



Responsible Communication, Sponsorship and Public Engagement Policy for Zabka Group

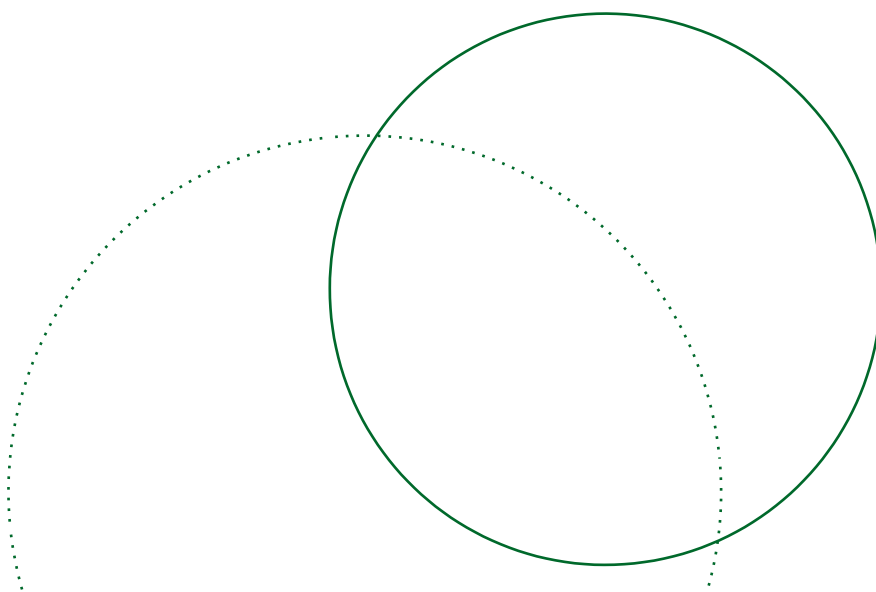


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ITEM	A document setting out the general principles of Zabka Group activities in the area of communication, sponsorship and public involvement.

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Introduction

Responsibility, openness, credibility and ambition – these are the values that are the foundation of our mission and that guide us in our daily work. At Zabka Group SA, we understand that one of the essential elements of dynamic development in business is dialogue and communication with stakeholders. Together with them, we shape the world around us and make a positive impact. We are committed to building mutual trust, which is why we care so much about the transparency, reliability and timeliness of information about our offer, philanthropic activities and public engagement. As a responsible business partner and neighbour, we closely monitor the needs and expectations of our stakeholders to better respond to upcoming challenges and impact the regulatory, economic and social environment by providing reliable information and expertise.

The policy defines the overarching principles for public presence, supports the implementation of the company's strategy and corporate principles, and facilitates the achievement of ambitions, including the ESG Framework.

We are convinced that thanks to the commitment of customers, employees, investors, business partners and local communities, we contribute to positive changes in environment we operate in.

Art. 1. Policy subject and scope

The Responsible Communication, Sponsorship and Public Engagement Policy sets out the principles and rules for the Zabka Group's activities related to:

- communication with stakeholders, advertising and promotional campaigns,
- philanthropic and sponsorship activities,
- public engagement.

We are committed to adhering the highest ethical standards in all our communications, philanthropic, sponsorship, as well as public benefit activities. Our goal is to be transparent in our operations, build awareness of the Zabka Group brand and influence the legislative and economic environment.

Art. 2. Basic principles of communication, marketing and advertising

2.1. General

- 2.1.1. All employees and associates of Zabka Group will learn the following rules as part of the training.
- 2.1.2. The following rules constitute binding guidelines for subcontractors, partners and institutions cooperating with Zabka Group in the field of marketing, advertising and communication. Violations of the rules should be reported in accordance with the Whistleblowing Procedure adopted by Zabka Group reporting channels. Specific information on the reporting channels is available on the Zabka Group corporate website: www.zabkagroup.com. The whistleblower will remain fully anonymous unless they choose to provide their details in the report. Zabka Group will refrain from any attempts to identify the person making an anonymous report.

2.2. Marketing and advertising

- 2.2.1. Zabka Group ensures full compliance with the communications and marketing laws applicable in the jurisdictions, adopted self-regulations and good practices.
- 2.2.2. All operations related to customers' personal data shall be performed in accordance with the relevant state law and the [Privacy Policy for the Zabka Group](#).
- 2.2.3. In its marketing communication, Zabka Group uses only messages that do not violate human rights, dignity and do not promote any form of discrimination.

2.3. Shareholder & investor communications and corporate communications

- 2.3.1. Shareholders and investors are one of the key and priority stakeholder groups. Zabka Group values constructive dialogue with them to build both: value and comply with corporate governance principles.
- 2.3.2. Communication is based on integrity, timeliness and relevance of data.
- 2.3.3. The investor relations are provided as a part of financial reporting, namely annual, semi-annual and quarterly reporting where the latest is not mandatory under Zabka Group home state laws but improves the Group' transparency and alignment with the market.
- 2.3.4. The foregoing allows for an assessment of the financial situation of the Group, opportunities and risks, and the actions taken in terms of sustainable development. In addition to financial reporting Zabka Group pays special attention to its remaining regulatory reporting, including the inside information reporting, taking care of its relevance and materiality for investors.

- 2.3.5. Shareholders or investors may address questions to investors' relations officers on a daily basis and to Company's directors during corporate events such as shareholders' meetings.
- 2.3.6. Communication with investors on behalf of Zabka Group can only be conducted by the Investor Relations Team, including Governance & Investor Relations Director and Head of Investor Relations as well as members of the Company's corporate bodies, namely the Board of Directors and the Management Committee. The Corporate Affairs Department is responsible for the corporate communication of the Zabka Group. Corporate communication is the strategic management of information flow between a company and its stakeholders, including employees, customers, investors, and the media. It encompasses both internal and external communication, shaping the organization's reputation, image, and relationships with its environment. Effective corporate communication supports business objectives, builds trust, and strengthens the company's market position.

Art. 3. Basic Principles of Philanthropy and Sponsorship

3.1. General

Zabka Group may provide benefits for specific social purposes that contribute to a positive impact on society and the natural environment.

3.2. Sponsorship

- 3.2.1. Zabka Group, may provide monetary or material benefits to Beneficiaries in exchange for the realization of agreed promotional activities.
- 3.2.2. When providing the benefit, Zabka Group cares about the transparency of sponsorship agreements and avoids benefits affecting the business relationship with the Beneficiary.

3.3. Rules for granting benefits and donations

- 3.3.1. All applications for a benefit for a given Beneficiary should be analyzed and evaluated, above all taking into account the priorities of Zabka Group in the field of philanthropy and sponsorship activities.
- 3.3.2. Zabka Group does not provide benefits to entities that do not:
- have met the requirements or violated the terms of the contract,
 - act to the detriment of Zabka Group or its stakeholders.

Zabka Group reserves the right to refuse to grant the benefit without indicating the reason.

- 3.3.3. Zabka Group does not make any donations to public or governmental bodies.
- 3.3.4. The provisions on lobbying and political engagement should be applied accordingly.

Art. 4. Basic principles of public engagement

4.1. General

- 4.1.1. Zabka Group's key areas of public involvement primarily include its business operations and activities resulting from its strategies.
- 4.1.2. The Zabka Group is publicly engaged through, among others cooperation with various organizations as well as involvement in projects, participation in legislative processes.
- 4.1.3. All social initiatives must be carried out in compliance with the company's policies and regulatory requirements. Any form of corruption or conflict of interest is strictly prohibited.

4.2. Lobbying and political engagement

- 4.2.1. Zabka Group closely cooperates with leading industry and business organizations whose statutory activities include shaping public policy in key areas for the retail sector. As part of these efforts, the company engages in initiatives aimed at supporting effective legislative solutions and promoting best practices.
- 4.2.2. Zabka Group maintains political and ideological neutrality. The Group does not support or finance political parties, election committees, candidates in any elections or other entities related to them.
- 4.2.3. Zabka Group is aware that even within the limits permitted by law, lobbying activities may be harmful to the public interest.

4.3. Local communities

Zabka Group supports local communities, conducts development and relationship-building activities, with respect for the law and their culture.

Art. 5. Final provisions

- 6.1. The policy was adopted by Board of Directors on 24 March.
- 6.2. The policy comes into force on the date of its adoption.
- 6.3. The Policy shall be reviewed periodically and, if necessary, updated accordingly to conform to current legal requirements.
- 6.4. The Policy shall be reviewed and updated by Management Committee.

Art. 6. Key terms and definitions

Beneficiary – an individual, legal or other entity benefiting from Sponsorship or Corporate Philanthropy

Environmental, Social and Governance (ESG) Framework – ESG Framework means Zabka Group framed directional approach to Environmental, Social and Governance (ESG) matters

Corporate philanthropy – a benefit in cash, in kind or in the form of volunteering, provided free of charge to the Beneficiaries, excluding customary gifts and samples

Zabka Group – Zabka Group SA

Stakeholders – all persons or organizations that both affect and are influenced by the Zabka Group. The key Zabka Group's stakeholders: Customers Investors and Shareholders, Business Partners, Employees and Associates, and Local Communities

Communication – any action taken by an organisation and its partners to convey information, influence or build a specific image

Lobbying - any activity carried out by methods not prohibited by law in order to exert a specific influence on the policy and decisions of the authority or other institutions in order to achieve the desired result

Marketing - a process that supports a brand in achieving its sales and image goals through promotions, sponsorships, direct marketing, digital marketing, and other communication activities

Partner / Business Partner – a natural or legal person with whom Zabka maintains business relations, excluding Employees, Associates,

Policy – this policy of responsible communication, sponsorship and public engagement

Employees – all persons employed in the Zabka Group under an employment relationship, regardless of the type of employment contract and working time

Advertising – information, regardless of form and tools, with a non-personal message, the purpose of which is to arouse and maintain interest in the product

Sponsorship – a cash or in-kind benefit provided by the Zabka Group to the Beneficiary

Responsibility Strategy – A document setting out the ambitions, directions of development and goals in the area of environmental, social and corporate governance (ESG) of the company.

Associates – persons providing services or making other benefits to the Zabka Group on the basis of Cooperation Agreements or relevant powers of attorney

Public involvement – any activity carried out by legally permitted methods aimed at influencing the legislative, economic and social environment by providing and obtaining information, aimed at promoting specific decisions and attitudes.

