



Policy on Responsible Sourcing of Minerals - Conflict Minerals and Cobalt



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

National Court Register (KRS) number:
0000636642
Tax identification number (NIP):
522-30-71-241

DOCUMENT SPECIFICATION

OWNER OF REGULATIONS	Quality Standards & Climate Protection Director
AUTHOR / PERSON UPDATING THE DOCUMENT	Supply Chain Sustainability Manager
APPROVING ENTITY	Management Board resolution
STATUS	Implemented
DOCUMENT VERSION	2.0
FIRST PUBLISHED DATE	March 29, 2024
DATE OF REVISION	April 1, 2026
NUMBER OF PAGES	9
PURPOSE	The policy sets consistent standards for the purchase of products that contain tantalum, tin, gold, tungsten (so-called conflict minerals) and cobalt, within the operating activities of Żabka Polska sp. z o.o.

TABLE OF CONTENTS

Introduction	4
Art. 1. Subject and scope of the policy	5
Art. 2. Definitions and abbreviations	6
Art. 3. General principles	7
Art. 4. Detailed provisions	7
Art. 5. Review and update the policy	9
Art. 6. Final provisions	9

Introduction

Responsibility is an integral part of the operations of Żabka Polska sp. z o.o., and concern for sustainable development manifests itself in all aspects of our business. Over the years, we have built close relationships with our business partners, including suppliers, striving to raise the standards of cooperation, protect resources and the environment, improve product quality and respect employee and human rights. We strive to work with suppliers who share our values, universal principles of doing business responsibly and ethically, respecting the rights of individuals and contributing to environmental protection. With growing awareness of the negative impact of the mineral extraction process, particularly tin, tantalum, gold, tungsten (3TG, the so-called conflict minerals) and cobalt, we note the growing risks associated with, for example, the illegal extraction and trade of these raw materials. Practices can not only accelerate armed conflicts in some regions of the world but can also lead to human rights violations and environmental degradation.

The purpose of this policy is to define the Company's obligations regarding the sourcing of and use of products containing the aforementioned minerals, and to establish requirements for the suppliers from whom it obtains them. Recognizing the widespread use of these minerals in devices that support digitization and the development of technologies that enable, among other things, energy transformation, we do not want the achievement of our goals to come at the expense of human health and life and environmental degradation. We pay particular attention to decision-making in the procurement of office equipment, technology infrastructure, our own fleet and energy infrastructure. By increasing the transparency of our supply chain in this regard, we will strive to ensure due diligence in the supply chain related to purchases of solutions that may contain components made from conflict minerals and cobalt. We want to work with our suppliers and business partners to minimize the negative impact that mining, processing and use of these raw materials in purchased solutions can have on local communities, conflict areas and ultimately the environment.

We expect our suppliers to comply with international and local regulations on the sourcing, processing and importation of conflict minerals and cobalt applicable in the European Union and the OECD's supply chain due diligence guidelines, and to cooperate with industry organizations tasked with raising standards, including transparency in the supply chains of these minerals.

Art. 1. Subject and scope of the policy

- 1.1.** The policy sets out consistent standards for the purchase of products that contain tantalum, tin, gold, tungsten (so-called conflict minerals) and cobalt, within the operating activities of Żabka Polska sp. z o.o.
- 1.2.** The rules set forth in the policy apply to products for the manufacture of which the minerals tantalum, tin, gold, tungsten and cobalt are used, in particular includes:
 - 1.2.1.** equipment, devices or services related to office equipment,
 - 1.2.2.** equipment and facilities and other elements of technological and technical infrastructure,
 - 1.2.3.** machinery and other elements for operations, in particular warehouses, terminals and other infrastructure of own operations,
 - 1.2.4.** own fleet with necessary instrumentation and other means of mobility,
 - 1.2.5.** elements of equipment for stores and sales areas,
 - 1.2.6.** batteries and other energy carriers and elements of infrastructure related to
 - 1.2.7.** related to energy generation, transmission and storage.
- 1.3.** The policy covers suppliers of indirect purchases and business partners of Żabka Polska, except for:
 - 1.3.1.** business partners providing space rental services;
 - 1.3.2.** persons cooperating with the company on a B2B basis;
 - 1.3.3.** representatives of the administration and public sector;
 - 1.3.4.** energy suppliers;
 - 1.3.5.** small purchases made.
- 1.4.** Other types of entities whose relationship with the Company (through purchases made) is intangible, incidental purchases, or does not support the core operating activities may also be excluded from the rules described in the Policy.

Art. 2. Definitions and abbreviations

- 2.1. CAHRA** - Conflict Affected and High-Risk Areas i.e.: conflict-affected areas and high-risk areas, mainly the Congo area and adjacent countries;
- 2.2. DD - Due Diligence** Diligence - the process of analyzing and evaluating the risks and benefits of a associated with a particular venture, involving the collection and analysis of a variety of business information before deciding on a collaboration or transaction;
- 2.3. Business Partner** - a natural or a legal person with whom Żabka Polska has a business relationship. Business Partners include, in particular:
- suppliers of goods and service providers
 - other natural persons or legal persons with whom Żabka Polska enters into a business relationship through contracts or other formal commitments.
- 2.4. Supplier** - a business entity that manufactures or supplies goods or provides services to Żabka Polska. Vendors include, in particular,
- manufacturers, distributors and sellers of materials and goods;
 - service providers.
- 2.5. DRC -**
- 2.6. Supply chain** - the series of processes / steps that minerals go through from the original producer to the final producer (e.g. mining, processing, importing, use in a product);
- 2.7. Conflict Minerals** - raw mineral sources of tin, tantalum, tungsten and gold that may fund conflict in the Democratic Republic of Congo or adjacent countries. They are often referred to as 3TG. Minerals related to mining, transportation, trade, handling, processing or export that support armed non-state groups, directly or indirectly, are considered conflict-affected;
- 2.8. OECD** - Organization for Economic Cooperation and Development (www.oecd.org). OECD Due Diligence Guidelines and OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- 2.9. Policy** - this Policy on Responsible Sourcing of Minerals - Conflict Minerals and Cobalt;
- 2.10. Żabka Polska, Company** - Żabka Polska sp. z o.o;
- 2.11. 3TG** - the abbreviation for conflict minerals, i.e.: tantalum, tin, gold, tungsten (from Tin, Tantalum, Tungsten, Gold).

Art. 3. General principles

3.1 The Policy serves to ensure that the objective established by Żabka Polska, i.e.:

- To ensure that business partners covered by the Policy, including product suppliers, implement the international and local standards for responsible extraction, processing, import and use set by the Organization for Economic Cooperation and Development (OECD) for due diligence in the sourcing of in minerals from conflict and high-risk areas¹.
- Ensuring compliance with, among others, the Regulations on Conflict Minerals and Critical Minerals², the Directive on Corporate Due Diligence for Sustainable Development³ and the Regulation on Batteries and waste batteries⁴.

Art. 4. Detailed provisions

4.1 This Policy sets forth the key principles for responsible sourcing of products containing minerals, including tantalum, tin, gold, tungsten and cobalt at Żabka Polska. The policy comes into effect on July 1, 2024, and includes:

- **To work with suppliers that comply with the principles of responsible extraction and processing of so-called conflict minerals and cobalt and operate in accordance with international and local standards (OECD guidelines).** Suppliers are required to establish and maintain policies for the responsible extraction, processing, import and use of minerals, as well as to exercise due diligence in their own supply chains, at the very least complying with the legal rules for the processing and use of conflict minerals and cobalt.
- **Dialogue with business partners on the responsible sourcing** of and use of these minerals and encourage steps related to raising standards and compliance with the law and good business practice in this area.

¹ [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, 2016](#), accessed on 30 Sept 2025

² [REGULATION \(EU\) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, May 17, 2017](#), accessed on 30 Sept 2025 establishing due diligence obligations in the supply chain of EU importers of tin, tantalum and tungsten, their ores and gold from conflict-affected and high-risk areas as well as [REGULATION \(EU\) 2024/1252 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 April 2024](#) establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020, accessed on 30 Sept 2025

³ [DIRECTIVE \(EU\) 2024/1760 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 June 2024](#) on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859, accessed on 30 Sept 2025

⁴ [REGULATION \(EU\) 2023/1542 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 July 2023 on batteries and waste batteries, amending Directive 2008/98/EC and Regulation \(EU\) 2019/1020 and repealing Directive 2006/66/EC](#), accessed on 30 Sept 2025

- **Sourcing in procurement processes from business partners and suppliers, statements or other forms of credible documents (e.g., certificates, letters of attestation, independent opinions, etc.) confirming the supply of products containing conflict minerals or cobalt, with proven sustainable and responsible origin**, which means, in a minimum scenario, that their sourcing is not linked to direct or indirect funding of armed conflict and human rights violations in the Democratic Republic of Congo (DRC) and CAHRA region and environmental degradation.
- **Secure the Company's ability to verify evidence of the origin** of the conflict minerals and cobalt used in the products, as well as confirm the implementation of due diligence processes in accordance with OECD guidelines.

4.2 Suppliers who do not meet the above-described requirements may be subjected to detailed analysis by the Company and evaluated for further cooperation in accordance with the adopted internal processes for evaluating suppliers and business partners.

Art. 5. Review and update the policy

- 5.1 The Quality Standards & Climate Protection Director shall be responsible for ensuring that the Policy complies with generally applicable laws and verifying any irregularities in its implementation or execution.
- 5.2 The Policy shall be subject to periodic review and, if necessary, to appropriate updating to adapt it to current legal requirements.
- 5.3 The Policy shall be reviewed and updated by the Supply Chain Sustainability Manager, at least once every 12 months.

Art. 6. Final provisions

- 6.1 Policy was adopted on March 29, 2024.
- 6.2 The Policy enters into force on April 1st, 2026.

