

THE CCC GROUP

CODE

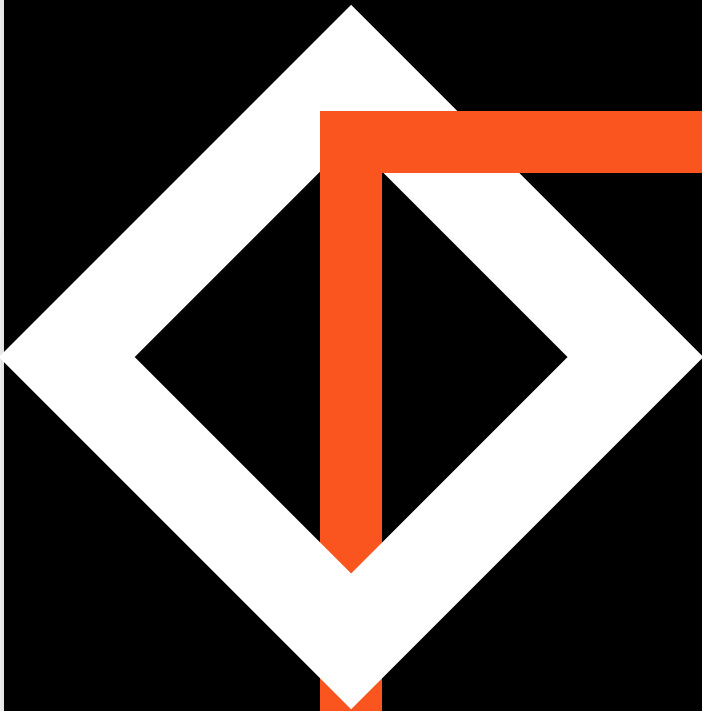
OF ETHICS

**CCC**  
SHOES & BAGS

*Go for more*



# THE PURPOSE



# THE PURPOSE OF THE CODE OF ETHICS

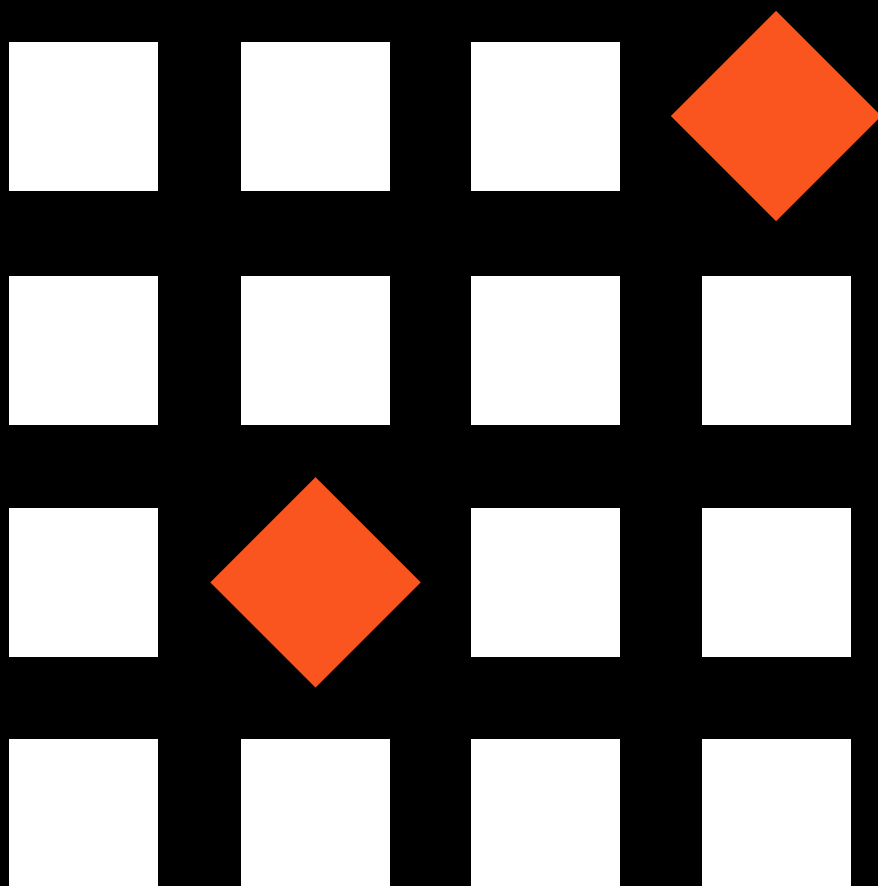
Code of Ethics of the Capital Group CCC outlines our approach as the Employees of Companies in the Capital Group CCC and describes obligations and guidelines regarding the standards of conduct, regardless of business area and responsibility in CCC.

This Code of Ethics formulates the highest values that strengthen the process of forming an ethical environment and mutual trust in CCC.

This Code also compliments legal regulations, defining frameworks and standards of behaviours aimed at ensuring functioning of the organization in a way that adds to the reputation and goodwill of the Capital Group CCC.

The Code is complemented by anti-corruption procedures, which alongside the Code, constitute a set of ethical principles applicable in the CCC Group.

# RULES OF CONDUCT



## RULES OF CONDUCT

Each employee of the CCC Group, in cases of doubt whether his conduct or proceedings of his associates comply with the Code of Ethics, may ask the immediate supervisor or Internal Auditor for clarification.

*Each employee of the CCC Group may provide his superior or Internal Auditor with comments and suggestions regarding the necessity to take account of additional ethical rules not included in the Code of Ethics.*

## INDIVIDUALS TO WHOM THE CODE OF ETHICS IS ADRESSED

Code of Ethics sets out standards of behaviour for all employees of companies in the Capital Group CCC, regardless of their position or countries they work in.

We also expect our Code of Ethics to be respected by individuals and entities cooperating with CCC.

## DECLARATION OF COMPLIANCE WITH THE CODE OF ETHICS

All employees should be familiar with the Code and act in compliance with its principles.

Moreover, managerial staff should promote ethical values and standards of CCC through example and behaviour in compliance with the principles of Code of Ethics.

Employees who fail to comply with the principles and breach internal regulations may be held liable by the Employer.

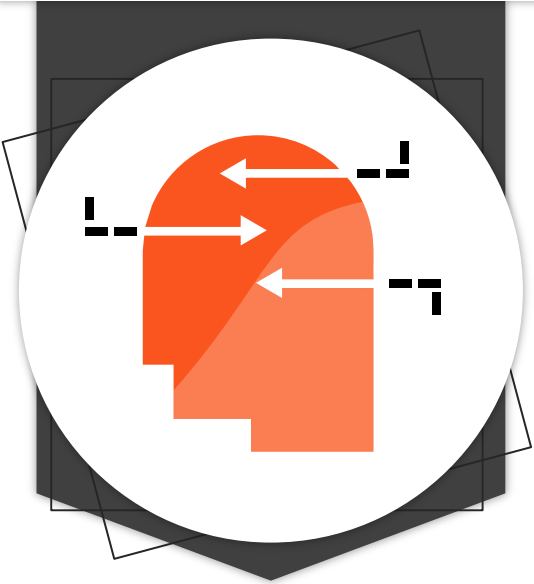
Code of Ethics might be adopted in its entirety by particular companies of the Capital Group, whereby the companies may act freely to further improve the best practices.

# ETHICAL VALUES



# VALUES, WHICH WE FOLLOW EVERY DAY IN CCC GROUP:

DEVELOPMENT



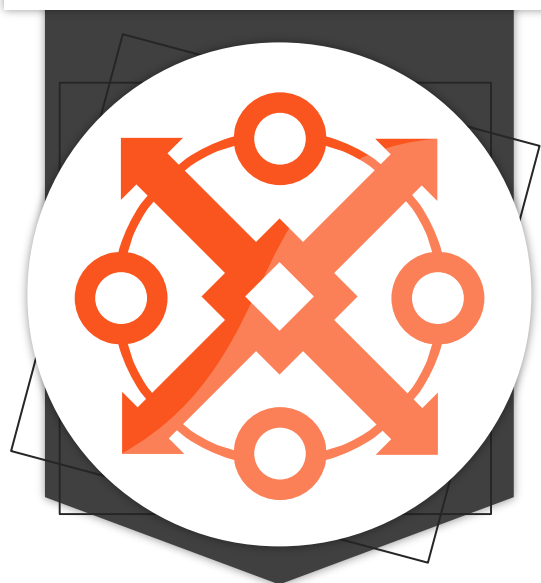
ENTREPRENEURSHIP



RELIABILITY



RESPONSIBILITY







# DEVELOPMENT

- #optimal use of knowledge and competencies
- #being a specialist in your field
- #continuous skills / competencies development
- #promoting engagement and effectiveness

## PROFESSIONALISM

We strive to fully utilise our knowledge and competencies at work. We build corporate value of our organization on the professionalism of our employees, each of whom aims at being a specialist in their field. We are committed to due diligence and objectivity in performing the tasks assigned to us, striving for continuous skills / competencies improvement. Continuous development of our employees is a condition for further existence and development of our Group.

## DIGNITY AND EQUAL OPPORTUNITIES

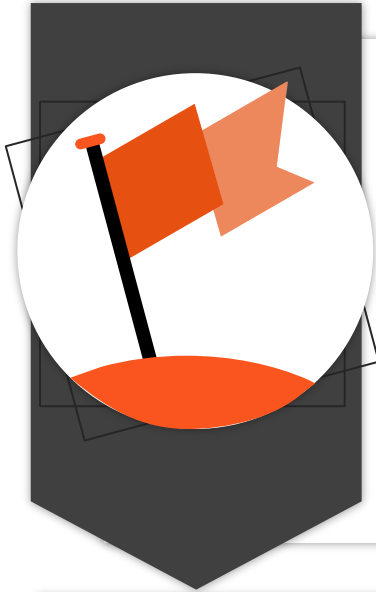
We provide our employees with appropriate working conditions regardless of skin colour, religion, sex, age, nationality, sexual orientation, citizenship, marital status, having children, political views, disability or other legally protected status. We do not accept behaviours which appear to constitute mobbing or discrimination. We treat and respect our employees equally, regardless of position or the Group's company. We protect and do not distribute private information regarding our associates. We conduct appraisal interviews honestly and respectfully to the principles of dignity. All decision on recruitment, employment, and termination of employment are based on objective criteria.

## DIVERSITY

Our organizational culture is open to everyone, regardless of skin colour, gender, age, background, nationality, sexual orientation, religion, disability or any other aspect of diversity. We perceive diversity as value added, trying to use it for the benefit of the Group. We treat other associates the same way we would like to be treated. We strive to allow expression of opinion, respecting the principles of dignity and diversity of views.

## TEAMWORK

Within the framework of our tasks, we are committed to teamwork, striving to fully utilise qualifications and competencies of our employees. We share the knowledge and communicate in a manner that enhances partnership relations development within teams among the CCC Group's companies. We value engagement, experience and results of work. We wish to develop relations between managerial staff and employees based on dialogue, mutual respect and trust. We value collaboration and mutual support in accomplishment of the pursued goals for the benefit of the Group and its stakeholders.



# ENTREPRENEURSHIP

- #innovation and dynamism in the actions
- #achieving ambitious goals
- #recognizing and using opportunities
- #expansiveness and creativity in developing new processes

## CUSTOMER FOCUS

Customer satisfaction is one of the fundamentals of the CCC Group's success. Through our actions and decisions, regardless of the position, we have the opportunity to influence the way we are perceived by customers. Every day we strive to provide a professional and reliable service that is honest and respectful. We try not only to adapt to the current customer needs, but to remain open to new challenges and exceed expectations as well.

## FAIR COMPETITION

We set ambitious goals and pursue them. We recognize and use development opportunities with respect for the principles of fair competition. We never enter into formal or informal agreements with competitors that restrict trade or exclude other competitors from the market. When contacting our competitors, we exercise caution and avoid dubious behaviour. We do not collect or use confidential information about competitors or owned by competitors and third parties.

## RELATIONS WITH BUSINESS PARTNERS

Creativity, innovation and development opportunities of our business partners also affect the achievement of the CCC Group's goals, therefore it is important for us to cooperate with entities that operate in accordance with legal regulations and ethical principles. We care about transparency of relations with our business partners through applying clear rules of cooperation. In the supplier selection process, we adhere to the internal procedure, objectivity and the principle of equality. We implement solutions that aim at ensuring compliance of our suppliers with international standards regarding human rights, forced labour, child labour, discrimination, work safety and environmental protection.

## IMPROVEMENT OF ACTIVITIES

We strive to improve our products, activities and processes, bearing in mind the interests of our stakeholders. We make efforts to introduce innovative solutions, appropriate to the Group's capabilities and needs. We build the position of the company position on the basis of experience, but also on openness to innovative ideas which lay foundations of our innovation. We welcome the opinions and ideas, especially from our employees.

A shield icon with an orange border and a white center, set against a dark grey background with a white circle.

# RELIABILITY

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- #openness and reliability in communication
- #fulfilling our commitments
- #collaborative partnership
- #authenticity in actions

## TRANSPARENCY

We conduct our business in a transparent manner. We comply with the law and internal procedures, including anti-corruption and ethics. We fulfil our commitments made adhere to terms and conditions of the signed contracts. We also ensure that the records we have created, especially documentation provided to third parties, is credible, reliable and complete. We conduct a transparent and honest information and reporting policy.

## PROTECTION OF COMPANY ASSETS

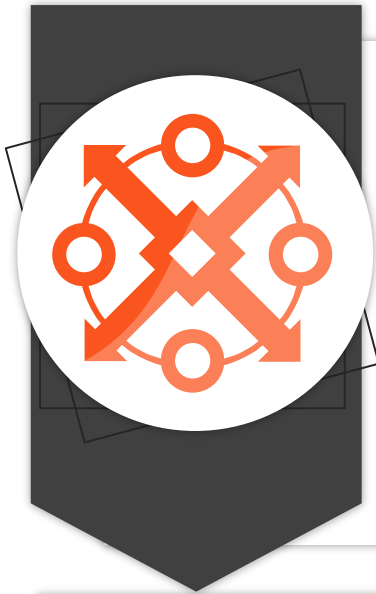
In order to remain reliable as employees, we use the Group's resources in an appropriate and responsible manner, and we avoid waste of the Group's assets. We consider assets to be fixed assets, movable property, entrusted assets of the company, know-how, trademarks and other intangible assets. Each of us is also obliged to use working time effectively. We do not accept the use of the Group's assets for private purposes in a manner incompatible with internal procedures.

## COMMUNICATION AND MARKETING

In relations with stakeholders, especially the media, we care about the image and reputation of the Group. We comply with the principle that communication with the media about the Group or a particular company from the Group is carried out solely by authorized persons. To ensure a consistent image of the CCC Group, each of our employees is responsible for compliance with the principles of internal communication, respectful of the brand and values of CCC. When carrying out marketing and promotional activities, we strive to ensure that our message is credible, honest and informs about product prices and promotion rules in an exhaustive manner.

## INSIDER TRADING

Our shareholders are of great importance to us, since their trust has given us support in our development. We are transparent and honest in our activities, and we provide equal access to information. We do not accept behaviours that may lead to insider trading. Employees who are in possession of confidential information that may affect the share price are precluded from deciding on this basis or persuading a third party decide upon purchase or sale of shares.



# RESPONSIBILITY

#awareness of our actions and consequences of our decisions

#care for the safety of employees

#attention to processes safety

#ensuring the expected product safety and quality

## CONFIDENTIAL INFORMATION

We protect and secure any information that has an economic value against any potential unauthorized disclosure which could damage the interests of the Group. We use confidential information only subject to discharge of professional duties that require access to it. We are aware that distribution or misuse of confidential information may result in legal sanctions. We protect not only confidential information, but also sensitive information, personal data and any relevant information in our possession.

## PRODUCT SAFETY

We are responsible for the product we offer, thus quality has the key value for us. While caring about the safety of use of our products, we thoroughly check their quality at every stage of production. That is why we strive to make our products meet national and international norms and standards. We continuously improve our practices regarding production, storage and sales and prevent situations which could negatively affect the product safety or quality.

## H&S

We approach security issues of our employees and associates with great care. We comply with applicable laws and internal health and safety regulations and strive to undertake actions exceeding legal requirements in the field. We seek to increase employees' engagement and awareness of the issues concerning occupational safety and health, regardless of position and area of work.

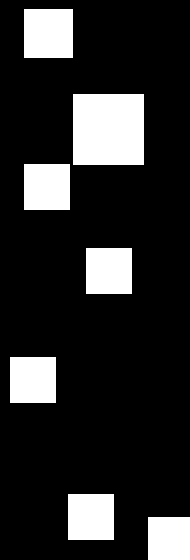
## CSR

As socially responsible, we engage ourselves in dialogue with our stakeholders. We insist on respecting mutual expectations and commitments. We condone and support the engagement of our employees in local communities. In addition, we implement and apply technological solutions for the sake of the environment and promote environmentally responsible attitudes among our employees.



**CONFLICT**

**OF INTEREST**



## CONFLICT OF INTEREST

We avoid situations in which our personal interests may interfere with those of the Group. We assume that an employee is in a situation of conflict of interest when decisions under his competences are affected by his own interest of a personal or financial nature or an interest of another person or entity, especially a competitive one, which is contrary to the interests of the Company or companies from the Capital Group CCC S.A. A conflict of interest is also a situation when employee's (or persons closely related) interests of personal or financial nature interfere with those of the Company.

The employee's personal interests also include those of closely related persons (such as blood relatives through marriage, family members, partners, other persons in the same household) or persons, with whom the employee maintains a close non-business relationship. By a competitive entity we mean an entity involved in the production or trade of footwear and handbags, both retail and wholesale.

## INFORMATION OBLIGATION

In the event of an employee of the Company finding himself in a situation of conflict of interest or believes that he may potentially be in such, he should immediately inform his immediate superior, the Internal Auditor or, under justified circumstances, also the President of the Management Board. A questionnaire, constituting Annex 1, is used to report a conflict of interest, submission of which is mandatory for each employee within 14 days of the date of commencing employment. The statement on conflict of interest shall be submitted to the Internal Auditor, who keeps records of conflicts in the CCC Group or to the Human Resources and Payroll Department.

## SITUATIONS LEADING TO CONFLICT OF INTEREST

An employee subcontracts services or as a result of such practices is responsible on behalf of The CCC Group for cooperation with relatives or other closely related persons, as well as with companies owned by the employee, his relatives or other closely related persons.

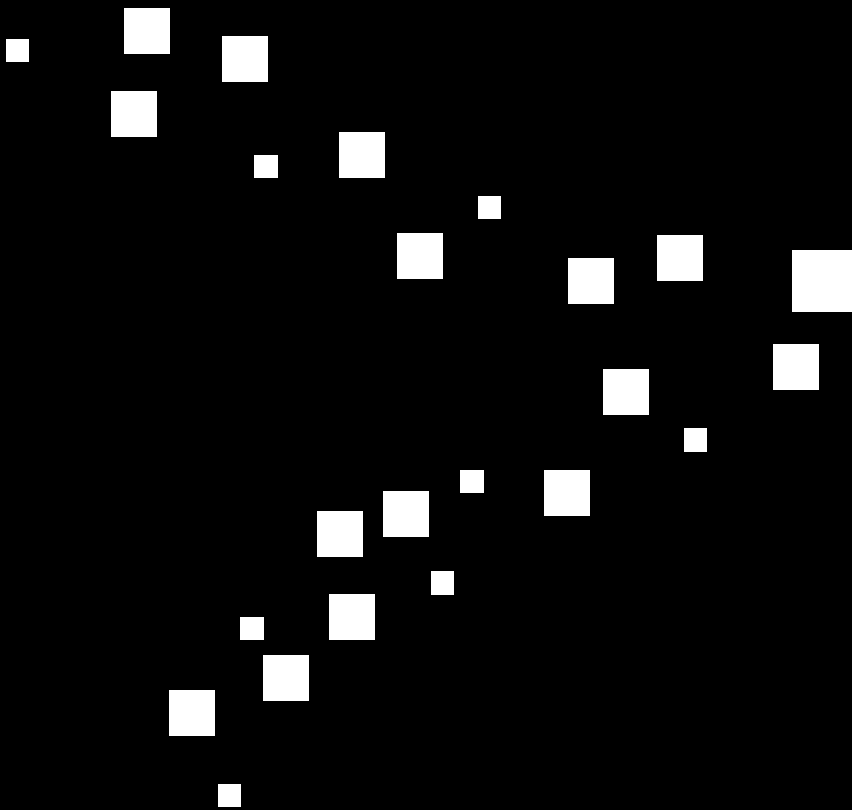
The scope of employee's duties allows him to make personal decisions regarding remuneration, promotion or recruitment of relatives or other closely related persons.

An employee participates or supports such activities of other entities, which may violate the interests of the CCC Group.

It is not possible to specify all potential situations leading to a conflict of interest, therefore, it is of great importance to critically analyze all the circumstances that may indicate such.

In the case of doubts whether there is a conflict of interest, please contact the Internal Auditor.

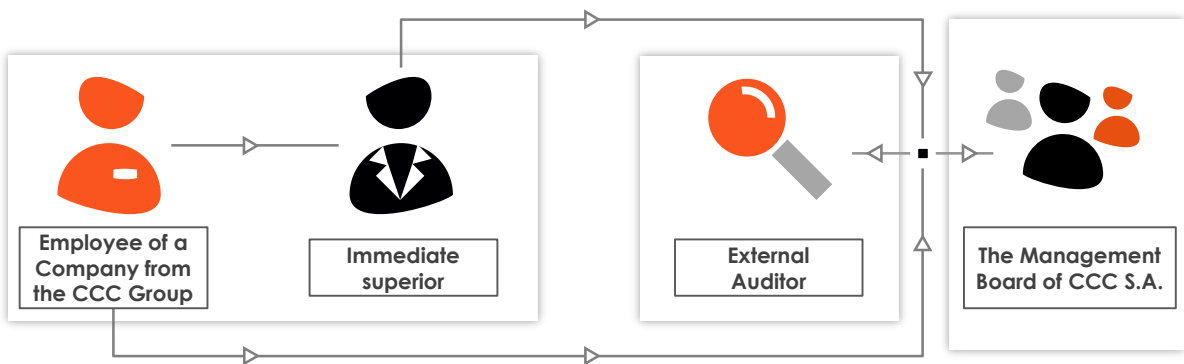
# REPORTING VIOLATIONS



# REPORTING VIOLATIONS OF THE CODE

*The CCC Group forms a culture based on cooperation and trust. We do our best to create an environment fostering clear and honest communication.*

Persons reporting violations of the Code, acting in good faith and to the best of their knowledge, should not fear negative consequences, if they did not abuse the Code themselves. All notifications shall be made to the best of knowledge and intentions, while each person who carelessly and deliberately makes unjustified accusations will have to bear consequences of his actions.



If questions of the rules laid out in this Code or intention to report violations arise, employees should first report to their superiors. In this way issues can be fully solved. Otherwise, use other dedicated channels of internal communication.

**ALL REPORTED INFORMATION IS OF STRICTLY CONFIDENTIAL NATURE AND IT IS HANDLED BY INDIVIDUALS WHO ARE BOUND TO ENSURE SECRECY.**

**Contact**



Contact form at:  
[firma.ccc.eu/csr/etyka](http://firma.ccc.eu/csr/etyka)



Dedicated e-mail address:  
[etyka@ccc.eu](mailto:etyka@ccc.eu)







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SHOES & BAGS