



Human Rights Policy for Business Partners



Froo Romania Holding S.A.
Drumul Dealu Bradului nr. 86-120
Et. 2 Sector 4, București, România
Nr. Reg. Com: J2023024089408



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PURPOSE	This document presents human rights principles the Company expects its business partners to acknowledge and comply with across all of their supply chains, throughout the course of the business relationship.

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Introduction

Froo Romania Holding S.A. (the Company) strives to plan and execute its business activities while integrating Environmental, Social and Governance (ESG) factors into its activities and decision-making processes, all supported by a robust governance model and related disclosures as being a part of Zabka Group and Zabka International ESG endeavors.

The Company organizational mission is to create value by making people's lives easier. Responsibility and sustainability are integral to achieving this objective, underpinned by ethical collaborative relationships with business partners who share the Company's values and beliefs. The Company firmly believe that success is not just about what can be achieved together, but also about how it is done.

This means that the Company initiatives, investments and partnerships must undergo scrutiny for their impact on the environment in which the Company and its stakeholders operate. Every decision the Company makes must be compliant not only with legal requirements but also with its own ethical standards, respect for human rights, sustainability objectives and good market practices. Considering the pivotal role the Company's business partners play in achieving the mission, it is imperative that they are fully committed to building a resilient, responsible and ethical supply chain rooted in shared values, principles and attitudes.

By developing the Human Rights Policy for Business Partners, the Company has defined ambitions for itself and our partners relating to respect for human rights. Importantly, the Company is aware that these ambitions can only be achieved through close collaboration and maintaining due diligence processes in the supply chain. The Company expects its partners to respect internationally recognized human rights standards, including the Universal Declaration of Human Rights, International Labor Organization Conventions and other relevant international agreements. It recognizes joint responsibility to uphold human rights in all aspects of collaboration across the supply chain.

The Policy aims to help the Company to manage the material impacts, risks and opportunities created by changing conditions, such as shifts in environmental, economic and social systems, to enhance long-term financial and non-financial value creation for its stakeholders across the value chain. Consideration has also been given to the interests of key stakeholders group in setting the Policy.

Art. 1. Document subject and scope

1. The document defines the human rights principles the Company expects its business partners to acknowledge and comply with across all of their supply chains, throughout the course of the business relationship.
2. The provisions of this document shall be applied to all material activities of the Company, taking into account, among other important considerations, agreed types of control, business maturity, local contexts and regulations.
3. Results arising from implementing the Human Rights Policy for Business Partners shall be monitored and reported using available standards and technology, in line with agreed processes and respective regulations.

Art. 2. Definitions

1. **The following definitions will apply for the purposes of this document:**
 - **Zabka Group** means Zabka Group S.A. (RCS: B263068), a company incorporated under the laws of Luxembourg, acting as the parent company of the Group;
 - **Group** means Zabka Group as the parent entity and all of the companies controlled by Zabka Group (including Zabka International), whether directly or indirectly (within the meaning of Article 1711-1 of the law on commercial companies dated 10 August 1915, as amended);
 - **Zabka International** means Zabka International S.à r.l. (RCS: B283681), a company incorporated under the laws of Luxembourg, being a direct subsidiary of Zabka Group S.A. (RCS: B263068). The Company holds participations in other Group companies and acts as an entity consolidating international operations of the Group outside Poland;
 - **Froo Romania Holding S.A.** or the Company (J2023024089408, ROONRC.J2023024089408, SRC 49289107), a company incorporated under the laws of Romania, being a direct subsidiary of Zabka International S.à r.l. (RCS: B283681) and holds participations in other companies and acts as an entity consolidating operations in Romania;
 - **ESG** helps stakeholders understand how an organization is managing any impacts, risks and opportunities related to Environmental, Social and Governance criteria (sometimes called ESG factors). ESG takes the holistic view that sustainability extends beyond just environmental issues, focusing on the creation of long-term financial and non-financial value;
 - **The Policy** or the **document** means specifically the Human Rights Policy for Business Partners of the Company;
 - **Human rights** are rights inherent to all human beings, regardless of race, gender, nationality, ethnicity, language, religion or any other status. Human rights include the right to life and liberty, freedom from

slavery and torture, freedom of opinion and expression, the right to work and education and much more. Everyone is entitled to these rights, without discrimination.

Art. 3. The Policy outline

1. The Company's Human Rights Policy for Business Partners defines the human rights principles the Company expects its business partners to acknowledge and comply with across all of their supply chains, throughout the course of the business relationship. It establishes the basis for collaboration and sets out the standards to be followed, expressed in various policies and regulations. It also communicates the ambitions and directions for growth that the Company seeks to pursue with its business partners. The key objective of this Policy is to facilitate building a responsible and sustainable supply chain grounded in partnership, mutual accountability and due diligence.
2. The Policy will be kept updated to maintain its relevance and materiality level to the business and all its stakeholders, to account for all identified ESG impacts, risks and opportunities, and to ensure due care in the value chain. If necessary, it may not be restricted to the specific themes outlined in this Policy document.
3. The Policy and all eventual related solutions will be gradually cascaded into the Company's businesses and activities in line with Article 1 of this document, which by the nature of their business fall under the scope of this Policy. Entities covered by the Policy shall evaluate such potential measures and decide on best actions to achieve the purpose of the Policy.
4. The Company, through its respective governance structures and other measures, shall secure adequate tangible and intangible resources to ensure the deployment of the Policy, including monitoring, reporting and continuous development, while simultaneously ensuring its business viability.
5. The Policy and other related solutions (such as specific goals and measures supporting effective and efficient deployment across the Company's operations including its subsidiaries) shall be monitored covering both qualitative and quantitative results.

Art. 4. Compliance, enforcement and reporting

1. Since the credibility of Company's business partners affects the credibility of the Company, the Company will evaluate and consider implementation of potential measures that would ensure the right to verify its business partners' compliance with this Policy's provisions.
2. The Company applies the principle of zero tolerance to any violation or non-compliance relating to the protection of human rights.
3. Instances of non-compliance with the Policy may be submitted via dedicated reporting channels. The

whistleblower will remain fully anonymous unless they choose to provide their details in the report. The Company will refrain from any attempts to identify the person making an anonymous report.

4. Potential measures to be considered by the Business Partners may include:
 - Business partners can regularly perform internal and external reviews, audits and inspections to evaluate the extent to which human rights are upheld within their organisations and supply chains.
 - Business partners can organise the training needed for employees across all levels of the organisation to increase their awareness about human rights and their commitment and responsibility to uphold those rights. The training also covers the procedures for reporting violations and the corrective measures that are available.
 - Business partners can implement dedicated channels for reporting violations, including human rights violations, where any irregularities or wrongdoing can be reported without fear of retaliation. Channels will include resources such as a telephone hotline, an email address or anonymous online reporting system.
 - If a violation of the principles of protecting the human rights is identified, a business partner should promptly investigate the root causes of the violation, implement suitable corrective measures, and proactively work to prevent similar incidents from happening in the future.
 - Business partners shall be committed to implementing appropriate corrective measures as soon as any violations are identified. These measures may include, but are not limited to, refining work practices, implementing training programmes, executing improvement plans, making alterations to the supply chain, or in extreme cases terminating the contract with a supplier or business partner.
5. The Company and its business partners treat any human rights violations with the utmost seriousness and are committed to holding accountable those responsible, as mandated by applicable laws. Depending on the nature and gravity of the violation, the consequences may include disciplinary actions against business partners, such as suspension, termination or legal liability, as well as termination of the relationship with the business partner.

Art. 5. Specific Policy provisions that should be considered by Business Partners

1. **Countering human trafficking.** Business partners shall condemn and commit to countering all forms of human trafficking in their operations and supply chains.
2. **Countering child labor.** Business partners shall adhere to regulations prohibiting child labor. They are committed to not hiring individuals below the legal employment age and to collaborating exclusively with suppliers and partners who share this commitment.

3. **Countering forced labor.** Business partners shall reject any form of forced or compulsory labor and are committed to ensuring that all employees are hired voluntarily and have the right to resign in accordance with applicable laws.
4. **Countering discrimination.** Business partners shall strive to ensure equal opportunities and to prevent all forms of discrimination, whether based on race, color, gender, sexual orientation, age, religion, disability, ethnicity, nationality, marital status, political beliefs, or any other legally protected status.
5. **Freedom of association and collective bargaining.** Business partners shall respect the right of employees to freedom of association, including the right to form and join trade unions and to participate in collective bargaining and collective disputes in accordance with applicable laws.
6. **Equal pay.** Company's business partners shall be committed to ensuring equal pay for work of equal value, without regard to gender, race, age, disability, sexual orientation or any other discriminatory factor.

Art. 6. Final provisions

1. The document in its present wording was adopted by the Board of Directors of the Company on 25 November 2025.
2. The document will be reviewed periodically and, if necessary, updated accordingly to conform to current legal requirements and best business practice.
3. The Company, in view of the objectives pursued by this document, instructs all of the companies thereby directly or indirectly controlled to adopt and adjust it as necessary, based on firm business judgment.



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