

CCC

CCC Group Code of Ethics



WERSJA Z DNIA 06.05.2024

CCC

CCC GROUP CODE OF ETHICS

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CHAPTER I



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1. LETTER FROM THE PRESIDENT

Dear Employees,

We are pleased to present the current version of the Code of Ethics of the CCC Capital Group, a fundamental document that guides our company in the field of ethics. It outlines the principles, values, and attitudes that shape our daily interactions, both internally and with our partners. The provisions in the Code of Ethics apply to our conduct in economic, social, cultural, and environmental areas.

The Code is built on binding and internationally recognized standards, defining human and labor rights. At CCC Group, we are committed to growing responsibly and sustainably, which is why we adhere to the Universal Declaration of Human Rights. Respect for ethical principles is a top priority for our Management Board.

We believe this is the foundation of any modern organization whose actions impact not just employees, but also the business environment, local communities, and the natural environment. It is our shared responsibility to care for the rights, well-being, and development of all these groups.

The principles of ethical conduct apply equally to all of us and are our collective responsibility. By combining professionalism with ethical practices, we will not only foster a positive work environment but also achieve even greater business success. As the Management Board, we are open to dialogue and collaboration on any emerging challenges. Every employee also has access to the Ethics Officer, who provides support in upholding the values and principles outlined in the Code.

Since the founding of the CCC Group, we have worked to ensure that it is managed ethically, building mutual respect and trust. With the adoption of this Code of Ethics, we will continue to strengthen this ethos as an organization, maintaining the highest standards of business ethics. I firmly believe that the success of this initiative relies on the commitment of each and every one of us.

Thank you for your daily efforts and contributions to our shared goals. It is because of you that the CCC Group continues to grow stronger every day, solidifying its position as an industry leader!

Yours sincerely,



2. PURPOSE AND SCOPE OF THE CODE

PURPOSE OF THE CODE

The Code of Ethics of the CCC Capital Group (hereinafter referred to as the Code) outlines the fundamental principles, behavioral guidelines, and standards of conduct applicable throughout our Capital Group. By adhering to the Code, everyone acting on behalf of CCC ensures their actions align with our values, comply with the law, and uphold generally accepted business ethics standards.

The Code defines the key values that foster an ethical work environment and mutual trust at CCC. Its main goal is to ensure compliance with Polish and international legal regulations. Additionally, the Code provides a clear framework for addressing ethical violations. It is supplemented by other policies referenced within the Code, which together form the comprehensive set of ethical principles that apply across the CCC Group.

SCOPE OF THE CODE

The provisions of the Code of Ethics of the CCC Capital Group apply to all individuals performing work for companies within the Group, regardless of the legal nature of their employment relationship. This includes all employees, irrespective of position or function. The CCC Group is continuously developing procedures to ensure ethical business operations. We also strive to ensure that third parties, such as suppliers and business partners, are guided by the values enshrined in this Code.

RESPONSIBILITY FOR THE CODE

The Ethics Officer is responsible for overseeing the Code's content, implementing procedures to raise awareness about it, and supervising the handling of reported violations. The Ethics Officer is supported by the Compliance Officer in this role. In subsidiaries and related entities of the CCC Group, a local Ethics Officer may also be appointed.

DESCRIPTION OF THE OMBUDSMAN'S ELECTION AND MANDATE

The Ethics Officer is elected by the Management Board and appointed by a Board resolution. The Ethics Officer's duties include monitoring compliance with the Code, investigating reported violations, recommending updates to the Code, and organizing and overseeing training on ethics and human rights.

DESCRIPTION OF THE SELECTION AND RESPONSIBILITIES OF THE ETHICS OFFICER'S REPRESENTATIVE

In subsidiaries, an Ethics Officer Representative may be appointed. The representative is selected by the Management Board or the General Manager, along with the HR Manager for international markets. The representative's responsibilities mirror those of the Ethics Officer: ensuring compliance with the Code, investigating breaches of ethical values within the subsidiary, proposing updates to the Code, and organizing training on ethics and human rights.

3. OUR MISSION, VISION, AND VALUES

OUR MISSION: Fashion available to everyone, everywhere

OUR VISION: #1 fashion omnichannel platform in CEE

OUR VALUES:

WE ARE DRIVEN BY CUSTOMERS

- Our customers are always at the heart of everything we do.
- We take pride in our products.
- We act quickly and consistently, with flexibility.



WE CREATE ENTREPRENEURIAL INNOVATIONS

- Our actions deliver value to both customers and the company.
- We think innovatively, continuously improving and simplifying processes.
- We are always seeking effective and responsible solutions.



WE WORK AS A TEAM

- We respect ourselves and our environment, inspiring one another.
- Our teams are where the best come together.
- We expect and give maximum commitment.



4. COMMITMENT TO COMPLY WITH BASIC STANDARDS

The provisions of our Code are aligned with key, widely recognized legal standards:

- **Universal Declaration of Human Rights**
- **Charter of Fundamental Rights of the European Union**
- **10 Principles of the United Nations Global Compact**
- **ILO (International Labour Organization) Conventions**, e.g.,
Convention No. 29 on Forced or Compulsory Labour
- **OECD Guidelines for Multinational Enterprises**
- **UN Guiding Principles on Business and Human Rights**
- **Commercial Companies Code**
- **Best Practice for WSE Listed Companies**
- **Recommended Standards for Anti-Corruption Compliance Management Systems and Whistleblower Protection Systems** for companies listed on the Warsaw Stock Exchange

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5. YOUR RESPONSIBILITIES

If you fall within the scope defined in the "Scope of the Code" section:

- **Read** the Code and the procedure for reporting violations.
- **Avoid** behaviors that conflict with the values and principles outlined in the Code.
- **Report** any observed violations of the Code.
- **Support** investigations into possible Code violations.

Additionally, management should lead by example, promoting CCC's values and ethical standards through their actions and adherence to the principles in the Code of Ethics.

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CHAPTER II



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RESPECTING VALUES

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CCC GROUP CODE OF ETHICS | **CHAPTER II**

In this chapter, we outline the values that every individual covered by the Code is responsible for protecting and respecting. These values originate directly from the mission and vision of the CCC Group, as well as from widely recognized ethical standards and regulations. Our values and ethical principles help us create a work environment where people are prioritized, and respect for human rights is a fundamental principle of our cooperation.

The following section provides definitions and descriptions of these values, translated into competencies that reflect how they are embodied in our daily interactions.

WE ARE DRIVEN BY CUSTOMERS

- Our customers are always at the heart of everything we do.
- We take pride in our products.
- We act quickly and consistently, with flexibility.



WE CREATE ENTREPRENEURIAL INNOVATIONS

- Our actions deliver value to both customers and the company.
- We think innovatively, continuously improving and simplifying processes.
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WE WORK AS A TEAM

- We respect ourselves and our environment, inspiring one another.
- Our teams are where the best come together.
- We expect and give maximum commitment.



The values we uphold are the cornerstone of our organizational culture. They guide us in our daily activities, decision-making, and in fostering relationships both within and outside the company. These values help us build a unified and resilient organization where every employee's contribution is valued, and our company inspires us to achieve our collective goals. By adhering to these values, we create an ethical workplace.

If you witness or are affected by a breach of ethical principles, you can report it using the procedures outlined in **Chapter III: Reporting Breaches of Values.**

1. RESPECT FOR HUMAN RIGHTS

1.1. PROTECTION AGAINST DISCRIMINATION

We are committed to creating a work environment free from discrimination. Recruitment, employment, and termination decisions are made based on objective criteria. Employee evaluations are conducted honestly, with respect for dignity, and we ensure equality in pay and development opportunities for all employees.

WHAT IS DISCRIMINATION?

Discrimination occurs when an individual is treated unfairly based on attributes such as sex, race, ethnicity, nationality, religion, belief, disability, age, or sexual orientation.

HOW CAN DISCRIMINATION MANIFEST ITSELF IN THE WORKPLACE?

Discrimination can occur both during employment and in the recruitment process.

During recruitment, for example, asking about marital status or family planning to assess a candidate's availability may be discriminatory.

Wage disparities may indicate discrimination when individuals with similar roles, experience, and qualifications receive different pay due to age, gender, or other criteria.

EQUAL OPPORTUNITIES

We are dedicated to providing equal opportunities for development and promotion, and we strive to ensure fair remuneration. These objectives are integral to our Sustainable Development Strategy.

1.2. COUNTERACTING HARASSMENT

At the CCC Group, we aim to foster relationships based on professionalism and mutual respect. Harassment, including mobbing, is unacceptable, and we are committed to addressing and preventing it.

WHAT IS MOBBING?

Mobbing refers to persistent and long-term harassment or intimidation of an employee, aimed at undermining their professional value, humiliating or ridiculing them, or isolating them from their team.

According to the ILO, mobbing involves offensive behavior that is vindictive, cruel, malicious, or humiliating, with the intent to harm an individual or a group of employees.

WHAT CAN MOBBING LOOK LIKE?

If you feel that your supervisor or co-worker treats you worse than others, leading to a significant drop in your self-esteem, this may be a sign of mobbing. Remember, mobbing must be a persistent and recurring issue to be classified as such.

Examples of mobbing include:

- Regular psychological abuse or frequent assignment of unrealistic tasks.
- Persistent and humiliating undermining of your professional competence.
- Repeated spreading of false information to discredit you.

REMEMBER! For behavior to be classified as mobbing, it must meet the following criteria:

- **PERSISTENT:** Occurs regularly.
- **LONG-TERM:** Lasts for about six months or more.
- **LOWERS PROFESSIONAL SELF-ESTEEM:** Harms your self-worth.
- **INTENDED TO HUMILIATE OR RIDICULE:** Aims to demean you.
- **ISOLATES OR ELIMINATES:** Seeks to remove you from the team.

If you witness or experience mobbing, report it using the procedures outlined in the **"REPORTING VIOLATIONS OF VALUES"** chapter.

For detailed information on our policies for combating mobbing, refer to the Regulations for Equal Treatment and Counteracting Discrimination and Mobbing within the CCC S.A. Capital Group.

1.3. MOBBING AND DISCRIMINATION

Discrimination involves treating someone unfairly due to legally protected characteristics (as listed in subsection 1.1). Mobbing, however, is not necessarily related to these protected features. Only employees under an employment contract, appointment, or cooperative employment contract can be victims of mobbing. Those on civil law contracts may pursue claims under the Civil Code for personal rights violations. Mobbing must also meet the five criteria outlined in **"COUNTERACTING MOBBING"**, such as being repeated behavior, whereas discrimination can be a single incident.

1.4. COUNTERACTING SEXUAL HARASSMENT

We are committed to preventing sexual harassment, which undermines human dignity. The CCC Group strives to ensure a safe and comfortable working environment and provides support for resolving conflicts related to sexual harassment.

WHAT IS SEXUAL HARASSMENT?

Sexual harassment involves any unwanted verbal, non-verbal, or physical conduct of a sexual nature that undermines a person's dignity. This includes creating an atmosphere of intimidation, hostility, humiliation, or offense. Key characteristics of sexual harassment are that the behavior is unwanted and unacceptable.

FORMS OF SEXUAL HARASSMENT IN THE WORKPLACE

Sexual harassment can manifest in various ways:

- **Verbal:** This includes propositions for sexual favors in exchange for benefits such as promotions or raises.
- **Non-Verbal:** Examples include intrusive and unwanted displays of erotic material or persistent staring.
- **Physical:** This involves unwanted touching or sexual contact.

For more details on our policies to counteract discrimination, refer to the Regulations for Equal Treatment and Counteracting Discrimination and Mobbing within the CCC S.A. Capital Group.

1.5. RESPECT FOR FREEDOM OF ASSOCIATION

We uphold the right to freedom of association and ensure that our employees' rights to organize in trade unions are respected.

WHAT IS FREEDOM OF ASSOCIATION?

Freedom of association is the right to form and join organizations, such as trade unions, to pursue common goals. This right is protected by legal frameworks, including the Constitution of the Republic of Poland and the Charter of Fundamental Rights of the EU.

WHAT CONSTITUTES A VIOLATION OF FREEDOM OF ASSOCIATION?

Examples of violations include:

- **Discouraging** employees from joining trade unions.
- **Intimidating** or engaging in anti-union behavior.
- **Promoting** employer-controlled employee engagement structures and unfair employment practices.
- **Refusing** to negotiate in good faith.
- Using short-term or informal contracts to undermine union organization.
- Systematic or organized **hostility** from the employer towards trade unions.

1.6. PROHIBITION OF FORCED LABOR

We have a strict policy against forced labor.

WHAT IS FORCED LABOR?

According to the 29th ILO Convention, forced labor is any work or service demanded from a person under threat of punishment and not voluntarily accepted. This includes work performed under coercion through violence, threats, imprisonment, debt bondage, retention of identity or travel documents, non-payment of wages, or other severe violations of rights.

1.7. PROHIBITION OF CHILD LABOR

We do not employ child labor. Our suppliers are expected to adhere to this policy as well. In line with ILO Convention No. 138, the minimum age for employment shall not be lower than the age when compulsory schooling ends, and in any case, not less than fifteen years. The Charter of Fundamental Rights prohibits child labor. Young workers must be provided with appropriate working conditions for their age and be protected from economic exploitation and any work that could harm their safety, health, or development, or hinder their education.

2. INFORMATION SECURITY

We safeguard against unauthorized disclosure of any information of economic value that could harm the Group if exposed. Confidential information is used solely for professional duties that require access. We recognize that mishandling confidential information may lead to legal consequences. We protect not only confidential but also sensitive information, personal data, and any relevant data we possess.

Detailed rules on data security, including personal data protection within the CCC Group, are outlined in the Personal Data Protection Policy and its integral appendix, Rules of IT Security and Personal Data Carriers.

3. SAFE WORKPLACE

We ensure that all employees work in a safe environment. Ignoring basic health and safety rules is unacceptable, and we actively promote safety. Occupational health and safety standards involve legal, research, organizational, and technical measures designed to provide conditions where employees can work productively without undue risk of accidents, occupational diseases, or excessive physical and mental strain.

BASIC DUTIES OF THE EMPLOYEE

Employees have the following fundamental responsibilities to ensure compliance with health and safety regulations:

- **Understand Regulations:** Familiarize yourself with occupational health and safety regulations, participate in related training, and complete required examinations.
- **Follow Guidelines:** Work in accordance with health and safety regulations and adhere to instructions and guidelines provided by supervisors.
- **Maintain Equipment:** Ensure that machines, tools, and equipment are in good condition, and keep the workplace organized and tidy.
- **Use Protective Gear:** Wear and use collective and personal protective equipment, as well as work clothing and footwear, as intended.
- **Medical Examinations:** Undergo initial, periodic, follow-up, and other recommended medical checks, and follow medical advice.
- **Report Hazards:** Immediately inform your supervisor of any accidents or hazards, and alert colleagues and others in the vicinity to potential dangers.
- **Cooperate:** Work with the employer and supervisors to meet health and safety obligations.

If you observe any breaches of health and safety regulations, report them to your supervisor or use the Violation Reporting Mechanism (see Chapter 3). Violations can lead to serious legal consequences and pose risks to your health and safety, as well as that of your colleagues.

You will receive comprehensive information on the health and safety rules at CCC Group during your training. For detailed policies, visit ►LINK◀

4. ANTI-CORRUPTION

We enforce a strict zero-tolerance policy towards corruption. Detailed rules and guidelines are outlined in the CCC Group's Anti-Corruption Code, available at ►corporate.ccc.eu/etyka◀

WHAT IS CORRUPTION?

Corruption involves any promise, proposal, offer, request, or acceptance of financial or personal benefits, either directly or indirectly, in exchange for an act or omission related to public duties or business activities.

BASIC RULES

Employees are required to adhere to the following rules:

- **No Financial or Personal Benefits:** Do not offer, give, or accept any financial or personal benefits.
- **Rejecting Benefits:** Refuse to accept any financial or personal benefits, and do not encourage others to provide such benefits.
- **Promote Ethical Conduct:** Foster ethical behavior and transparency among colleagues and business partners.
- **Avoid Risk:** Ensure that actions do not expose CCC Group to risks related to anti-corruption regulations.
- **Report Suspicions:** Notify the appropriate channels about any suspicions or evidence of corruption.

To report corruption, follow the procedure outlined in the CCC Group's Anti-Corruption Code.

5. FAIR COMPETITION

We aim high and seize development opportunities while strictly adhering to the principles of fair competition. We do not engage in formal or informal agreements with competitors that restrict trade or create unfair market conditions. We exercise caution in our interactions with competitors and avoid unethical practices. We do not seek or use confidential information about competitors or third parties.

6. RELATIONS WITH THE ENVIRONMENT

We create value through transparent interactions with stakeholders and consider their feedback when shaping our products. We adhere to the principles defined in the CCC Values in all our stakeholder relationships.

CUSTOMERS

When interacting with CCC Group customers, maintain the highest standards of professionalism and uphold the company's image. Provide accurate and truthful information about our products.

SUPPLIERS

In dealings with suppliers, maintain impartiality and objectivity, avoiding situations that could lead to corruption or conflicts of interest. Contracts with suppliers must follow established procedures. For detailed rules, refer to the Supplier Code.

The acceptance and giving of gifts are governed by the CCC Group's Anti-Corruption Code.

7. ENVIRONMENTAL RESPONSIBILITY

In all our actions, we prioritize environmental stewardship. Climate change presents a global challenge that affects us all, including within the workplace. The CCC Group is committed to adhering to applicable environmental regulations and follows globally recognized policies, including the UN Sustainable Development Goals, the Paris Agreement, and the EU Taxonomy.

We continuously assess and optimize our environmental impact as part of our Sustainable Development Strategy. Environmental responsibility is a key pillar of this Strategy, and our goals are regularly monitored and reviewed.

We expect our suppliers to uphold the highest environmental standards in their operations.

8. CONFLICT OF INTEREST

We strive to avoid situations where personal interests may conflict with the interests of the Group. An employee is considered to be in a conflict of interest if their decisions, made within their role, are influenced by personal or financial interests, or the interests of another person or entity, especially if such interests are contrary to those of the Company or the CCC Capital Group.

Personal interests include those of close associates (such as family members, partners, or others living in the same household) or individuals with whom the employee maintains close non-professional relationships. A competitive entity refers to any business involved in the production or sale of footwear and handbags, whether retail or wholesale.

INFORMATION OBLIGATION

The Compliance Officer oversees the conflict of interest process. If an employee finds themselves in a conflict of interest or believes they may be in one, they must promptly notify their direct superior, the Internal Auditor, or, in certain cases, the President of the Management Board.

Employees are required to complete and submit a conflict of interest questionnaire within 14 days of their employment. The Compliance Officer maintains a register of conflicts within the CCC Group.

SITUATIONS THAT LEAD TO CONFLICTS OF INTEREST

A conflict of interest may arise in the following situations:

An employee assigns orders or is responsible for working with relatives or close associates, or with companies owned by them.

The employee's role involves making personnel decisions, such as regarding remuneration, promotion, or recruitment, that could affect their relatives or close associates.

The employee is involved in or supports activities by other entities that may harm the interests of the CCC Group.

While it's impossible to list every potential conflict of interest scenario, it is crucial to critically assess any circumstances that might indicate a conflict.

If you're unsure whether a conflict of interest exists, seek guidance from your Internal Auditor to clarify or rule out any potential issues.

9. PRODUCT SAFETY

We take responsibility for the products we offer, with quality being a top priority. We are committed to expanding our range of eco-friendly products to protect our environment and reduce our ecological footprint. To ensure the safety of our products, we rigorously check their quality at every stage of production. Our commitment extends to meeting both national and international standards and regulations. We continuously improve our manufacturing, warehousing, and sales processes to prevent issues that could affect product safety or quality.

If you have any concerns about product safety and quality, please contact the Product Department.

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CHAPTER III

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REPORTING VALUE VIOLATIONS

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1. WHO IS A WHISTLEBLOWER?

A whistleblower is someone who reports a violation of the values outlined in Chapter II. Respect for Values.

To be considered a whistleblower, the following conditions must be met:

- **Possession of Key Information:** The whistleblower has significant evidence of misconduct or irregularities related to the company's operations.
- **Fact-Based Reporting:** The information provided must be based on verifiable facts, showing a breach of laws or the principles outlined in the Code of Ethics.
- **Willingness to Act:** The whistleblower must be prepared to submit the report and take the necessary steps to initiate action.
- **Good Faith Reporting:** The individual must act in good faith, believing their report serves an important public or company interest, rather than being an attempt to retaliate or cause harm.

Anyone in an employment relationship with companies in the CCC Capital Group may use this mechanism to report, regardless of their role or position. This includes full-time employees, co-workers, interns, and former employees.

2. WHAT YOU NEED TO KNOW BEFORE APPLYING

To facilitate the review of your report, try to include the following details:

- **Nature of the violation:** A brief description of the issue.
- **Date, time, and location:** When and where the violation occurred.
- **Involved parties:** Names of individuals involved and their roles in the incident.
- **Consequences of the violation:** A description of the impact or outcomes of the issue.
- **How you became aware:** Explain how you discovered the problem.
- **Additional witnesses:** Information about other people who may have witnessed the violation.

Important! Even if you don't have complete evidence, report the issue through the Whistleblowing Mechanism. Do not conduct your own investigation. If your report is made in good faith, you will not face any negative consequences.

3. WHISTLEBLOWING MECHANISM

To make a report, use one of the available channels:

REPORTING PLATFORM

<https://cccsa.whistlelink.com/>

DEDICATEDMAIL

etyka@ccc.eu

CONTACT FORM

corporate.ccc.eu/etyka

TRADITIONAL MAIL

CCC S.A.
Compliance Officer
Strefowa 6, 59-101 Polkowice

You can submit a report either anonymously or by providing your personal details. All reported information is treated with strict confidentiality and handled by individuals bound by confidentiality obligations. If you submit your report online, you will receive a unique request code that allows you to track the status of your report. You can check the progress of your submission by entering the code on the panel at corporate.ccc.eu/etyka.

4. WHO HANDLES YOUR REPORT

DEDICATED TEAM

The initial review of the report is carried out by the Ethics Officer, ensuring the protection of the whistleblower's personal data. The Ethics Officer, with the assistance of the Compliance Officer, is responsible for conducting the investigation. In special cases, the Management Board may also be involved, particularly in matters concerning the Ombudsman or Compliance Officer. Throughout the investigation, the flow of information is handled in accordance with strict privacy protection, whistleblower protection, and respect for the whistleblower's anonymity. All individuals involved in the investigation are required to maintain confidentiality.

If your organization has appointed an Ethics Officer Representative, they will oversee your report. Their role includes reviewing submissions and leading investigations within the entity where they were assigned.

CASES OF HARASSMENT AND DISCRIMINATION

In cases involving reports of harassment or discrimination, due to the severity of these violations, a distinct process is followed. Upon receiving such a report, a three-member Commission is appointed to handle the investigation. Members of the Commission must not be connected to the case in any way. The head of the unit where the accused works is also not eligible to join the Commission. The Commission is led by the Managing Director of Finance and conducts its meetings confidentially.



5. WHISTLEBLOWER PROTECTION

We ensure protection for whistleblowers. The identity of the reporter remains confidential and will not be disclosed without their consent, except in cases where the CCC Group is legally obligated to do so, such as when law enforcement agencies are involved in the investigation.

The CCC Group strictly prohibits any form of retaliation against a whistleblower. Any retaliatory actions will be considered a breach of the values outlined in this Code and may lead to disciplinary action. If retaliation occurs, it should be reported through the whistleblowing mechanism.

A whistleblower is protected if the report is made in **good faith**, meaning the whistleblower believes the information is true and is not seeking personal gain or revenge.

Protection does not extend to individuals acting with malicious intent or for personal benefit.

6. WHAT HAPPENS AFTER YOU REPORT

Once an incident is reported, it will be reviewed by the investigation team. The initial review typically takes up to 7 working days. Investigations into substantiated reports may take up to 2 months, though this period may be extended in exceptional cases. Both open and anonymous whistleblowers will be informed in writing about the outcome of the investigation, in compliance with data protection regulations.

If the report is found valid, consequences will be appropriate to the offense, in accordance with labor law.

For violations of the Code of Ethics, the employer may impose sanctions, including the loss of certain benefits or other professional consequences as per internal regulations.

In severe cases of mobbing or discrimination, the employer has the right to terminate the perpetrator's employment. The employer may also report the incident to law enforcement authorities if criminal activity is suspected.

If you have concerns regarding how your report was handled or the results of the investigation, you can request further information by contacting: etyka@ccc.eu.

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CHAPTER IV



INFORMING ABOUT THE CODE'S CONTENT

- 1. Familiarization with the Code:** All individuals subject to the Code are required to familiarize themselves with its content to ensure understanding and adherence to the outlined principles.
- 2. Mandatory Training:** Employees are required to participate in all training sessions related to the Code of Ethics. The CCC Group integrates ethics training as part of the onboarding process for new employees.
- 3. Acknowledgement of the Code:** After completing the ethics training, each participant must sign a statement confirming they have read and understood the Code. A template of this declaration can be found in the "Appendices" (VI.3).
- 4. Updates and Notifications:** When the Code of Ethics is updated, the CCC Group will inform employees of the changes within 7 days of the update.
- 5. Accessibility and Language:** The CCC Group ensures that the Code, including details on the whistleblowing mechanism, is displayed in communal areas across all CCC Group companies. The Code will also be made available in appropriate language versions to meet the needs of employees.

EN

The Code in **Polish**
is available to the public
at: CORPORATE.CCC.EU/ETYKA

EN

The Code is available to the public
at:

CORPORATE.CCC.EU/EN/ETHICS

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CHAPTER V

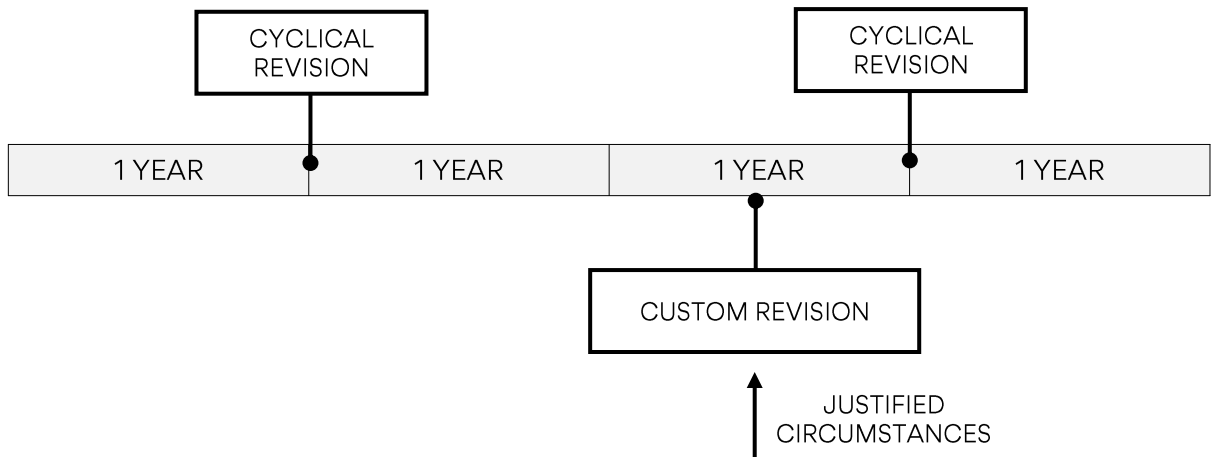


MECHANISM FOR MONITORING AND UPDATING THE CODE

CYCLICAL REVISIONS

Cyclically, every two years, the Ethics Officer, with the support of the Compliance Officer, is obliged to revise its content in the light of the latest changes in international and national law.

Along with the revision, a survey should be conducted among people covered by the Code, concerning the knowledge of its provisions and the assessment of its effectiveness. The results of the analysis will be taken into account by the team working on the revision.



CUSTOM REVISIONS

Revisions of the Code of Ethics may be made more frequently in justified circumstances. Such circumstances may be, for example, evidence-based lack of operational functionality of the Code or legal changes requiring immediate regulations in the Group's approach to managing the Ethics area.

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CHAPTER VI



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CCC GROUP CODE OF ETHICS | **CHAPTER VI**

ATTACHMENTS

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1. GLOSSARY

CCC GROUP	-	parent company of the Group together with all subsidiaries
MOP	-	International Labour Organization, an affiliate of the United Nations (United Nations) dealing with labour issues, in particular protection against forced labour, child labour, protection of freedom of association
OECD	-	The Organisation for Economic Co-operation and Development, which brings together 37 highly developed countries, its aim is to support member states in achieving economic growth and improving the quality of civic life, Poland has been its member since 1996
GLOBAL COMPACT ONZ	-	a pact under the aegis of the United Nations (United Nations) to promote the principles of sustainable business
WHISTLEBLOWER	-	a person who has important information that is evidence of irregularities related to the functioning of the enterprise
FEATURE PROTECTED BY LAW	-	Some features of a person's identity, which are acquired (e.g. religion, worldview) or innate (e.g. skin colour, sex), may expose a person to discrimination in a particular way. The Labour Code specifies characteristics such as: gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination, sexual orientation, employment for a definite or indefinite period of time, full-time or part-time employment
GOOD FAITH	-	The possessor of good faith, even if he is not actually entitled to the right, has an erroneous but justified belief that he is entitled to a certain subjective right.
BAD FAITH	-	A person is in bad faith who, invoking a right or a legal relationship, knows or should know that they do not exist, and any misconception of their existence is not justified, as in the case of good faith. Bad faith also occurs when a person really cannot assume, does not know, and should know that he or she is not entitled to a given right.
PERSISTENCE OF ACTION	-	A behavior that is relentless, constantly repeated, uninterrupted, and even bears the hallmarks of persecution. Such behavior indicates bad faith on the part of the person who exhibits such behavior.
ETHICS OFFICER	-	designated person in the company responsible for monitoring compliance with the Code of Ethics, considering reported violations of ethical values, reporting the revision initiative of the Code of Ethics, promoting ethical attitudes, including: organizing and supervising training in the field of ethics and human rights
COMMISSION FOR ETHICS	-	A team appointed to investigate a report of violation of the ethical principles contained in the Code
COMPLIANCE OFFICER	-	A person responsible for minimizing the risk of non-compliance of the company's activities with legal regulations, standards or sets of recommendations, in order to prevent financial losses or loss of reputation.
ETHICS OFFICER'S REPRESENTATIVE	-	a person whose duties include local monitoring of compliance with the Code of Ethics, consideration of reported breaches of ethical values, supervision of ethics training, coordination of the implementation of ethics regulations at the individual level and submission of semi-annual reports on activities to the Ethics Officer.

EMPLOYEE DECLARATION OF UNDERSTANDING AND ACKNOWLEDGEMENT OF THE CCC GROUP CODE OF ETHICS

NAME.....

SURNAME.....

POSITION.....

STATEMENT OF COMPLIANCE

I hereby confirm that I have thoroughly reviewed the CCC Group Code of Ethics and commit to adhering to its principles.

I acknowledge my understanding of the potential consequences related to my employment should I fail to comply with the Code of Ethics.

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DATE

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LEGIBLE SIGNATURE

The Company allows for confirmation of reading the document in electronic form.

ccc