Code of Ethical Conduct of the Empik Group

Resolution No. 1/30/12/2025

of the Management Board of Empik S.A., with its registered office in Warsaw, dated 30 December 2025, concerning the addendum adopting the Empik Group Code of Ethical Conduct, together with its appendices.

Introduction

The Empik Group Code of Ethical Conduct (the **"Code"**) is a document developed to establish common ethical standards for the business activities of Empik S.A. and its subsidiaries (the **"Empik Group"**).

The Code, together with the documents elaborating on its principles, also serves as a source of guidelines, guidance and good practices for Empik Group employees and business counterparties. The Empik Group requires its business partners to comply with the principles set out in the Code.

The Code also constitutes a commitment, applicable to all Empik Group entities, to conduct business in accordance with good business practices and customs and applicable law, in particular with respect for human rights and employees' interests, guided by tolerance and respect for diversity.

Professionalism and quality

The Empik Group is a leading player in Poland's modern retail market, operating both in physical stores and online, including through a marketplace and mobile app, and providing access to digital content - audiobooks, e-books and podcasts - as well as tickets to cultural and entertainment events.

The Empik Group continually draws on its 75-year history, which has led Empik stores to be recognised as centres of culture, information and entertainment.

Meeting the challenges of today and honouring this historical legacy requires every Empik Group employee to uphold the highest standards of professionalism and quality.

About the Code

Purpose and scope of the Code

The purpose of this Empik Group Code of Ethical Conduct, hereinafter referred to as the "Code", is to establish common, high standards and practices in employment, respect for the natural environment and the conduct of business.

The provisions of the Code of Ethics apply to all entities within the Empik Group. The Empik Group Management Board and all persons working for the Empik Group under an employment contract, a contract of mandate or another civil-law contract are required to comply with the Code of Ethics.

Responsibility for the Code

The Compliance Officer is responsible for overseeing the content of the Code, implementing procedures for communicating the Code and supervising the handling of reports of breaches of its provisions.

Basis of the Code

The provisions of the Empik Group Code of Ethical Conduct are based on internationally recognised standards and international guidelines regarded as sources of best practice for ethical business conduct, namely:

- Universal Declaration of Human Rights,
- Charter of Fundamental Rights of the European Union,
- Ten Principles of the United Nations Global Compact,
- Fundamental Conventions of the ILO (International Labour Organization), e.g. Convention No. 29 concerning Forced or Compulsory Labour,
- OECD Guidelines for Multinational Enterprises,
- UN Guiding Principles on Business and Human Rights,

Principles of the Code

Commitment to respecting human rights

The Empik Group is committed to respecting internationally recognised human rights, in particular those arising from:

- International Bill of Human Rights,
- Charter of Fundamental Rights of the European Union,
- Ten Principles of the United Nations Global Compact,
- International Labour Organization (ILO) Declaration and its conventions,
- OECD Guidelines for Multinational Enterprises,
- UN Guiding Principles on Business and Human Rights.

Employment practices

Prohibition of child labour: The Empik Group is committed to preventing child labour.

The employment of persons under the age of 15 is strictly prohibited throughout the value chain. Persons aged between 15 and 18 may be employed only in accordance with the rules strictly defined by generally applicable law;

The Empik Group will require its subcontractors and suppliers to follow the same principles on preventing child labour.

Prohibition of forced labour and human trafficking: The Empik Group does not tolerate forced labour or human trafficking anywhere in its value chain. The Group is committed to preventing these practices in its own operations. The Empik Group will require its subcontractors and suppliers to follow the same principles on preventing human trafficking and forced labour.

Non-discrimination and diversity: Tolerance and respect for diversity underpin the Empik Group's organisational culture. The Group strives to create an inclusive work environment where everyone feels respected and accepted, regardless of background, beliefs, religion, gender, sexual orientation, age, disability or any other personal characteristic. There is no place in the Empik Group for any form of discrimination, including hate speech, harassment and sexual harassment.

Further information on diversity and preventing discrimination can be found in the Empik Group Diversity Policy and the internal Anti-Discrimination and Anti-Bullying Policy.

Workplace bullying: The Empik Group is committed to preventing workplace bullying and does not accept any form of it in the workplace.

Occupational health and safety: Providing healthy and safe working conditions for employees and other workers is an Empik Group priority. Each position is subject to an occupational risk assessment, and the

identification of potential hazards provides the starting point for designing appropriate preventive measures. Work may begin only after completion of mandatory occupational health and safety training tailored to the tasks performed. The Empik Group also regularly organises training and educational and information activities to raise awareness of occupational health and safety.

Ensuring fair working hours: The Empik Group is committed to providing employees and other workers with fair working hours that allow them to maintain a work-life balance. Daily and weekly working-hour limits, as well as employees' right to rest, are strictly observed within the Empik Group.

Ensuring fair remuneration: The Empik Group provides fair and decent remuneration for work, in accordance with applicable law and with respect for international standards, including International Labour Organization (ILO) guidelines, the UN Global Compact principles and the Universal Declaration of Human Rights. Remuneration is determined transparently, based on objective criteria, and paid on time.

Freedom of association: The Empik Group respects employees' right to freedom of association and to establish organisations representing their interests. We believe that constructive dialogue and cooperation strengthen our organisational culture and support the development of the entire Group.

Corporate ethics

Anti-corruption: All Empik Group employees and other workers are required to avoid any conduct that could be perceived as corrupt.

Detailed rules on preventing corruption are set out in the Empik Group Anti-Corruption Code.

Preventing conflicts of interest: All Empik Group employees and other workers are required to avoid situations that could give rise to a conflict of interest. In our daily work, we act impartially and transparently, ensuring that private relationships or interests do not influence business decisions or the interests of the company.

If you have any doubts about a potential conflict of interest, refer to the Empik Group Anti-Corruption Code or contact the Compliance Officer.

Fair competition: The Empik Group conducts business in accordance with the principles of fair competition and applicable law. We ensure that our market practices are transparent and ethical, avoiding actions that could breach these principles. We promote awareness among our employees and management, supporting a culture of responsible business. The Empik Group is committed to conducting business in accordance with the principles of fair competition and applicable antitrust law.

The Empik Group provides periodic training for management on the principles of fair competition and runs information campaigns to raise awareness of fair competition among Group employees.

Personal data protection: We process personal data in accordance with applicable law, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 *on the protection of natural*

persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR). We collect personal data only for legitimate, lawful purposes and only to the extent necessary to achieve those purposes. We are all required to handle the data entrusted to us responsibly.

Further guidance is provided in the Personal Data Protection Policy. If you have any questions concerning the processing of personal data, you may contact the Data Protection Officer (daneosobowe@empik.com).

Information security: The Empik Group safeguards information security, including appropriate protection of data, IT systems and documents against unauthorised access, loss or disclosure. Employees are required to comply with the organisation's internal information security procedures and report all incidents.

Care for consumers: The Empik Group takes care to ensure that products offered to consumers are safe and meet the required standards. We strive to provide clear and helpful product information, supporting our customers in making informed purchasing decisions.

Care for the climate and the environment

The Empik Group is committed to caring for the climate and the environment, in particular by:

- Monitoring its impact on the climate and the environment and taking action to mitigate adverse impacts;
- Monitoring and setting targets for Scope 1 and Scope 2 greenhouse gas emissions;
- Using natural resources responsibly, including minimising waste and resource consumption and promoting circular economy initiatives.

Regularly reporting on climate action as part of reporting practices

Mechanisms for monitoring compliance with the Code

The mechanisms implemented under this Code of Ethics are intended to monitor compliance with the Code, manage supply-chain risks and support stakeholders in actively participating in the Empik Group's due diligence process.

Remediation

If the Empik Group may have contributed, directly or indirectly, to an adverse impact, it will endeavour to work with the relevant parties to develop and implement remedial measures, in accordance with the principle of shared responsibility set out in the OECD Guidelines on Responsible Business Conduct. Where additional support is required, the Empik Group may cooperate with the appropriate judicial or non-judicial bodies to ensure adequate solutions.

Reporting breaches

Breaches of this Code may be reported:

- by email to: zglosnaruszenie@empik.com;
- via the form at empik.com: https://www.empik.com/pomoc/formularz-dla-sygnalistow
- in person to the Compliance Officer;
- by post to: Compliance Officer, Empik S.A., ul. Marszałkowska 104/122 (00-017 Warsaw), marked "For the addressee only".

We ensure confidentiality and protection from retaliation for those who report in good faith.

Reports may also be made anonymously.

A detailed description of the reporting process, including information on how reports are handled, is provided in the Rules for Reporting Breaches of Law.

Process for updating the Code

This Code is reviewed annually and whenever legal changes relevant to its content occur. A review may result in amendments to the Code. Any amendment that does not arise directly from legal provisions will be consulted on with employee representatives. Employees will be informed of every amendment to the Code within 7 days of its adoption.

Appendix 1 - Acknowledgement statements

DECLARATION

I declare that I have read the provisions of the Empik Group Code of Ethics and undertake to comply with the principles set out therein.

_____ Full name of the signatory

_____ Position of the signatory

_____ Handwritten signature

_____ Date and place