



Responsible Communication, Marketing and Advertising Policy Żabka Polska



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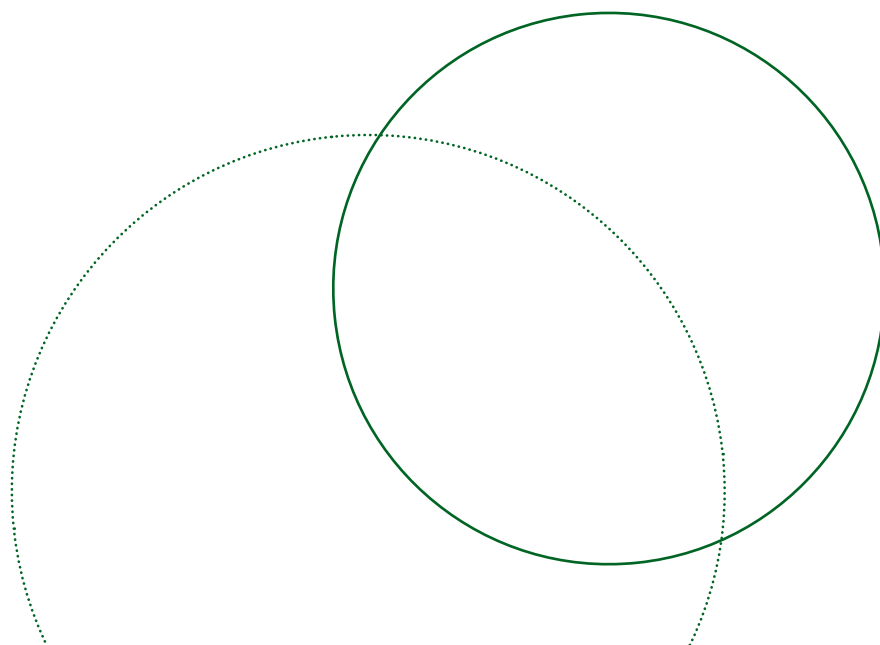




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| Introduction

Żabka Polska carries out its mission based on four key values: responsibility, openness, credibility and ambition. They are the foundation of all business processes as well as attitudes and behaviors that shape the organizational culture. All activities carried out in the area of communication and marketing under the Żabka brand are evidence of the implementation of these values and are consistent with them.

Our stakeholders expect transparent, up-to-date and fact-based information about the Company's offer and activities. Therefore, we make every effort to ensure that all groups of our recipients have access to knowledge and necessary information, using the most effective communication channels. We actively engage in continuous dialogue with our stakeholders, taking into account their expectations and market trends in order to deliver high-quality, sustainable and innovative products in line with our values and priorities.

The Company has adopted a business strategy that is based on three complementary processes - format transformation, digital transformation and responsibility integration, According to this assumption. Żabka Polska creates an ecosystem of convenient modern convenience solutions, making everyday life easier for millions of customers while freeing up their time.

One of the goals of the Company's Responsibility Strategy adopted is to promote healthy lifestyles and facilitate access to high-quality and healthy food. The assumption of the Strategt is also to make a positive impact on the environment and protection of our planet's natural resources. Care for the environment is an important element of responsibility for actions taken, social and business credibility, an expression of openness to new eco-trends and solutions that reduce negative environmental impact, and an element of ambitious climate goals. Achieving these goals requires marketing and public relations activities, implementation of advertising and promotional campaigns. At the core of these activities are the principles of sustainable development.

Our Responsible Communications, Marketing and Advertising Policy describes the principles by which we carry out our commitment and serves as a statement of commitment from the Company's management and senior management, a guideline for our marketing and communications teams, and a promise to our employees, business partners, suppliers and all others with whom we work.

| Art. 1. Scope of the Policy

- 1.1.** The Responsible Communication, Marketing and Advertising Policy of Żabka Polska defines the principles and rules of the Company's activities related to providing information to stakeholders and conducting communication activities, advertising and promotional campaigns aimed at increasing brand awareness and maintaining or supporting interest in the Company's offer in order to influence consumer behavior, promote its business and image on the market. This Policy is in accordance with the relevant laws and internal regulations of the Company, as indicated in Article 7 - "Related Documents"
- 1.2.** As an expression of Żabka Polska's desire to actively implement the assumptions of the Responsibility Strategy, the Policy sets out the principles governing the activities carried out in the area of communication, marketing and advertising.

| Art. 2. Purpose of the Policy

- 2.1.** This Policy is part of the implementation of the adopted Responsibility Strategy. The purpose of the Policy is to define the principles ensuring the implementation of communication, marketing and advertising activities so that they most effectively support the implementation of the Responsibility Strategy and remain in line with the principles of sustainable development, which is its foundation. The task of responsible communication is to support the building of Żabka Polska's position as a market leader in the area of sustainable development.
- 2.2.** The guidelines adopted by Żabka Polska for responsible communication, marketing and advertising are:
- striving to build market awareness of sustainable development in ongoing communications,
 - building the image of Żabka Polska as a responsible and ethical business partner, employer, contractor and issuer,
 - informing on the priorities of the Responsibility Strategy and actions taken in this regard,
 - timeliness, reliability, transparency and credibility,
 - respect for the principles of ethics understood as socially recognized moral norms, respect for values, improving the quality of relationships and interpersonal relations, promoting sustainable development, influencing the environment to extend thinking beyond just one's own benefit,
 - full compliance with applicable laws and good practices and ethics of marketing and advertising,
 - maintaining the principles of linguistic purity and correctness,

- respect for human rights, minority rights, personal rights, human dignity, freedom of worldview,
- promoting respect and tolerance for diversity,
- prohibition of discrimination as defined in the UNGC Principles or the OECD Guidelines for Multinational Enterprises.

Art. 3. Key terms and definitions

3.1. Żabka Polska, Company → Żabka Polska sp. z o.o.;

3.2. Responsibility Strategy → Strategic document for Żabka Polska, adopted in 2021, setting ambitions, directions of development and goals in the area of responsibility environmental, social and corporate governance (ESG) of the Company. The strategy consists of 4 pillars: Sustainable lifestyles, Positive Impact on the Environment, Responsible Organization and Green Planet, including 11 thematic areas <https://zabkagroup.com/pl/nasza-odpowiedzialnosc/>;

3.3. Marketing → Marketing is one of the processes that supports a brand in achieving sales and image goals: promotions, sponsorships, direct marketing, digital marketing and other communication activities;

3.4. Advertising → Information disseminated by any means, in any form and using any tools, which contains a non-personal message and is intended to draw attention to the advertised item, arouse and maintain interest in it, and promote it in the market.

3.5. Communication → All communication activities undertaken by an organization and its cooperating entities in order to convey information, exert influence or build a certain image. The following activities are included in the scope of communication;

- **Public Relations**

The public aspect of communications, which is designed to generate the desired public opinion of the Company, using both traditional and digital tools and through the Company's involvement in supporting local initiatives;

- **Investor Relations**

A component of strategic management, including finance, communications, marketing and compliance with securities law, that enables effective communication between the company, the investment community and other stakeholders;

- **Komunikacja wewnętrzna**

All messages communicated within the organization to provide employees with access to information, engage employees, support motivation, and create an organizational culture.

- 3.6. Stakeholders** → Entities (individuals, communities, institutions, organizations, offices) that can influence the Company or are influenced by its activities. Key stakeholders defined for Żabka Polska are:
- Customers and consumers,
 - Franchisees,
 - Employees,
 - Local communities,
 - Media,
 - Business partners and service providers,
 - NGOs/associations,
 - Public bodies, regulatory entities and local councils.
- 3.7. Communication channels** →
- Online channels among others: own (website, newsletters, intranet, emails, applications, etc.); social media,
 - Offline channels, among others: TV, radio, outdoor, flyers, brochures, catalogs, stands, displays, POS materials.
- 3.8. Law** → Regulations that affect the Company in all applicable jurisdictions, including laws, codes, international standards and guidelines.
- 3.9. Greenwashing** → Providing misleading information or creating a false impression of the Company's pro-environmental activities.
- 3.10. Children and adolescents** → Persons under 18 years of age.

Art. 4. Policy implementation principles

Marketing i reklama

4.1. The Company values the trust of its stakeholders. Aware of the impact of communication, advertising and marketing activities on consumer behavior, the Company is committed to respecting the following principles:

4.1.1 Compliance with regulations

Full compliance with laws in applicable jurisdictions, including: laws, codes, international standards and guidelines, and accepted/supported self-regulations and good practices

4.1.2 Integrity

The Company uses only fair advertising and ensures that all of its communications are fair and accurate in terms of information about the Company's offerings, not misleading the public.

The Company is committed to complying with regulations regarding the provision of all necessary information, including product labeling, providing information on the nutritional value of products and the content of saturated and trans fats, sugars, salt/sodium, allergens, GMOs and other substances that may affect human health (e.g., lactose, gluten, soy, etc.). The Company encourages its suppliers to label products with nutritional content by both weight and standard serving size.

4.1.3 Credible communication

The Company is committed to ensuring that all claims about product features or characteristics are valid and supported by evidence (e.g., documents proving mandatory or voluntary certification, environmental impact, nutritional value, source of origin, etc.).

The Company will ensure that environmental labels and data authenticating product attributes (e.g., recyclability or biodegradability) are reliable, comparable and verifiable, in accordance with planned EU regulations on product environmental footprint (PEF).

Responsible sale of products and services

The Company is aware that some products sold, such as alcohol, tobacco, energy drinks, products containing strong chemicals, can be harmful if used improperly, not in accordance with the recommended amount or instructions for use. This is an important issue for our customers, and we take our responsibility as a seller of these products seriously. To support our customers and the communities in which we operate, we offer age-restricted products, which means that customers may be required to verify their age when making purchases in the store, in accordance with the law. The Company ensures that customers are informed of the consequences of using these products through appropriate labeling. We clearly communicate to our customers that alcohol is an adult product, and provide procedures to prevent sales to underage customers - store personnel are trained to verify IDs and refuse sales when appropriate. Identical rules apply to tobacco products.

4.1.4 Health, sustainable diet and responsible consumption

In accordance with the Responsibility Strategy, the Company is committed to improving the quality of life of its customers, so its marketing messages are designed to support the implementation of this strategy. The Company ensures that advertising and marketing messages promoting healthy lifestyles comply with the principles set forth in the Responsibility Strategy.

The Company places particular emphasis on monitoring marketing communications for alcohol and tobacco products, and focuses on overseeing compliance with regulatory requirements for advertising applicable to these products.

4.1.5 Children and adolescents

The Company ensures that its marketing and advertising communications regarding products for children and adolescents meet the following requirements:

- complies with Polish regulations on the protection of minors in advertising,
- recognizes the authority of parents/legal guardians and refrains from using communications that undermine that authority,
- does not take advantage of children's inexperience, credulity and trust, and does not disseminate information that may mislead children,
- refrains from encouraging children to consume products not permitted for minors,
- strives to promote attitudes in accordance with the principles of sustainable development, including ecology, a healthy and active lifestyle and a healthy and balanced diet, as well as attitudes of tolerance, ethics, etc.,
- contains sufficient information about product features to enable children and their parents/legal guardians to make an informed purchasing decision,
- does not engage in ethical, political and worldview disputes.

4.1.6 Protection of Personal Data

All operations related to customers' personal data used in communication, marketing and advertising activities, i.e. collection, recording, systematization, gathering, storage, viewing, retrieval, use, transfer (distribution, sharing, access), anonymization, blocking and deletion, will be carried out in accordance with the provisions of Polish law and the Company's Policy on the Processing of Personal Data.

4.1.7 Prohibition of discrimination

The Company uses only advertising and marketing messages that do not violate human rights and dignity and do not promote any form of discrimination. In its marketing communications, the Company honors the principles set forth in the Company's Equality Policy.

Communication with stakeholders

4.2. In accordance with the adopted Responsibility Strategy, the Company wants to manage stakeholder expectations, enable the identification of issues, and improve relations and interactions with stakeholders through its communication activities.

The Company also wants to be actively involved in shaping the legislative, economic and social environment, as outlined in the Social Engagement Policy. The Company's stakeholders are identified in the Responsibility Strategy, and the Company conducts communication with them in a fair and transparent manner, in accordance with the adopted internal rules.

Communication with shareholders and investors

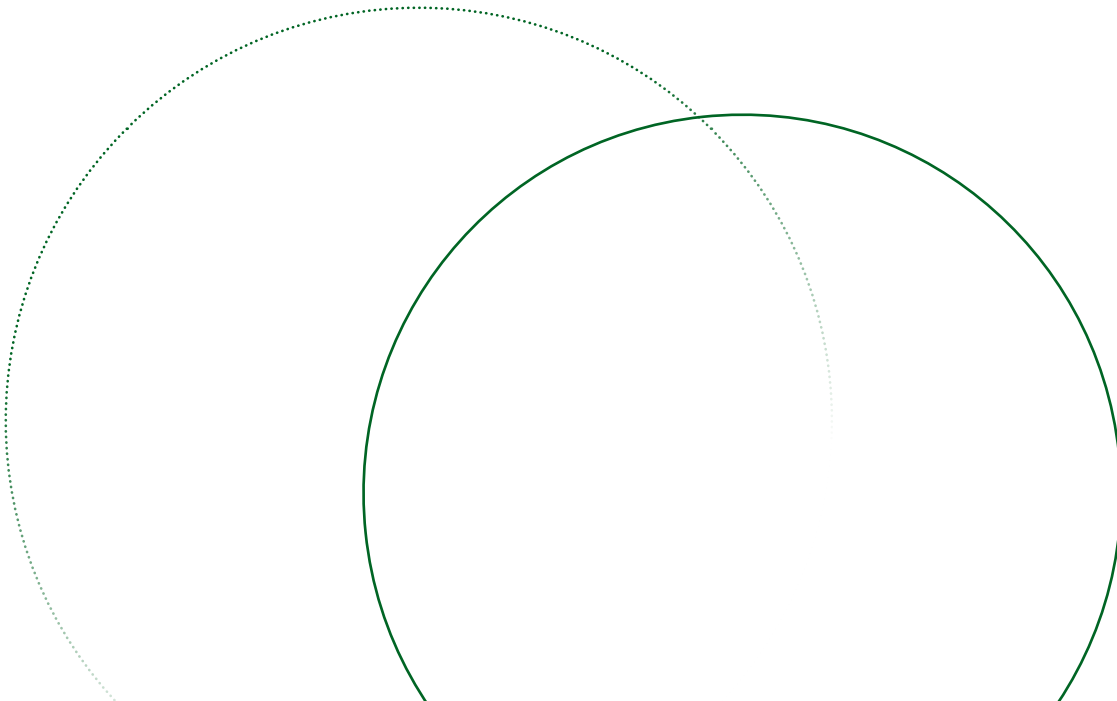
4.3 Shareholders and investors are among the Company's key stakeholders. Żabka Polska believes that constructive dialogue between the Company and shareholders/investors is important for building its value and adhering to corporate governance principles. The Company focuses on open communication and fair disclosure of information, with an emphasis on the integrity, timeliness and relevance of the data provided.

The Company conducts its operations and manages the organization using best practices in the areas of corporate governance and business ethics (including the Whistleblower Protection Bill, the Public Disclosure Bill).

4.3.1. Communication with investors is a high priority. We provide extensive information about the Company's operations in an integrated report, which includes an annual report containing financial statements, management reports, non-financial information. The reports are submitted in the form required by regulations to the market and are available on our website in a dedicated tab /section for investors. The Company ensures that information is disclosed in a way that allows the organization's financial position and prospects, climate opportunities and risks, and sustainability efforts to be assessed.

4.3.2. Questions from shareholders/investors may be directed to persons responsible for investor relations, indicated on the Company's website.

4.3.3. Only authorized persons can communicate with investors on behalf of Żabka Polska - listed in the investor communication strategy. Other employees of the Company are not authorized to provide information on behalf of the Company.



Art. 5. Roles and responsibilities

- 5.1.** The Company shall ensure that all of its employees and associates are familiar with this Policy and receive mandatory training on its scope and sustainability covering the main provisions of the Responsibility Strategy.
- 5.2.** The principles of this Policy must be followed by subcontractors, partners and institutions working with the Company in marketing, advertising and communications. Key principles will be included in the Code for suppliers. The content of all marketing and advertising communications is subject to approval by the Company in accordance with internal regulations
- 5.3.** Policy violations shall be reported in accordance with the Whistleblower Procedure. The Company guarantees the confidentiality of anonymous reports and that no retaliatory action will be taken against those contacted. In the event of a violation of this Policy, the Company will investigate and take corrective action, as well as steps to prevent such violations in the future, in accordance with its internal procedures.
- 5.4.** The Company's responsible communication, marketing and advertising activities shall be disclosed in its public non-financial reporting to the extent required by applicable non-financial information reporting standards.
- 5.5.** Persons responsible:

Position	Scope of responsibilities
ESG Director	Supporting those involved in reviewing communications and messages for compliance with the priorities of the Company's Responsibility Strategy.
Marketing Director	Ensuring that the Company's marketing and advertising communications comply with the principles of responsible marketing set forth in this Policy. Acceptance of the content of marketing and advertising communications.
Corporate Affairs Director	Ensuring that the Company's communications comply with the principles set forth in this Policy. Acceptance the content of information and communications provided on behalf of the Company outside the organization and in internal communications to employees. Monitoring compliance with the principles and rules of this Policy at all levels of the Company.
Press Office	The sole entity authorized to issue statements, prepares communications and release information to the media on behalf of the Company.
Director of Investors Relations	Ensuring that the Company's investor relations communications comply with the rules set forth in this Policy. Acceptance of reports, communications and any other materials communicated on behalf of the Company to investors.

Compliance Officer

Monitoring all related policies, procedures and other internal regulations of the Company for compliance with the provisions of this Policy. Ensuring that the Policy complies with generally applicable laws and regulations, and verify any irregularities in its implementation or execution. Review and update of the Policy at least once a year.

Art. 6. Policy review and update

6.1. The Policy shall be reviewed periodically and, if necessary, updated accordingly to conform to current legal requirements.

6.2. The Policy shall be reviewed and updated by the Manager of the External Relations and CSR Team, at least once a year.

Art. 7. Policy adoption

7.1. The Policy was adopted by the Management Board of Żabka Polska on December 16,

2022. 7.2. The Policy comes into effect on February 01, 2023.

Art. 8. Related documents

1. The Company's Responsibility Strategy
2. The ICC 2018 Code of Responsible Marketing and Advertising Communications
3. Good Practices of companies listed on the Warsaw Stock Exchange 2021
4. Code of Ethics
5. Investor Communication Plan - in preparation
6. Personal Data Processing Policy
7. Whistleblowing Procedure
8. Public Engagement Policy
9. Corporate Philanthropy and Sponsorship Policy
10. The Act of July 29, 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organized Trading and on Public Companies