empik

CODE OF CONDUCT FOR EMPIK GROUP BUSINESS PARTNERS

Resolution No. 1/30/12/2025 of the Management Board of Empik S.A. with its registered office in Warsaw of 30 December 2025 on the adoption of the Empik Group Code of Ethical Conduct together with appendices.

§ 1 Introduction

At Empik, we believe that conducting business responsibly means not only delivering inspiring products related to books, sports and lifestyle to customers, but also caring for people, the communities with which we cooperate, and the natural environment. Our operations are based on values such as integrity, sustainability and mutual respect. Therefore, we expect our suppliers to act in accordance with these principles, supporting our mission through ethical and responsible business practices.

§ 2 Scope of Application

This Code applies to all suppliers, manufacturers, distributors, business partners and other entities involved in the supply of products or services to Empik. It constitutes the basis for cooperation and sets out the principles that must be observed at every stage of the value chain and supply chain.

We require our suppliers to communicate the contents of this Code to all their employees, subcontractors, external workers and other entities involved in the supply chain.

Suppliers are also obliged to ensure that such persons understand the provisions of the Code and comply with its principles. They should also enable their employees to confidentially report and discuss any situations that may be contrary to the provisions of the Code.

§ 3 Ethics and Compliance with Law

We expect our suppliers to conduct business in compliance with applicable national and international laws, with due regard for the values set out in the Universal Declaration of Human Rights, the International Bill of Human Rights and the OECD Guidelines for Multinational Enterprises.

Business operations should reflect the highest standards of ethics, transparency and accountability, including compliance with principles relating to the prevention of corruption, bribery, data falsification, financial misconduct and anti-competitive behaviour.

§ 4 Human Rights and Working Conditions

Suppliers shall respect the Universal Declaration of Human Rights and act in accordance with the fundamental conventions of the International Labour Organization (ILO), in particular with regard to the elimination of forced

labour and child labour, freedom of association, the right to collective bargaining and non-discrimination in employment.

Forced labour, human trafficking and the employment of children in violation of ILO standards are strictly prohibited. All workers shall be treated with dignity and respect.

§ 5 Environmental Responsibility

We require suppliers to undertake actions to protect the environment and minimise the impact of their operations on climate and natural resources. This includes emission reduction, waste management, responsible water and energy consumption and the use of environmentally friendly packaging.

§6 Obligations under Regulation (EU) 2023/1115 (EUDR)

Upon entry into force and applicability of the EUDR, products supplied by the supplier may not originate from land subject to deforestation after 31 December 2020. The Supplier undertakes to provide all information required under the EUDR, including information on the origin of raw materials and geolocation data for production plots.

§7 Product Quality and Safety

Products and services supplied must comply with applicable quality and safety standards and correspond to the agreed specifications. In the case of books, sports products and lifestyle products, particular importance shall be attached to user safety, quality of workmanship and accurate consumer information.

§8 Confidentiality and Data Protection

Suppliers are required to maintain the confidentiality of all information obtained during cooperation with Empik. This includes commercial, technological and personal data. Data processing must comply with applicable laws, in particular Regulation (EU) 2016/679 (GDPR).

§9 Reporting Violations and Irregularities

We encourage suppliers and their employees to report any irregularities related to breaches of this Code. Reports may be submitted:

- by email to: zglosnaruszenie@empik.com;
- via the whistleblowing form available on empik.com;
- directly to the Compliance Officer;
- by post to: Compliance Officer, Empik S.A., ul. Marszałkowska 104/122, 00-017 Warsaw, marked "confidential".

We ensure confidentiality and protection against retaliation for persons reporting in good faith.

§10 Compliance Monitoring and Sanctions

Each entity covered by this Code should submit a declaration committing to comply with the social, environmental and ethical criteria described in Annex 1. Empik reserves the right to conduct audits and supplier assessments regarding compliance with this Code.
Verification may be based on self-assessments, document reviews, assessment of responses to incidents or reports, and monitoring of public information sources, including ESG ratings and registers of violations. Where material breaches are identified, we may require corrective actions or terminate cooperation.

§11 Remedial Actions

In the event of the identification of material breaches of this Code or adverse impacts arising from the Supplier's activities in the areas of human rights, labour conditions, the environment, or ethics, the Supplier shall be obligated to promptly inform the Empik Group of such occurrence and to cease all activities that have caused or may cause further harm.

If the Empik Group has directly or indirectly contributed to the occurrence of an adverse impact, it shall make efforts to develop and implement appropriate remedial actions in cooperation with the Supplier, in accordance with the principle of shared responsibility set out in the OECD Guidelines for Responsible Business Conduct.

The Supplier shall be obligated to provide evidence of undertaking adequate remedial actions proportionate to the severity and nature of the breach. Such actions may include, among others, the updating of policies, training activities, remediation, or other corrective measures.

In the event that the Supplier fails to undertake remedial actions, undertakes actions that are inadequate, the consequences of the breach are severe, or there is a serious risk of their occurrence, the Empik Group reserves the right to terminate its cooperation with such entity.

§12 Review and Updates

This Code shall be subject to periodic review every two years or whenever changes in applicable law materially relevant to the content of the Code occur. As a result of such review, amendments to the Code may be introduced.

Any amendment to the Code that introduces new obligations for the entities subject to its provisions shall be subject to consultation, and such entities shall be informed of any amendment within 14 days of its adoption.

§13 Final Provisions

The Supplier Code of Conduct constitutes an integral part of our business relationship. The current version is available on our website or upon request. Each Supplier is required to familiarize itself with the contents of this Code and to comply with the principles set forth herein.

§14 Responsibility

At the Group level, responsibility for overseeing compliance with the provisions of this Code shall be vested in the Compliance Officer. The Compliance Officer shall ensure the proper implementation and execution of the principles set out in the Code throughout the organisation and shall coordinate activities related to its application and reporting.

Apendix 1

Criteria for Assessing Compliance with the Code

In conducting our business in an environmentally and socially responsible manner, with due care for environmental protection and respect for human rights at every stage of our operations, we expect our suppliers to comply with the following environmental, social and governance criteria:

§1 Environmental Criteria

1. The entity conducts its activities in accordance with international environmental standards, in particular the OECD Guidelines for Multinational Enterprises.
2. The entity identifies and monitors its environmental impact and undertakes measures aimed at reducing such impact to an extent proportionate to the nature and scale of its operations.
3. The entity controls emissions of pollutants into air, water and soil in accordance with local regulations or, where such regulations are absent, in accordance with recognised international environmental standards.
4. The entity undertakes measures to reduce greenhouse gas emissions, including its carbon footprint, having regard to its organisational and technological capabilities.
5. The entity monitors the consumption of raw materials and natural resources, such as water, energy and fuels, and implements solutions designed to limit their excessive use.
6. The entity manages waste in accordance with applicable laws and, where no detailed regulations apply, in line with the waste hierarchy principles: prevention, reuse, recycling and recovery.
7. The entity undertakes measures to mitigate adverse impacts on land and spatial environment, preventing excessive exploitation, contamination and land degradation.
8. The entity has measures and procedures in place to prevent environmental accidents and to respond to incidents that may result in contamination or environmental damage.

§2 Social Criteria

1. The entity does not permit any forms of treatment inconsistent with the Universal Declaration of Human Rights.
2. The entity ensures fair remuneration, social benefits and compliance with applicable working time standards.
3. The entity does not employ children under the age of 15, in accordance with ILO Convention No. 138 and applicable national law, and, where young workers are employed, provides them with special protection of health, safety and access to education. The entity does not permit any of the worst forms of child labour as defined in ILO Convention No. 182.

4. The entity does not use any forms of modern slavery, in particular forced, compulsory or bonded labour, or human trafficking.
5. The entity systematically monitors and improves occupational health and safety conditions by implementing safety procedures and standards designed to prevent accidents and failures.
6. The entity provides an inclusive working environment, in particular by counteracting discrimination on the grounds of sex, age, sexual orientation, disability, origin, religion or political views.
7. The entity supports integration and equal opportunities in the workplace by promoting anti-discrimination policies and support programmes.
8. The entity counteracts all forms of harassment, violence and workplace bullying, ensuring a safe and healthy working environment.
9. The entity is committed to identifying and remedying potential human rights violations, taking into account local communities, including minorities and Indigenous Peoples.
10. The entity respects employees' right to freedom of association, to establish and join organisations representing their interests, and to engage in collective bargaining, in accordance with local law or, where such law does not provide for such rights, in accordance with the conventions of the International Labour Organization.

§3 Governance Criteria

1. The entity declares that it counteracts corruption and irregularities and undertakes measures proportionate to the scale of its operations.
2. The entity enables employees to report violations confidentially and ensures whistleblower protection.
3. The entity complies with intellectual property protection principles in accordance with applicable national law and recognised international standards.
4. The entity ensures personal data protection and information security.
5. The entity complies with principles aimed at preventing unfair competition and price-fixing and manages potential conflicts of interest.

§4 Definitions

Discrimination – unjustified, less favourable treatment of a person compared with persons in a comparable situation, in particular on the grounds of sex, race, ethnic origin, nationality, religion, belief, worldview, disability, age, sexual orientation, political views or trade union membership. Discrimination may be direct or indirect.

Indirect discrimination – a situation in which, due to certain specific characteristics of a person, an apparently neutral provision, criterion applied or action taken causes or could cause adverse disparities or a particularly disadvantageous situation for that person, unless such provision, criterion or action is objectively justified by a lawful aim to be achieved and the means of achieving that aim are appropriate and necessary.

Human trafficking – the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or exploitation of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having control

over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

Conflict of interest – a conflict of interest exists where the impartial and objective performance of the functions of an entity or person is compromised by any personal interests.

Corruption – promising, offering, giving, demanding or accepting, directly or indirectly, by any person, any undue pecuniary, non-pecuniary or other advantage, or accepting an offer or promise of such advantage, in exchange for an act or omission in the performance of a public function or in the course of business activity.

Workplace bullying – actions or conduct concerning an employee or directed against an employee, consisting in persistent and long-term harassment or intimidation of the employee, causing the employee to have a lowered assessment of their professional usefulness, or causing or intended to cause humiliation or ridicule of the employee, isolate them or eliminate them from the team of employees.

Harassment – a form of discrimination consisting of unwanted conduct whose purpose or effect is to violate a person's dignity and create an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Sexual harassment – any unwanted conduct of a sexual nature or related to the sex of a person, whose purpose or effect is to violate that person's dignity, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; such conduct may consist of physical, verbal or non-verbal elements.

Business partners – all entities cooperating with the Empik Group as part of its business activities, in particular suppliers of goods and services, commercial partners operating retail stores, as well as merchants offering products on the Empik sales platform through the marketplace model.

Forced or compulsory labour – in accordance with International Labour Organization (ILO) Convention No. 29 concerning Forced or Compulsory Labour, "forced or compulsory labour" means all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

Freedom of association – the right to associate with others in order to form structures serving the pursuit of common collective objectives. It includes, in particular, the right to establish trade unions for the protection of the interests of their members.

Appendix 1 Acknowledgement Statement

Statement

I hereby declare that I have read the provisions of the Empik Group Code of Ethics and undertake to comply with the principles arising therefrom.

_____ Full name of the signatory

_____ Position of the signatory

_____ Handwritten signature

_____ Date and place