



Public Engagement Policy



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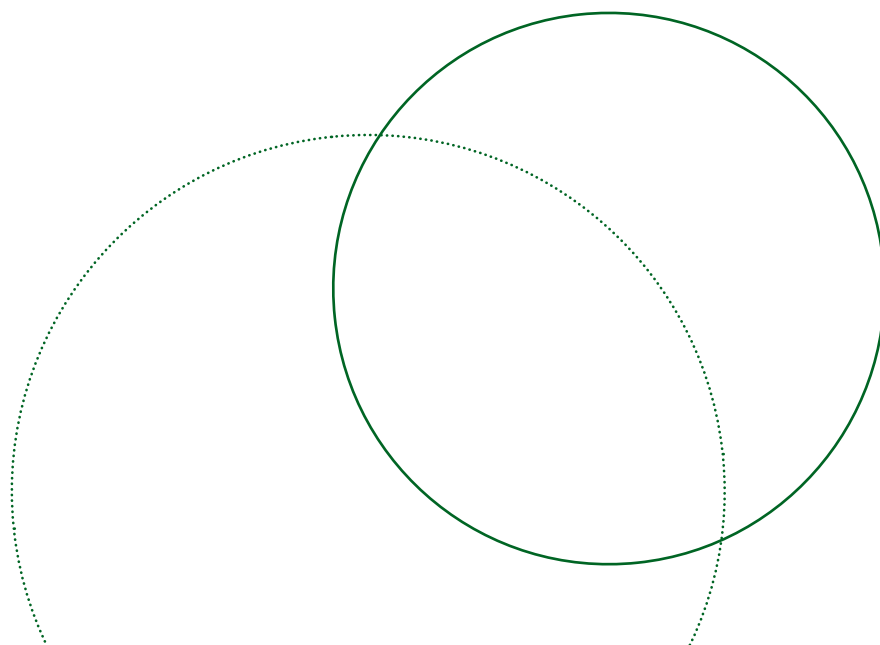




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I Introduction

The social, economic, environmental and legislative environment in which Żabka Polska operates is changing dynamically and gives rise to significant challenges that require the Company to seek optimal solutions. Public engagement means taking an active role in influencing the environment, i.e. creating conditions for the implementation of changes in a responsible manner and mobilizing others in its favor by taking specific actions that matter. Żabka Polska wants to speak out on issues that are important to it, its customers, employees, associates, business partners, the local community, and be an important participant in the public debate on important topics. The realization of this goal is an expression of how Żabka Polska wants to be perceived in the public consciousness and of its concern to influence the creation of conditions in which it operates and develops in a sustainable manner in the long term.

I Art. 1. Policy subject and scope

- 1.1.** The purpose of this Policy is to set out the basic principles of public engagement of Żabka Polska, in accordance with the law, the Company's internal regulations and the adopted strategies, including the Responsibility Strategy.
- 1.2.** The ambition of Żabka Polska is to influence the legislative, economic and social environment by providing detailed and reliable information, and expertise. It is the duty and responsibility of Żabka Polska to present views and take actions to engage customers, employees, associates, business partners and the local community for positive changes in the environment in a clear, transparent manner and in accordance with current knowledge. The Public Engagement Policy aims to support these ambitions by identifying key areas of engagement and ways of advocacy for Żabka Polska, making the voice of Żabka Polska heard, respected, and acted upon.

I Art. 2. Definitions

- 2.1. Policy** —————→ this Public Engagement Policy of Żabka Polska;
- 2.2. Żabka Polska, Company** —————→ Żabka Polska sp. z o.o.;
- 2.3. Employees** —————→ all persons employed at Żabka Polska under an employment relationship, regardless of the type of employment contract and working hours;

- 2.4. Associates** → persons providing services to Żabka Polska or performing other services on the basis of Cooperation Agreements or relevant powers of attorney, including Partners, Managers, Directors;
- 2.5. Business Partner** → a natural or legal person with whom Żabka Polska maintains a business relationship, excluding Employees, Associates, Franchisees and Agents. Business partners include:
- Recipients (customers),
 - Suppliers of goods and services,
 - Beneficiaries of a donation or sponsorship as defined in the Procedure for Donations and Sponsorships,
 - Other natural or legal persons with whom Żabka Polska enters into economic relations by entering into contracts or other formal obligations.
- 2.6. Public engagement** → any activity carried out by legally permissible methods aimed at influencing the legislative (e.g., participation in the law-making process), economic (e.g., cocreation of good conditions for the development of entrepreneurship in the market economy) and social (influence on social, educational institutions) environment through the provision and acquisition of information, aimed at promoting certain decisions and attitudes.

Art. 3. Rules of public engagement

3.1. Key areas of public engagement of Żabka Polska are:

- Wholesale and retail (selling goods and services directly to customers, including e-commerce);
- Services;
- New technologies;
- Consumers and competition rules;
- Environmental protection and combating climate change;
- Health, good nutrition and sustainable lifestyles;
- Education;
- Local relations and cooperation with local governments.

Areas of engagement may go beyond those listed above due to the ongoing development of the scope of Żabka Polska's business and the variety of issues that may affect its long-term development plans.

3.2. The Company is committed to establishing contacts, attracting the interest of public figures and organizations and initiating relevant conversations and collaborations on the topics listed in Art. 3.1. in public spaces and traditional and digital media, including social media.

3.3. In order to increase the interest of public figures, decision makers, government and non-government organizations and agencies, and increase its public engagement, Żabka Polska:

- engages in cooperation with a number of organizations, associations and chambers of commerce;
- actively participates in the national and international lawmaking process, including through official position presentations and participation in regulatory discussions;
- identifies important developments and takes a broad interest in current trends and initiatives on relevant topics, including those involving social, economic and environmental aspects;
- conducts ongoing regulatory monitoring;
- presents the position of Żabka Polska, taking into account the voice of stakeholders at various meetings, conferences, events, forums for the exchange of ideas and opinions;
- shares knowledge through, for example, publication of articles, results of research conducted;
- engages in external initiatives and projects;
- supports local communities and other stakeholders, including business partners by initiating or (co-) organizing actions and activities for positive change.
- periodically reports partnerships with organizations of which it is a member or partner, and provides information about the value of funds allocated to support institutions, organizations, etc.

3.4. When engaging with the public, Żabka Polska is guided by the following principles:

- **Compliance with the law and internal regulations** - complies with the standards of applicable law and internal policies and procedures implemented at the Company, including those relating to anti-corruption, bribery and extortion, access to public information, combating unfair competition;
- **Ethical conduct** - acts in accordance with Żabka Polska's Code of Ethics;
- **Professionalism** - acts in an honest and professional manner. It avoids behavior that is inappropriate or that could damage the Company's reputation in any way;
- **Prohibition of corruption** - giving or offering illegal benefits is prohibited. In its actions, Żabka Polska follows the Company's Internal and External Fraud Prevention Policy - Anti-Fraud Policy;

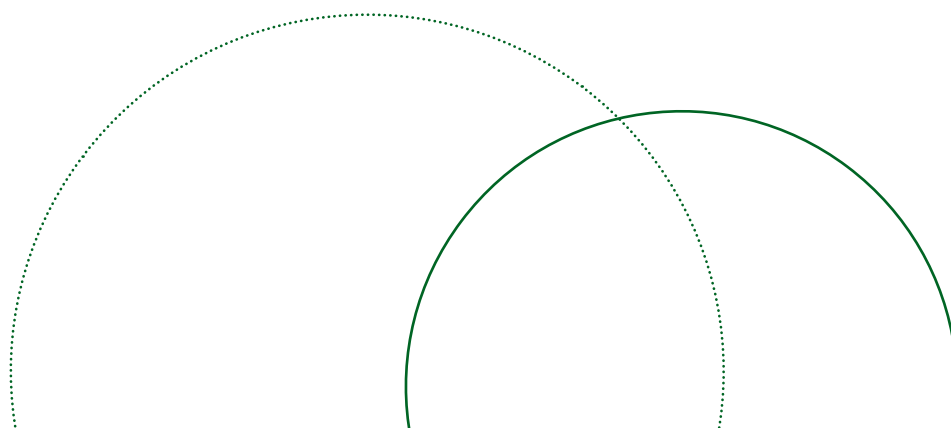
- **Respect** - contacts with representatives of the various groups involved in the legal, economic and social process are conducted with respect for the other person and with due regard for the professional relationship;
- **Honesty** - operates in a transparent manner. The information it provides must be true, up-to-date and correct;
- **Confidentiality** - treats the information acquired as confidential and disseminates it only to the extent necessary, e.g., proceedings;
- **Avoidance of conflicts of interests** - avoids activities that could expose Company representatives to conflicts of interest. It is guided by the Conflict of Interest Prevention Policy implemented at the Company.

3.5. Żabka Polska places emphasis on the consistency of its activities with the adopted Responsibility Strategy, which is why it ensures that the goals of the organizations and associations with which it cooperates within the framework of public engagement also coincide with it. To this end, the Company regularly reviews the nature of the organizations and associations themselves and the activities they carry out, and in the event of significant discrepancies with Żabka Polska strategic directions and values, decides to withdraw from such a structure or terminate cooperation.

3.6. A special form of public engagement is lobbying. These are any activities carried out by methods not prohibited by law in order to exert a certain influence on the policies and decisions of authorities or other institutions to achieve a desired result.

Żabka Polska is aware that even within the limits permitted by law, these activities can become harmful when the level of influence from companies, associations, organizations or individuals is disproportionately high. Any contact with a government official either directly or indirectly (by engaging outside entities for such contact) must be properly justified and preceded by the approval of the Management Board and the Compliance Officer. Unjustified political engagement on behalf of the Company is not permitted.

At the same time, Żabka Polska maintains political neutrality. It does not support or finance political parties, election committees, or candidates in presidential, parliamentary, local, European, and other elections.



3.7. Żabka Polska also wants to have a positive impact on local communities, thus the activities undertaken by the Company should implement the assumptions of the adopted Social Engagement Strategy consisting of the following 3 pillars:

Pillars of the Public Engagement Strategy

Pillar no. 1 **Wellbeing**

We support our customers in making informed choices every day, promoting an active, nature compatible and healthy lifestyle, both in terms of physical and mental health.

Pillar no. 2 **Neighborhood**

We bring people from the neighborhood closer by supporting activities that build local ties and create community and environmentally friendly meetings, facilitate joint initiatives.

Pillar no. 3 **Equal opportunities**

We facilitate empowerment and a start in the labor market for youth at risk of social exclusion, promote entrepreneurship and innovation in the spirit of social and environmental responsibility.

I Art. 4. Roles and responsibilities

- 4.1.** The Management Board is responsible for carrying out the Public Engagement Policy of Żabka Polska, including approving membership in organizations and associations, taking into account their objectives and their overall activities, and taking into account the best interests of the Company, adopted strategies, including the Responsibility Strategy.
- 4.2.** The Corporate Affairs Department is responsible for implementing activities in the area of public engagement, taking into account the communication of information, in accordance with the Responsible Communication, Marketing and Advertising Policy, and coordinating the Company's participation in all types of organizations and associations. The Communications Department provides a quarterly summary of public engagement to the Risk and Compliance Committee and other necessary information for internal and external disclosures in this area.
- 4.3.** The Compliance Officer is responsible for ensuring compliance of the Policy with the law, internal regulations and verification of any irregularities in its implementation or execution.
- 4.4.** All Employees and Associates of the Company - are required to comply with this Policy, as well as promote compliance with it.

I Art. 5. Policy review and update

- 5.1.** The Policy shall be reviewed periodically and, if necessary, updated accordingly to conform to current legal requirements.
- 5.2.** The Policy shall be reviewed and updated by the Manager of the External Relations and CSR Team, at least once a year.

I Art. 6. Final provisions

- 6.1.** The Policy was adopted by the Management Board of Żabka Polska on 16 December, 2022.
- 6.2.** The Policy comes into effect on 1 February, 2023.

