



Human Rights Policy for Business Partners



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Introduction

We commit our Business Partners to respect human rights in accordance with accepted international standards, including the Universal Declaration of Human Rights, the Conventions of the International Labour Organization, and other relevant international agreements. We are aware of our responsibility to respect human rights in all aspects of our operations, both with regard to our employees, associates, and Business Partners.

Art. 1. Document subject and scope

1. This *Human Rights Policy for Business Partners* applies to all operations carried out by Żabka Polska.
2. This Policy sets out the human rights principles that we expect our Business Partners to respect throughout our supply chains and for the whole duration of our business relationships.
3. The provisions of this document apply to all material activities of Żabka Polska, taking into account, among other things, agreed-upon types of controls, business maturity, local context, and regulations.
4. The results of implementing this *Human Rights Policy for Business Partners* will be monitored and reported using available standards and technologies, in accordance with agreed-upon processes and applicable regulations.

Art. 2. Definitions

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;
- **Żabka Polska** or **Company** (KRS: 0000636642, NIP: 522-30-71-241) means a company registered under Polish law that holds shares in other companies and acts as the consolidating entity for the Group's operations in Poland;
- **Group** refers to Zabka Group as the parent company and all companies controlled by Zabka Group, directly or indirectly (within the meaning of Article 1711-1 of the Act of 10 August 1915 on Commercial Companies, as amended);
- **ESG** (Environmental, Society, and Governance) helps stakeholders understand how an organization manages impacts, risks, and opportunities related to environmental, social, and corporate governance criteria (sometimes referred to as ESG factors). ESG is based on a holistic approach in which sustainability goes beyond environmental issues, focusing on creating long-term financial and non-financial value;
- **Policy** or **document** refers specifically to this *Human Rights Policy for Business Partners*.

- **Human rights** are the rights of all people, regardless of race, gender, nationality, ethnic origin, 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 many others. These rights are enjoyed by everyone without discrimination.

Art. 3. Policy framework

1. The *Human Rights Policy for Business Partners* defines the human rights principles that we expect our Business Partners to adhere to throughout their supply chains and throughout our business relationships. It forms the basis for cooperation and defines the standards to be observed, expressed in various policies and regulations. It also communicates the ambitions and development directions that the Group, including Żabka Polska, wishes to pursue together with its Business Partners. The main goal of the Policy is to support the creation of a responsible and sustainable supply chain based on partnership, mutual accountability, and due diligence.
2. Żabka Polska is guided by the concept of due diligence. A prerequisite for cooperation with each of Żabka Polska's Business Partners is ensuring compliance of the Company's operations with all applicable international and national laws, as well as voluntary guidelines and principles regarding responsible business conduct and sustainable development. These include: the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the Ten Principles of the United Nations Global Compact, and the Sustainable Development Goals (SDGs) of the United Nations Agenda 2030.
3. The document will be communicated to all stakeholders to facilitate its effective and efficient implementation.
4. This Policy will be updated to maintain its relevance and level of materiality for the business and stakeholders, to address all identified ESG risks and opportunities, and to ensure due diligence in the supply chain. It may be expanded beyond the specific topics described in this document on the as needed basis.
5. This Policy and other related measures (such as specific objectives and measures supporting the effective and efficient implementation of the Policy within the Company) will be progressively monitored, encompassing both qualitative and quantitative results. This information will be reported in an appropriate and timely manner to the designated group of stakeholders.

Art. 4. Compliance, enforcement, and reporting

1. As the credibility of our Business Partners affects the credibility of the Group, including Żabka Polska, we would like to ensure the right to verify their compliance with the provisions of this Policy. Żabka Polska's Business Partners will be required to conduct a self-assessment of our principles of conduct, including human rights issues. Depending on the nature of the Business Partner's activity and the level of risk associated with our business relationship, the verification process may be expanded to include an ethics audit, which precisely identifies deviations from standards and potential risks associated with conducting business with the organization. The Company accepts the results of audits conducted by independent auditing organizations that conduct assessments in accordance with internationally accepted standards.
2. Failure to comply with the standards set forth in this Policy constitutes a direct threat to the Company's credibility and may have legal, financial, reputational, and security consequences. At Żabka Polska, we adhere to the principle of zero tolerance for any violation or non-compliance with the provisions of this Policy.
3. Instances of non-compliance with the standards set forth in this Policy can be reported through dedicated reporting channels. Detailed information on reporting channels is available on the website: <https://www.zabka.pl/wspolpraca-handlowa/#Compliance>. The reporting party will remain completely anonymous unless they choose to provide their details in the report. The Company will not make any attempt to identify the person submitting an anonymous report.
4. Business Partners are obliged to conduct regular internal and external reviews, audits, and inspections to assess the degree of human rights compliance within their organizations and supply chains.
5. Business Partners are required to provide training to employees and contractors at all levels of the organization to increase their awareness of human rights and their commitment and responsibility to comply with them. Training should also include reporting procedures and available remediation mechanisms.
6. Business Partners are obliged to implement dedicated channels for reporting violations, including human rights violations, enabling the reporting of any violations or misconduct without fear of repercussions. These channels include resources such as a telephone hotline, email address, or anonymous online reporting system.

7. If a violation of this Policy is identified, the Business Partner is required to promptly investigate the causes of the violation, implement relevant corrective measures, and actively work to prevent similar incidents in the future.
8. Business Partners commit to implementing adequate corrective measures immediately upon becoming aware of any violation of this Policy. These measures may include, but are not limited to, improving work practices, implementing training programmes, implementing improvement plans, introducing changes to the supply chain, or, in extreme cases, terminating the contract with a supplier or Business Partner.
9. Żabka Polska and its Business Partners take all human rights violations seriously and are committed to holding those responsible accountable in accordance with applicable law. Depending on the nature and severity of the violation, consequences may include disciplinary action against employees, such as suspension, termination of employment, or legal action, as well as termination of the Business Partner's relationship.

Art. 5. Specific provisions of the Policy

1. **Countering human trafficking.** Business Partners shall oppose and commit to countering all forms of human trafficking in their operations and supply chains.
2. **Prohibition of child labour.** Business Partners shall adhere to regulations prohibiting child labour. 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. **Prevention of forced labour.** Business Partners shall reject any form of forced or compulsory labour and are committed to ensuring that all employees are hired voluntarily and have the right to resign in accordance with applicable laws.
4. **Prevention of discrimination.** Business Partners shall strive to ensure equal opportunities and to prevent all forms of discrimination, whether based on race, colour, 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.** Our 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 Management Board on 1 May 2026.
2. The document will be reviewed periodically whenever needed and, if necessary, updated accordingly to conform to current legal requirements and best business practice.

