



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.

In the case of materials covered by this policy, their cultivation and sourcing in an unsustainable manner may be associated with a range of environmental risks, such as deforestation, destruction of peatlands, soil degradation, water pollution, or carbon dioxide emissions, as well as social risks, such as violations of labor rights and human rights.

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 Private Label products. In the next steps, we have the ambition to also engage our Branded Product suppliers.
- Palm oil: currently used in Good Mood Private Label¹ products and Branded products

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 relevant suppliers one of the following certificates adequate for the subject group of raw materials (coffee, tea, cocoa, palm oil, soy, fish and seafood), which assured sustainable sourcing of these materials:

- Rainforest Alliance,
- FairTrade

¹ Other Private Label products do not contain palm oil

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- RSPO (Roundtable on Sustainable Palm Oil)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)
- GlobalG.A.P.
- ASC (Aquaculture Stewardship Council),
- MSC (Marine Stewardship Council),
- BAP (Best Aquaculture Practices).

In the absence of the above-mentioned certificates, other equivalent certificates² ensuring the sustainable sourcing of these raw materials are accepted.

² The comparison of equivalence is carried out using external tools that compare certification standards, including the [Standards Map App](#), accessed on 30.09.2025.

Art. 1. SUBJECT AND SCOPE OF THE POLICY

1. This Policy defines uniform standards and procedures for:
 - a. Private Label 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.
 - b. Branded Products offered by Żabka Polska as well as Good Mood Private Label products, containing palm oil
2. The procedures specified in the Policy apply to the Company.

Art. 2. DEFINITIONS AND ABBREVIATIONS

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|--|---|
| 1) Policy | – This Policy on the sustainable sourcing of plant materials, fish and seafood. |
| 2) Biodiversity | – 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 | – A certification program that includes requirements for farms and supply chain |
| 5) FairTrade | – Certification system that ensures products meet specific social, economic, and environmental standards |
| 6) RSPO (Roundtable on Sustainable Palm Oil) | – International certification of sustainable palm oil cultivation and its processing at every stage of the supply chain. |
| 7) RTRS (Round Table on Responsible Soy) | – International certification of sustainable soy cultivation and assurance of social responsibility in the soy sector. |
| 8) ICSS (International Sustainability & Carbon Certification) | – International certification of sustainable crops, certification of their emissions, and assurance of social responsibility in the soy production sector for industry. |
| 9) ProTerra | – International certification of sustainable crops, certification of their emissions, and assurance of social responsibility in the soy production sector for industry. |
| 10) SAN (Sustainable Agriculture Network) | – 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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- 11) **SSAP (U.S. SOY SUSTAINABILITY ASSURANCE PROTOCOL)**
 - International certification of sustainable crops, certification of their emissions, and assurance of social responsibility in the soy production sector for industry.
- 12) **Donau Soya Standard & Donau Soya Guidelines**
 - International certification of sustainable crops, certification of their emissions, and assurance of social responsibility in the soy production sector for industry.
- 13) **GlobalG.A.P.**
 - certification system that sets voluntary standards for Good Agricultural Practices (G.A.P.). It ensures that food is produced safely, sustainably, and responsibly across agriculture, aquaculture, and floriculture sectors.
- 14) **ASC (Aquaculture Stewardship Council)**
 - Certification system aimed at ensuring sustainable development and traceability in the fishing industry.
- 15) **MSC (Marine Stewardship Council)**
 - Certification system designed to ensure that fish come from sustainable and legal sources and are properly labeled.
- 16) **BAP (Best Aquaculture Practices)**
 - A certification program for hydroponic seafood facilities that covers environmental and social responsibility, animal welfare, food safety, and traceability.
- 17) **Non- GMO (Genetically Modified Organisms)**
 - Free from genetically modified organisms
- 18) **Supply Chain**
 - Series of processes / steps through which raw materials pass from the primary producer to the final producer.
- 19) **Private Label 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.
- 20) **Żabka Polska, Spółka**
 - Żabka Polska sp. z o. o.

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.
2. 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 Private Label.
3. Requirements set by the Company for Private Label Products:
 - **Coffee, cocoa, tee:** with Rainforest Alliance or FairTrade certificate
 - **Soy³:** with RTRS, ProTerra, ISCC, SAN, SSAP, DSS or GlobalG.A.P. certificate
 - **Palm oil:** no palm oil⁴
 - **Fish and seafood:** with fish and seafood with ASC/ MSC/ BAP certificate.
4. Żabka Polska expects suppliers of its Private Label products to present documentation that confirms certification of an ingredient, according to product specifications.
5. Private Label product suppliers are also obliged to obtain full chain of custody certification for their production process, aligned with requirements of the relevant certification systems.
6. Requirements for branded product suppliers:
 - products with certified sustainable palm oil (RSPO certificate)

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 (Dz. U. z 2021 r. poz. 763), in force since January 1, 2020.

³ 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 its percentage quantity has been declared on the label (QUID))

⁴ except for Good Mood label, which contains certified palm oil (CSPO).

Art. 5. ADDITIONAL PROVISIONS

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

- ✓ Education and dialogue with business partners, 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
- ✓ 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 of the relevant supply chain actors according to the requirements.

Art. 6. REVIEW AND UPDATE OF THE POLICY

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

Art. 7. FINAL PROVISIONS

1. The Policy was adopted by the Company's Board on 12 July 2022.
2. Current version of the Policy comes into force on April 1st, 2026.

