

## Policy on Sustainable Sourcing of Plant, Raw Materials and Sustainable Fishing of Fish and Seafood

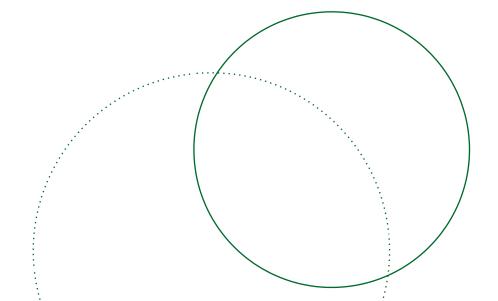


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## Introduction

Responsibility is one of the values of Żabka Polska - as we develop in a sustainable and responsible way, we are aware of our obligations towards the natural environment, employees, franchisees and consumers, as well as the communities within which our stores operate. The company's ambition is to create conditions for sustainable living - for everyone and every day. We emphasize our environmental responsibility, guided by respect for people, animals and the planet. Responsible business practices include caring for the sustainable sourcing of plant materials and sustainable fishing and seafood.

The purpose of this policy is to define the requirements for the certification of raw materials that have the greatest impact on people and the environment. This group includes the following raw materials: coffee, tea, cocoa, soy, fish and seafood present in our Own Brand products. In further steps to demonstrate responsible business practices for this group of raw materials, we will also encourage our suppliers of Branded Products to legitimate with the sustainable sourcing certification.

With the aim of reducing harmful effects on the soil, air, water resources, biodiversity and ecosystems, and more broadly the climate, but also human health, we want to be part of the economy that responsibly approaches the topic of sustainable agriculture and fishing. In our daily operations, we feel responsible for what we offer our customers and therefore we know how important it is to be an entrepreneur who openly and directly talks about the actions taken in the context of improving food products, caring for environmental safety and sustainable development. We are committed to continuous improvement of products standards available for sale, as well as cultivating plant raw materials as well as fishing raw materials in an environmentally and people-friendly manner. This means that we want the process of product creation to have no negative impact on forests, soils, waters and animals, and that people employed in production are treated in accordance with respect for human rights by providing decent working conditions and preventing child labour.

Confirmation of the above assumptions is the possession by our suppliers of our Own Brand assortment one of the following certificates adequate for the subject group of raw materials (coffee, tea, cocoa, soy, fish and seafood):

- Rainforest Alliance 2020,
- RTRS (Round Table on Responsible Soy),
- ISCC (International Sustainability & Carbon Certification,
- Pro Terra,
- SAN (Sustainable Agriculture Network),
- SSAP (U.S. SOY SUSTAINABILITY ASSURANCE PROTOCOL),
- DSS & DSG (Donau Soya Standard & Donau Soya Guidelines)
- ASC (Aquaculture Stewardship Council),
- MSC (Marine Stewardship Council),
- BAP (Best Aquaculture Practices).



## Art. 1 SUBJECT AND SCOPE OF THE POLICY

- 1. This Policy defines uniform standards and procedures for Own Brand products offered by Żabka Polska, containing coffee, tea, cocoa, soy, fish and seafood, and also excludes the use of genetically modified organisms in food production.
- 2. The procedures specified in the Policy apply to the Company.

## **Art. 2 DEFINITIONS AND ABBREVIATIONS**

- 1) Policy This Policy on the sustainable sourcing of plant materials, fish and seafood.
- **Biodiversity** 2) Diversity of life at all levels of its organization. It includes the diversity of genes, species, and ecosystems.
- 3) Sustainable Development A trend that assumes thoughtful use of resources in such a way that they are sufficient to build the well-being of the current generation, but can also meet the needs of the future.
- 4) Rainforest Alliance 2020 A certification program that includes requirements for farms. It was created as a result of the merger of two organizations: UTZ and Rainforest Alliance Certified.
- 5) RTRS (Round Table on International certification of sustainable soy cultivation and assurance of social responsibility in the soy sector. Responsible Soy)
  - International certification of sustainable crops, certification of their emissions, and assurance of social **Sustainability & Carbon** responsibility in the soy production sector for industry. Certification)
    - International certification of sustainable crops, certification of their emissions, and assurance of social responsibility in the soy production sector for industry.
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    - Certification system aimed at ensuring sustainable development and traceability in the fishing industry.

- 6) ICSS (International
- 7) ProTerra
- 8) SAN (Sustainable Agriculture Network)
- 9) SSAP (U.S. SOY **SUSTAINABILITY ASSURANCE PROTOCOL)**
- 10) Donau Soya Standard & **Donau Soya Guidelines**
- 11) ASC (Aquaculture **Stewardship Council)**



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  - 12) MSC (Marine Stewardship Council)
- Certification system designed to ensure that fish come from sustainable and legal sources and are properly labeled.
- 13) BAP (Best Aquaculture Practices)
- A certification program for hydroponic seafood facilities that covers environmental and social responsibility, animal welfare, food safety, and traceability.
- 14) Non- GMO (Genetically Modified Organisms)
- Free from genetically modified organisms

15) Supply Chain

- Series of processes / steps through which raw materials pass from the primary producer to the final producer.
- 16) Own Brand Products
- Products offered to the customer under the Żabka Polska brand, understood as products produced by a given supplier, with properties specified by Żabka Polska, packaged in a way indicated by Żabka Polska and marked with a trademark indicated by Żabka Polska, to which all intellectual property rights are held by Żabka Polska.
- 17) Żabka Polska, Spółka
- Żabka Polska sp. z o. o.



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## **Art. 3 GENERAL PRINCIPLES**

- 1. The policy is aimed at achieving the company's goal, i.e. minimizing the impact on biodiversity and ecosystems by using only certified raw materials and products, such as coffee, tea, cocoa, soy, fish and seafood in Own Brand products.
- 2. Regardless of the provisions of paragraph 2 above, the Company assumes a complete elimination of uncertified raw materials and products (coffee, tea, cocoa, soy, fish, seafood) in the products offered by Żabka Polska of its Own Brand.
- 3. Goals set by the Company:

#### Coffee

- From 01.2023 coffee with Rainforest Alliance 2020 certificate in Own Brand products
   Tea
- From 01.2025 tea with Rainforest Alliance 2020 certificate in Own Brand products **Cocoa**
- From 01.2025 cocoa with Rainforest Alliance 2020 certificate in Own Brand products
   Soy
- From 06.2024 50% of Own Brand products with certified soy (international certification carried out by authorized external institutions confirming responsible soy production e.g. RTRS, ProTerra, ISCC, SAN, SSAP, DSS.
- From 06.2025 100% of Own Brand products with certified soy (international certification carried out by authorized external institutions confirming responsible soy production e.g. RTRS, ProTerra, ISCC, SAN, SSAP, DSS.
- During the transition period, i.e. until 06.2025, audits and own certifications of the supplier in the field of sustainable soy procurement will be acceptable.
  - 1. The supplier's own certification should cover 5 pillars of responsible soy cultivation: Compliance with Legal Requirements & Fair Business Practices
  - 2. Respect for Law and Safety at Work
  - 3. Entrepreneur's Social Responsibility
  - 4. Protection of the Natural Environment
  - 5. Sustainable Agricultural Practices
- From 06.2025 the Company will only honour international certificates for sustainable soy procurement.

The certification requirement applies to an ingredient that constitutes at least 10% of the final product or determines the character of the product (ingredient giving character to the product or placed in the name or on the graphics) or its percentage quantity has been declared on the label (QUID)

#### Fish and seafood

From 04.2023 - fish and seafood with ASC/ MSC/ BAP certificate in Own Brand products.



# Art. 4 INGREDIENTS AND PRODUCTS FREE FROM GENETICALLY MODIFIED ORGANISMS

The products supplied to the Company should be free from Genetically Modified Organisms (GMOs), taking into account the legal requirements contained in the Act of June 13, 2019 on the labelling of products produced without the use of genetically modified organisms and as free from these organisms (Journal of Laws 2019, item 1401), in force since January 1, 2020.

#### **Art. 5 DETAILED PROVISIONS**

This Policy sets out the following key principles related to the sustainable sourcing of coffee, tea, soy, cocoa, and sustainable fishing of fish and seafood in the Private Label assortment of the Żabka Polska network:

- ✓ Education and dialogue with business partners supplying the Private Label assortment of the Company, about responsible cultivation and sustainable fishing, and encouraging them to take steps in this direction;
- ✓ Supporting responsible producers inclusion of the certification aspect as a purchasing criterion at appropriate, agreed deadlines;
- ✓ Maintaining the principle of certified raw materials (coffee, tea, cocoa, soy and fish) in Private Label products;
- ✓ Ongoing education of Employees, Associates and Franchisees in maintaining biodiversity and sustainable sourcing of raw materials;
- ✓ Educating consumers about biodiversity and sustainable sourcing of raw materials and supporting conscious purchasing choices;
- ✓ Verification of the certificates held by individual links in the supply chain in the field of Private Label.



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## Art. 6 REVIEW AND UPDATE OF THE POLICY

The Director of Quality and Food Management Standards is responsible for ensuring the Policy's compliance with universally applicable laws and for verifying any irregularities in its implementation or execution. The Policy is subject to periodic review and - if necessary - appropriate update to adapt it to current legal requirements. The review and update of the Policy is carried out by the Director of Quality and Food Management Standards, no less than once every 12 months.

## Art. 7 FINAL PROVISIONS

The Policy was adopted by the Company's Board on 12 July 2022 and revised n 2024.

The Policy comes into effect on the day the resolution is adopted.

