



# Human Rights Policy for Business Partners

**Żabka Polska sp. z o.o.**

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**PURPOSE**

The purpose of this Policy is to ensure that our Business Partners 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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## I. Introduction

We require our Business Partners to respect human rights in compliance with internationally recognised human rights standards, including the Universal Declaration of Human Rights, International Labour Organization Conventions, and other relevant international agreements. We recognise our responsibility to uphold human rights in all aspects of our business, including our interactions with employees, associates, and business partners.

## II. Scope

This Human Rights Policy applies to all operations carried out by Zabka Polska, our subsidiaries and our Business Partners.

## III. Commitments

We commit, and expect our Business Partners to commit, to:

1. **Countering human trafficking:** Our Business Partners condemn and commit to countering all forms of human trafficking in their operations and supply chains.
2. **Countering child labour:** Our Business Partners adhere to regulations prohibiting child labour, and 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 labour:** Our Business Partners 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. **Countering discrimination:** Our Business Partners 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:** Our Business Partners respect the right of employees to freedom of association, including the right to form and join trade unions and to collective bargaining and collective disputes in accordance with applicable law.
6. **Equal pay:** Our Business Partners are committed to ensuring equal pay for work of equal value, without regard to gender, race, age, disability, sexual orientation, or any other discriminatory factor.

## IV. Cooperation with suppliers and business partners

We expect all of our suppliers and Business Partners to adhere to this Human Rights Policy for Business Partners and to commit to monitoring their activities for compliance with the values and standards set forth in this Policy.

## V. Monitoring and enforcement

Our Business Partners will monitor compliance with this Human Rights Policy for Business Partners and take all necessary steps to enforce it. We aim to ensure that all our employees, suppliers, and business partners adhere to the provisions of this Policy and uphold high ethical and human rights standards. What we expect from our Business Partners:

### Monitoring.

1. **Audits and inspections:** Our Business Partners regularly perform internal and external audits and inspections to evaluate the extent to which human rights are upheld within their organisation.
2. **Training and awareness:** Our Business Partners organise the necessary training for employees across all levels of the organisation, aimed at raising their awareness about human rights and their commitment and responsibility to uphold those rights. The training also covers violation reporting procedures and available corrective measures.
3. **Reporting channels:** Our Business Partners have implemented dedicated channels for reporting violations, including human rights violations, such as a telephone hotline, email address or anonymous online reporting system, where any irregularities or violations can be reported without fear of retaliation.
4. **External disclosures:** Our Business Partners have not restricted their employees, suppliers and business partners from making external disclosures regarding potential violations through the Green Line (Whistle B platform) and other channels to Żabka Polska sp. z o.o., in which case the latter may request that the Business Partner take a stance on the reported violation.

### Enforcement.

1. **Responding to violations:** If a violation of this Human Rights Policy is identified, our Business Partner will promptly investigate the root causes of the violation, implement suitable corrective measures, and proactively work to prevent similar incidents from happening in the future.
2. **Corrective measures:** Our Business Partners commit to implementing appropriate corrective measures upon the identification of any violations. 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.
3. **Responsibility and consequences:** Żabka Polska sp. z o.o. and its Business Partners regard 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 employees, such as suspension, termination, or legal liability, as well as termination of the relationship with the supplier or business partner.

## VI. Review and update

Żabka Polska sp. z o.o. will regularly review and update these monitoring and enforcement policies to ensure their effectiveness and alignment with changing human rights standards and practices. Any changes to this Policy will be communicated to its intended recipients.