



Corporate Philanthropy and Sponsorship Policy



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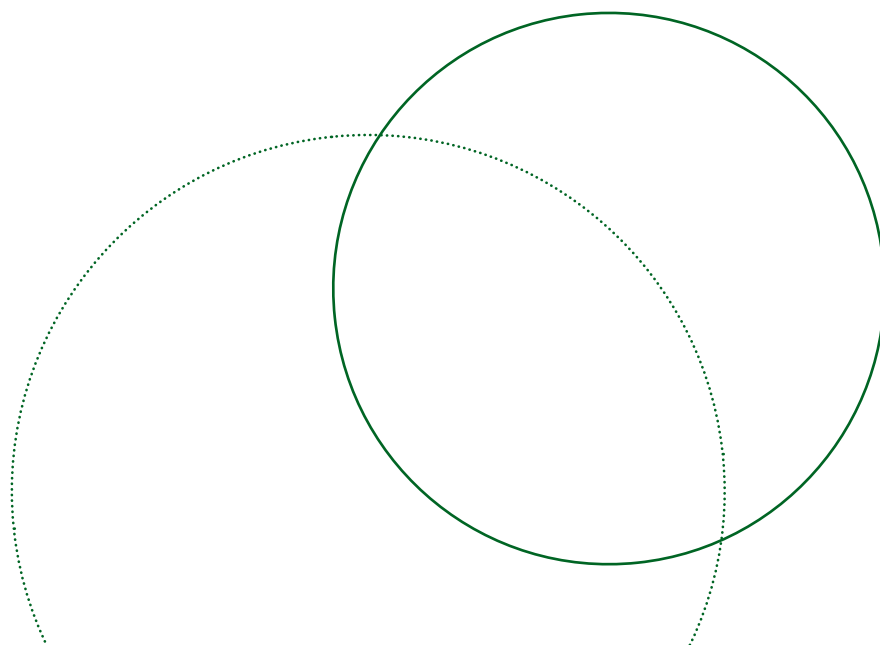




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Introduction

Żabka Polska wants to address significant social challenges in a conscious and responsible manner and positively influence various stakeholder groups. In accordance with the adopted Social Engagement Strategy, three pillars have been set to ensure the fulfillment of the above commitment, i.e. (1) taking actions aimed at improving the mental and physical health of society, (2) strengthening neighborhood ties, and (3) minimizing the risk of exclusion.

We realize that the implementation of the above tasks requires reliability and regularity. We plan to put them into practice by, among other things, engaging in philanthropic as well as sponsorship activities. To ensure compliance with the priorities indicated and transparency in the benefits granted by Żabka Polska, this Corporate Philanthropy and Sponsorship Policy has been adopted. Its purpose is to find answers to basic questions about the process, as well as to provide a framework for detailed internal regulations on the provision of benefits.

Art. 1. Policy subject and scope

1. The purpose of this Policy is to define the main principles of Żabka Polska's philanthropic and sponsorship activities, including marking the connection of granting benefits with the Social Engagement Strategy and defining the assumptions of the benefit transfer process.
2. The provisions of this Policy shall apply without exception to all forms of philanthropic and sponsorship activities.

Art. 2. Definitions

1. **Policy** → this Policy of Corporate Philanthropy and Sponsorship;
2. **Żabka Polska, Company** → Żabka Polska sp. z o.o.;
3. **Employees** → all persons employed at Żabka Polska within the framework of the employment relationship, regardless of the type of employment contract and working hours;
4. **Associates** → persons providing services to Żabka Polska or performing other services on behalf of Żabka Polska on the basis of cooperation agreements or relevant powers of attorney, including Partners, Managers, Directors;
5. **Sponsorship** → a benefit in cash or in kind, made by Żabka Poland (Sponsor) to the Beneficiary (Sponsored), in order for the Beneficiary to perform the activities specified in the sponsorship agreement;

6. **Corporate philanthropy** → a monetary, in-kind or volunteer benefit granted and provided free of charge by Żabka Polska to Beneficiaries, excluding customary gifts and samples;
7. **Beneficiary** → an individual, legal entity or other entity (e.g. unincorporated entity, NGO, institution, etc.) benefiting from Corporate Philanthropy or Sponsorship.

Art. 3. Providing benefits for specific social purposes

1. Żabka Polska provides benefits for specific social purposes, in line with the organization's values and within the scope of key areas including:
 - strengthening health and improving the quality of life,
 - supporting quality education,
 - economic growth and ensuring decent work,
 - eliminating social inequality, discrimination and exclusion,
 - pursuing sustainable development.
2. The specific social goals mentioned in paragraph 1 shall be determined in accordance with the Social Engagement Strategy adopted at Żabka Polska.
3. Benefits for social purposes shall be provided within the annual budget for philanthropic and sponsorship activities.

Art. 4. Corporate philanthropy

1. The Company shall make donations primarily to non-governmental organizations, especially those having the status of public benefit organizations.
2. Employees of the Company may, within the scope of their employment at Żabka Polska, engage in employee volunteering under the terms and hours specified in the Company's internal regulations.

I Art. 5. Sponsorship

1. The Beneficiary of the Sponsorship, in return for providing the agreed promotional or advertising services to Żabka Polska, shall receive a monetary or material benefit intended to cover the costs of the entirety or a specific scope of work related to the organization and implementation of the sponsored project.
2. Żabka Polska cares about the transparency of sponsorship agreements and does not provide benefits that could potentially affect the business relationship with the Beneficiary, in particular the conclusion of any commercial transaction.

I Art. 6. Basic principles of philanthropic activities and sponsorship

1. The prerequisite for making a decision on the transfer of a benefit to a given Beneficiary is the submission of an application for such a benefit describing the project, its scope, benefits and budget available on the żappka platform and sending it:
 - by regular mail to the address of the Company's headquarters, or
 - by email to: darowizny@zabka.pl
2. When requesting support, the applicant must bear in mind that:
 - The Company may refuse to provide support without indicating reasons for the refusal,
 - The Company may require the Beneficiary to inform about the support of the activities undertaken, with financial or material resources from Żabka Polska,
 - The Beneficiary may not inform about the support received without the consent of Żabka Polska,
 - The Company may make public information about the support provided.
3. All applications received are subject to a thorough analysis and evaluation in accordance with the priorities of philanthropic and sponsorship activities established by the Company for the year.
4. The receipt of a benefit is preceded each time by the signing of an appropriate agreement on philanthropic or sponsorship activities.
5. The Beneficiary shall be obliged to present, within 14 days of execution of the agreement described in paragraph 4, an accounting of the funds granted to confirm their use for the intended purpose, and to the extent possible to present other confirmations of the use of the funds granted (e.g. photographs).

6. In the event of the identification of gross misconduct or a reasonable suspicion of violation of the law, funding of the Beneficiary's activities may be immediately discontinued. .
7. Żabka Polska shall maintain political and worldview neutrality. As such, it does not directly or indirectly support political activities. Żabka Polska will leave applications submitted by political parties and foundations established by them, or by sports clubs operating in various organizational and legal forms, unexamined.
8. In addition, benefits will also not be granted to entities that, among other things:
 - did not submit all the necessary documents, despite a request for their completion, or submitted documents that raise concerns about their authenticity,
 - have failed to account for or misused funds in the last 5 years,
 - act to the detriment of the Company or its other stakeholders,
 - are public officials as defined in the Criminal Code or persons holding politically exposed positions.

Art. 7. Roles and responsibilities

1. The Corporate Affairs Department shall be responsible for the philanthropic and sponsorship activities conducted by Żabka Polska, and in particular for the process of receiving and verifying applications, granting and transferring benefits, controlling and archiving all activities undertaken in this regard, and for presenting a report on philanthropic and sponsorship activities to the Company's Management Board, at least once a year.
2. The decision to grant a benefit is made each time in the form of a resolution of the Company's Management Board upon the proposal of the Director of Corporate Affairs.
3. The Compliance Officer shall be responsible for ensuring compliance of the Policy with generally applicable laws and periodically verifying any irregularities in its implementation or execution.
4. The Compliance Officer shall report on the results of the verification referred to in paragraph 3 to the Company's Management Board, at least once a year.

| Art. 8. Policy review and update

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

| Art. 9. Final provisions

1. The Policy was adopted by the Management Board of Żabka Polska on December 16, 2022.
2. The Policy comes into effect on February 01, 2023.

