does not agree to any violations of personal dignity.

SUSTAINABLE DEVELOPMENT GOALS



Żabka Polska expects that the above goals will be respected not only by its employees but also its business partners in order to ensure that they are complied with throughout the entire value chain.

► Definitions

For the purposes of this Code, the below phrases shall have the following meanings:

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 the Company.

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.

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 procedures, to the final delivery of a product or service to the customer. In addition, the supply chain entails the cooperation and interaction of all actors involved in all stages of the product or service delivery process.

Business partner: a natural or legal person having a business relation with Żabka Polska, except for their 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.

Subcontractor: every entity providing work and services to its contractor.

Employee: every person employed by Żabka Polska under an employment relationship, regardless of the type of employment contract and working time.

Scope 1 (according to GHG protocol): GHG emissions from natural gas consumption, vehicle fuel consumption, emissions from refrigerant leakage in logistics centers, and diesel fuel consumption.

Scope 2 (according to GHG protocol): GHG emissions resulting from the organization's consumption of electricity and heat, per the definition of the operational control according to the GHG Protocol, e.g., offices, logistics centers, production plants.

Scope 3 (according to GHG protocol): GHG emissions from operations related to Żabka's business activities, as defined by GHG Protocol, e.g., stores run by Franchisees.

Summary of our standards

I. Ethics and management

1.1 Organizational management and risk management

Managing the organization in accordance with the law

The Business Partner is required to conduct all business interactions and activities within the scope defined by their agreement with Żabka Polska honestly and in a manner compliant with the law. In their relationship with Żabka Polska, the Business Partner must communicate openly, honestly and fairly and report any irregularities related to the matters covered by this Code.

Risk management

The Business Partner manages, documents (e.g., in the form of a SWOT analysis) and identifies basic risks (e.g., accidents, job risks) that could impact the organization and its business continuity.

1.2 Ethics

Conflict of interest and gifts

The Business Partner is required to prevent the occurrence of a conflict of interest. Actual or potential conflicts of interest related to the activity of the Business Partner should be disclosed promptly to Żabka Polska using the irregularities reporting channel.

The Business Partner should not provide gifts or offer entertainment to Żabka Polska employees at any time during the request for proposal procedure or a business partner selection process.

The Business Partner is required to observe any other internal procedures of Żabka Polska related to the provision of gifts and entertainment during their relationship with Żabka Polska.

Rules of fair competition

The Business Partner agrees to conduct their activities in accordance with the rules of free and fair competition.

The Business Partner agrees to comply with applicable antitrust and competition laws.

The Business Partner agrees to keep confidential any information pertaining to Żabka Polska or/and its business partners (including trade secrets) that has not previously been made public.

Fighting corruption

The Business Partner does not practice or tolerate corruption, bribery, extortion or embezzlement. All confirmed cases of corruption must be investigated and documented, and remedial measures implemented.

Protection of data, confidential information and intellectual property

The Business Partner is required to respect intellectual property rights, protect confidential data and ensure compliance with privacy rules and regulations.

The Business Partner is required to respect and protect the intellectual property rights of all parties by using only software and information technology that have been legally acquired and licensed.

The Business Partner uses software, hardware, and content only in compliance with the associated licenses or terms of use.

The Business Partner is required to ensure that the personal data of employees and all stakeholders are protected.

The Company must be notified of any irregularities and incidents related to data provided by Żabka Polska.

The Business Partner is required to ensure that data and information pertaining to affiliation with Żabka Polska are protected.

Żabka Polska must be notified of any irregularities and incidents.

Ethics management

The Business Partner has a document that defines key norms and procedures, ethical employee attitudes and irregularity reporting procedures. If no such document exists, the Business Partner will adopt and follow the Code of Conduct and Ethics for Żabka Polska Employees.

1.3 Code implementation and involvement of subcontractors

Management approach

The Business Partner is required to conduct regular internal audits of their compliance with the requirements described in the "Our Standards" section of the Code of Conduct for Business Partners of Żabka Polska. The results of an internal audit must be available to Żabka Polska.

The Business Partner is required to appoint a person responsible for the implementation of this Code in their organization.

Subcontractors

The Business Partner is required to ensure that their subcontractors who take part in developing a product or a service for Żabka Polska read and observe this Code. The Business Partner is required to immediately notify Żabka Polska of any infringement of the Code.

Complaints procedure

The Business Partner must enable employees to report violations of the law and the Code.

The Business Partner is required to provide employees with an independent external system for making anonymous complaints/anonymous reporting of violations and for providing feedback.

The Business Partner must ensure that the whistleblower is protected against retaliation.

The Business Partner is required to conduct investigative proceedings and implement corrective actions where appropriate.

II. Working conditions

2.1 Respect and honesty in the workplace

Protection of human rights

The Business Partner must comply with applicable national laws as well as international laws and regulations on human rights in all of their business locations. All confirmed human rights violations must be investigated and documented, and remedial measures implemented.

The Business Partner will not tolerate any signs of physical, psychological or sexual violence, harassment of employees, or attempts to intimidate them nor any manifestations of inhuman treatment of employees.

Non-discrimination and equal treatment

The Business Partner is required to treat all employees and partners equally and not to exclude them from the community on the basis of gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation, sexual orientation, parenthood, hereditary disease, social status, or any other factor unrelated to individual's ability to perform the work required in a given position.

The Business Partner must ensure that their employees are not in any way harassed or discriminated against.

The Business Partner must adopt objective and non-discriminatory criteria in all employment decisions, including hiring processes, payment terms, access to social benefits, access to training, and career development opportunities for employees. All confirmed cases of discrimination and/or harassment in the workplace must be investigated and documented, and remedial measures implemented.

Prohibition of child labor

The Business Partner is required to comply with national laws and international standards for the protection of the rights of children and minors. As per Convention no. 138 of the International Labour Organization the minimum age of the Business Partner's employee shall not be less than the age of completion of compulsory schooling or the minimum age for admission to employment, whichever is more restrictive, and in any case, it shall not be less than 15 years. This also applies to training and internship. All confirmed cases of child labor in the workplace must be investigated and documented, and remedial measures implemented.

Prohibition of forced labor

The Business Partner, including an employment agency, agency's subcontractor and recruitment agency, is prohibited from using forced labor, human trafficking, pimping and prison labor, except for rehabilitation programs paid at or above the national minimum wage. All confirmed cases of forced labor, prison labor, human trafficking and/or pimping in the workplace must be investigated and documented, and remedial measures implemented.

The Business Partner may not keep employee identification documents.

2.2 Wages and working time

Wages

The Business Partner is required to remunerate employees by the date set forth in their contract or at least once a month at no less than the minimum wage in a given country.

The Business Partner is required to adopt and implement work regulations containing the rules on wages and reduction in wages in the event of improper performance of job duties or other workplace violations.

The Business Partner is required to pay employees statutory social security benefits and other benefits due to them under national laws (e.g., insurance benefits, overtime pay, and paid annual leave).

Working time and days off work

The Business Partner must ensure that the basic working time of their employees does not exceed 48 hours per week (in accordance with International Labour Organization standards) or the maximum level set by applicable legal requirements in the respective country.

The Business Partner is required to comply with national laws on terms and limits of overtime in force in the respective country. Overtime rules should be included in the work regulations.

The Business Partner is required to ensure that all employees whose daily working time exceeds 6 hours take a break as determined by the applicable legal requirements in their country.

The Business Partner monitors, at least annually, and keeps a record of the working time of their employees.

The Business Partner respects their employees' right to sick leave and other types of leave, including maternity and parental leave, and respects the rights of pregnant women during pregnancy as defined by the laws of the respective country.

The Business Partner guarantees that each employee has at least one day off in a seven-day work week.

Employment stability and social security

When hiring an employee, the Business Partner must adhere to all requirements specified in local labor laws.

The Business Partner must provide employees with an employment contract written in a language the employee understands. The contract must be signed no later than on the first day of work, after all documents necessary to commence work, such as medical examinations, have been obtained. Employees receive a copy of the signed contract.

The Business Partner must ensure that each employee has the right to freely terminate the employment relationship after giving the appropriate advance notice. In the event of dismissal, the Business Partner must provide the employee with a notice period as specified by the national laws.

2.3 Freedom of association

The Business Partner agrees to respect the rights of employees to associate as they wish, to form trade unions and to bargain collectively in accordance with local legal requirements and obligations. The Business Partner may not intimidate, discriminate against or harass employees because of their union activity.

2.4 Occupational health and safety

The Business Partner is required to ensure the health and safety of employees in the workplace and to take action in accordance with the laws applicable in the respective country to minimize the risks associated with the work environment, particularly those associated with workplace accidents.

The Business Partner provides employees, free of charge, with equipment necessary to perform work. No deductions will be made for cleaning and/or maintenance of equipment and work clothing.

The Business Partner will not create situations that would pose a serious threat to employees' health and safety at work.

The Business Partner must provide employees with written information on occupational risks and certify that the employees have become familiar with this information. The Business Partner is also required to provide all possible forms of risk prevention and minimization.

The Business Partner provides employees with regular OHS training in line with local law. The Business Partner monitors and records, on an ongoing basis, occupational health and safety related incidents (e.g., by keeping records of accidents and near misses as well as OHS training for employees). The Business Partner is required to provide employees with mandatory social security insurance.

In case an employee suffers an accident at work or on their way to and from work, the Business Partner will ensure that the employee may seek compensation from the competent public administration authority.

The Business Partner is required to have procedures in place to monitor the impact of working conditions on employees, identify health and safety risks, including mental health risks, occupational disease risks resulting from exposure to physical, chemical, biological, and mechanical factors, etc., and take preventive action to protect employees' health.

III. Environmental protection

3.1 Environmental governance and compliance with regulations

Compliance with regulations

The Business Partner is required to comply with all applicable laws and regulations on environmental protection, including, but not limited to, the laws and regulations governing hazardous materials, air and water emissions, and waste, as well as the laws, regulations and requirements of Żabka Polska regarding the ban on or restriction of the use of certain substances during product manufacturing or design.

The Business Partner is required to obtain and maintain all required permits, regulatory approvals and registrations required by environmental regulations.

Management of environmental issues

The Business Partner is required to manage environmental issues, designate a person or an entity responsible for managing environmental protection and monitoring and minimizing business-related risks, at least to the extent required by law.

The Business Partner takes preventive actions that reduce the risk of environmental pollution (beyond the levels specified in the permits held).

The Business Partner monitors, at least annually, their impact on the environment.

3.2 Use of raw materials and waste management

Use of raw materials

The Business Partner agrees to comply with laws governing the use of single-use plastic products, to ensure an appropriate proportion of recycled material in product packaging and to ensure the recyclability of used raw materials, thus facilitating the achievement of required collection targets at the national level, and to take any other actions required by regulations.

The Business Partner is required to exercise due care (in accordance with national laws in this regard and the European Commission recommendations) in the selection of raw materials used, the so-called conflict minerals (and their suppliers), so that they do not come from conflict regions which could directly or indirectly contribute to the financing of groups violating human rights, using forced or slave labor or trafficking in human beings.

Waste management

The Business Partner complies with all national and local laws on waste management (including transport, processing and storage), with particular emphasis on hazardous waste.

The Business Partner monitors, at least annually, and documents weights and codes of produced waste and the methods of handling waste, to the extent required by law.

3.3 Climate protection

CO₂ emissions

Goal for 2024 - each Business Partner named in the agreement with Żabka Polska will calculate greenhouse gas emissions in scope 1 and 2.

IV. Products and services

4.1 Sector-specific guidance

The Business Partner complies with all applicable laws and regulations concerning international and domestic trade.

4.2 Product quality and safety

The Business Partner is required to meet quality and safety standards for the supplied products to ensure that they do not have defects detrimental to the life, health and physical integrity of consumers - in accordance with existing laws.

The manufacturer of food products is required to have a certified IFS, BRC, ISO22000, FSSC food safety management system, and if they do not have one in place, they will voluntarily submit to an audit conducted by or on behalf of Żabka Polska.

4.3 Supply chain traceability

At the request of Żabka Polska, the Business Partner is required to disclose information about products from their manufacture to the final producer, including: the origin of materials and parts, processing history, and the distribution and location of the product after delivery, to the extent not covered by trade secrets.

4.4 Designation

The Business Partner agrees to comply with all laws and regulations regarding product and packaging labeling, product composition, material content determination, as well as recyclability and disposal in line with guidelines of Żabka Polska set forth in business agreements.

I.

Ethics and management

We create a credible organization of people engaged in sustainable business development. Our values - Responsibility, Openness, Credibility, Ambition - shape our approach to business. We live them every day through corporate governance, strategic actions and due diligence procedures.



1.1 Organizational management and risk management

► Managing the organization in accordance with the law

★ OUR STANDARDS

The Business Partner is required to conduct all business interactions and activities within the scope defined by their agreement with Żabka Polska honestly and in a manner compliant with the law. In their relationship with Żabka Polska, the Business Partner must communicate openly, honestly and fairly and report any irregularities related to the matters covered by this Code.

► Risk management

★ OUR STANDARDS

The Business Partner manages, documents (e.g., in the form of a SWOT analysis) and identifies basic risks (e.g., accidents, job risks) that could impact the organization and its business continuity.

➤ OUR AMBITIONS

The Business Partner has implemented a risk assessment process and procedures for dealing with risks.

✓ GOOD PRACTICE

The Business Partner has identified and manages sustainability risks in their organization.

1.2 Ethics

► Conflict of interest and gifts

★ OUR STANDARDS

The Business Partner is required to prevent the occurrence of a conflict of interest. Actual or potential conflicts of interest related to the activity of the Business Partner should be disclosed promptly to Żabka Polska using the irregularities reporting channel.

The Business Partner should not provide gifts or offer entertainment to Żabka Polska employees at any time during the request for proposal procedure or a business partner selection process.

The Business Partner is required to observe any other internal procedures of Żabka Polska related to the provision of gifts and entertainment during their relationship with Żabka Polska.



► Rules of fair competition

★ OUR STANDARDS

The Business Partner agrees to conduct their activities in accordance with the rules of free and fair competition.

The Business Partner agrees to comply with applicable antitrust and competition laws.

The Business Partner agrees to keep confidential any information pertaining to Żabka Polska or/and its business partners (including trade secrets) that has not previously been made public.

► Fighting corruption

★ OUR STANDARDS

The Business Partner does not practice or tolerate corruption, bribery, extortion or embezzlement. All confirmed cases of corruption must be investigated and documented, and remedial measures implemented.

➤ OUR AMBITIONS

The Business Partner implements an anti-corruption compliance program that includes due diligence analyses prior to entering into a new relationship with a business partner.

✓ GOOD PRACTICE

The Business Partner implements the Anti-Bribery Management System in line with ISO 37001.

► Protection of data, confidential information and intellectual property



★ OUR STANDARDS

The Business Partner is required to respect intellectual property rights, protect confidential data and ensure compliance with privacy rules and regulations.

The Business Partner is required to respect and protect the intellectual property rights of all parties by using only software and information technology that has been legally acquired and licensed. The Business Partner uses software, hardware, and content only in compliance with the associated licenses or terms of use.

The Business Partner is required to ensure that the personal data of employees and all stakeholders are protected. The Company must be notified of any irregularities and incidents related to data provided by Żabka Polska.

The Business Partner is required to ensure that data and information pertaining to affiliation with Żabka Polska are protected. Żabka Polska must be notified of any irregularities and incidents.



► Ethics management

★ OUR STANDARDS

The Business Partner has a document that defines key norms and procedures, ethical employee attitudes and irregularity reporting procedures. If no such document exists, the Business Partner will adopt and follow the Code of Conduct and Ethics for Żabka Polska Employees.

➤ OUR AMBITIONS

The Business Partner builds an ethical culture within their organization, e.g., through internal communications and training in ethics for employees.

✓ GOOD PRACTICE

The Business Partner designates a person or an entity responsible for ethics management in their organization, e.g., attorney / ethics committee / board.



1.3 Code implementation and involvement of subcontractors

► Management approach

★ OUR STANDARDS

The Business Partner is required to conduct regular internal audits of their compliance with the requirements described in the "Our Standards" section of the Code of Conduct for Business Partners of Żabka Polska. The results of an internal audit must be available to Żabka Polska.

The Business Partner is required to appoint a person responsible for the implementation of this Code in their organization.



► **Subcontractors**

 **OUR STANDARDS**

The Business Partner is required to ensure that their subcontractors who take part in developing a product or a service for Żabka Polska read and observe this Code. The Business Partner is required to immediately notify Żabka Polska of any infringement of the Code.

 **GOOD PRACTICE**

The Business Partner verifies compliance with the Code of Conduct for Business Partners of Żabka Polska among their subcontractors at least annually.

► **Complaints procedures**

 **OUR STANDARDS**

The Business Partner must enable employees to report violations of the law and the Code.

The Business Partner is required to provide employees with an independent external system for making anonymous complaints/anonymous reporting of violations and for providing feedback.

The Business Partner must ensure that the whistleblower is protected against retaliation.

The Business Partner is required to conduct investigative proceedings and implement corrective actions where appropriate.



II.

Working conditions

Żabka Polska's Responsibility Strategy clearly defines standards of work that we set not only for ourselves but also for our business partners. Respect for inalienable human rights, the resulting inclusive organizational culture, uncompromising guarantee of health and safety at work and high management standards are just a few of the areas that are the focus of Żabka Polska in its relations with employees and Business Partners.



2.1 Respect and honesty in the workplace

► Protection of human rights

The very foundation of Żabka Polska is to act with full respect for human rights. Their inalienable nature constitutes the basis for the company's relations with all of its stakeholders.



★ OUR STANDARDS

The Business Partner must comply with applicable national laws as well as international laws and regulations on human rights in all of their business locations. All confirmed human rights violations must be investigated and documented, and remedial measures implemented.

The Business Partner will not tolerate any signs of physical, psychological, sexual violence, harassment of employees and attempts to intimidate them nor any manifestations of inhuman treatment of employees.

✓ GOOD PRACTICE

The Business Partner is engaged in promoting and raising awareness with regard to human rights in their supply chain (e.g., through educational actions, membership in human rights organizations, adopting the Global Compact principles, etc.).

► Non-discrimination and equal treatment

★ OUR STANDARDS

The Business Partner is required to treat all employees and partners equally and not to exclude them from the community on the basis of gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation, sexual orientation, parenthood, hereditary disease, social status, or any other factor unrelated to an individual's ability to perform the work required in a given position.

The Business Partner must ensure that their employees are not in any way harassed or discriminated against.

The Business Partner must adopt objective and non-discriminatory criteria in all employment decisions, including hiring processes, payment terms, access to social benefits, access to training, and career development opportunities for employees. All confirmed cases of discrimination and/or harassment in the workplace must be investigated and documented, and remedial measures implemented.

➤ OUR AMBITIONS

The Business Partner monitors, at least annually, diversity issues within the company, e.g., the breakdown of employees based on gender, age and nationality and the ratio of women's salary to men's salary taking into account their job levels.

✓ GOOD PRACTICE

The Business Partner implements solutions to ensure diversity in the workplace by, for example, creating policies to address the gender pay gap, gender balance in leadership positions, or designating a person responsible for managing diversity issues within the company.

► Prohibition of child labor

★ OUR STANDARDS

The Business Partner is required to comply with national laws and international standards for the protection of the rights of children and minors. As per Convention no. 138 of the International Labour Organization the minimum age of the Business Partner's employee shall not be less than the age of completion of compulsory schooling or the minimum age for admission to employment, whichever is more restrictive, and in any case, it shall not be less than 15 years. This also applies to training and internship. All confirmed cases of child labor in the workplace must be investigated and documented, and remedial measures implemented.

➤ OUR AMBITIONS

The Business Partner prevents child labor throughout the supply chain by introducing procedures and policies as well as appropriate contractual provisions in this regard.



► Prohibition of forced labor

★ OUR STANDARDS

The Business Partner, including an employment agency, agency's subcontractor and recruitment agency, is prohibited from using forced labor, human trafficking, pimping and prison labor, except for rehabilitation programs paid at or above the national minimum wage. All confirmed cases of forced labor, prison labor, human trafficking and/or pimping in the workplace must be investigated and documented, and remedial measures implemented.

The Business Partner may not keep employee identification documents.

➤ OUR AMBITIONS

The Business Partner is required to conduct risk assessment to avoid the occurrence of forced labor, prison labor, human trafficking and other forms of compulsory work in their supply chain.



2.2 Wages and working time

► Wages

★ OUR STANDARDS

The Business Partner is required to pay wages on time, in accordance with applicable national wage laws, in the amount not less than the applicable national minimum wage for the period worked.

The Business Partner is required to adopt and implement work regulations containing the rules on wages and reduction in wages in the event of improper performance of job duties or other workplace violations.

The Business Partner is required to pay the employee statutory social security benefits and other benefits due to them under national laws (e.g., insurance benefits, overtime pay, and paid annual leave).



► Working time and days off work

★ OUR STANDARDS

The Business Partner must ensure that the basic working time of their employees does not exceed 48 hours per week (in accordance with International Labour Organization standards) or the maximum level set by applicable legal requirements in the respective country.

The Business Partner is required to comply with national laws on terms and limits of overtime in force in the respective country. Overtime rules should be included in the work regulations.

The Business Partner is required to ensure that all employees whose daily working time exceeds 6 hours take a break as determined by the applicable legal requirements in their country.

The Business Partner monitors, at least annually, and keeps a record of the working time of their employees.

The Business Partner respects their employees' right to sick leave and other types of leave, including maternity and parental leave, and respects the rights of pregnant women during pregnancy as defined by the laws of the respective country.

The Business Partner guarantees that each employee has at least one day off in a seven-day work week.

► Employment stability and social security

★ OUR STANDARDS

When hiring an employee, the Business Partner must adhere to all requirements specified in local labor laws.

The Business Partner must provide employees with an employment contract written in a language the employee understands. The contract must be signed no later than on the first day of work, after all documents necessary to commence work, such as medical examinations, have been obtained. Employees receive a copy of the signed contract.

The Business Partner must ensure that each employee has the right to freely terminate the employment relationship after giving the appropriate advance notice. In the event of dismissal, the Business Partner must provide an employee with a notice period as specified by the national laws.



✓ GOOD PRACTICE

The Business Partner has implemented a policy and internal regulations on the employee recruitment process that prohibit misleading or fraudulent practices in the recruitment and hiring processes.

2.3 Freedom of association

★ OUR STANDARDS

The Business Partner agrees to respect the rights of employees to associate as they wish, to form trade unions and to bargain collectively in accordance with local legal requirements and obligations. The Business Partner may not intimidate, discriminate against or harass employees because of their union activity.

✓ GOOD PRACTICE

The Business Partner actively works with stakeholders such as NGOs, trade associations, and employee representatives to build lasting relationships with employees through dialogue, including with employee organizations in the workplace (such as trade unions).



2.4 Occupational health and safety



OUR STANDARDS

The Business Partner is required to ensure the health and safety of employees in the workplace and to take action in accordance with the laws applicable in the respective country to minimize the risks associated with the work environment, particularly those associated with workplace accidents.

The Business Partner provides employees, free of charge, with equipment necessary to perform work. No deductions will be made for cleaning and/or maintenance of equipment and work clothing.

The Business Partner will not create situations that would pose a serious threat to employees' health and safety at work.

The Business Partner must provide employees with written information on occupational risks and certify that the employees have become familiar with this information. The Business Partner is also required to provide all possible forms of risk prevention and minimization.

The Business Partner provides employees with regular OHS training in line with local law.

The Business Partner monitors and records, on an ongoing basis, occupational health and safety related incidents (e.g., by keeping records of accidents and near misses as well as OHS training for employees).

The Business Partner is required to provide employees with mandatory social security insurance.

In case an employee suffers an accident at work or on their way to and from work, the Business Partner will ensure that the employee may seek compensation from the competent public administration authority.

The Business Partner is required to have procedures in place to monitor the impact of working conditions on employees, identify health and safety risks, including mental health risks, occupational disease risks resulting from exposure to physical, chemical, biological, and mechanical factors, etc., and take preventive action to protect employees' health.



GOOD PRACTICE

The Business Partner has implemented the occupational health and safety management standards (e.g., ISO 45001).

The Business Partner is required to define a strategy/approach promoting the long-term and proactive preservation of employee health and safety, taking into account age, disability, occupational diseases, gender issues and social challenges.



III.

Environmental protection

We minimize our environmental footprint across the value chain to protect the planet. We set ambitious goals - Žabka is green by nature and our ambition is to be an example to others. This is why responsibility for the environment is key to all our strategic actions, not only those directly related to taking care of the planet.



3.1 Environmental governance and compliance with regulations

► Compliance with regulations

★ OUR STANDARDS

The Business Partner is required to comply with all applicable laws and regulations on environmental protection, including, but not limited to, the laws and regulations governing hazardous materials, air and water emissions, and waste, as well as the laws, regulations and requirements of Żabka Polska regarding the ban on or restriction of the use of certain substances during product manufacturing or design.

The Business Partner is required to obtain and maintain all required permits, regulatory approvals and registrations required by environmental regulations.



► Management of environmental issues

★ OUR STANDARDS

The Business Partner is required to manage environmental issues, designate a person or an entity responsible for managing the environmental protection and monitoring and minimizing business-related risks, at least to the extent required by law.

The Business Partner takes preventive actions that reduce the risk of environmental pollution (beyond the levels specified in the permits held).

The Business Partner monitors, at least annually, their impact on the environment.

➤ OUR AMBITIONS

The Business Partner has a system of recording and handling environmental complaints.

✓ GOOD PRACTICE

The Business Partner conducts an environmental risk analysis at least once a year.

The Business Partner has implemented an environmental management system, e.g., ISO 14001.

The Business Partner is engaged in promoting and raising awareness with regard to environmental protection in their supply chain (e.g., through educational actions addressed to employees, partners, sub-contractors and customers; membership in environmental organizations, etc.).

3.2 Use of raw materials and waste management

► Use of raw materials

OUR STANDARDS

The Business Partner agrees to comply with laws governing the use of single-use plastic products, to ensure an appropriate proportion of recycled material in product packaging and to ensure the recyclability of used raw materials, thus facilitating the achievement of required collection targets at the national level, and to take any other actions required by regulations.

The Business Partner is required to exercise due care (in accordance with national laws in this regard and the European Commission recommendations) in the selection of raw materials used, the so-called conflict minerals (and their suppliers), so that they do not come from conflict regions which could directly or indirectly contribute to the financing of groups violating human rights, using forced or slave labor or trafficking in human beings.

The Business Partner has read, understands and complies with the Circularity Policy of Żabka Polska.

OUR AMBITIONS

The Business Partner is required to share data on compliance with the Circularity Policy of Żabka Polska at least annually.

The Business Partner agrees to design packaging, materials, services and processes in line with the Circularity Policy of Żabka Polska enabling reuse or recycling of the packaging used.

The Business Partner complies with the policy regulating the use of palm oil, if applicable.

GOOD PRACTICE

The Business Partner uses sustainably sourced raw materials, reducing their consumption and avoiding waste.

► Waste management

OUR STANDARDS

The Business Partner complies with all national and local laws on waste management (including transport, processing and storage), with particular emphasis on hazardous waste.

The Business Partner monitors, at least annually, and documents weights and codes of produced waste and the methods of handling waste, to the extent required by law.

OUR AMBITIONS

The Business Partner has a waste management strategy in place for waste prevention, reduction, reuse and recycling, energy recovery, incineration without energy recovery, and in exceptional situations use of landfills/disposal of waste in a safe and environmentally-friendly manner.

The Business Partner reduces generation of food waste, whether related to the operation of the organization or in the process of manufacturing, storage and delivery of food products to Żabka Polska, through procedures or policies in this regard.

The Business Partner agrees to monitor and document the amount of food waste (in the process of manufacturing, storage and delivery of food products).

GOOD PRACTICE

The Business Partner (even if not legally obligated to do so) donates food at risk of going to waste to NGOs/public institutions or makes other efforts to minimize food waste.

The Business Partner also works toward waste neutrality, i.e., they collect and recover as many raw materials as they introduce onto the market.

3.3 Climate protection

► Energy consumption management

OUR AMBITIONS

The Business Partner monitors, at least annually, the type and level of fuel and electricity consumption.

The Business Partner agrees to optimize energy consumption and apply energy efficient solutions.

The Business Partner agrees to analyze the possibility of increasing the share of renewable energy in their energy consumption.



GOOD PRACTICE

The Business Partner increases the share of renewable energy in their energy consumption to at least 100%. The Business Partner has implemented a strategy/plan to improve energy effectiveness or has implemented the certified ISO 50001 Standard - Energy Management System.

► CO₂ emissions

OUR STANDARDS

The Business Partner named in the agreement with Żabka Polska will calculate greenhouse gas emissions in scopes 1 and 2 at the latest by 2024.

OUR AMBITIONS

The Business Partner monitors their reduction targets in scopes 1 and 2 and shares this information with Żabka Polska (at least once a year).



GOOD PRACTICE

The Business Partner regularly calculates their carbon footprint in scope 3.

The Business Partner regularly and independently verifies the level of emissions and the extent to which reduction targets have been met (e.g., at least every 3 years).

The Business Partner calculates emissions generated by their products and shares this information with Żabka Polska.

The Business Partner joins the Science Based Targets initiative.

IV.

Products and services

We help consumers change their daily habits for the better - for their and the planet's benefit, making sustainability an obvious choice. We understand how important it is not only to meet the highest quality standards of products and services offered, but also to conduct transparent communication in this regard.



4.1 Sector-specific guidance

★ OUR STANDARDS

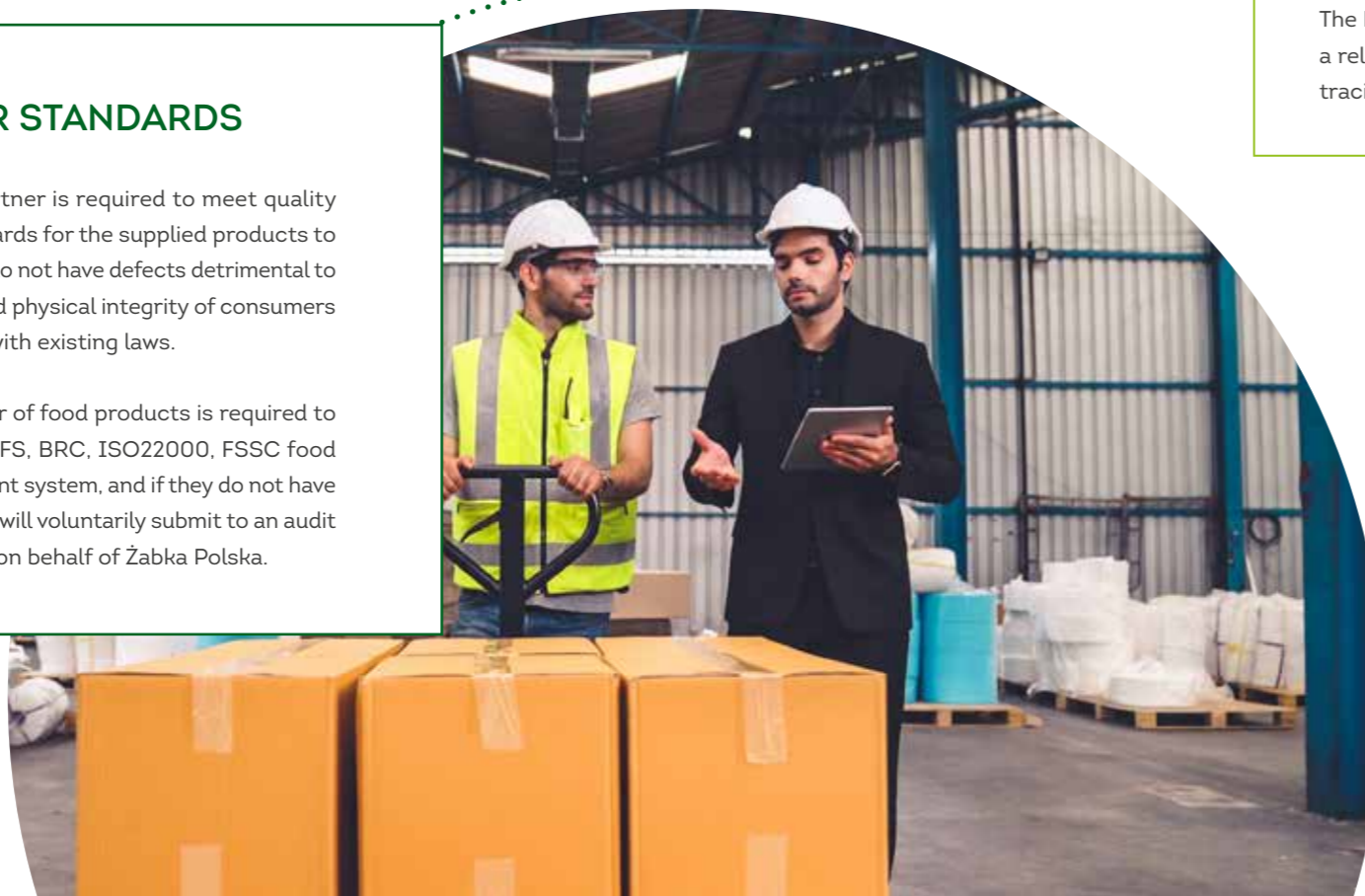
The Business Partner complies with all applicable laws and regulations concerning international and domestic trade.

4.2 Product quality and safety

★ OUR STANDARDS

The Business Partner is required to meet quality and safety standards for the supplied products to ensure that they do not have defects detrimental to the life, health and physical integrity of consumers - in accordance with existing laws.

The manufacturer of food products is required to have a certified IFS, BRC, ISO22000, FSSC food safety management system, and if they do not have one in place, they will voluntarily submit to an audit conducted by or on behalf of Żabka Polska.



4.3 Supply chain traceability

★ OUR STANDARDS

At the request of Żabka Polska, the Business Partner is required to disclose information about products from their manufacture to the final producer, including: the origin of materials and parts, processing history, and the distribution and location of the product after delivery, to the extent not covered by trade secrets.

✓ GOOD PRACTICE

The Business Partner has implemented a reliable and transparent supply chain tracing method.



4.4 Designation

OUR STANDARDS

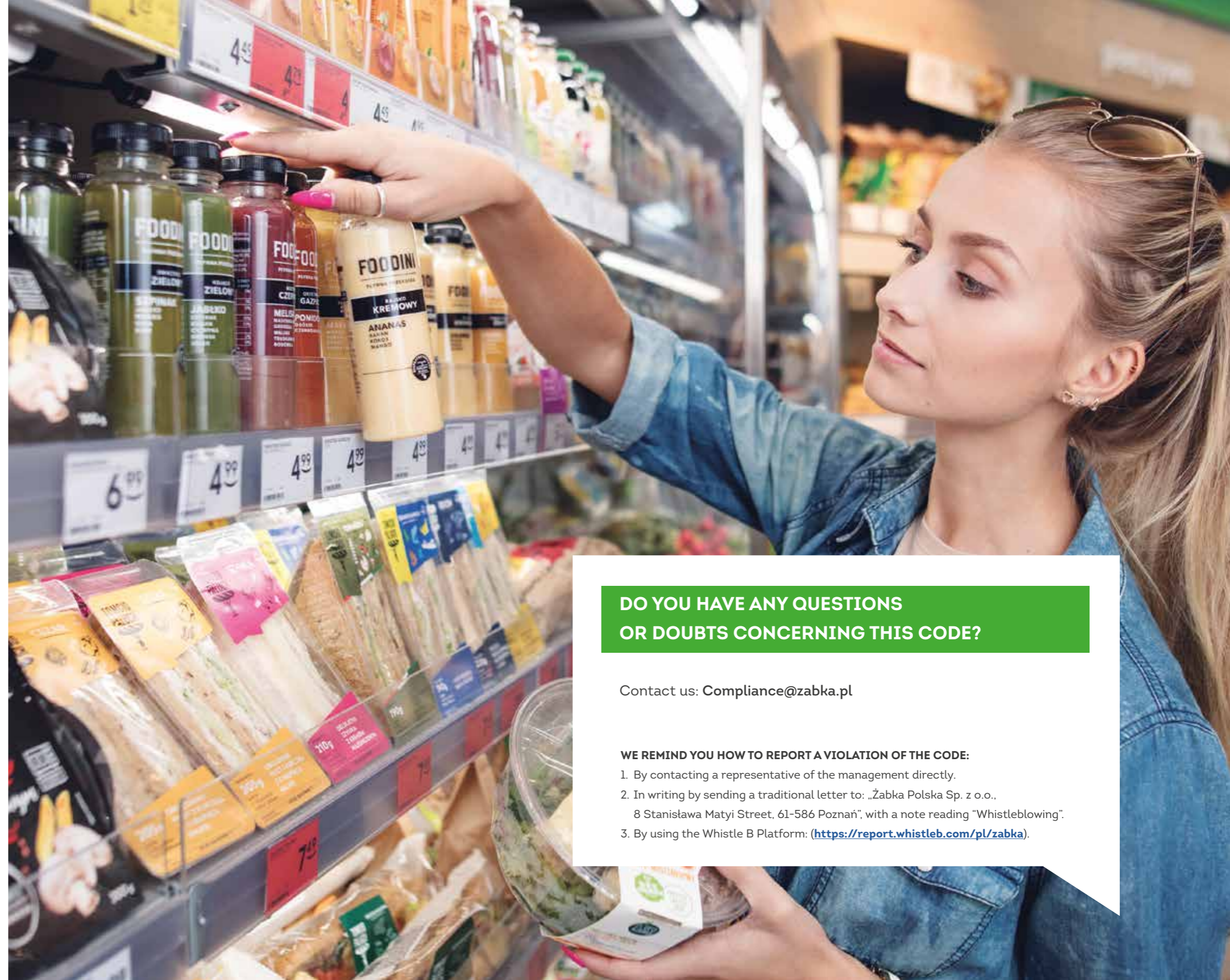
The Business Partner agrees to comply with all laws and regulations regarding product and packaging labeling, product composition, material content determination, as well as recyclability and disposal in line with guidelines of Żabka Polska set forth in business agreements.

GOOD PRACTICE

The producer of food products conducts the Nutri-Score analysis of products and has a food labeling system in place.

The Business Partner places information on environmental issues on a product to avoid third-party claims and the so-called greenwashing.

The Business Partner places information on the packaging to help sort materials after use.



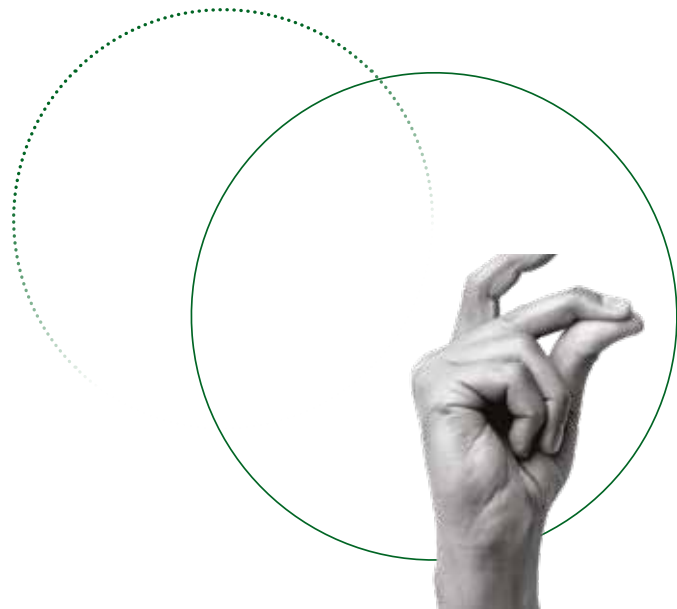
DO YOU HAVE ANY QUESTIONS OR DOUBTS CONCERNING THIS CODE?

Contact us: Compliance@zabka.pl

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

1. By contacting a representative of the management directly.
2. In writing by sending a traditional letter to: „Żabka Polska Sp. z o.o., 8 Stanisława Matyi Street, 61-586 Poznań”, with a note reading “Whistleblowing”.
3. By using the Whistle B Platform: (<https://report.whistleb.com/pl/zabka>).

żabka



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