



HUMAN RIGHTS POLICY

Żabka Polska sp. z o.o.

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PURPOSE

The purpose of this Policy is to ensure that our employees and associates adhere to internationally recognised human rights standards, including the Universal Declaration of Human Rights, International Labour Organization Conventions, and other relevant international agreements.

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INTRODUCTION

This Policy outlines our fundamental standards of conduct and action pertaining to human rights. This document is in line with the Principles of the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights, while also considering the provisions of the Universal Declaration of Human Rights, the European Convention for the Protection of Human Rights and Fundamental Freedoms, the International Labour Organization Conventions, the Beijing Declaration on women's rights, and the UN Convention on the Rights of Persons with Disabilities. Adherence to the above principles signifies our commitment to acting with utmost care in support of human rights.

This Policy applies to all employees, directors, and members of the management and supervisory boards within Żabka Polska sp. z o.o. (the "Company"), as well as other stakeholders, particularly permanent associates. We will promote the principles outlined in this Policy among our business partners, including through the policies set out in the Code of Conduct for Business Partners, Human Rights Policy for Business Partners, Code of Ethics and Conduct for Żabka Polska Franchisees and Code of Ethics and Conduct for Żabka Polska Employees. These Codes are founded on our commitment to ensuring compliance with the Universal Declaration of Human Rights and the 10 Principles of the United Nations Global Compact. By joining the Global Compact initiative, Żabka Polska made a clear declaration of its zero tolerance for any form of infringement of human dignity. Żabka Polska expects all recipients of this Policy to adhere to applicable national and international laws and regulations governing the protection of human rights in all places where they operate. Żabka Polska promotes a zero-tolerance policy towards all forms of physical, psychological and sexual violence, insults, attempts at intimidation, and inhumane treatment.

This Policy contributes to the achievement of our business goals and ambitions. Respect for human rights is deeply ingrained in our corporate DNA and forms the foundation of our daily conduct. Our stance is grounded in the belief that all activities should be carried out in a manner that does not violate human rights.

We also expect all those covered by this Policy to respect and contribute to the protection of human rights.

Section 1. SCOPE

1.1. Equal treatment and anti-discrimination

We are committed to promoting equal opportunities and diversity while actively countering all forms of discrimination and workplace bullying. We proactively prevent discrimination based on race, colour, nationality, ethnicity, language, social background, economic status, union membership, religion, sex, age, sexual orientation, disability, family status, genetic characteristics, political views, employment status, or any other basis. Internal decisions pertaining to employment and business relationships, including hiring, training, and promotions, are made exclusively on the basis of objective criteria, ensuring the right to equal protection against discrimination.

1.2. Child protection

We do not employ children in our Company or its affiliated companies. We adhere to the International Labour Organization Conventions regarding the minimum employment age. According to the

International Labour Organization's Convention No. 138, the minimum employment age must not be less than the higher of the age of completion of compulsory schooling or the minimum statutory age for admission to employment, and, in any case, it must not be less than 15 years. This also applies to training and internships/apprenticeships. In addition, the minimum age for admission to work which is likely to jeopardise the health, safety or morals of young persons must not be less than 18. All confirmed cases of child labour must be investigated and documented, and corrective measures must be implemented.

1.3. Prohibition of forced labour and human trafficking

Our Company, its affiliated companies and associates are committed to actively preventing and countering forced labour, human trafficking, procuring, and the use of prisoner labour, except under rehabilitation programmes providing remuneration at or above the national minimum wage. We respect the freedom to choose the form of employment.

1.4. Health and safety

We are committed to protecting our employees and associates, as they are our most valuable asset. To this end, we make every effort to protect their health and ensure their safety in the workplace. In addition, we respect their right to a healthy and balanced lifestyle, including a healthy diet.

1.5. Freedom of association

We respect the right of employees to form and join trade unions and to organise strikes, as permitted by applicable laws. Moreover, as an employer, we encourage open dialogue without retaliation, intimidation, or harassment.

1.6. Privacy protection

We uphold the privacy and dignity of all those who engage in a business relationship with us. We are committed to protecting personal data by communicating the processes we employ for collecting, sharing, storing, transferring, and deleting such data. We comply with all applicable data protection laws.

1.7. Working hours, remuneration, and additional benefits

We comply with all regulations pertaining to remuneration, working hours, overtime, paid leave, and other benefits. We offer our employees fair remuneration. Remuneration is established fairly in line with industry standards.

1.8. Violence-free work environment

We strive to create a workplace free of any violence, workplace bullying, intimidation, and any incidents that may jeopardise the safety, well-being, and health of our employees. This encompasses all forms of harassment, irrespective of their nature, whether physical, sexual, verbal, or psychological. We put our policy against violations into action by implementing employee training programmes. Reports of potential violations are handled by a dedicated Ethics Committee.

1.9. Clean and healthy environment

In recognition of everyone's right to safe, clean water and air, we acknowledge our responsibility for the impact our actions have on the climate and the environment. Therefore, we are committed to reducing our environmental footprint across the entire value chain.

1.10. Local communities

We are open to engaging with local communities. We encourage our employees, associates, franchisees, and customers to support and respect the rights of local communities, including those that may be underrepresented.

Section 2. POLICY IMPLEMENTATION, REVIEW AND UPDATE

We are committed to mitigating the risk of human rights violations within our Company by identifying, monitoring, and addressing any actions or behaviours that could potentially lead to such violations.

The Company's Management Board assumes responsibility for this Policy. This Policy is subject to approval by the Company's Management Board and undergoes periodic reviews and updates by the Management Board, with a specific focus on its accuracy and effectiveness, at least every two years. We declare our commitment to taking actions to identify, monitor, and address any violations and to implementing corrective measures related to human rights, in order to provide better support to our employees and associates.

The Company is committed to operationalising its human rights policy by integrating its provisions and requirements into the daily procedures and instructions used in both strategic and operational activities. To ensure their implementation, it is crucial that the Company's employees and business partners are acquainted with this Policy. Accordingly, this Policy is publicly available and all persons covered by it will receive periodic mandatory training on human rights and compliance. Its scope encompasses key aspects of human rights protection and identification of potential violations.

Section 3. CONTROL MECHANISMS

We are committed to ensuring that anyone who may be impacted by our actions has access to mechanisms for addressing incidents potentially leading to human rights violations in a fair, respectful, and timely manner.

We encourage our employees and associates to engage in open and honest communication. Individuals who report a complaint or concern in good faith will not face any repercussions. Confidentiality will be maintained in respect of any person reporting non-compliance with this Policy.

Questions or reports of potential violations should be submitted to the Ethics Committee or through the Green Line (Whistle B platform, which is an anonymous reporting channel). We accept reports from all employees, associates, and third parties. The Company commits to promptly investigate all complaints and take appropriate corrective measures in accordance with the applicable Whistleblower Procedure.